A "PERFECT STORM" OF ERRORS CAUSED A GROSSLY WRONGFUL CONVICTION

The convergence of ten separate major errors/misconducts caused the Goodwin loss:

- 1. 51 material lies to the Judge & Jury (J&J) by the prosecutors, <u>including in</u> essentially sworn, offers of proof. One of the worst was told 10+ times.
- 2. 65 <u>material</u> perjuries by four State experts & two investigators, five of whom had inappropriate personal reasons to conjure an unjustified prosecution.

 Over two million dollars & prison time for some of them was at stake.
- 3. The investigators illegally suborned perjury from eight other witnesses.
- 4. The prosecutors (DDAS, Deputy District Attorneys) suppressed 250+ pieces of material exculpatory evidence, that is correct, 250+ BRADY VIOLATIONS plus DNA.
- 5. The DDAS suppressed 300+ witness tatements for confirmed interviews. BARNETT v. SPR. CT. (2010) 50 Cal 4th 890, 5 Cal Rptr 3d 283, 295, 306 requires that all of these witness statements be produced. It appears 100 more are suppressed.
- 6. The DDAS suppressed extensive other evidence which they were obligated to produce to facilitate defense cross exam, e.g. the produced <u>none</u> of the evidence on which the experts relied to develop their pinions, 120+ boxes of records. Law is <u>absolute</u> that all of this must be produced.
- 7. The correct law was not introduced as to financial allegations supporting motive, either via jury instructions or an expert's testimony, <u>and</u> the DDAS consistently materially misstated the <u>law</u> re: these allegations.
- 8. The defendant's actions which had been determined in the past by Courts of competent & correct jurisdication as legal & legitimate were postured as fraudulent & illegal. There were 17 allegations of uncharged, untrue crimes.
- 9. The defense lawyer, a PD, refused to both put on necessary exculpatory evidence she had, & to investigate other critical areas, saying "they have no case".
- 10. The clearly biased Judge constantly sustained DDA objections & cut off critical cross exam on core issues to guilt or innocence, e.g. 3 CT 771±, 785-787.
- Alan Jackson, the lead prosecutor, is running for L.A. District Attorney in 2012.