

MICHAEL F. GOODWIN DECLARATION RE HIS MEDICAL PROBLEMS AS OF AUGUST 21, 2022^A

I Michael F. Goodwin declare that the following matters are of my own personal knowledge, and if required I could and would testify truthfully there- to in a Court of law.

1. I am ill to the point of almost not being able to normally function 90%+ of the time. To be more precise, on my best days I'm only able to devote 2 to rarely 4 hours to productive tasks as opposed to necessary items to live.

Most days that is just 1 to 2 hours, and at all times in those hours I can "function" I am still working with severe brain fog, fatigue, nausea and my arms and legs seeming weaker and like wet noodles, miserable/hard to focus.

2. As an example, yesterday, Friday, August 19th, I was so ill that I was in bed all day, mostly sleeping, 16+ hours of sleep, except for a trip to TTA for an optometrist visit. I was so ill I skipped dinner and nightly pills.

3. Re my symptoms: As an overview, the combined symptoms seem like severe flu. Below I detail the individual conditions I observe, varying in degree.

A. Foggy head, seems like skull is filled with cotton candy /often headaches.

B. Dizziness-disorientation-vertigo. This is dangerous, potentially life threatening if I fall and hit my head on a metal edge of a table, bed, etc;

Two days ago my cellmate, Jackie Wilson, caught me falling after he saw my eyes roll back in my head. I am constantly concerned re falling.

C. Severe fatigue. I am normally active, high energy and when I feel well I exercise well, walk per instructions from my Dr. etc. I also normally worked well and was sharp mentally on 8 hours sleep at night and a 1 hour nap.

D. My arms/legs seem extraordinarily weak, like wet noodles, and my arms-legs have muscle-joint pain, particularly my calves, sometimes cramping up.

E. Nausea from light to strong enough that I don't eat. I almost vomited once.^B

F. I often get a stuffed-up nose, having to blow substantial mucous out.

A) CDC# F69095, RJD, E24-D101, DOB 2.4.45, age 77, 6.2", 220 lbs.

B) Added next morning, see #12, similar. page 3.

- G. I'm told I sometimes appear to be slurring my words, and feel that at times I can feel-hear that. It seems to occur when my symptoms are worst.
- H. When my symptoms seem worst I often have to strain my forehead muscles just to keep my eyes open. My closest friend in here tells me it is obvious when I'm extremely ill from the appearance in my eyes, which I seem to also feel.
- I. Re my extreme fatigue, just this week I spontaneously fell asleep twice at the law library when I was working on the computer, once at the clinic when I was waiting, and I nodded off several times in a POOCH (service dog) meeting.
- J. I am periodically very constipated although I do not suggest that is linked. There are some peculiarities there I should share if that may be linked.
- K. I urinate 20 to 33 times a day, actual count, although I doubt this is linked.
3. My=CDC Dr. implied this was low blood pressure related, specifically the vertigo. IT IS NOT. He failed to check blood pressure records, regularly taken from me, vs. when I was dizzy, which is almost always. My bp varies from 90s/50s (yes low but needs to be so, below) 145/90s. I was similarly dizzy-feeling ill on both.
4. It is dangerous to my remaining eyesight to have been cut back from 30mg of lisinopril to 10mg in the mistaken diagnosis that low blood pressure is the cause. I already lost vision in my right eye when guards one evening would not allow me to go get my blood pressure meds on time, explained in #5 below.
5. I had a "Central retinal vein occlusion" in my right eye, losing the ability to read although I can see colors and very blurry movement. That is AKA a "mini-stroke;" the ophthalmologist advised, also that I am at very high risk for one in my left eye due to a similar congenital defect, abnormally small ocular blood vessels. A blood pressure spike cause the 1st one, and I'm prone to another if I do not keep my blood pressure always below 120/80, best if it is abnormally low, two different ophthalmologists have advised.
6. I need 30 mg of lisinopril back ASAP or at least bp checks each late afternoon when my stress-blood pressure seems to be highest (based on telltale headaches.) ^A <
- A) Thru the years I've been able to correllate certain area headaches with high BP.

7. I had what was diagnosed as covid twice, once in Nov-Dec. 2020 and again in Dec.-Jan. 2021-22. My symptoms, some of which I experienced before my first bout with covid, got much, much worse after the covid, and more symptoms surfaced.
8. As science shows, many people experience heart, lung and/or brain-nervous system problems after having had covid. Since I'm 77 with past severe heart and lung problems, below I am particularly susceptible.
9. Medical confirmations, attached, report that I recently had an abnormal EKG, which my CDC Dr. verbally confirmed, and also an enlarged aorta.^A <
10. I get what I describe as sharp heart pains a few times a week, not too painful, 4-6, and they do not last long. I've not been able to relate them to "trending" re my other symptoms, which are almost always with me, no propensity as when.
- I do constantly have dull ache pain to the left of my heart area, aligned with my nipple, seeming in the side of my chest. It is always at 4± and I don't think it ever abates although it obviously could while I'm sleeping.
11. There are times when I twist my upper body a certain way (cannot isolate how-what causes this) I get an exponentially increased pain in that area, an 8-9, brutal, "grabbing-twisting," which lasts up to a minute, a few times a month.
12. This morning at breakfast, after I had only an apple and cup of strong, 3 bag in 16 oz. water tea I became so nauseated that I got the dry heaves, almost vomiting. I ate-drank nothing further, came back and took a 1½ hour nap.
13. When I awoke I was still very dizzy, but still got the broom and swept the cell floor. Although that took just 2-4 minutes I breathed way too hard I feel.
14. Several times a day I get an intense "tingling" feeling in the left shoulder above my heart, in somewhat of a saddle shape over my left shoulder, across the shoulder front and back, down 3-4" and then up the left side of my neck to just below my ear. It is not painful and might be described as a vibrating, lightly.
15. The Scopomaline patches seem to slightly assist^B the vertigo but they too often <
- fall off right away. I have oily skin and need medical tape to keep them on.

A) Yet CDC has set until 10/14/22 as the "schedule by" to see my cardiac Dr.

B) Note the label of these patches says "MAY CAUSE DIZZINESS!"



- A PINNACLE CASE OF INCONTROVERTIBLY PROVEN ACTUAL INNOCENCE, AND THE DIRTIEST CASE OF PROSECUTOR FELONIES TO WRONGFULLY CONVICT ON LEXIS, MUCH WORSE THAN MILLER V. PATÉ OR ROCHIN V. CALIFORNIA.¹ <
- A DOZEN+ WILFULL LADA PROSECUTOR PERJURIES,² SUBORNATIONS OF PERJURY LIES, FRAUDS-ON-THE-COURTS TO INTRODUCE MATERIAL FALSE EVIDENCE PROVEN HEREIN, OF 50+ WHICH EVIDENCE INCONTROVERTIBLY PROVES IN THE FULL CASE. <
- THESE CRIMES WERE PERPETRATED BY EX-ASSISTANT LADA PATRICK DIXON AND ALAN JACKSON, 2012 LOS ANGELES DISTRICT ATTORNEY RUNNER-UP. THE CRIMES PROTECTED A POLITICAL PATRON FROM EXPOSURE OF \$1,000,000+ FELONIES.³ <

"ATTORNEYS ARE OFFICERS OF THE COURT, AND WHEN THEY ADDRESS THE JUDGE SOLEMNLY UPON A MATTER BEFORE THE COURT, THEIR DECLARATIONS ARE VIRTUALLY MADE UNDER OATH!" See the U.S. Supreme Court cite in footnote 2.

- 1) "Prosecutor said paint on pants...BLOOD!" to wrongly convict, 386 U.S. 1, 7.
- 2) HOLLOWAY v. ARKANSAS 98 S. Ct. 1173, 1174, 1179 (1978), 28 cases, accord.
- 3) Evidence proves the complaining witnesses, powerful politician Collene Campbell and her lawyer Dolores Cordell committed multiple felonies to steal, loot, fraudulently divert millions which would have paid all debt. Then they reported that Goodwin killed Mickey and Trudy to avoid paying.

Michael F. Goodwin

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EVIDENCE HERE WILL CONVICT EX-VERY TOP TIER LADA PROSECUTORS ALAN JACKSON-PAT DIXON OF MULTIPLE FELONIES AND PROVE MICKEY THOMPSON'S MURDER TRIAL IS A RICO CONSPIRACY.

U.S. Supreme Court precedent in five+ legal disciplines requires reversal of Michael Goodwin's conviction and a criminal investigation now of Jackson-Dixon.

This brief addresses just the 1st 3 of 12 LADA claims alleged to show guilt, all of which evidence not shown-explained the Jury proves intentionally false...

"HE STOLE \$527,000..FLED FOR YEARS..HE WAS CAUGHT BY A 1991 GUATEMALA BOAT REPO!"

These are false DA claims I-II-III. The 1st one is proven false by the DA's own trial Exh. 99, cp 609 here, including DA expert perjury/DDA perjury subornation.

II is the 1991 Guatemala boat repossession which NO evidence supports and Exhibits 302-310 prove the DA claims in Exh. 301 are intentionally false by DDAs.

This is one of 3 DA claims "GOODWIN ASSETS REPOSSESSED", evidence shows false.¹ <

III, "HE FLED", NO evidence supports it/Exhs. 311-331 prove wilfully false.

1. I swear irrefutable evidence here MUST convict Jackson-Dixon of many felonies.
 2. Proven here are 21 claims re II-III with absolutely NO supporting evidence, 16 of these by prosecutors and 5 by defense counsel, ALL ALSO PROVEN 100% FALSE.
 3. 4 LADA wilfully false-no support evidence claims are offers-of-proof, Exh. 301.
 4. All 3, I-II-II, are also false claims in the DA and AG Statements of Fact in the direct appeal and evidence proves multiple direct appeal added lies on these.¹ <
 5. All 3 were core in DA closing arguments, e.g. RT 8784-5, 9027, Exh. 301 cp 629+.
 6. Evidence proves current LADA prosecutors Patankar, Zifkin, Albracht wilfully, repeatedly lied-perjured-made material false claims re I-II-II in the Response.¹ <
 7. The fraud on #I was used as the only "evidence", although wilfully false, to prevail on the RT 6751 offer-of-proof to "get in" 14 false and prohibited claims which "prosecution team lawyers" had already lost on in prior litigation, see #8.¹ <
 8. Prosecution team lawyers also proved the boat repo false in SA CR 93-67(B)(GLT).
 9. Evidence proves all DDAs committed felony BRADY material withholding, massive.¹ <
 10. Defense lawyer Saris had evidence proving all this but didn't adversarially test.¹ <
- EVIDENCE PROVES ALL DA CLAIMS SIMILARLY, MALICIOUSLY FALSE, AND SARIS THREW THEM.¹ <
- 1) Other two not briefed herein, these & other noted additional claims, briefed later.

I. HERE; CONCLUSIVE PROOF THAT THE LADA TRIAL EXHIBIT PROSECUTORS CLAIMED PROVED GOODWIN STOLE \$527,000 INTENDED TO PAY MICKEY, ACTUALLY PROVES THEY PERJURED.

- Just four pages of official evidence in Exhibit 300, cp 605+, clearly walked through below, conclusively proves prosecutors introduced material false evidence via wilfull perjury, subornation of perjury and gross deception.
- More prejudicially, this intentional fraud on the Courts, was the sole evidence prosecutors used to "slip-in" evidence prohibited by 2 Court Orders^B and Res Judicata since prosecution team lawyers had lost the prohibited 14 claims in prior litigation, SA CR 93-67(B)(GLT)/prosecutors also hid the BRADY mtl.

This became the largest fraud of the trial, 40+ perjuries, plead in V.

This DA false evidence introduction requires reversal-a criminal investigation^C

1. Cp 606, RT 6779, DDA (Deputy DA) Alan Jackson suborned material perjury from DA financial expert Karen Kingdon that all the home sale funds, along with undescribed other funds were improperly taken-sent offshore by Diane Goodwin:

"THE HOME (TWICE, LINES 9-15)...THEN THE RECORDS SHOW THAT IT ALL FUNNELS INTO DIANE GOODWIN'S NAME AND THEN BASED ON THESE RECORDS, THE FUNDS GO OFFSHORE!"

The only record offered, DA trial Exhibit 99, cp 609, 3 pages later, that Jackson-Kingdon looked at-referenced just before her perjury above, next page, RT 6766, proves Diane, nor Mike got \$1 from the \$527,000 sale price.

Unless prosecutors acquiesce, provide records showing Di got the funds.

2. The "other" Kingdon-Jackson reference "all" funds are the 14 prohibited claims in the 2nd bullet above, proven false in Section V herein.(coming later)
3. I re-stress that Jackson-Kingdon cannot weasel out of absolute proof that these were intentional felonies, perjury and subornation of perjury. That is undisputed since at cp 607, RT 6766, they boat look at-reference Exh. 99 proving Diane got not \$1 of the home sale funds, also proven pp. 5-6 here^D

4. Cp 608, RT 9027, DDA Dixon, in his rebuttal close lied "MIKE GOT HOME FUNDS!"^E

- A. See RT 6739-51 sidebar including the most material offer-o-proof, proven false.
- B. 6.23.06 hearing pages 12-26, many more references, RT 4050 "NO OTHER FRAUDS"; paraphrased. C. MORRIS v. YLST (9th Cir. 2008) 447 F.3d 735, 744.
- D. DDAs are "PRESUMED TO KNOW" pages 5-6 from their file-"GOODWINS NO HOME FUNDS!"
- E. Exh. 330 proves 11 material-wilfull false Dixon statements on RT 9027/cp 608.

ARGUMENTS WITHOUT EVIDENTIARY SUPPORT ON 6 DA CLAIMS OF GUILT REQUIRE REVERSAL NOW.
AND EVIDENCE HERE PROVES ALL 29 OF THE SEPARATE UNSUPPORTED DA ARGUMENTS ARE FALSE.
- cp = consecutive page #, lower right corners -

Law: "A CLAIM WITHOUT ANY EVIDENCE TO SUPPORT IT MIGHT AS WELL BE NO CLAIM AT ALL!" (concurrency by Justice Breyer)
GALLOW v. COOPER 577 U.S. 933, 933, 133 S.Ct. 2730, 2731,
186 L.Ed.2d 935, 2013 U.S. Lexis 4946 @ p. 2, more precedent, endnote.¹ <

Merely false claims are not focused on.. These are both unsupported by any evidence I can find and evidence proves them false, I submit wilfully for most or all of them.
Claim; Listed in descending order of ease of proof and materiality per Petitioner.

II. Reading the Exhibit 302 cp 635+, Mike McGhee (the claimed Goodwin boat repos-
sessor in Guatemala in 1991, by Dixon, Exh. 301 cp 620, RT 6901-7) says
nothing like DDA Dixon represented on 3+ different material Exh. 301 offer-of-proof
claims. Evidence proves McGhee never saw the boat, was fed what to say, page 6.² <

1. "IN 1991, I BELIEVE^A, HE WAS RETAINED BY MARYLAND NATIONAL BANK
TO REPOSSESS THE DEFENDANT'S BOAT.³ HE MADE LOTS OF CALLS AND
DID LOTS OF INVESTIGATION IN AN EFFORT TO ACCOMPLISH THAT. <

ALL OF THAT LED HIM TO GUATEMALA WHERE HE, AFTER GOING
THROUGH ALL THE BARS AND TALKING TO PEOPLE AND TALKING TO
DIVERS, FOUND THE DEFENDANT'S BOAT AND REPOSSESSED IT!" - 4 <
RT 6903:18-26, offer-of-proof, cp 624. McGHEE DID NOT SAY HE REPOED THE BOAT.

A. This became a stipulation⁵ due to trial counsel's failure to investigate,
and at least gross negligence, if not wilfull complicity.⁶ However, I submit
that has no relevance in this analysis, although details are @ endnote 5. <

Again, the bp 100071-84 McGhee statement that Dixon relied on (note
confirmation of DDA Jackson and det. Lillienfeld in the interview and refer-
enced by Dixon, RT 6902:12)⁷ in Exh. 301 says absolutely nothing re repossessing
any boat, anytime, anywhere. He also correctly affirms Goodwin kept the boat
at a marina in the U.S., bp 100076 cp 641^B. That is Nelson's Boatyard, see bp
032116b, 032256 also I believe, but DA bates stamped discovery has been kept
from Petitioner since trial 15+ years ago. That is a Penal Code § 141 felony.⁸ <

B. Cinching that this is a wilfull DDA crime, bp 028312-28, 032116b, 032256,
and the withheld Bank files.. Goodwin left the boat to the Bank in 1990 when

A) On 636/Exh. 309 both confirm it was about May 1991. B) "Alphas" are short foot-
notes. McGhee also said he was waiting for "THE BOAT TO BE TRANSPORTED TO THE
U.S....(but that) HE WAS CONCERNED GOODWIN WOULD SINK HER," cp 647/bp 100082.

1) Numbers are endnotes at p. (coming after 9.1.22) cp 2

The true Bank agent, Wayne Vann⁹, picked her up for the Bank. Not having been able⁹ to see bates stamped discovery for 15 years I don't know what Vann told authorities, but he told me he was not completely candid with them since he felt something untoward was in the works. However, I am confident that the evidence conclusively proves the truth, which is that the boat was in the U.S. from me, not McGhee, in 1990.

Crucially, "Prosecution team lawyers" proved Petitioner left the boat for the bank in the U.S. in 1990 in prior litigation, SA CR 93-67(B)(GLT). Evidence proves the LADA also has that file, CT 1433/bp 000399/000427, Exh. 305 cp 665, but withheld it, including BRADY materials A) showing they proved Goodwin gave the boat to the Bank in 1990 in Florida, making the 1991 Guatemala repo impossible, and B) that a Federal Court of correct jurisdiction ruled 14 murder trial claims in #IV, false. The OCDA initiated this murder case-that case-gave LA the overlapping file, RT 6750.^B

Thus Res Judicata-collateral estoppel and most probably Judicial estoppel¹⁰ should have prohibited relitigating this phony 1991 boat repossession claim.

It was very prejudicially falsely argued, used to link fled, sending funds which Goodwin allegedly stole overseas to escape with, all proven false in my full actual innocence brief. See RT 8784-5/9027/20 cp 629+ & my lawyer's betrayal, Exh. 310.^{A&C}

The intentionally false boat repo in 1991 in Guatemala conspiracy is the only support I find for the "FLED AS CONCIIOUSNESS OF GUILT" Jury instructions, next section-III re claims-arguments with no supporting evidence. More on boat repo now.

Defense counsel Elena Saris was grossly ineffective for failing her duty to investigate this and expose it. Petitioner swears I repeatedly stressed these true facts to her. I need her withheld trial counsel trial notes file to prove my repeated instructions, including my fundamental objective of proving actual innocence, which she ignored, violating McCOY v. LOUISIANA 138 S.Ct. 1500 (2018).

Also crucially, all this will be proven true, including that McGhee never saw the boat nor, to a 99% confidence level, was a Bank Agent, by the withheld BRADY material in the SA CR 93-67(B)(GLT) case file and Maryland Bank file.

RT 6762/6792 and DA trial Exhibits from the Bank file prove the DA has it.^B

A) SEE PAGE 7 #13, FOLLOWING FOR DEFENSE COUNSEL DEFRAUDING THE COURT BY LYING THERE WAS EVIDENCE PROVING PETITIONER WAS IN GUATEMALA FOR A PHONY 1991 BOAT REPO.

B) In Exh. 305 @ cp 668, also bp 026874 @ cp 670. RT 6750 is @ cp 671. C) Cp 695.

NEW.PROOF.GOODWIN.IS.ACTUALLY.INNOCENT/WAS.ININTENTIONALLY.FRAME.D.IN.A.RICO.CONSPIRACY.

I FIND NO EVIDENTIARY SUPPORT FOR ANY CLAIMS BELOW AND EVIDENCE PROVES ALL FALSE.^A <
 - 90% of evidence proving these false is in bates stamped DA discovery-other withheld -

2. "THE ONLY REASON MICHAEL FRANK GOODWIN IS SITTING IN THAT CHAIR RIGHT NOW. THE ONLY REASON HE'S BACK SITTING IN THAT CHAIR RIGHT NOW. THE ONLY REASON HE'S BACK IN THIS COUNTRY IS BECAUSE FRANK MICHAEL MCGHEE REPOSSESSED HIS HOME AND TRANSPORTATION AND MICHAEL GOODWIN WAS LEFT STANDING BAREFOOT ON SOME DOCK SOMEWHERE ON THE RIO DULCE RIVER IN GUATEMALA WITH NO HOME AND NO TRANSPORTATION!" RT 8784:27-8785, prosecutor Alan Jackson close, cp 630-1. C <

There are 3 related but separate false claims there, none of which have any supporting evidence Petitioner can find. They are, 1) McGhee repossessed the boat, 2) the only reason Goodwin is back in the Country is because of that, and 3) Goodwin was left in Guatemala with no home or transportation. Because the McGhee repo did not occur, proven supra and infra, #1 and 3 cannot be true-have no support.

#2, "ONLY REASON GOODWIN IS BACK;" cannot be true since the Guatemala repo did not occur, plus infra I include evidence proving I was in the Country solid from spring, 1990 until my 12.13.01 arrest except for a few weeks of vacations.^B <

3. "DISAPPEARS"... "DISAPPEARED UNTIL THEY REPOSSESSED THE BOAT IN GUATEMALA!"... "DISAPPEAR!"... "DISAPPEARED!" Dixon RT 9027/4 disappears, cp 633. C <

4. Dixon embellished these lies by also stating, "AND, LADIES AND GENTLEMEN, THAT'S WHAT HAPPENED. WE NEXT HEAR FROM HIM IN 1991 ACCORDING TO THE STIPULATION!" C <

The stipulation, Exh. 309, cp 691 says nothing like that and DA bates stamp discovery has 100s of pages of official evidence proving Goodwin was known of-seen in the U.S. often during 1988-1989-1990 and on, e.g. cp 10, Exhs. 317-325, more.

The DA has and hid much more evidence proving I didn't flee, Exh. 324 cp 845, but for here-now back to DA claims re boat repo with no support evidence-false.

5. "FRANK MICHAEL MCGHEE REPOSSESSED THE BOAT IN--WHENEVER IT WAS!" RT 6482:4, DDA Alan Jackson, Exh. 301 cp 634.. C <

6. "THEN THE DEFENDANT GOT ON THAT BOAT AND FLED THE COUNTRY FOR THE BETTER PART OF TWO YEARS!" RT 20:22, Exh. 301 cp 634A. C <

These and more all source from the Exh. 301 cp 620+ false offer-of-proof and:

7. "BETWEEN MAY 11th AND 13th GOODWIN SAILED AWAY ON A \$400,000 YACHT!" RT 2741:17 AND :22, Jackson opening statement, proven false at cp 10. C <

DDAs wilfully gave the Jury the false impression that Goodwin then went to Guatemala.

A) Evidence proves Saris had this evidence available to win but didn't investigate.
 B) E.g. to-from Ireland with my Dad just weeks pre-arrest. C) I stress-no evidence.
 - CITES RE 16+ FALSE DA CLAIMS WITHOUT SUPPORTING EVIDENCE JUST RE CLAIMS II-III -
 (herein cp 2-14)

PER SCOTUS, IF NO EVIDENCE SUPPORTS A CLAIM IT MUST BE STRICKEN WHETHER PROVEN FALSE OR NOT. SO HERE ARE MORE NO SUPPORTING EVIDENCE BOAT REPO AND FLED CLAIMS.

I cannot prove a negative, e.g. no evidence supports these, so the DA must supply the proof that evidence is on the record supporting these claims. I won't prove them false here since that is not necessary to require striking them.

In the root-foundation to the fraud Exh. 301, RT 6901-7 offer-of-proof:

8. "THERE'S A QUOTE IN THE STIPULATION FROM THE DEFENDANT THAT APPEARS IN THE REPORT. AND, IN FACT, DETECTIVE LILLIENFELD AND DEPUTY D.A. JACKSON WERE THERE WHEN THE QUOTE WAS GIVEN" RT 6902:10, CP 623.

Petitioner swears he has never met with Lillienfeld and Jackson together so it is impossible there is evidence supporting this prejudicial claim. It makes it appear that I agree with all the bogus claims in the offer-of-proof, in addition to the false stipulation that my lawyer lied to me to agree to.

[The main false quote with no evidence in the proof offer is 3 pages prior.]

- Also, 9. "...I THINK IT'S CLEAR FROM THE EVIDENCE, YOUR HONOR, IS THAT THE DEFENDANT GOT OUT OF TOWN AS SOON AS HE COULD..." RT 6905:7, CP 626.

10. "AND HE ESCAPED...AND HE WENT TO THE CARIBBEAN AND THE COAST OF SOUTH AMERICA WHERE IT WOULD BE VERY DIFFICULT TO FIND ANYONE, AND THIS WAS HIS ESCAPE" RT 6905:14-18, CP 626.

Stunningly my lawyer agrees although NO evidence supports it/evidence impeaches:

11. "BUT THAT'S BEEN ESTABLISHED" By Saris, RT 6905:20, cp 626, more footnote. A < Note @ cp 626 line 24 Dixon suggests that Saris cross examine Lillienfeld on this, with which Exh. 302, cp 635, she could have proven it false. She didn't do it.

Without spelling it out, no evidence was offered to support the RT 6906 excuse for McGhee not being able to testify. Evidence proves the excuse false.

Underscoring the absurdity of all this see Dixon's RT 6907:4/cp 628 claim:

"WE THINK THAT WE'VE PRETTY MUCH PRESENTED A SEAMLESS CASE AND HAVEN'T WASTED ANY OF THE COURT'S TIME..."

Yes, now that I have more evidence back SEAMLESS PROOF OF A DA RICO CONSPIRACY.

Cinching prosecutors' criminal intent to maliciously-wrongfully convict by introducing wilful false evidence with no supporting evidence see cp 10-11 re:

12. "THE LAST TIME ANYBODY SAW HIM WAS OUT OF SOUTH CAROLINA"...(WHEN HE..) "SAILED AWAY IN MAY 1988, RT 2741, cp 633, also false/no evidence support)
 + A) More throwing the case from lack of investigation, p. 7 #13/p. 13 #18/p. 14 #19-21. These in addition to her having evidence proving all 16 DA claims false, blowing it.

Evidence proving several incontrovertible facts prove McGhee never saw the boat.

Before offering enough of that proof to prove he did not see the boat I swear that there are far more claims in Mr. McGhee's statement proving that he A) absolutely did not occur, there is no a hint supporting that they occurred, and B) Petitioner is aware of facts which absolutely confirm to him that McGhee had to be told what to say on more than half a dozen absurd false claims.^A

However, since investigation and interviewing McGhee and others re how he-they came up with many frankly crazy claims is necessary for proof, I will hold those claims except these comments. E.g. @ Exh. 307, cp 681 my ex-wife confirmed she never spoke with McGhee, so didn't tell him all those fantasies McGhee=lied that Diane (my ex-wife) told him, bp 100079 & 100084 cp 644 and 649.

I know, but without investigation, which my defense counsel Elena Saris, should have done, I don't know how to conclusively prove, that prosecution team agents had to tell McGhee much of what he said, and they blew some issues,^B e.g....

- Note at bp 100071 that McGhee said the boat has two masts, cp 636/Exh. 302.

See the DA trial Exhibits photos at cps 660+ in Exhibit 304 obviously proving the boat had just one mast. It is impossible that a boat Captain who was contracted to repossesses a boat with one mast, and then sailed her 1000± miles from Guatemala to the U.S., as the DDAs claimed, made that mistake.

- Also on bp 100071 McGhee used the name "Scalawag"^C in stating that the bank had asked him to find a boat with that name. The name the bank had is "Believe"^E and that is what McGhee would have been asked to find, had the bank truly used him, which the bank file/more evidence proves they did not.

Exhibit 308 cp 685+ are official Maryland Bank file DA trial Exhibits re the "Believe" bank loan. Although the copies are not 100% clear you can see they say "Believe", not Scalawag. This can prove the prosecution told him what to say. I'll hold that to first see how they address this fraud-lie.

- There are other telltales, fatal to McGhee seeing the boat. I'll hold for now.
- A) When these are proven as "fed" to McGhee they further prove prosecutor crimes.
- B) E.g. they overlooked or couldn't get him to lie to the alleged repossession.
- C) Exh. 302, cp 636-637.

My advocate had proof to destroy this DA claim, yet instead ARGUED FOR THE LIE, cp

Saris had all this evidence and more available, incontrovertibly proving McGhee did not repossess the boat anytime-anywhere, did not say he had done it, that I was in Colorado in 1990-93, not in Guatemala in 1991, that I did not flee, was easy to find in the U.S. during 1988-89^A-90-91+, but didn't investigate-claimed, <

13. "THE ONLY EVIDENCE IS THAT HE WAS OUT OF THE COUNTRY FOR 3 MONTHS IN 1991 WHEN SOMEONE WAS TRYING TO REPOSSESS HIS BOAT!" RT 8824, Exh. 310.

There are three false claims by Saris there, all 3 material based on the prosecution arguing them in their close, see KYLES v. WHITLEY 514 U.S. 419, 444.

1. As per Exhibit 302 here, McGhee's statement, bp 100071, which is the only so called "evidence" offered to support the alleged 1991 Guatemala repo, there is no evidence anyone was trying to repossess the boat in Guatemala in 1991. ^B <

We now know that alleged repossession was false, impossible, a DDA CRIME.

2. Evidence Saris had but kept from the Jury, most of it in bates stamped DA official discovery (cites primarily Section III also thruout, e.g. many cp 9+)

A) proves Goodwin was in the U.S. beginning in Spring 1990 thru 1991 and on, after bringing the boat to the U.S. before August 1990, Exh. 303 cp 656+, and

B) The only claimed evidence I find supporting Saris' claim above that Petitioner was in Guatemala for any time, although nothing mentions 3 months or any time period, is a passage in the stipulation, Exh. 301, cp 634+, allegedly from McGhee, that evidence proves impossible from numerous facts-perspectives.

It is: "MR. MCGHEE WOULD TESTIFY (speaking of "around May, 1991," cp 634) 14. in the stip) THAT AFTER WEEKS OF SEARCHING, HE LOCATED THE YACHT AND MICHAEL GOODWIN ON THE RIO DULCE RIVER IN GUATEMALA, AT WHICH TIME HE REPOSSESSED THE YACHT IN THE NAME OF MARYLAND NATIONAL BANK!" [Cp 6 & Exh. 303 cp 656-7 cinch as impossible]

There are two related impossibilities there which make the claim that he located the yacht and Goodwin in May, 1991± impossible. The boat could not have been there since the Bank got it in 1990, and McGhee couldn't repo it in 1991

since the bank already had the boat in the U.S. Thus "yacht & Goodwin", impossible. ^C <

- A) E.g. the DA has Diane's American Express files, bp 007626, where \$50,000+ was spent on the boat while we lived on her for 8 months of 1989 in FLA, withheld.
- B) Since the bank got her in 1990/case SA CR 93-67(B)(GLT/bp 032116b/028312-28.
- C) Saris 3rd false claim above is HIS BOAT, parroting the false DA claim that Mike illegally bought the boat while in Bankruptcy. The Federal Order proves that false.

LEAD DETECTIVE LILLIENFELD SWORE GOODWIN TOOK THE BOAT FROM GUATEMALA IN 1990.

- Dixon even suggested that Saris impeach via det. Lillienfeld, cp 626:24. She didn't -

See Exhibit 303 cp 656-7, bp 025220-1, also sworn to @ bp 025332-3.

The Exh. cover cp 655 clearly explains how this is clearly proven, but to be clear.

1. Cp 656 line 19 affirms Mike and Diane were officially separated in Texas on July 25, 1990. Cp 657 swears Mike took the boat from Guatemala before that.
2. Cp 657:9-13 explains that after a disagreement between Diane and Mike, Mike sailed the boat away from Guatemala. It then goes on to swear that after that, a Ron Ridgeway helped Diane return to the U.S. and to Texas where the Goodwins' divorce was ultimately obtained. The August 1990 Texas divorce is also confirmed at bps 031948-53 and 028237-45 per my notes.
3. Merely comparing the "Mike sailed the boat from Guatemala" on cp 657 before Ridgeway brought Diane back to the States where she was later separated, 7.25.90, cp 656:19 (and later divorced, still in 1990) confirms Mike took the boat from Guatemala in 1990, the year before McGhee claimed to repo her.
4. Bps 028312-28, the FBI report used by prosecution team lawyers to prove Mike gave the boat to the bank in 1990, in SA CR 93-67(B)(GLT), 032116b, the witness statement from Nelson's boatyard, affirming the 1990 Mike turnover to the true bank agent, Wayne Vann, 032256, (similar per my notes) also confirms that the McGhee repo in 1991 is impossible, a contrived LADA conspiracy to maliciously wrongfully convict, a harbinger of the full RICO Conspiracy felony.
5. Ridgeway was Diane's new boyfriend. When I returned from the U.S.^A once early and unexpectedly I found a written assignment from Diane turning the use of her (contrary to DA baseless claims she bought and owned the boat with what the Federal Court determined-ruled, habeas Exh. 3, cp 289, to be later included in my full actual innocence brief at Exh. cp were her separate funds) boat to Ridgeway. So I sailed it away, a surprised, spurned husband. My brother Marc assisted, cp 681, and gave a statement, withheld, as is Ridgeway's BRADY statement, referenced by Lillienfeld at cp 657, cp 025221, also 025333.

A) My taken by authorities passport, e.g. bp 032860, withheld, proves I was in/out of the U.S. many times in 1988-89-90-91, as do the Customs-Immigration files. They "assisted the investigation," RT 7632. As such their BRADY materials are required. Anyone would know if fleeing not to come thru Customs-Immigration. I didn't flee.

Exhibit 306, cp 675 is a 3rd party declaration from an Aspen, CO. business owner which confirms Petitioner stayed with him in the fall-winter of 1990-91, and that even when I wasn't necessarily staying in his guest cottage he would frequently see me skiing and/or ski with me^A. He also confirmed my DUI which det. < Lillienfeld, cp 656-7 was discussed with him including my 1991 Court appearances.

Further, he confirmed speaking with me (by telephone) when I was alternately living at my family 40 acre ranch in Westcliffe, CO. which I had told him about.

Finally he commented that he was comfortable enough as a 40 year friend that had I been "living on" (commuting to/from?) a boat out of the country he would have learned about it. He did not. I gave the boat to the bank agent in '90.

Cp 677 is a 3rd party confirmation of me living at the Westcliffe address.

Cp 678+ from Colorado police is a further confirmation of my 12.31.90 DUI arrest from which I repeatedly appeared in Court in Glenwood Springs, CO, about 40 miles North of Aspen, until that case was resolved 10.29.91 with a lesser charge. Note authorities got the reports on that case which include the BRADY material proving I was A) living in Colorado during 1990-91, not hiding on a boat in Guatemala, which again has no supporting evidence I can find. And, that B) I was so often in Court during 1991 that I couldn't have been in Guatemala.

Back to Exh. 303, cp 656:21 thru 657 line 2,^B Lillienfeld swore to: <

"IN SEPTEMBER 1997 YOUR AFFIANT OBTAINED REPORTS FROM THE ASPEN, COLORADO POLICE DEPARTMENT. THESE REPORTS INDICATE THAT ON DECEMBER 31, 1990, MICHAEL GOODWIN WAS ARRESTED FOR DRIVING UNDER THE INFLUENCE BY THE ASPEN, COLORADO POLICE DEPARTMENT. HE WAS CONVICTED OF THIS OFFENSE ON OCTOBER 29, 1991, FINED, AND PLACED ON PROBATION!" [This also impeaches the 1991 Guatemala boat repossession]

How can the DA deny being aware of this proof I was not in Guatemala for the non-existent, no supporting evidence 1991 McGhee boat repossession? And, how can defense counsel Saris justify not using the DUI arrest and/or the Lillienfeld sworn statement, which Ridgeway could have confirmed, that I brought the boat from

Guatemala in 1990, cp 656-7, Exh. 303, to prove this DA fraud was wilfully false?

- A) I had an annual Aspen Ski pass which would have "registered" the 50+ days I skied had there not been 8+ years of unjustified delay in charging, also AMEX records proved I was in CO. for Summer 1990 thru 1991. But again the delay lost my records.
 B) Cp 657-8/cp 025221-2 also proves DDA Dixon lied that Moreau wasn't found until 2001.

III. 3rd MAJOR DA CLAIM, "HE FLED FOR YEARS;" needed to "sell" the false boat repo.

An objective analysis needs no more proof the 1991 Guatemala boat repo is false.

However, because the incontrovertible evidence is that past LADA regimes' prosecutors used so many outright crimes-frauds-deceptions-withholding of BRADY^A material, e.g. 21 lies/6 deceptions on RT 8783^B-5, Exh. 330 cp to perpetrate this conviction, I offer a bit more. I also hold aside even more if later needed.

For example, there are absolute, undeniable mutually exclusive prosecution repeated on-the-record claims that make clear McGhee statement claims impossible. E.g., prosecutors claimed Goodwin "sailed away" from South Carolina in mid-May, 1988, cp 633 here, to disappear for years (3 years RT 9027, cp 632, 2 years RT 20), only to be caught-put on trial when McGhee allegedly seized the boat in Guatemala in May, 1991, RT 8784-5, via an offer-of-proof, Exh. 301 cp 620+ Jackson claimed:

15. "THE LAST TIME ANYBODY SAW HIM WAS OUT OF SOUTH CAROLINA AFTER HE HAD HAD THE BOAT REFURBISHED --..." RT 8784:14, Exh. 301, cp 630.

There again is no evidentiary support for that on the record, or otherwise Petitioner can find, just like there is no evidence supporting "HE SAILED AWAY IN MID-MAY, 1988" Jackson opening statement, RT 2741, cp 633 and 633A-key comments.

The LADA shows no supporting evidence for the 2741 "HE SAILED AWAY" claim, more materially, evidence is irrefutable that Jackson knew that and his RT 8784 closing argument above was false, + are all his RT 8783-5-cp 629-631 flee and 1991 Guatemala boat repossession claims. They're a multi-layered, complex fraud.

To verify the depth of the Jackson-Dixon frauds-on-the-Courts re boat repo and "HE FLED, DISAPPEARING FOR YEARS UNTIL THE 1991 GUATEMALA BOAT REPO" I ask you to objectively read at least RT 6901-7, 8783-85, 9027, 2741, 20 @ cp 621-633B.

Verify defense counsel's complicity in this at RT 8824 and 8844, cps 695+, very prejudicial whether it was simply negligent or stunningly, malicious.

Segwaying into the related "HE FLED" DA also false claim, no evidentiary support I see, we prove how much evidence prosecutors had proving I did not flee.

A) Detailed in Exh. 322 cp 830, (just retrieved) will be proof of 100+ pages of withheld exculpatory evidence the DA has proving they wilfully lied re boat repo/fled.

B) A PRIME MICROCOSM OF THE DA RICO CONSPIRACY TO WRONGFULLY CONVICT, E.G. INCLUDING UNTRUTHS ON 6 AREAS OF GUILT CLAIMS AND 15 UNTRUTHS WITH NO EVIDENTIARY SUPPORT.

Reflect on-consider what prosecutor Alan Jackson's state-of-mind and intent was to make the following closing arguments and representations to the Jury & Judge.

With 100s of pages of evidence he & Dixon had cited/included conclusively proving Goodwin did not flee, was regularly and highly visible in the U.S. in 1988-1989-1990 and on, and that no evidence was presented that I can find proving Petitioner fled, what could Jackson have been thinking to make these claims?

See prior page, "THE LAST TIME ANYBODY SAW HIM WAS OUT OF SOUTH CAROLINA!" #15. RT 8784:14, cp 630. Jackson was clearly referencing his opening statement,

"BETWEEN MAY 13 AND 15 GOODWIN SAILED AWAY ON A \$400,000 YACHT!" (#7) RT 2741:17 and :22 at cp 633. He referenced from South Carolina.

16, then unsupported says, "SOMEBODY WAVING TO HIM OFFSHORE!" RT 8784:17, cp 630.

Then the nexus of the McGhee false repossession fraud, he says

"AND WHERE DOES HE GO?" RT 8784:18, cp 630. (Question, so no #)

At this point I suggest you jump to cp 630 in Exh. 301 where Jackson's closing argument, for which there is NO-ZERO evidentiary support, goes on to describe a fantasy, criminally fabricated by Jackson-Dixon-Lillienfeld claim that McGhee repossessed the boat in Guatemala in 1991 leaving Goodwin stranded on some dock with no home and no transportation. If you have evidence show it.

It is already proven with undeniable evidence that the McGhee Guatemala '91 (or any McGhee repo) did not occur. So now we focus on the extensive knowledge Jackson and Dixon are presumed, per law to have from evidence in their files that I did not flee, that I met with LASD and offered to do so again, but was denied, and that I was mostly in the U.S. in 1988-1989-1990 and onward, next pages.

First we dismantle Jackson's claims above re "...SAILING AWAY IN MID-MAY 1988" ostensibly to Guatemala to hide on a boat, disappearing for 3 years. No one testified to anything like that and no evidence even suggested anything like it.

DDAs introduced true testimony that Goodwin/the boat "GOT UNDERWAY" from

Darby Marine, RT 3060:17, correction re nomenclature^A, in early August, 1988.^B <

- A) Perhaps minor, but correcting Jackson from misleading "PUT TO SEA!"
 B) "ARRIVED MARINA," June 27, RT 3062:7, "THERE 6 WEEKS," RT 3054:4, "SPOKE WITH UTSEY (on-stand witness) TO EXPEDITE WORK AUGUST 2-3," RT 3059:18, 3064:14. Obviously boat-Petitioner left after that, 3± months after Jackson's 5.15.88 claim, cp 633.

Proof that ex-DDAs Jackson-Dixon wilfully conspired to criminally defraud the Courts^A mounts below where they "reverse-engineered" the phantom McGhee 1991 Guatemala boat repossession which is core in the conviction.

The sole testimony re when the Goodwins-the boat may have left the U.S. or even the state of South Carolina simply says nothing about their direction when they "WENT UNDERWAY" in early August, 1988, nor could this witness or any witness at Darby Marine have seen which direction they went, North, South, West or East, offshore or not, only that they went down Shem Creek from the Marina.

As per Exh. 314, cp 785+, maps of Charleston Harbor, into which Shem Creek, on which Darby Marine was located, perhaps 1/2 mile up the creek from the outlet into the Harbor, Petitioner's sworn to notation re approximately where Darby was on Shem Creek one could not see the miles away ocean outlet.

It appears, per law, that since no evidence was introduced to support the Jackson claim, cp 633, that we "SAILED AWAY", ostensibly per cps 629-30-31-32, RT 8783-84-85 and 9027, closing arguments, right away to Guatemala, that that claim must be stricken without any proof it is false. Nonetheless I'll add...

In the DVDs onto which evidence I accumulated, but haven't otherwise seen since my arrest 20+ years ago, and were scanned onto the DVDs, but the prison has refused to print from them is evidence we did not go to sea from Darby, but were in another S. Carolina harbor on 8.18.88. That is on Disc #3, file # 22930308, dated 7.7.96, p. 196, from the SA CR 93-67(B)(GLT) sentencing Exhs.

As per Exh. 305 cp 665 the DA has this case file in which prosecution team prosecutors proved Goodwin left the boat to the true bank agent, Wayne Vann, in the U.S. in 1990. That disc also has what appears to be 100± pages of receipts proving the Goodwins lived in Florida for most of 1989.^B

And Exh. 320 cp 820 shows the Goodwins/the boat were in Ft. Lauderdale just 3 weeks later in September, 1988, bp 026470. Law rules Jackson knew this.

With absolutely NO evidence supporting him, and legions of evidence law rules he is aware of proving Goodwin in the U.S. in 1988-89-90+ Jackson lied:

A) Trial. Appeal, CA. Supreme and U.S. District Courts have seen these claims.
 B) Petitioner has identified extensive exculpatory evidence on most DA claims, available nowhere else, on DVDS.

17A. "WE DON'T HAVE CONCOMITANT EVIDENCE OR CONVERSE EVIDENCE THAT THE DEFENDANT WAS DOING SOMETHING ELSE AND WE NEED THAT!" RT 8438:19, [The "something else" other than the DA claim "FLEEING"]

And, 17B. "...THERE HAS TO BE SPECIFIC EVIDENCE THAT HE WAS DOING SOMETHING OTHER THAN FLEEING. AND THERE JUST ISN'T ANY!" Same page, line 26, both of these in Exh. 325, cp 853.

17C. "...AS TO WHY HE LEFT THE COUNTRY AT THE TIME!" RT 8437:6, Dixon, cp 852.

But again, where is any evidence Goodwin-the boat were out of the Country on-the-record, as required for a "FLED AS CONCIIOUSNESS OF GUILT" instruction, in addition to "A PURPOSE TO AVOID BEING OBSERVED OR ARRESTED,"^A which law requires? And where is the evidence offsetting Goodwin being in the U.S. for most of 1988-1989-1990 and onward?^B I swear I find nothing, not a whiff.

Based upon evidence I've accumulated-retrieved proving all of the 12 DA claims allegedly supporting guilt are false, the 1st three of which are seen up to here and onward,^C I expect these prosecutors to lie-perjure-defraud at-will.^D

However, my attorney Elena Saris had a duty to advocate for me, to investigate and to adversarially test each element of the prosecution case. She did not.

Re the boat repossession & claims that Goodwin fled Saris repeatedly lied in agreement with the DA claims, e.g. below, although she had all the evidence here, and much more which proves the DA claims false and her statements false.

Some of these support later false DA claims, e.g. #IV-V, that Goodwin allegedly did not pay Mickey's judgment (which DDAs argued as "GOODWIN KILLED TO AVOID PAYING," proven false infra) and that he committed 14 Bankruptcy (BKY) frauds, stealing-looting \$580,000 to avoid paying/Exh. 332-334 prove them false.

Examples of Saris false claims she would have avoided by investigation:

18. "HIDING HIS MONEY FROM A BANKRUPTCY ESTATE. GETTING OUT OF DODGE FOR THE PEOPLE THAT WERE COMING AFTER HIS ASSETS!" RT 8436:27+

Re the 1st sentence there, the Federal Order in Exh. 334 that the habeas Judge rules is BRADY material and shows IAC (Saris ineffectiveness), Exh. 335, proves it false. Nothing I can find on-the-record supports the 2nd sentence, and

- A) People v. JURADO (2005) 38 Cal. 4th 72, , 41 Cal. Rptr. 3d 319, 362.
- B) Some cited supra, Exhs. 312-329, many listed re evidence Saris had, cp 15+.
- C) Proof all DA claims are false will be filed in my full actual innocence brief.
- D) Evidence here/investigation shows all my assets were correctly in Bankruptcy.

evidence which easy investigation would have found proves Petitioner had no need to "GET OUT OF DODGE" to protect his assets since all of his assets were correctly filed in the Bankruptcy (BKY) as required by BKY law, no exceptions:

Again, all this will be conclusively proven in sections #IV and V.

And Saris's lack of investigation, lack of preparation, lack of knowledge of law crucial to the understanding of the case further exacerbated prejudice.^A

E.g. 19. "YOU CAN CONVERT YOUR ASSETS TO GOLD BECAUSE YOU WANT TO PAY OFF A HIT MAN WITHOUT A TRAIL^B OR YOU CAN CONVERT YOUR ASSETS TO GOLD BECAUSE YOU DON'T WANT THEM GOING INTO A BANKRUPTCY ESTATE!" RT 8437:18-22, Exhibit 325, cp 852.

Note the prejudice created-agreed to there when Saris offers and/or agrees to a scheme which includes the possibility of a hit man. I do not recall-cannot find the DA initially proposing this scheme. It appears Saris hatched it.

Just as bad if not worse is that there was no reason for this discussion at all since the Exh. 334 Federal Order rules that none of the assets the LADA were claiming Petitioner had hidden/fraudulently transferred/converted to gold, any of those things were done to. And, should the DA try to claim the \$527,000 home sale funds they claimed the Goodwins had taken is proven untrue in Exh. 300.

Similarly to the above Saris continues to exacerbate the prejudice with more false statements resulting from lack of investigation-knowledge of law,

e.g. 20. "THE FACT THAT HE MAY HAVE LEFT THE COUNTRY HAS BEEN VERY TANGENTIALLY PROVED!" RT 8437:24. [I see no evidence of that, none]

"WE HAVE HIM IN FLORIDA IN THE LATER MONTHS OF 1988!" RT 8437:25.^C [But Saris showed the Jury none of this and much more no fled evidence]

And, 21. "HE BOUGHT A BOAT THAT WE HAVE FROM MIKE MCGHEE THAT HE WAS TRYING TO HIDE FROM THE PEOPLE WHO WERE TRYING TO REPOSSESS IT. THAT WAS A STIPULATION THAT WE MADE, THAT THEY SPENT THREE WEEKS. SO HE'S FLEEING FROM HIS CREDITORS. AND I THINK THAT HAS BEEN MADE VERY CLEAR!" RT 8438 :3-8, exhibit 325, cp 853.

As proven here in Exh. 302 vs. 301 and others through Exh. 310 (311 later) the entire McGhee claim was false. And again I find nothing to support the fourth and 5th lines there, "HE'S FLEEING FROM HIS CREDITORS, THAT....IS CLEAR!" & FALSE.

A) Violating U.S. v. CRONIC (1984) 466 U.S. 648, HINTON v. ALABAMA (2014) 571 U.S. 263, 274, McCOY v. LOUISIANA (2018) 138 S. Ct. 1500, STRICKLAND v. WASHINGTON, more.
 B) Playing right to DA false claim #VI. C) Exhs. 317-325 prove Goodwin in U.S. '88-'91.

As per the introduction to this section re boat repossession in 1991 in Guatemala. and Goodwin fled in May, 1988, hiding-escaping for years, I've plead 21 material claims on these subjects for which I find no supporting evidence.

16 of those are by prosecutors and 5 by defense counsel Elena Saris, several of them overlapping. There are actually more than 21, but I did not parse them all, e.g. #17A-B-C could be separate, and some I did not number.

More materially may be that all of them are proven completely false by evidence prosecutors had, and with which law "PRESUMES THEY HAVE KNOWLEDGE,"^A and that they kept from the Jury. Defense counsel was complicit in allowing the fraud.

Re # 18-19 and portions of #21 where defense counsel Elena Saris falsely argued, with no supporting evidence, the core DA Case-in-Chief that Petitioner had to hide from his creditors because he had improperly hidden-transferred his assets that ostensibly should have been in the Bankruptcy (BKY) estate, this...

Petitioner recognizes, in 1000s of hours working on this case and prior to that the interlinked BKYS, for 36 years now, no claims in the murder trial of him allegedly transferring-hiding or otherwise improperly manipulating any assets that were purported to belong to his personal BKY estate except the following.

The \$527,000 in home sale funds which DA trial Exhibit 99 in Exh. 300 here proves was an intentional DA fraud including incontrovertible evidence of DA expert Kingdon material perjury suborned materially by ex-DDA Alan Jackson.

Also proven in Exh. 300 is that ex-DDA Pat Dixon lied materially that the home sale \$527,000 went to Mike Goodwin, it appears a Govt. Code § 3108 felony.

The only other personal BKY estate claimed assets claimed as misused are the 14 Counts listed in DA trial Exhibit 101 re the \$580,000 Diane Goodwin got in May 1988 from JGA/Whitehawk and Desert Investors. Prosecution murder trial claims on those, very prejudicial, Exhibit 336 cp , the Jury foreman's post-trial declaration, are all proven false in Section V herein, with Exhibits 331-336.

If Saris or the DA claim other Goodwin personal Bankruptcy case assets are cited at the murder trial as misused, give cites and I will prove them false.
A) E.g. U.S. v. AGURS 427 U.S. 97, 110 (1976)/in re BROWN (1998) 17 C4th 873, 879.

CITES, TIMELINE OF EVIDENCE PROVING GOODWIN WAS IN THE U.S. IN 1988-1989-1990-1991 VS. DA CLAIMS "HE SAILED FROM S. CAROLINA IN MAY '88, DISAPPEARED UNTIL '91!"

- Some items help for me to get DA discovery to complete this. Endnotes material¹ <
- 1988, cps 629-634, Exh. 301 for DA claims Petitioner fled in '88...disappeared, vs: <
- Exh. 312, cp 775, Goodwin/his lawyer met with investigators 3.26.88±^A, 2 <
- Exh. 313, cp 780, passport and documents confirming Goodwins in CA. May 12, 1988. <
- Note in passport 12.18.88 Goodwin coming thru Customs and Immigration,³ also <
- confirmed in bps 032860/034320. Asked to meet LASD. They said no/Exh. 325 cp 854+. <
- Credit card file, bp 032110-2, driving CA. to FLA. May, '88, no attempt to hide. <
- 5.20.88 arrived at boat Jacksonville, FLA. bp 000302/036984:9 dupe/Exh. 316 cp 796. <
- Phone on boat, bp 025388, 200+ calls friends-family-associates, easy to trace. <
- 6.15.88 left Jacksonville, up coast to S. Carolina, bp 000302:10, Exh. 316 cp 796. <
- 6.28.88⁵ arrived Darby Marine, Charleston S.Carolina for 6+ weeks/Exh. 316 cp 796. <
- July-August 1988, BRADY material I got post-trial/Exh. 315 cp 790-us in S. Carolina.⁶ <
- 8.1.88± Goodwins available in S. Carolina-signed re home sale, Exh. 317 cp 801. <
- Evidence on DVD prison won't print from proves us in S. Carolina, 8.18.88⁷ <
- 8.27.88 letter dated to my lawyer, "TOLD OK TO TRAVEL..TOLD LASD BOAT", Exh. 318.⁸ <
- 8.11.88 left Darby Marine, Charleston, Exh. 316 cp 796:17, also confirmed else⁹ <
- where. Left for here since those above prove did not "GO TO SEA" from Darby.^B <
- DEA/Customs-Immigration boarded us a week+ after we left Darby Marine, near <
- McClellanville (sp), North of Charleston. They "Assisted Investigation", RT 7632.¹⁰ <
- Thus this BRADY material and that re a search off Pensacola in 1990¹¹-discoverable. <
- 9.19.88, bp 026470, us-boat in Ft. Lauderdale Exh. 320 cp 821/Customs-Immigration. <
- 10.13.88, bp 0024565, call to opposition in Bankruptcy lawyer-EZ to trace. <
- Exh. 319 cp 810+, advised arch enemy Mickey lawyer D. Cordell, will be in FLA. <
- 12.18.88, thru FLA. Customs-Immigration Exh. 313 cp 782, How-Why if hiding? <
- 12.21.88, 1.4 hour EZ to trace phone conf. with Bankruptcy trustee lawyer/Exh. 321. <
- Exh. 322 cp 830+, 100+ evidence pp. in DA discovery us in U.S. 1988-1989-1990. <

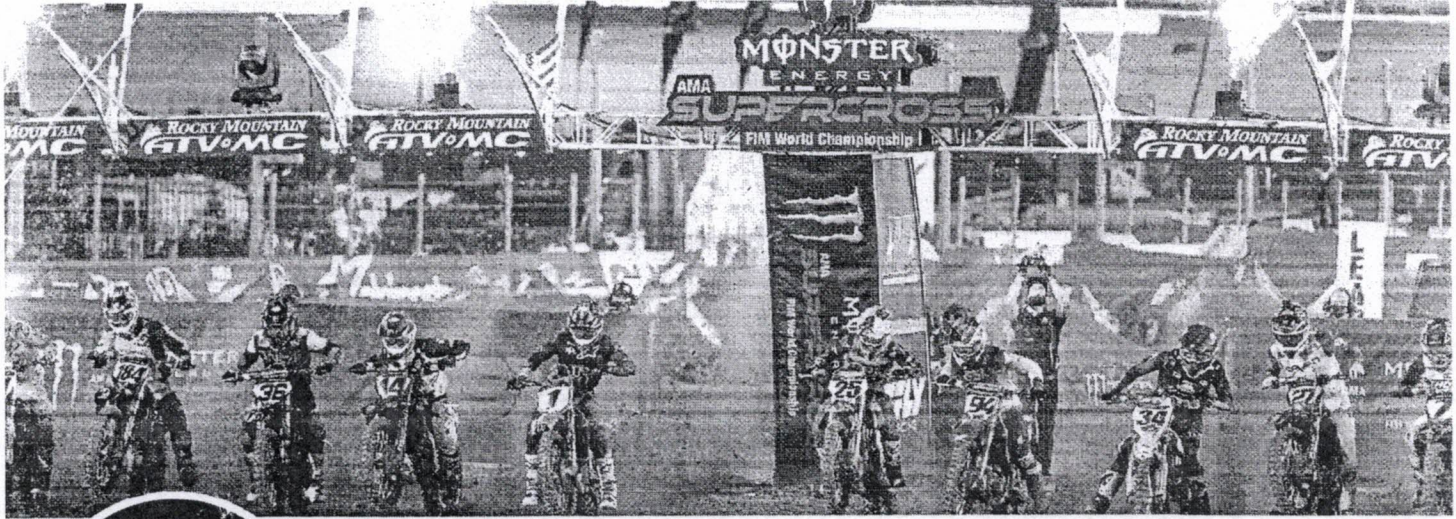
PLEASE, WHAT IS THE EVIDENCE THE DA-COURT-MY LAWYER SAID SUPPORT "HE FLED-HID!"^C <

A) Note he was told he was just a witness/because of that OK to travel, Exh. 318. <

DDA Dixon lied re this @ 3.1.07 hrng. to defeat Delay/Due Process Mtn. cp <

B) Per Jackson lie RT 2741, cp 633 Exh. 301, root of DA fled-boat repo fraud. <

C) Law requires "A PURPOSE TO AVOID OBSERVATION" for a fled instruction/where is it? <



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EXHIBIT LIST, PROOF MICHAEL GOODWIN IS ACTUALLY INNOCENT OF THE MICKEY THOMPSON MURDERS-WILFULLY FRAMED BY DA CONSTITUTIONAL LAW VIOLATIONS ON ALL CLAIMS RE GUILT.

- Evidence here proves the DA intentionally introduced material false evidence for all 12 claims needed to convict, each violating multiple U.S. Supreme Ct. rulings.

Exh. (cp#, consecutive page #, under) Description

- IT IS CRITICAL TO READ THE EXHIBIT COVERS CLOSELY, MORE FACTS & LAW -

- 300
605 Proof DDA Jackson suborned material perjury from DA financial expert Karen Kingdon that Diane Goodwin defrauded & took the (\$527,000) home sale funds. This material false evidence was argued by DDA Pat Dixon @ cp 608 They can't deny this wilfull perjury. DA trial Exh. 99, cp 609, proves it.
- 301
620 Intentionally false DDA Dixon offer-of-proof including 3 sub-perjuries/lies that a Mike McGhee repossessed a boat Goodwin "was hiding on for 3 years" in Guatemala, "that McGhee said that in his interview," Exh. 302/cp 635. Exh. 302 also includes more false DA claims, RT 8784-5, 9027, 6482 re the proven impossible below boat repo. The DA also witholds BRADY evidence re it.
- 302
635 The Mike McGhee witness statement DDA Dixon swore in his Exh. 301 offer-of-proof that McGhee said he had repossessed the Goodwin boat in Guatemala/1991. McGhee said nothing about repossessing/seizing the boat anywhere at anytime and admitted correctly that Goodwin kept her (boats are called her/she) at a Florida Marina, cp 641 and Goodwin was bringing her to FLA, cp 647. McGhee also "fumbled his lines" (evidence shows he was told much of what to say since he clearly never saw the boat.) At cp 636 he said the boat had two masts. Exh. 304, cp 660⁺, official DA photos-1 MAST. That is an absurd error that no one who sailed a boat 1000± mi/Guatemala to the U.S. as prosecutors falsely claimed, would make. He made other fatal to his credibility boat description errors I'll save for a hearing.
- 303
655 Sworn to pages of lead investigator Mark Lillienfeld's search affidavit, bp 025220-1 confirming that Goodwin brought the boat to the U.S. before he & his wife were separated in August 1990, making a 1991 repo impossible.
- 304
660 DA trial Exhibit boat photos (also more from official DA discovery) prove the boat has one mast, more official DA boat photos, withheld, bp 029834+. BRADY and DA bates stamped exculpatory evidence, withheld, cinches that DDAs (Deputy District Attorneys) conspired knowingly to defraud the Courts here. "Team prosecution lawyers" proved Goodwin gave the boat to the lending Bank in 1990 in Florida in prior litigation, SA CR 93-67(B)(GLT). Res Judicata, probably Judicial estoppel prohibited this false claim, file withheld. Bp 028312-28, FBI report, 032116b, 032256 and the withheld Bank file (DA has/RT 6762-6792)^H also proves a fraud.
- 305 Cp 665 proves the DA has the SA CR 93-67(B)(GLT) file/CT 1433/bp 000399/000427. A) RT 8824 added proving Saris betrayal/IAC violating CRONIC. B) In Exh. 305/cp 668.

Exhibit list, proof Goodwin is actually innocent, was wilfully framed, continued.

- 306 3rd party declaration that I spent fall-winter of 1990-91 in Aspen, and
675 Colorado state police report re my DUI arrest on 12.30.90. Det. Lillienfeld
also confirmed this and that he has the Aspen report on this. It will prove
I was in CO. Court so often in 1991 that I couldn't have been in Guatemala.
The CO. file also proves I lived full time in Colorado, spring 1990 into '93.
at the family Westcliffe ranch. See cp for affirmation re Westcliffe, CO.
- 307 Email from my ex-wife Diane that she did not know a Mike McGhee and thus did
680 not speak with him, impeaching his Exh. 302 cp 644 and 649.A
- 308 Official Bank file evidence McGhee would have gotten had he been contracted
685 to repossess the Goodwin boat. Note it says the boat name is Believe. McGhee
claimed the boat name he was hired to find-repo was Scalawag, cp 636-637.
- 309 The at-issue stultation stating McGhee repossessed the boat in Guatemala in
690 1991, including transcript where it was read to the Jury, RT 6988-89.
- 310 Defense counsel Elena Saris closing argument pages where she A) agreed to the
695 false DA claim that I was in Guatemala for the 1991 repossession although she
had all this evidence and more proving the bank got the boat from me in the
U.S. in 1990, RT 8824 cp 696, and B) how she was unprepared-contradicted her
8824 claim, at RT 8844 cp 697. This erodes her credibility with the Jury.
More Saris transcript pp. re IAC on other claims-issues to be added-briefed.
- 311 Saved for more proof the McGhee boat repo did not occur, e.g. Maryland bank
750 file, bps 028312-28±/032116b/032256, more, transcript parts of SA CR 93-67(B)(GLT)
where prosecution team lawyers proved Goodwin gave the boat to the bank in 1990. B <
- 312 LASD confirmation I met with detectives along with my lawyer^C soon after the
775 murders. Note I was told I was a witness, not a suspect. This proves a Dixon
lie to the Judge @ RT10509/cp 778 that I knew I was a suspect. He used this
lie to persuade the Court re "HE FLED AS CONCIIOUSNESS OF GUILT!" w/no evidence. C <
- 313 My passport and other official evidence proving my ex-wife and I were still in
780 CA. in mid-May, 1988, months after the murders. This proves as do many other
incontrovertible pieces of evidence herein, and/or cited here for materials
witheld by the LADA, that Jackson lied in this opening, RT 2741, cp 633,
Exhibit 301, that I sailed away from South Carolina by May 15, 1988. Also see
cps 630-31-32 to see how this was used to prejudice me to the Jury.
- 314 Maps of the area including the boatyard-marina (Darby Marine) from where DDA
785 Jackson lied at RT 2741, cp 633/Exh. 301 that I "SAILED AWAY IN MID-MAY," 1988,
to which DDAs embellished to falsely persuade the Jury that I then right away
went to Guatemala. Note Darby was way up a creek, Shem Creek, miles from the
Charleston Harbor outlet to the ocean. No matter what date we may have "SAILED
AWAY" no one at DARBY could have seen where we went and no one testified re it.
In fact we went North up the intercoastal waterway, Exh. 315 & more proves.
- 315 Exculpatory report prepared by authorites impeaching the very roots of the
790 DA fled claims. I did not see for trial but got it years after trial, BRADY?
They correctly proved that we were still in South Carolina in August, 1988.
This report also affirms many dozens of BRADY materials, e.g. checks will
prove we did go North after leaving Darby marine in Charleston, S.C./not to sea.
A) I will add her page 119, 3.29.01 Grand Jury testimony when I locate it, proving,
we lived for most of 1989 in Florida. B) Thus Res Judicata/collateral estoppel/
Judicial estoppel should have prohibited re-litigation, IAC & DA misconduct @ fault.
C) The Judge used my right to remain silent against me by prohibiting his testimony.

Exhibit list. proof Goodwin is actually innocent, was wilfully framed, continued.

- 316 Bp 000302/dupe 036984, LASD statement from DA trial witness Robert Utsey,
795 (RT 3040+) confirming a fairly close to exact or possibly exact schedule
re the boat at the marina he managed, Darby Marine, Charleston, S. Carolina. ^A <
This proves DDA Jackson was on notice he lied to the Court at RT 2741, cp
633 that Goodwin sailed away from Charleston in May, 1988, from which DDAs
intentionally left the Jury with the false impression that he went straight
to Guatemala. Utsey essentially affirmed these same dates-this schedule.
- 317 LADA official bates stamped discovery proving the Goodwins signed the home
800 sale documents in August, 1988, further proving they did not disappear for
years in May, 1988 per RT 2741/6901-7/8784-5/20, more, most in Exh. 301 .
Cp 802 is a page from my prior attorney Elliot McIntosh's meticulous
inventory of 35,500 pages of evidence withheld in the prosecution evidence
locker on my case. This page identified the shipping proof of that home sale
documentation in addition to other BRADY material. Please read annotations.
- 318 Letter to my top-rank attorney in 1988, Al Stokke, dated-written in and mailed
805 in the U.S. on 8.27.88. It confirms we told LASD re the boat ^B(as did Diane's <
application to the bank for a loan, bp) that we would be living on the
boat, and that I'd been advised it was no problem traveling. I presume, but
do not specifically 100% recall (some recall of this) that was because I was
told I was simply a witness, not a suspect). As per the prior page footnote,
the Judge prohibited my then attorney from testifying to these facts simply
because he advised me to exercise my 5th Amendment Right to Remain Silent.
- Mr. Stokke had contemporaneously prepared evidence he would have testified to
affirming that at my suggestion he had spoken with lead LASD investigator
Sgt. Griggs, offering me to come in during december 1988, while advising them
where I would be. He noted-would have testified to them saying don't come in.
- HOW CAN THIS/EXH. 312/MORE TRANSLATE TO FLED JURY INSTRUCTIONS & DISAPPEARED
(FOR YEARS AFTER MAY 1988) 4 TIMES, RT 9027 AND "NOBODY SAW HIM AFTER SOUTH
CAROLINA" (UNTIL THE BOAT WAS REPOSSESSED IN GUATEMALA IN 1991), RT 8784-85?**
- 319 "#1 SOURCE OF CASE INFORMATION TO THE D.A." RT 6939, cp 812, Dolores Cordell,
810 Mickey's lead lawyer and a DA expert letter confirming she was told we were
in Florida, bp 033759. If we were hiding-fleeing why would we have advised C <
our lawyer to tell our #1 enemy? At cp 813+ home phone calls buying the boat.
- 320 Bp 026470, proof we/the boat were in Ft. Lauderdale in September, 1988/cp 820.
- 321 BRADY material showing a 1.4 hour telephone conference I had with the Bank-
825 ruptcy trustee's lawyer Kirk Rense, 12.21.88. ^DI would know that my location <
could easily have been located via a trace had I been hiding-fleeing.
There are 10± more like this in the withheld Bankruptcy (BKY) file/DA has.
- 322 Pages from defense counsel Saris prepared 191± page inventory of DA bates-
830 stamped discovery proving the DA has evidence proving the 1991 Guatemala
boat repo did not occur , and that I did not flee-disappear-try to hide.
The latter is proven by 100+ pages of evidence showing me in U.S. 1988-89-90+.
Read annotations closely. The DA has withheld the 37K discovery pp. for 15 years.
- A) Evidence also proves 100+ phone calls while there including to friends-family-
business associates. An idiot would understand tracing would be easy if hiding.
- B) At the Exh. 312 LASD interview right after the murders, the Jury wasn't told about.
- C) If one were planning a murder & to flee on a boat no one knew about you wouldn't
buy it via your home phone which police would immediately get the records for.
- D) At cp 782/Exh. 313 note me thru Customs-Immigration on 12.18.88. One wouldn't do
that if they were fleeing from a murder-trying to hide-disappear. All above, IAC.

Exhibit list, proof Goodwin is actually innocent, was wilfully framed, continued.

- 323 Incontrovertible proof further impeaching "HE FLED IN MAY 1988, DISAPPEARED
840 FOR THREE YEARS UNTIL McGHEE REPOSSESSED THE BOAT HE WAS HIDING ON, IN 1991-A <
GUATEMALA!" and proving Jackson-Dixon knew they lied-defrauded the Courts.

Cps 841-2 are official DA bates stamped discovery pages re reports on a key boat witness, Bill Redfield, who sold Diane the boat. Cp 841 confirms he was with the Goodwins in Florida in 1989 and went sailing on the boat, bp 000511. Cp 843 is from attorney Elliot McIntosh's, bar #151050, 262± page inventory of 35,500± pages of withheld documents in the prosecution evidence locker on my cases, meticulously described, on which I ID'd BRADY mtl on all DA claims. B <

This page, annotated and clean, confirms bank records the DA has which will include checks and other evidence proving we lived wide open, high visibility for most of 1989 in Florida on Diane's boat. Diane's Grand Jury 3.29.01 page 119 testimony also confirms this, as does extensive BRADY material, Exh. 329.

- 324 LASD spokesman confirming in the 1993 L.A. TIMES that they always knew where
845 Goodwin was. That was because I had an attorney, Al Stokke who liasoned for me, and when I was in the U.S. I was fully visible, coming thru Customs and Immigration, using credit cards, doing nothing to "AVOID OBSERVATION!" The <
key here is that this obviously confirms they have BRADY materials re this.

- 325 Transcripts, RT 8435-38 & 7516+, which objectively reading prove A) Jackson
850 grossly misled the Court that there was no evidence that Goodwin that Goodwin had not fled (cp 851 lines 16-27. He outright lied since law is absolute, <
unrelenting that he is charged with knowledge of evidence in his case file).

B) defense counsel Saris falsely states "...HE'S FLEEING FROM HIS CREDITORS... I THINK THAT HAS BEEN MADE VERY CLEAR!" cp 851 lines 7-8. That was wrongly made clear only via Saris and the prosecutors agreeing to-introducing the McGhee stipulation, Exh. 309 cp 690 which had absolutely no supporting evidence, And, Exh. 302 cp 635 along with more incontrovertible evidence here proves it did not occur. Saris functioned as a prosecutor on a dozen similar claims. D <

CRUCIALLY. Objectively reading cp 852+, the no jury present argument to allow or keep out Goodwin's attorney's testimony that they met with LASD just after the murders, Goodwin was told he was a witness, not a suspect and more, infra, it shows C) Goodwin's Fifth Amendment right to remain silent was used against him, and D) Jackson-Dixon clearly knew facts re Goodwin's presence in the U.S., meeting with LASD, offers-to-meet again with LASD in December 1988 (for which LASD said no, Stokke would have testified to, that just the evidence here will...

CONVICT JACKSON-DIXON FOR PERJURIES RE "HE IMMEDIATELY FLED-DISAPPEARED!"

- 326 Held for extensive exculpatory evidence on the 7 DVDs where appx. 400,000 pp. of petitioner's evidence LASD seized are scanned on, and I identified as not available anywhere else. Some of this alone prove key LADA claims are false and wilfully fabricated to intentionally present false evidence to convict. The prison has refused to print this evidence off despite that printing off evidence I needed was a condition of me agreeing to accept these on DVD rather than hard copy, e.g. 6.23.16 transcript, pp. 12-13 by the Judge. Yet subsequently the Court refused to agree to enforce that condition.

- A) Accurately paraphrased, see RT 6701-7/2741/8784-5/9027/more. B) Filed with the Court and DA multiple times, denied and/or ignored. C) Re proof this, e.g. cp 11. D) See Exh. 310 cp 695 and in full actual innocence brief I'll prove she was grossly ineffective-failed to investigate-prejudiced me on all 12+ DA guilt claims.

Exhibit list, proof Goodwin is actually innocent, was wilfully framed, continued.

327 Held for declarations re proof I was living in the United States beginning in Spring 1990, from third parties, if the LADA continues to refuse to comply with Constitutional law and CA. Penal Codes requiring producing the bates stamped discovery proving this, e.g. bps 028312-28, 032116b, 032256, more, and BRADY material proving this. The BRADY material includes the portions of the SA CR 93-67(B)(GLT) transcripts where team prosecution^A lawyers proved I gave the boat to the true bank agent in the U.S. in 1990, the Maryland Bank file, the DUI arrest-case file for the 12.30.90 Aspen, CO. DUI proving I lived in CO. and was in Court there thruout 1991^B

These declarations will be from various 3rd parties I met with in CA. in 1990 when I traveled there from CO., including confirming they also called me at my families' CO. ranch. They have agreed to provide them but I don't want to involve them unless necessary because of past witness harrassment.

A long shot, remotely he will do it, but I met-gave impromptu ski lessons on Aspen Mountain to former POTUS Donald Trump. I later walked and talked with Trump and his then girlfriend Marla Maples in fall 1990^C

328 This will be extensive various pieces of evidence supporting that I did not flee, that evidence proves it was clear that my intent was to stay available to law enforcement, and similar supporting that I was not hiding-escaping vs. unsupported by evidence prosecution and my own lawyer claims I escaped.

329 Evidence proving extensive Constitutionally required evidence is possessed-withheld by the prosecution. This includes BRADY materials, 300+ pages of defendant's statements "REQUIRED WITHOUT LIMIT", citations, including Penal Code § 1054.1(b), JENCKS/PC § 1054.1(f) material for every testifying DA witness, withheld, confirmed, relevant statements (plead with evidence cites in my habeas reply, ignored), 100+^Dboxes of relevant evidence confirmed on which DA experts relied to develop the "OPINIONS TO WHICH THEY TESTIFIED", and much more. The latter, and more re these four DA experts, Cordell, Coyne, Kingdon, Bartinetti are required by U.S. v. NOBLES (1975) 422 U.S. 225, 239+, THOMPSON V. Spr. Ct. (1997) 53 CA4th 480, HINES V. Spr. Ct. (1993) 20 CA4th 1818, 1822. "FAILURE TO COMPLY WITH STATE LAW IS A DENIAL OF DUE PROCESS!" HICKS v. OKLAHOMA (1980) 447 U.S. 443, see my habeas page 155 for more law.

I STRESS AND SWEAR TO, THERE IS BRADY MATERIAL I'VE IDENTIFIED-BRIEFED^E MORE QUICKLY-DIRECTLY-INCONTROVERTIBLY PROVING 1) MY ACTUAL INNOCENCE, 2) THAT I WAS WILFULLY FRAMED IN A STATE RUN RICO CONSPIRACY, THAT 3) THIS IS THE WORST OR NEARLY THE WORST CASE OF DA CRIMES ON LEXIS, AND 4) IT COVERED UP MILLION DOLLAR+ CRIMES BY THE COMPLAINING WITNESSES.

330 Listing by cites on DDA Jackson-Dixon 30+ material false closing argument material false claims in just four (4) transcript pages, 21 for which I find absolutely no evidentiary support on the record, or not on-the-record for most of them. And for all of them evidence proves Jackson-Dixon had the evidence in advance proving them false, in many instances impossible. Subsequent DDAs both had proof of falsity/had it pointed to-ignored it.

331 Underscoring LASD maliciousness, LASD media plants "HE FLED IN 2 WEEKS!"^F

- A) The DA has this case file, CT 1433/bp 000399/000427 Exh. 305, also DA Exh. 101.
 B) Thus it was impossible for me to be hiding on a boat in Guatemala in 1991.
 C) And later communicated. D) 80 boxes Cordell RT 3749/20 boxes Kingdon bp 000409.
 E) For every DA guilt claim. F) Cp . Evidence proves more LASD/DA false plants.

Exhibit list, proof Goodwin is actually innocent, was wilfully framed, continued

- 332 Reserved for Attorney General false statements in the direct appeal,^A both in writing and oral, to be included for all 12 false prosecution claims.
- 333 Reserved for prosecutor false statements in the habeas response, for all 12 major prosecution claims which will be proven false herein.
- 334 Reserved for prosecution false claims not otherwise addressed, e.g. in briefs within the Court Reporter's transcript (CT) or RTs without Jury.
- 335 Reserved for det. Lillienfeld perjuries/"reckless untruths" per FRANKS v. DELAWARE related only to claims I-II-III, also to include support CT/RTs

Evidence/Exhibits re claims IV and V since they are inextricably linked.

- 336 Prosecution claims re "GOODWIN REFUSED TO PAY MICKEY HIS JUDGMENT DEBT"; "GOODWIN COMMITTED FINANCIAL FRAUDS TO AVOID PAYING MICKEY"; and/or "HE KILLED TO AVOID EVER HAVING TO PAY MICKEY'S JUDGMENT DEBT!"
- 337 Proof Goodwin paid the Bankruptcy (BKY) estates exactly as law requires, by assigning assets to the BKs, including having \$912,000+ cash in the BKs before the murders, intended to pay Mickey's \$794,000 debt. And, that Goodwin's 2nd BKY trustee paid another \$5,768,000+ cash to debt. See official DA bates stamped discovery, bp 022222, 028828+, 021489.
- 338 Evidence showing that Goodwin in effect begged for Mickey to be paid, but...
- 339 Proof that law prohibited Goodwin from paying Mickey's debt directly, to do that would have been a felony. Only the Govt. appointed-supervised BKY trustees, on which Thompson's lawyer's insisted, were allowed to pay debt including Mickey, and only after Court approval, e.g. CT 213.
- 340 Reserved for proof that the BKY trustees, in collusion with Mickey's lawyer Dolores Cordell,^B the DA's "#1 SOURCE OF CASE INFORMATION" RT 6939, and Mickey's sister Colleen Campbell^B looted-diverted \$2,500,000± cash and assets via perjuries-frauds, from creditors to their own pockets.
- Studies citing evidence proving this are on Petitioner's home computer that LASD seized without appropriate authorization in the warrant, the contents of which have been kept from Petitioner for 20+ years despite Motions^C The computer also includes extensive exculpatory evidence on other DA false claims, e.g. fled, the phony boat repossession, the \$20,000 unaccounted chk.
- 341 Additional reservation for specific Cordell and Campbell crimes, some of which I now have accessible in the boxes finally made available on E yard.
- 343 Proof Petitioner offered assets that generated \$5,000,000+ in cash to bond-insure payment of Mickey's \$794,000 debt, for which his lawyers agreed to accept "A MORE REASONABLE \$500,000", their words (in withheld DA bates stamped discovery). Mickey's lawyers denied it but agreed in would pay him/bp 023792.
- 342 Proof the prosecution team forged evidence/destroyed exculpatory evidence proving Goodwin's clear intention to pay, e.g. bp 023776-8, 029967-79, FELONIES.
- A) I doubt these are needed to prove actual innocence and dismiss with prejudice.
B) Yet Cordell-Cambell, who evidence proves stole-looted my funds intended to pay Mickey were the Government's complaining witnesses vs. me for allegedly not paying.
C) These BRADY material "DEFENDANT'S STATEMENTS" must be "DISCOVERED WITHOUT LIMIT!"