

Michael F. Goodwin, F69095, in pro-per

R.J.D.C.F., B-9-118L

480 Alta Road, San Diego, CA 92179

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

MICHAEL F. GOODWIN,

Petitioner,

Vs.

LOS ANGELES COUNTY SUPERIOR COURT
NORTHEAST DIVISION. PASADENA

Respondent,

The People of the State of California, by their
Attorney, Kamala Harris, Attorney General
of California.

Real Party in Interest

No. _____

Spr. Ct. No. GAO52683

Appeal No. B197574

NOTICE TO THE COURT OF 25+
OUTRIGHT LIES (17+) AND/OR
MATERIALLY MISLEADING
CLOSING ARGUMENTS BY
PROSECUTOR ALAN JACKSON IN
JUST THREE (3) PAGES OF HIS
CLOSING ARGUMENT, 23 RT 8783-
8784-8785.

NINE OF THE 17+ OUTRIGHT LIES
HAD NO SUPPORT IN THE TRIAL
EVIDENCE. SEVEN OF THE SIMPLY
MISLEADING CLOSING ARGUMENTS
HAD NO EVIDENTIARY SUPPORT.

The attached details over 25 lies and materially misleading
closing arguments by prosecutor Alan Jackson in just three pages
of his closing argument, 23 RT 8783-8784-8785.

Evidence cites proving these closing arguments are included
for most of them. We must have the suppressed evidence for 100%
proof. We have prima facie evidence, supplied upon request.

PROSECUTOR JACKSON LIED TO AND MISLED THE JURY 31 TIMES
IN JUST 3 PAGES OF HIS CLOSING ARGUMENTS!

Fourteen+ of these were arguments with no evidentiary support. The law rules those are thus testimony¹, and thus when they are false, reversal is required per Penal Code § 1473 (b)(1)².

The materially misleading closing arguments are ruled as also to be treated as false testimony per ALCORTA v. TEXAS (1957) 355 U.S. 28, 31, if they could have affected the verdict.

However, to be conservative we've listed the last eight here, numbers 18 > 25 merely as misleading statements. At least two of those are OUTRIGHT LIES BY JACKSON, ON WHICH HE KNEW HE WAS LYING.

Also in an abundance of caution, we've "combined" up to four of Jackson's outright lies, and/or materially misleading statements into just one "number", 1 through 25.

For ease of your analysis we went through the 3 pages of closing arguments transcript and first marked 1 through 17 the outright, irrefutable lies. We then went back to the beginning of the 3 pages, 23 RT 8783 and numbered, starting at #18M the merely materially misleading statements. The M stands for "misleading".

Although there are many very prejudicial "WHOPPER" lies here, I feel the most outrageous, and known as lies by Jackson when he told them, are numbers 15, 5 and 2 at pages 2 (summary) 4-5-7-18-23.

Numbers 1 and 17 of the ACTUAL LIES each truly include four (4) each repeats of lies and/or materially misleading "closings"

Just one or a few of these lies/misleading closing statements require reversal per the law from several perspectives.³

1) U.S. v. KOYAJAN (9th Cir. 1993) 8 F. 3d 1315, 1321, also see 1319+.

2) In re PRATT (1999) 82 CR 2d 260, 272, in re HALL (1981) 30 Cal. 3d 408, 424.

3) E.g. "If any prosecution team member knew or should have known that false testimony was being presented, reversal is automatic," 513 F.3d 1057, 1075-76 (9th).

SUMMARY OF 31 JACKSON MATERIAL CLOSING LIES/MISLEADING ARGUMENTS

Just 25 will be listed as we've combined up to four lies in one #.

- 1.^{6th} "He spent \$400,000 in 1988 dollars for a boat that the richest of the richest couldn't afford"; 3 lies/1 misleading statement.
- *2.^{6th} "Goodwin couldn't win in Court"; Goodwin won millions more.
3. "The boat loan was approved before the Thompsons were killed"
- 4.^{6th} "The house went into escrow before the Thompsons were killed"
- *5. "Within weeks he sold all of Diane's JGA/Whitehawk!" HUGE LIE!
6. "JGA/Whitehawk really belonged to Mike!" Evidence says NO WAY!
7. "Mike had been hiding assets!" Suppressed evidence proves all disclosed.
8. "Mike dumped all the assets!" 94% were not sold, went to Bankruptcy.
9. "He dumps all his investment in Desert Investors!" Two lies here.
10. "Mike turned his assets into cash, then into gold, and then took EVERYTHING AND MOVED IT OFFSHORE!" There are multiple lies here.
11. "\$500,000 in gold and cash moved offshore!" (of his)
- 12.^{6th} "A \$400,000 yacht;" (He bought. Elsewhere "A \$400,000 boat loan"
- 13.^{6th} "the last time anybody saw him was out of South Carolina"
- 14.^{6th} "Where does he go?" (Immediately to Guatemala, fleeing.) HUGE LIE!
- *15.^{6th} "The only reason Goodwin was caught and is on trial is that Mike McGhee repossessed the boat on which he was living in Guatemala, leaving him with no home and no transportation!" HUGE, PREJUDICIAL LIES!
- 16.^{6th} "The only reason he came back is that he had no options!" Two lies.
- 17.^{6th} "There was no evidence the murders were caused by a robbery;" 4 times.
- 18.^{6th} "The boat was the perfect escape vehicle"
19. A.^{6th} "The boat was so expensive that even the richest of the rich could not afford it!" This is so absurd, ludicrous it is sick.
B.^{6th} "Goodwin paid \$400,000 in 1988 dollars for the boat!"
20. "He dumped the investments even though they may have been valuable"
- 21.^{6th} "Why did Goodwin have to get out of the Country so fast!" He didn't.
- 22.^{6th} "Somebody waved to him offshore!" There was no evidence he was offshore.
- 23.^{6th} "McGhee's sole job was repossessing boats worldwide"
- 24.^{6th} "You heard evidence his family lives in Florida"
25. "You should consider Goodwin fleeing in determining his guilt"

We accurately paraphrased. Clear material lies go through #17 although several after that are prejudicial lies also. The "footnoted" 3 pages of transcript follows the brief. My sworn declaration is page 27.

- 1) These 16 are both false and have no real support in the evidence.

DDA JACKSON PROVABLY LIED 17 TIMES IN 3 PAGES OF CLOSING ARGUMENT

He also materially misled the Jury an additional 8+ times, there violating ALCORTA v. TEXAS (1957) 355 U.S. 28, 31, reversible error.

However, this Court knows the law is legion on how utterly reprehensible a prosecutor's lying to achieve a conviction is, and i've cited law elsewhere, so for here we focus on the stunning facts which prove an outrageous 17 provable lies by Jackson in just 3 pages of his closing argument.

In addition, 9 of those lies had no support on the record so they were Sixth Amendment violations also requiring reversal.

These 17 are only a few of the 91+ lies we can prove for DDAs Jackson and Dixon in the Goodwin proceedings, including 24+ lies to the Judge in offers-of-proof and/or "advisements to the Judge". Those are firmly ruled as under oath¹ and when false, they are Penal Code § 118 or 125 felony perjuries which call for years of prison time, and reversal of the conviction.

These prosecutors also grossly misstated the law about eight times, including for the very nexus of the case, "Goodwin refused to pay Thompson, killing Thompson so he wouldn't have to pay". However that was both a huge misstatement of law and misleading.

- Goodwin had been in Bankruptcy for 16 months prior to the murders. Only the Bankruptcy trustee was authorized to pay Thompson. IT WOULD HAVE BEEN A FEDERAL CRIME FOR GOODWIN TO PAY.
- Thompson dying didn't reduce Goodwin's obligation to pay by \$1.
- Goodwin had \$823,000 in the Bankruptcy trust account for 3 months before the murders, with the intent of getting Thompson paid. Suppressed evidence will prove he begged the trustee to pay.

1) HOLLOWAY v. ARKANSAS (1978) 98 S.Ct. 1173, 1174, 1179, People v. MROCZKO (1983) 35 Cal 3d 86, 112, People v. MIRENDA (2009) 174 Cal App 4th 1313, 1332.

Jackson's lies to the Judge and Jury here, all 100% provable, will be in "order of appearance," not descending order of how outrageous and/or prejudicial they were.

The numbers below will also be annotated on the three pages of transcript of closing argument here, 23 RT 8783, 8784, 8785.

First we will list the lies by number. Then we will come back to the beginning of 8783 and list the materially misleading statements in order of appearance, but alphabetically.

We will also note for either or both of those which are the "arguments which have no support in-the-record" which are thus Sixth Amendment violations, also prohibited by legions of law.

We will then come back and detail how we can prove each of Jackson's lies and misleading statements are false or misleading.

We will try to give exact quotes except where accurate paraphrasing is necessary because of length and/or to put the argument into the correct context.

Because so many of Jackson's lies here are so outrageous, it would be difficult to put them in descending order of "damage!" However, numbers

1.^{6th} "He (Goodwin) goes out and buys a 57' motorsailer that the richest of the rich couldn't afford, for \$400,000 in 1988 money!"

8783:4. There are 2 lies and two misleading arguments there, p 17.

2.^{6th} "He couldn't beat Thompson on his own terms,"¹ just after "He couldn't win fairly!" 8783:9. Goodwin beat, with Court approval, Thompson 7 times to 6, and for millions of dollars more! Pg. 18.

3. "The boat loan was approved 6 days before the Thompson's were killed," 8783:17. (Which fit into Goodwin's time plan to kill

Thompson). The loan wasn't approved for weeks later. Page 20.

1) This argument or derivatives of it were made more than a dozen times, LIES!

4. ^{6th} "Within two days after that,¹ the house goes into escrow," p. 20 .

Jackson continued, "It looks like the plan is coming together!"

5. "Within weeks he sold all of Diane Goodwin's interest in Whitehawk,"

8783:23. Whitehawk never was sold and funded \$2,000,000 to pay

Mickey Thompson, but his lawyer Cordell led a looting of it, p. 23 .

6. "Diane's interest in Whitehawk was really Mike's," line 24, p. 24 .

Suppressed evidence prove's Mike never owned any of Whitehawk.

7. "Mike had been hiding assets in Diane's name," line 26, p. 24 .

8. "Mike dumped them all," (the assets), line 28. Not true. P. 25 .

THERE ARE EIGHT (8) PROVABLE BIG LIES ON JUST THE 1ST PAGE, 8783.

9. "He DUMPS all of HIS investment in Desert Investors," 8784:3, p. na .

There are two material lies there.

This one and #5 above leveraged off of Jackson's lie to the Judge alone, in an offer-of-proof at 3 CT 741:3 that "Goodwin liquidated all of his assets around the time of the murders"

In truth and in fact, evidence not introduced at trial, much of which is suppressed by the D.A., proves Mike sold nothing.

10. "Mike turned (HIS) assets into cash, then into gold, then took

EVERYTHING AND MOVED IT OFFSHORE!" 8784:5-7. Huge multi-part LIE!

11. "\$500,000 in gold and cash moved offshore," 8784:13, page na .

12. ^{6th} "A \$400,000 yacht," (Mike's even though he was in Bankruptcy, from

8783:3, at 8784:14, page na . The boat was Diane's, just \$331,000.

13. ^{6th} "The last time anybody saw him was out of South Carolina," line 14,

page na . The D.A. had extensive evidence of where I always was.

NOW JACKSON'S FRAUD ON THE COURT GETS REALLY DEVIOUS AND COMPLEX.

14. ^{6th} "Where does he go", line 18, page na . Jackson then goes into a

long diatribe which leads the Jury to believe I fled to Guatemala.

We explain that on the next page. In fact we lived in FLA. for most

1) Jackson argued "the house went into escrow just two days after that, (the boat loan approval, allegedly 6 days before the murders). That says the house went into escrow four days before the murders. Not true. The escrow opened after the murders.

of 1989, and suppressed evidence proves we were in Florida for much of 1988 as well, including 9/19/88 in Ft. Lauderdale, bp 026470-1, and in December in South Florida.

DDAs Jackson and Dixon argued, with no evidence to support them, AND IT PROVABLY IS NOT TRUE, that a Mike McGhee repossessed the boat on which I was allegedly living, the boat my wife owned via her own separate property, and HER OWN LOAN.

They argued, lying blatantly, that McGhee had told Jackson in a face to face interview that McGhee had seized that boat in Guatemala. Sadly my trial lawyer agreed to a stipulation on this even there was no evidence to support it.

I begged her not to agree to it since I knew I had the boat at the time near Pensacola, Florida, and that there was conclusive evidence available to prove that. My lawyer overruled me.

When I finally saw McGhee's witness statement years after trial, I saw that he admitted I had the boat in Florida, and that he never said he repossessed the boat anywhere, nor did he say he had even seen it in Guatemala. See bp 1000072+, his statement.

The prosecutors have no evidence, and introduced no evidence that places the boat anywhere but in the U.S.

Yet they argued, again with no evidence to support their argument, that McGhee seized the boat in Guatemala, and that i'd sailed her in the Caribbean, and way down near South America!¹

The prosecution EXTRINSIC FRAUD ON THE COURT about this "fled" and he was "Found in Guatemala" gets much worse.

And, the prosecutors used this phony argument to obtain a very prejudicial "fled as consciousness of guilt" Jury instruction.

See on the next page why that was fatal to my defense.

1) All of that is provably untrue.

Now Jackson's and Dixon's fraud on the boat repo really gets bad.
 15. ^{6th} "The only reason Michael Frank Goodwin is sitting in that chair right now (the defendant's chair having been arrested and now being prosecuted) the only reason he's back in this country is because Frank Michael McGhee repossessed his home and his transportation and Michael Goodwin was left standing barefoot on some dock somewhere on the Rio Dulce in Guatemala with no home and no transportation"; 23 RT 8784:27 > 8785:4. Page na .

But again, 1) they had no evidence introduced at trial that the boat was anywhere out of the U.S., and certainly not in Guatemala, 2) they had no evidence McGhee repossessed the boat. In fact his witness statement¹ states I had the boat in Florida, and he didn't say he repossessed the boat anywhere.

3) There was no evidence introduced to show I lived on the boat or in Guatemala, and 4) there was no evidence introduced that if McGhee had repossessed the boat, which he didn't and no evidence says he did (only lies by Jackson and Dixon), that I would have then had no home or transportation. I could well have also had a home and a car.

But none of that matters since evidence proves:

- A) McGhee didn't seize the boat. And,
- B) I had the boat in Florida at that time, 1991. And,
- C) I'd provably been in either Colorado or California for 9 to 10 years before I was arrested, highly visible in Court, plus I went on TV re: the murders and stated "Arrest me or leave me alone"; plus I had a CBS 48 HOURS camera in my living room to film my expected arrest.

Please, where is the "fled" or hiding in all that, what evidence?

1) At bps 100071+. "Boat in Florida", 100082 and elsewhere.

The vast enormity of Jackson's EXTRINSIC FRAUD ON THE COURT in a Penal Code § 182 (1) thru (5) CONSPIRACY TO OBSTRUCT JUSTICE AND FALSELY CONVICT still needs further explanation to get the full import of the reprehensible deception.

Recall Jackson's closing argument at 8784:18, #14 at the bottom of the 3rd page prior to this, "Where did he go?"

That was in August 1988 where Jackson/Dixon did have, and introduced evidence that Diane and I had merely checked out of the Shem Creek Marina in Charleston, South Carolina. That was true.

But we didn't go from there to Guatemala, or anywhere out of the Country. And no evidence says we did.

We sailed north of there up the intercoastal waterway, and then just about 6 weeks later, evidence in discovery proves we were in Ft. Lauderdale, Florida, bps 026470-1, by the D.A.

I remember that well since we were docked for a few hours just next to that behemoth, THE TRUMP PRINCESS.

Jackson "leaps forward" from the true fact of us sailing away from the dock in Charleston, with no indication in evidence or even legit hearsay as to where we went, three whole years from 1988 to the bogus McGhee seizure, allegedly in Guatemala, by implying from his argument that we went directly from South Carolina to Guatemala, "to flee from the murder i'd committed"

This is not only a HUGE lie, but since no evidence supported it, Jackson's argument on this includes multiple Sixth Amendment violations requiring reversal.

Perhaps most egregious is that the defense's chances of exposing these lies/frauds was amputated by Jackson/Dixon suppressing hundreds of BRADY violations and critical witness statements¹.

1) E.g. page 26, exh. 17 in the June '14 filing proves we lived in Florida highly visible for more than 8 mos. of 1989. But those check records are suppressed.

16. ^{6th} "Michael Goodwin is only back in this Country because he ran out of options" (AFTER MIKE MCGHEE SEIZED THE BOAT ON WHICH HE LIVED IN GUATEMALA, LEAVING HIM WITH NO HOME OR TRANSPORTATION) accurately paraphrased from 8785:8, with explanation of what Jackson was referencing as taking all Goodwin's options at lines 1 through 4.

We established that McGhee did not seize the boat at all in Jackson lie #15 on the prior pages.

Thus, Jackson had no real evidentiary support for stating that Goodwin, me, was ever out of the Country, and thus he had no evidence that Goodwin had to ever come back in the Country.

When he had no evidence that was introduced at trial that Goodwin "had to come back into the Country" he also had no evidence, or even an indication as to why Goodwin came back.

Jackson built a false script of McGhee seizing the boat, falsely arguing that "Goodwin was left with no home, no transportation, and thus no options"

But, none of that was true.

For arguments sake let's say McGhee had seized a boat in Guatemala that belonged to Diane Goodwin, although he did not, and he said in his witness statement to Jackson that Goodwin had the boat in Florida. How did Jackson purport to know that Goodwin lived on the boat? How did Jackson purport to know that Goodwin had no home and no transportation? Jackson had no evidence or even an indication of any of this. Jackson simply made it up.

Jackson did have solid evidence of Goodwin in the U.S. for 10+ years before the murders, on TV¹, and very visible in Court.

1) On TV saying "Arrest me or leave me alone," and also on CBS 48 HOURS.

JACKSON WILDLY LIED TO THE JURY, AND VIOLATED THE LAW, BELOW.

17.^{6th} Jackson and Dixon deceived the Judge re: the veracity of evidence that the Thompson murders were the result of a theft of \$250,000 in gold coins which Thompson had just purchased.

Because of the DDAs confounding the true facts re: the gold and the robbery, the Judge prohibited all mention of it. She would not allow any of the persuasive evidence to go to the Jury.

Outrageously Jackson and Dixon then argued to the Jury that there was no evidence available that the murders were the result of a robbery (of the gold or anything else). For example by A.J.:¹

"WHERE IS THE EVIDENCE OF THAT?", the robbery, 23 RT 8785:19,

"WHERE IS THE EVIDENCE THAT THIS WAS A ROBBERY?", 8785:20,

"THERE IS NO EVIDENCE OF A BREAK IN", 8785:21,

"THERE WAS NO EVIDENCE THE SAFE WAS TOUCHED", 8785:22

Jackson lied four times in four lines of his closing argument that there was no evidence of a robbery.

He then went even further at line :27, calling defense counsel's argument that the murders were a result of a robbery a "red herring"

But Jackson and Dixon knew there was powerful evidence that the murders were a result of a robbery, and that they had caused the provably biased Judge to keep it from the Jury.

Dixon joined the lying fray on this by several times arguing;

"YOU'VE (the Jury) SEEN ALL THE EVIDENCE", 23RT 9002-9007-8-9012-9030.

This reprehensible deceit is firmly against the law. See our AOB at pages 348352, People v. VARONA (1983) 143 Cal. App. 3d 566, 570, People v. DAGGET (1990) 225 Cal. App. 3d 751, 758, People v. RODRIGUES (1994) 8 Cal. 4th 1060, 1125, People v. FRYE (1998) 18 Cal 4th 894, 970.

1) Jackson lied here to the Jury four times "No evidence of robbery"

THESE ARE JACKSON'S MATERIALLY MISLEADING STATEMENTS, NOT THE LIES.

18.^{6th} At lines one on 23 RT 8783, and seven, Jackson argued that the boat Diane bought (evidence proves it was Diane's alone) was:

- "The perfect escape vehicle," line one, and
- "Exactly the boat he (Goodwin) needed to get out of the Country",
23 RT 8783:7-8.

But Jackson materially misled the Judge and Jury with those false arguments, violating ALCORTA v. TEXAS (1957) 355 U.S. 28, 31 which rules that even if a statement is not an outright lie, if it misleads the Jury it is to be counted as false testimony or possibly perjury.

In addition, Jackson had no supporting evidence for his arguments that the boat was "the perfect escape vehicle," and it was not, the facts, true evidence proves.

Sadly, in addition to Jackson and Dixon so badly lying to, and misleading the Jury on this, defense counsel dropped the ball and didn't bring forth the true facts, the real proof.

If someone wanted to "disappear" or "hide," buying a large conspicuous, custom boat is one of the worst ideas. It was most often the largest, most conspicuous boat in the small groups of boats in most of the harbors the Goodwins visited.

There are many daily radio "webs" in the cruising community. Regularly the gossip on these "nets" or "webs" is who saw what boat where and when. There were no secrets or the ability to "hide" this unique, rare type of boat, 7 RT 3054, 3063 at the trial.

Hiding/disappearing/fleeing would be much easier in a non-descript home in hundreds of American, or worldwide cities.

19.^{6th} There are two materially misleading arguments by Jackson within his argument at 8783 which is our first actual lie, eight pages prior. There are actually two lies within that "first" lie also.

A) Jackson argued that the boat that Diane Goodwin bought was a boat that "The richest of the rich couldn't afford"

That is A BIG LIE, and he had no evidence to support that absurd argument, none. Thus it and, B), below were 6th Amend vios.

Our research proves that thousands, possibly tens of thousands of yachts are sold at triple, ten times, up to 263 times the modest cost of Diane's \$331,000 boat. Many yachts are listed for over 25 million dollars, and research shows that the "Richest of the rich" boats they obviously can afford range from \$90,000,000 to \$800,000,000.

I reasonably also believe that the \$331,000 purchase price was less than the average purchase price for a home at the time in middle to upper-middle class California large metro area homes.

More importantly, the boat payments of \$2000 per month were less than 1/3 (one third less) that the over \$6000 it cost us to live in our home overlooking the ocean in Laguna Beach. Just the payments on the three mortgages and the taxes exceeded \$6000 per month. Jackson lied repeatedly to make us look rich, bad, unethical.

In addition, we no longer needed automobiles and the associated costs because of our move to a boat, a "downsizing"

I'm positive the boat saved us \$5000 per month, perhaps \$6000.

B) Jackson also lied that "The \$400,000 paid for the boat was in 1988 dollars!" Not true. The only 1988 dollars was the \$131,000¹ down payment. 60%+ of the purchase price was in a 20 year loan. In fact, looking at the payments over 20 years, just 29% was '88 money.
1) Plus the 7 out of 240 \$2000. per month payments.

20. "Notwithstanding the fact they may have been very lucrative," (allegedly Mike's assets that he dumped, the clear implication being that as part of an "escape plan" following the murders, Mike [illegally and/or unethically] dumped his assets at a loss to 'get out of town quickly'; which was in fact argued).

However, the biggest of the assets was never sold and paid out \$2,350,000 on the investment to the Pension Plan's and Diane's share.¹ This is in fact shown on tax returns which are suppressed. That was JGA/Whitehawk that paid \$2,000,000 to the Bankruptcies.

That would/should have paid Thompson and other creditors in full. But, suppressed evidence proves that Thompson's lawyer Dolores Cordell led a looting of all that money and more.

I have the evidence identified and cited as to where it "lives" in the government files.

Rather than admit the truth that Thompson was only not paid because of Cordell's provable FELONY CRIMES, the DDAs brought her in as their #1 expert, 19 RT 6939 in the trial record, to testify that the only reason Thompson didn't get paid was because of me.

So, related to JGA/Whitehawk, the unassailable fact that it wasn't in any manner sold, but that Jackson LIED THAT IT HAD SOLD, makes it of no materiality in the above Jackson misleading, actually lying statement that "It was sold even though it may have been lucrative", 23 RT 8783:28 onto 8784.

The only other asset that Jackson argued about was "Desert Investors". Diane made a coup' in selling that. She really made out getting her full investment. The project bombed and all the other investors lost BIG TIME. 1) The Bankruptcy trustee twice confirmed that Mike (me) never owned any of JGA/Whitehawk. Ask.

21.^{6th} "Why would Michael Goodwin need to get out of the Country so quickly?" 23 Rt 8784:8.

The true facts are that I didn't "get out of the Country quickly". Jackson had NO evidence I was out of the Country at all.¹

Evidence Jackson had and hid showed me in the United States through August 5th, in Florida on September 19th, and also in December in 1988. He had NO evidence I was out of the Country.¹

Plus for most of 1989 in Florida. Jackson had and hid our actual check records from the Florida banks which proved we lived "wide open", high-visibility in Florida for over 8 months of 1989.²

In addition, Sheriff's spokesman Ron Spear reported to the Los Angeles' TIMES, 7/16/93 that "We knew where Goodwin was all of the time"; exhibit_____.

And, evidence we have proves that I often spoke to the Bankruptcy trustee's lawyer on the telephone and wrote him.

This "misleading" of the Jury is so malicious that it really belongs as a complete false statement. We have it here only to be ultra conservative in an abundance of caution.

It also severely erodes that "Goodwin got out of the Country quickly" that evidence proves that I was still in California two months after the murders,³ that I met with murder investigators and was told I was a witness, not a suspect, 5 CT 1233, exhibit_____, and, as stated above, repeated evidence in the D.A. official discovery keeps me solidly in the U.S. through August 11, 1988, five months after the murders. Jackson and Dixon are liars, SIMPLY LIARS.

They have no evidence that I left the U.S. in 1988 or 1989, and only very unreliable heresay that I was "out" even after that.

1) Only hearsay from a proven perjurer that our boat was in Guatemala.

2) Exh. 17, June '14 DISCOVERY REQUEST, page 29. 3) Bps 000307, 540, 032415 & 17.

22.^{6th} "Somebody waving to him offshore", 23 RT 8784:17.

Jackson had no evidence we went offshore when we left Shem Creek Marina in Charleston, nor that anyone waved to us anywhere.

As stated, we went North from the marina up the intercoastal waterway. From the Marina one could not even see which direction we went, out into the ocean, or up, or down (South) the inter-coastal waterway.

The only evidence of "To where the Goodwins went when we left the Marina" was that we were not at that Marina anymore.

This is where, at line 18, Jackson launches into his fraud that we went right then to Guatemala, "Where does he go?" an exact quote. Jackson simply made up where he wanted us to be!

Jackson then goes on about the perjurious stipulation we addressed earlier¹, where Dixon and Jackson told the Judge that "Mike McGhee told Jackson in a face to face meeting that he had repossessed the boat on which Goodwin lived, in Guatemala"

But, that was alleged to be in 1991, three years later, and if you'll read McGhee's witness statement beginning at bp 100071+, exhibit_____ he A) never said he repossessed, seized or even touched the boat anywhere, and B) he admitted that I had the boat in Florida.

Other evidence proves that yes I had the boat in Florida, and that McGhee never touched her.

23.^{6th} "Mike McGhee's one job in the world back then was to find people's boats"; 8784:21. Jackson lied, although this may not be extremely material. McGhee's primary job was a "boat surveyor", as Jackson stated. NO evidence supported this lie by Jackson.

1) Dixon was fully complicit in this, also lying to the Judge at 19 RT 6901-5, that McGhee seized the boat, and that i'd been near "South America!" NO evidence!

24. ^{6th} "You heard evidence that his family lives in Florida," 23 RT 8785:5, implying that this evidence placed his family living in Florida in 1991 when McGhee allegedly seized the boat (but he did not seize/repossess the boat anywhere evidence proves).

I am 99% confident that there was no evidence presented that Goodwin's family lived in Florida in 1989-1990-1991, 1991 being when Jackson was referencing.

I am almost as confident that NO evidence was presented to the Jury that Goodwin's family lived there even in 1988.

However, the big issue here is 1991, when McGhee allegedly seized the boat, "leaving Goodwin standing on a dock in Guatemala with no home and no transportation (That is the only reason he was caught and is now on trial, 23 RT 8784:28+)"

1991 is when Jackson also falsely argued "Goodwin ran home to Mama (in Florida)" 8785:6-9.

Goodwin's parents bought a ranch in Colorado in 1988, three years prior, and when Goodwin voluntarily had the boat in Florida, per official D.A. discovery, his parents were living at their Colorado ranch. Jackson made this all up!

25. "The escape of a person after a crime is something that you can, you should consider", 8785:11. Jackson even lied enough on this to get a bogus Jury instruction. But A) the Judge left out the required word "immediately" and Goodwin was in South Carolina and/or Florida for most of 1988 and 1989, B) he met with investigators and was told he was a witness, not a suspect, 5 CT 1233, and that there was no problem with him leaving, and C) Sheriffs "knew where he was all of the time"; LOS ANGELES TIMES, 7/16/93.¹

1) Plus, there was NO evidence "Goodwin fled after the crime". He even hired a top level lawyer who told detectives Goodwin would come in if he was a suspect.

DETAILS AND EVIDENCE CITES PROVING THAT JACKSON LIED IN HIS CLOSE.

1. A) "HE buys a 57' motosailer...." The Maryland Bank files prove that Mike didn't buy the boat, that Diane did, with her sole obligation loan.

Then the suppressed files re: Diane's separate property interests in JGA/Whitehawk and Desert Investors prove that the money she paid the \$131,000 down payment with was her legitimate separate property which sourced from a pre-marriage inheritance.

And, the assets on which Maryland Bank approved Diane's \$200,000 boat loan (not \$400,000 as Jackson lied at 6 RT 2740:05 in his opening statement, also lying there that the loan was to Mike, me, not Diane¹) will be proven as all her separate property assets with suppressed evidence.

First, the evidence proving the boat was bought by Diane in her name only, with her sole obligation loan is listed in exhibit 17 to the June, '14 DISCOVERY REQUEST, between pages 104 and 112.

To see that I had never owned any of the assets from which she used the cash to buy the boat see the Bankruptcy trustee firmly stating that I had never owned any of JGA/Whitehawk at pg. 41 to the 6/3/91 hearing in the SA-86-06166-JR case and document #215 page 27 line 24 in the same case.

To see the trustee saying i'd never owned any of Desert Investors, and the Judge agreeing, see document #261, page 13, and the 4/17/90 hearing in the same case.

There are many more documents we can cite proving all of this but we won't give it all up right now to the corrupt prosecution.

1) Jackson suborned perjury from expert Kingdon that i'd signed the loan, 3CT 751.

1.^{6th} B) "...the boat cost \$400,000". This is the second lie under lie #1. There are actually 3 lies by Jackson under lie #1.

Jackson knew the boat cost just \$331,000, not \$400,000 based on his own evidence he introduced, trial exhibits 85-86-87-89, plus scads of other undisputed evidence in official D.A. discovery that was not introduced at trial.

It can't be disputed that the boat cost just \$331,000, with \$131,000 down, and a \$200,000 Maryland Bank loan. Evidence we have proves that Jackson also had the entire Maryland Bank file and suppressed it. See page 12 for another big lie re: this statement.

It is obvious Jackson and Dixon suppressed this evidence since it would have exposed their lies and destroyed a critical, but entirely fabricated part of their case. It would have proven:

- Mike Goodwin did not buy the boat, Diane did. And,
- That D.A. financial expert Kingdon falsely testified/perjured that Mike signed on the loan, 3 CT 751, when he didn't. And,
- Not only that Mike McGhee didn't seize the boat in Guatemala, but that he didn't seize it anywhere. And,
- That I, Mike Goodwin, had brought the boat back to the U.S. And,
- That Diane made payments on the boat for about two years. This belies the DDAs' arguments that the Goodwins were fleeing and "cutting all ties to the U.S.", 6 RT 274):14-16.

2.^{6t} "Goodwin couldn't beat Thompson on his own terms...fairly",¹ 23 RT 8783:9 and repeated more than ten times throughout opening statements and closing arguments. Just evidence at trial proves that I beat Thompson for millions of dollars more collected, with Court approval than he beat from me. I won 7 times to his 6 wins.

1) Jackson meant in Court proceedings as he made clear elsewhere. And, in fact in non-Court proceedings I prevailed/beat Thompson even more. Ask for details.

(Jackson outright lie #2, continued)

In fact, on-the-record (OTR) evidence from trial proves directly that I won over Thompson on two huge Court rulings for \$1,085,000. Those were the \$625,000 INSPORT purchase in the fall of 1986 by my camp, Diane, my wife, and business associate Chuck Clayton, 9 RT 3731, and elsewhere.

Plus the win of the \$460,000+ cash in the L.A. Coliseum interpleader, 9 RT 3746 and elsewhere.

Those don't tell the entire story by a long shot.

Us prevailing to obtain/retain the INSPORT agreement allowed us to stage Supercross events in 1987 which took in over \$1,750,000 more, and to still own the substantial asset value of the INSPORT franchise contract for the exclusive staging of AMA Supercross events in major NFL stadiums.

The fact that Thompson did not have INSPORT cost him way over \$1,000,000 in ticket sales in 1987-1988, evidence proves.

In addition, Thompson's loss on the \$460,000 cash in the Coliseum interpleader, which came to us, was the result of a much bigger loss for him, evidence proves in a published opinion.

In ruling against Thompson for the \$460,000 cash, the Bankruptcy Court also ruled that Thompson was not a secured creditor in the Bankruptcies, as the Thompson lawyers had claimed he was.

This was a huge loss, a strategic disaster.

The above were only the on-the-record losses by Thompson.

He also lost on his claim that JGA/Whitehawk should be estate property when receivers stated, NO, and the Court agreed, suppressed evidence proves. That was a \$2,350,000 loss by Thompson. Before the murders evidence proves Mickey had lost \$4,000,000+ in Court rulings.

3. Third Jackson lie. "The boat loan was approved 6 days before the Thompson's were murdered", 8783:17. Simply, provably untrue.

Evidence Jackson had and suppressed proves that the boat loan wasn't approved until 4/12/88, almost a month after the Thompson's were killed, exhibit 17 page 109, item #1207 of the June 2014 DISCOVERY REQUEST served on the Superior Ct/prosecution.

All references to exhibits 17 through 24 will be in that DISCOVERY REQUEST. Any exhibits included with this writing will have an underline beneath them, (e.g., exh. X.)

There is other evidence which also proves this, and the other claims we make here that Jackson and Dixon lied. We will hold many of those citations back to embarrass the government should they choose to retry on this theatre of the absurd.

The reason the above lie by Jackson is material is that he claimed that the boat loan approval, along with the house sale were "timing triggers" that my plan to kill Thompson was working, 23 RT 8783:22, thus being catalysts for me to then go ahead with my alleged plan to kill Mickey and Trudy Thompson.

- 4.^{6th} Fourth Jackson lie, evidence he lied; "Within two days after that (allegedly March 10, 1988, "6 days before the Thompsons were killed") the house goes into escrow", 8783:21. Big lie.

No evidence was introduced as to when the house went into escrow, or when the house escrow opened, I don't believe.

Jackson only introduced a paper that said it was typed on March 18, 1988, two days after the murders, I believe, not the March 12, which Jackson lied, which was four days pre-murders.

See bps 033760+ not even signed by the buyers, exh. _____.

There was no evidence introduced even as to when Mike or Diane signed the escrow papers, and there is evidence in discovery that they were out of California for several days surrounding March 18th, from the 18th through the 21st in Durango, CO, bps 033506, 000386, 000537.

Since the documents state "sign and return" it is a reasonable permissive inference that they were mailed on or after March 18, when they were typed (per the date right on them).

Thus the Goodwins wouldn't have received them until after they returned from Durango, CO. on the 21st. They then would have signed them and mailed them either to the escrow co. who had to still mail them to the buyers to get their signatures after the Goodwins signed, (obviously since the papers in D.A. discovery were signed by the Goodwins and not the buyers.)

I've seen nothing to indicate when the buyers signed the escrow papers and the escrow couldn't possibly open until they signed the papers, and I believe come up with their deposit.

Thus we possibly have the Goodwins signing the house sale escrow papers on March 22nd, ten days after Jackson lied they were signed.

And after that the papers still had to go to the buyers to obtain their signature, and to get back to the escrow company to open the escrow.

I wouldn't be surprised that the escrow may not have opened until April 1st. Any date is speculation on which a verdict can't stand.¹

The issue is that Jackson A) lied on a material issue, and B) he argued this with no support in the evidence. That is a 6th Amendment denial of due process which alone requires reversal.

1) JACKSON v. VIRGINIA (1979) 443 U.S. 307, 315-16, also 397 U.S. 358, 364.

The frauds on the house don't stop there, they get worse.

Lead prosecutor Patrick Dixon stated on 23 RT 9027 in his rebuttal close that "Mike sold the house and his investments for gold, and sends it offshore" (accurately paraphrased as many are)

Re: the house, neither of the Goodwins took \$1 from the house sale. Every bit of the money, the suppressed escrow instructions will show, went to benefit the Bankruptcy estate/creditors. First, as law dictates, the mortgages were paid, and the equity went directly into the Bankruptcy trust account managed by the trustee. And the investments weren't Mikes.¹

The prosecutors suborned material perjury from their financial expert Karen Kingdon on this. She testified that the house had sold for cash, 18 RT 6567, and that the Goodwins took the funds offshore, 18 RT 6779, also implied at 18 RT 6735, 6768.

The prosecutors are proven to have suborned these perjuries since A) they had the escrow files proving otherwise, page 61 in the June 2014 DISCOVERY REQUEST, exh. 17, yet they suppressed them, B) they are charged with knowledge of this evidence that they had, in re BROWN (1998) 17 Cal. 4th 873, 879, many other citations, and C) Kingdon knew she lied since she had accounted for the funds from the house in her accounting reports, bps 032277-032367. Thus the DDAs knew Kingdon was perjuring from a second source.

Kingdon also testified to reading that house sale file which the DDAs had and suppressed so they could pull these EXTRINSIC FRAUDS ON THE COURT, 3 CT 781:24. Thus the DDAs had it.

PC § 1385 and precedent mandate reversal for these frauds.

1) Extensive evidence proves they weren't Mike's. E.g. see the next pages.

5. "Within weeks he sold all of Diane's interest in Whitehawk"

8783:23. This may be the most outrageous lie of the whole case.

We present prima facie evidence here that Whitehawk (same as JGA for our purposes here) was not ever sold, but rather contributed \$2,000,000 to the Bankruptcy estates with the intent of paying Thompson and the other creditors. 8 RT 3528 and 9 RT 3701-3705, plus other cites.

There are also suppressed checks listed in the D.A. evidence locker on the case which when produced will prove that all funds from JGA/Whitehawk were paid to the account of Diane Goodwin or the pension, see exhibit 17 in the June 2014 DISCOVERY REQUEST, pages 114-115 for over \$1,000,000 worth of the checks. Others are listed in the suppressed Bankruptcy accounting files.

The prosecutors can't deny that they were aware of the JGA checks on pages 114-115 of exhibit 17. Evidence proves they used several of the items of evidence listed on page 115 as their trial exhibits.

The prosecutors simply scammed the Court, the People of the State of California, and me, the defendant by using what they wanted, and hiding the exculpatory/impeaching evidence, INTENTIONALLY since they used some from the same group at trial.

DDA financial expert Kingdon also admitted that she had seen the JGA schedule of distributions, 19 RT 6921:6. Those proved that JGA wasn't sold. The prosecutors also had that evidence and knew that Jackson was lying above, I submit COMMITTING PERJURY.

There is much more evidence we can cite proving that JGA/Whitehawk wasn't sold, but this is enough.¹

1) E.G. tax returns showing Diane's and the pension's continuing ownership.

6. "Diane's interest in Whitehawk was really Mike's" 23 RT 8784, lines 24 through 26.

Suppressed evidence we've identified proves A) that this is an outright lie, and that Jackson and Dixon both knew that Jackson was lying when he made this closing argument. He made the exact same grossly false opening statement at 6 RT 2740.

A Bankruptcy trustee has an incentive to include as many assets in a Bankruptcy estate as he possibly can stretch to grab, appropriate or not. That is because the trustee gets paid a percentage of the assets he distributes to creditors.

Nonetheless the Bankruptcy trustee repeatedly confirmed that Mike had no ownership interest whatsoever in JGA/Whitehawk.

See page 40± to the 6/3/91 hearing in the SA-86-06166-JR Bankruptcy for the trustee confirming that Mike had never owned nor transferred this asset. The trustee also confirmed this in document #215, page 27 line 24 in the same case.

There are dozens of other documents which also establish that Mike had no ownership rights in JGA/Whitehawk, e.g. bp 010122, plus in exhibit 17 to the June, 2014 DISCOVERY REQUEST, page 10, item #130, also in exhibit 18, pages 29-30, items between #375 and #384. These include the original structure dox.

7. "Mike had been hiding assets in Diane's name", 23 RT 8784:26.

Even the Bankruptcy trustee said this wasn't true, bps 010090, 010491, plus 031731 Court papers filed by Cordell, originally provided by us, 032392, 032394, all offered in surety, 001158, all transfers listed, 026951-60, many, many other cites.

These cites also prove full disclosure of all assets.

8. "Mike dumped them all"; (the assets, JGA/Whitehawk and Desert Investors, and the implication of all our assets.)¹

The true fact is that Mike sold none of his assets of consequence. He and Diane together agreed to sell a liability, the house, which cost them over \$6000 per month to stay in, and that they didn't need because they were moving to Diane's boat, which they disclosed to Maryland Bank.

However, the prosecution dishonestly, by suppressing the evidence which proved the correct facts, argued that all assets were community property belonging to both Mike and Diane.

In alleging this the prosecutors not only repeatedly lied about the facts, but they ignored the law re: the fact that pension vestings are not to be considered as an asset of the debtor. And, since Diane was not in Bankruptcy with her provable separate property and pension vesting, her pension certainly wasn't "community property". Thus the prosecutors lied about at least \$1,000,000 in pension vesting/value there.

But, to give them the benefit of the doubt, for discussion sake, let's assume for now that all assets were community property.

Based on that calculation less than 6% of the combined assets were sold/"dumped". That was the \$215,000 Diane got for Desert Investors, on which she made out. The investors that stayed in lost money. \$3,600,000+ in assets weren't sold/"dumped".

The unsold assets totaled \$823,000 cash in the company, the \$625,000 value of the INSPORT agreement, \$1,657,000 still to come in from JGA/Whitehawk, and about \$500,000 in various assets, e.g. Edgemont Ranch, Lake Tahoe property, Laguna Surf note, etc;
1) Jackson lied to the Judge at 3 CT 741 that "Mike liquidated all his assets".

We've detailed the evidence cites for the evidence the prosecution had and hid/suppressed which proves eight (8) outrageous lies by DDA Jackson on just one page of closing argument. Some on the next two pages are equally outrageous.

The Courts are unanimous that "Closing arguments are an important part of the trial".¹

There are far more evidence cites even to prove these eight lies by Jackson as lies, and for the other eight lies, plus the more than six materially misleading statements by Jackson, all IN JUST THREE PAGES OF HIS CLOSING ARGUMENT.

However, if the Los Angeles District Attorney's office, and the Attorney General are truly interested in Justice and fulfilling their oaths of office, the evidence cited here is enough to:

- Prove that this conviction cannot be sustained. And,
- Prove that if all the evidence which was held by the govt. and was required to be produced, was produced, a conviction would not have occurred, in fact probable cause didn't exist.
- Prove that L.A.D.A. prosecutors Jackson and Dixon intentionally framed Goodwin, with det. Lillienfeld's complicity, in a Penal Code § 182 (1) thru (5) FELONY CONSPIRACY TO OBSTRUCT JUSTICE, AND TO FALSELY CONVICT, with over 300 lies/false arguments by them?²
- Prove that this is one of the worst prosecutorial/investigatory FRAUDS ON THE COURT IN DECADES, IF NOT THE PAST CENTURY in the Ninth Circuit. It will set "Watershed" precedent. And,
- Prove that this conviction was the result of a 26 year RICO CRIMINAL ENTERPRISE run by politician Collene Campbell.

Truth in evidence and Justice require that Goodwin is released now.

1) U.S. v. KOYAJAN (9th Cir 1996) 8 F3d 1315, 1323, 223 CA 3d 606, 694, others.
 2) Way over 205 by Lillienfeld, plus about 96 by the prosecutors, all provable.

End Jackson lies.

DECLARATION RE: DDA¹ JACKSON'S 31 LIES/MISLEADING CLOSING ARGUMENTS IN 3 PAGES

I Michael Goodwin declare that the following, and the document I prepared which is enclosed are of my own personal knowledge, and if required I could and would testify truthfully thereto in a Court of law under penalty of perjury under the laws of California.

1. I know that at least 17 (seventeen) of the closing arguments by DDA Jackson listed in the enclosed document, coded HC-46 by me, are blatantly, provably, irrefutably false. Most are prejudicial²

2. I know that at least 8 (eight) more are misleading to the Judge and Jury. Most are material and very prejudicial.

3. Jackson made these combined 25 false and misleading closing arguments in just 3 pages of closing arguments, 23 RT 8783-84-85.

4. Actually, when all Jackson's "repeats" of these false and misleading closing arguments are counted there are at least 31.

5. At least nine of the 17 outright closing argument lies had no support in the evidence that I can find or recall.

6. An additional 7 of the simply materially misleading closing arguments had no support in the evidence I can find or recall.

7. For at least 24, two dozen of the 31 total false and/or simply misleading closing arguments, i've identified evidence Jackson had which proved to him he would be lying before he lied/misled.

8. Evidence also conclusively proves Jackson lied to the Judge in offers-of-proof or "advisements to the Judge" 19 times. For details on those request documents HC-41, short, and/or HC-26.

9. The DDAs lied over 91 times in the L.A. proceedings, provably. I declare upon penalty of perjury under the laws of California that the above is true and correct. 8/12/14 in San Diego.

1) Deputy District Attorney. 2) Most of the errors listed on this page are material/prejudicial


Michael Goodwin

1 ESCAPE VEHICLE ANYBODY COULD HAVE.^{18M} DURING THE -- AND I
2 WON'T DRONE ON ABOUT THIS. DURING THE COURSE OF HIS
3 BANKRUPTCY, HE WAS PERSONALLY BANKRUPT; HE WAS
4 CORPORATELY BANKRUPT, YET HE GOES OUT AND BUYS A 57-FOOT¹
5 MOTOR SAILER THAT THE RICHEST OF THE RICH COULDN'T^{19M}
6 AFFORD, \$400,000 IN 1988 MONEY. WHY? NOT BECAUSE HE WAS
7 LOOK NOTHING GET A TAN, FOLKS. THIS WAS EXACTLY THE BOAT
8 HE NEEDED TO GET OUT OF THE COUNTRY.^{18M} WHY? BECAUSE HE
9 COULDN'T WIN FAIRLY. HE COULDN'T BEAT MICKEY THOMPSON ON²
10 HIS OWN TERMS -

11 HE HAD A PLAN IN MIND. HE WAS GOING TO
12 HAVE HIM KILLED. HE WAS GOING TO HAVE HIM WASTED, AS HE
13 SAID. SO HE GETS THE YACHT. AND YOU THINK IT WAS A
14 COINCIDENCE THAT MICKEY THOMPSON AND TRUDY THOMPSON MET
15 THEIR FATE THE WEEK OF MARCH 16TH? IT WASN'T A
16 COINCIDENCE. LOOK AT WHEN THE BOAT WAS APPROVED. THE
17 BOAT LOAN WAS APPROVED SIX DAYS BEFORE THEY WERE KILLED.³
18 THAT BOAT LOAN GOT APPROVED ON THE 10TH AND WITHIN SIX
19 DAYS MICKEY THOMPSON AND TRUDY THOMPSON WERE SHOT TO
20 DEATH.

21 THEN WITHIN TWO DAYS AFTER THAT, THE HOUSE
22 GOES INTO ESCROW.⁴ OH, MY GOODNESS, IT LOOKS LIKE THE
23 PLAN IS COMING TOGETHER. WITHIN WEEKS SOLD ALL OF DIANE
24 GOODWIN'S INTEREST IN WHITEHAWK.^{A 5} BUT DIANE GOODWIN'S
25 INTEREST IN WHITEHAWK WAS REALLY MICHAEL GOODWIN'S
26 INTEREST IN WHITEHAWK.⁶ HE HAD BEEN HIDING ASSETS IN HER
27 NAME OR ATTEMPTING TO HIDE ASSETS IN HER NAME⁷ AND HE
28 DUMPED THEM ALL.⁸ NOTWITHSTANDING THE FACT THAT THEY MAY

18M

1 TWO
LIES
AND
TWO
MISLEADING
ARGUMENTS
IN #1 HERE
18M

2

3

4

5

6

7

8

PROSECUTOR ALAN JACKSON LIED SIX TIME, AND MISLED THE
JURY FOUR TIMES ON THIS PAGE. ALL WERE MATERIAL.

23 RT 8784

1 HAVE BEEN VERY LUCRATIVE.^{20M}

2 WITHIN WEEKS OF THAT -- OR ACTUALLY WITHIN
3 DAYS OF THAT, HE DUMPS ALL OF HIS INVESTMENTS IN DESERT
4 INVESTORS.⁹ WHY IS THAT IMPORTANT? BECAUSE MICHAEL
5 GOODWIN WAS SPECIFICALLY TAKING ASSETS TURNING THEM INTO
6 CASH; TAKING CASH TURNING THAT INTO GOLD; AND TAKING
7 EVERYTHING AND MOVING IT OFFSHORE.¹⁰

8 NOW WHY WOULD MICHAEL GOODWIN NEED TO GET
9 OUT OF THE COUNTRY SO QUICKLY?^{21M} EITHER HE IS THE
10 UNLUCKIEST GUY ON THE FACE OF THE PLANET, FOLKS, OR HE
11 HAD PLANNED MICKEY THOMPSON'S MURDER AND WANTED TO GET
12 OUT.

13 \$500,000 IN GOLD AND CASH MOVED OFFSHORE.¹¹
14 A \$400,000 YACHT.¹² THE LAST TIME ANYBODY SAW HIM WAS OUT
15 OF SOUTH CAROLINA AFTER HE HAD HAD THE BOAT.¹³
16 REFURBISHED -- OR NOT REFURBISHED BUT HAD IT STOCKED WITH
17 RADIO EQUIPMENT, ET CETERA, SOMEBODY WAVING TO HIM
18 OFFSHORE.^{22M^A} SEE YOU LATER, MIKE. AND WHERE DOES HE GO?¹⁴

19 AS YOU HEARD THERE WAS A STIPULATION. YOU
20 DIDN'T MEET FRANK MICHAEL MAGEE, BUT FRANK MICHAEL MAGEE
21 IS A BOAT SURVEYOR. FRANK MICHAEL MAGEE'S ONE JOB IN THE
22 WORLD BACK THEN WAS TO FIND PEOPLE'S BOATS.^{23M}

23 THE SUGGESTION IN OPENING STATEMENT BY
24 MS. SARIS WAS, OH, WELL, MIKE GOODWIN WAS IN AND OUT OF
25 THE COUNTRY CONSTANTLY. HE WASN'T FLEEING. HE WAS JUST
26 DOWN SAILING, JUST HANGING OUT; HE WASN'T FLEEING.
27 FOLKS, THE ONLY REASON MICHAEL FRANK GOODWIN IS SITTING
28 IN THAT CHAIR RIGHT NOW, HE ONLY REASON HE'S BACK IN THIS

START
OF
HUGE
LIE

A) THIS ONE IS ACTUALLY A LIE, NOT JUST A MISLEADING ARGUMENT.

1 COUNTRY IS BECAUSE FRANK MICHAEL MAGEE REPOSSESSED HIS¹⁵
2 HOME AND HIS TRANSPORTATION AND MICHAEL GOODWIN WAS LEFT
3 STANDING BAREFOOT ON SOME DOCK SOMEWHERE ON THE RIO DULCE
4 RIVER IN GUATEMALA WITH NO HOME AND NO TRANSPORTATION.

5 YOU HEARD EVIDENCE THAT HIS FAMILY LIVES
6 IN FLORIDA.^{24M} OF COURSE, HE'S GOING TO COME BACK. WHAT DO
7 PEOPLE DO WHEN THEY'RE OUT OF OPTIONS? THEY COME RUNNING
8 HOME TO MOMMA. THAT'S WHY MICHAEL GOODWIN IS BACK IN¹⁶
9 THIS COUNTRY. AND NOT OUT OF ALTRUISM.

10 ONE OF THINGS THAT THE COURT WILL TELL YOU
11 IS THAT THE ESCAPE OF A PERSON AFTER A CRIME IS SOMETHING^{25M-25M}
12 THAT YOU CAN CONSIDER. SOMETHING THAT YOU SHOULD
13 CONSIDER IN DETERMINING GUILT. AND I WANT TO SPEND JUST
14 A SECOND TALKING ABOUT WHAT I THINK MS. SARIS WILL TEND
15 SPEND A LOT OF SECONDS TALKING ABOUT AND THAT IS THIS
16 DEFENSE OF ROBBERY SHE TOLD YOU IN HER OPENING STATEMENT
17 WE'RE GOING TO SHOW YOU THAT WHAT HAPPENED ON THAT HILL
18 THAT DAY WAS A ROBBERY.

19 I SIMPLY ASK: WHERE DID IS THE EVIDENCE^A
20 OF THAT? WHERE IS THE EVIDENCE THAT THIS WAS A ROBBERY¹⁷
21 NOT AN EXECUTION? THERE IS NO EVIDENCE OF A BREAK-IN.
22 THERE WAS NO EVIDENCE THAT THE SAFE WAS EVER TOUCHED.
23 MS. SARIS AND THE DEFENSE SHOWING YOU PICTURES OF THE
24 SAFE; AND SHOWING JACO SWANEPOEL PICTURES OF THE SAFE;
25 AND ASKING IF HE HAD SEEN VIDEOS OF THE SAFE. THAT'S ALL
26 A RED HERRING.

27 DO YOU KNOW WHAT A RED HERRING IS, BY THE
28 WAY? LET ME DIGRESS BECAUSE I DON'T WANT TO PUT

A) This is truly sickening. There was compelling evidence the murders were the
the result of a robbery gone bad. The DDAS argued successfully to keep it out &
then repeatedly argued "where is the evidence of a robbery?"