

THIS AFFIDAVIT WAS IN THE OPPOSITION TO THE REFUSAL A
MOTION FOR THE O.C. CASE

AFFIDAVIT OF TONY RACKAUCKAS

REFERENCED AT PAGE 10 TOP

I am the elected District Attorney of Orange County. Some time after commencing my term of office in January of 1999, I was approached by investigators from the Los Angeles County Sheriff's Office who requested assistance from my Office in investigating the case of the 1988 murder of Mickey and Trudy Thompson. I was aware of the case and the fact that despite the Los Angeles County situs of the killings, there had been some connections to Orange County. I also had as one of the priorities of my administration, a goal of devoting resources to examining unsolved serious cases. In that regard, I have expanded the TrackERS project, a program designed to compile data bases on homicides and sexual assaults and to solve old cases, and I have encouraged my staff to take a look at unsolved cases. This was consistent with my earlier practices as a deputy district attorney when I re-opened and filed three old murder cases, *People v. Maniscalco*, *People v. Gullett and Ewing*, and *People v. Fred Douglas*.

I agreed to hear a presentation by the LASO investigators about the Thompson killings.^B Thereafter, I agreed to devote some resources to assisting them in their investigation, including having a deputy district attorney assigned to work on the matter with them.

Beginning in approximately April of 2001, the assigned attorney was David Brent, an experienced homicide prosecutor. Ultimately, Mr. Brent informed me in approximately November of 2001, that he intended to file charges. Prior to that time, I never told Mr. Brent that I expected any particular outcome. He was not told to target any particular suspects or that a filing was expected. He also was free to change the direction of the investigation. I did not direct or take part in the investigation, nor have I ever undertaken any detailed examination of that investigation. EVIDENCE WE HAVE GIVES PRIMA FACIE PROOF THIS IS PERJURY.

Prior to being approached by the LASO investigators, I had a limited familiarity with the

A) THIS CASE WAS FILED OUT OF JURISDICTION FOR THE L.A. COUNTY MURDERS, BASED SOLELY UPON FABRICATED EVIDENCE THAT A PISTOL I OWNED MAY HAVE BEEN A MURDER GUN. EVIDENCE PROVES THAT RACKAUCKAS KNEW BEFORE CHARGES WERE FILED THAT WAS IMPOSSIBLE. B) WE NEED, & AUTHORITY RULES WE ARE ENTITLED TO THE EXCULPATORY PORTIONS OF THIS PRESENTATION. BECAUSE SO MANY PORTIONS OF THE STATE CASE ARE FALSE, WE NEED IT ALL.

01

REFERENCED AT PAGE 10 TOP

facts of the murders. In approximately 1988 or 1989, while working in private practice for the Law Offices of Richard Rockwell, I represented the Thompson family on a matter relating to the estates of the decedents. I have little recollection of the details of that representation. I do recall speaking to a Los Angeles County medical examiner and getting an opinion from him on the A subject of whether it medically could be determined which decedent died first. I also recall that I researched and informed the clients about the legal effect of any such determination. I do not recall personally obtaining any statements from neighbors of the Thompsons, such as those contained in the affidavits of Lance and Sandra Johnson that I am informed are attached to defendant's motion. I do not believe I ever made any court appearances.

PAGES "K" & "A" INDICATE
THIS IS NOT TRUE. WE NEED/
DESERVE HIS FEE DETAILS.

I first met Collene and Gary Campbell in approximately 1983 or 1984. I knew that their son had been a homicide victim and I had heard that they might be supportive of the Recall Rose Bird alliance that I was directing at the time. Thereafter, Collene Campbell became more involved with families of crime victims. She and I were both active in various crime-fighting legislative efforts and I had contact with her on numerous occasions over the years in that capacity. After the death of her brother and sister-in-law, Collene Campbell founded a non-profit organization called MOVE (Memory of Victims Everywhere). She asked if I would volunteer to be treasurer. I agreed to do so. My duties entailed filing semi-annual reports based on information that was provided by an accountant. This was not particularly demanding or time-consuming since there was not a great deal of money to report. I no longer performed this function after 1996.

Subsequent to my election as District Attorney I have not had any conversations with Collene Campbell or members of her family concerning the details of the investigation of the murder of her brother and sister-in-law or the filing of a case. She did not ask me to investigate

02

A) RACKAUCKAS' NOTES OF THE MEDICAL EXAMINER MEETING WILL MOST PROBABLY BE EXCULPATORY, AS WILL BE HIS NOTES OF THE MEETING WITH THE FAMILY. RE: WHO DIED FIRST, & IN TURN ALL OF COLLENE CAMPBELL CORRESPONDENCE WITH LAWYERS, THE INSURANCE COS., & FAMILY. EVIDENCE PROVES CAMPBELL "ASSISTED IN THE INVESTIGATION" PER IN RE: STEELE (2004) 32 CAL 4TH 682, 10 CAL RPTR 3D 536, 542-547. THUS THE STATE IS OBLIGATED TO PRODUCE ANY EXCULPATORY EVIDENCE SHE HAS POSSESSION OF "OR SHOULD BE AWARE OF!"

REFERENCED AT PAGE 10 TOP

the matter or file a case and I did not seek out the case. ^{**} Other than approving the expenditure of resources for investigation of the matter after having been approached by LASO and briefed on ^B the circumstances of the crime and their opinion that Orange County was an appropriate venue, I have not been involved in the investigation in either a personal or advisory capacity. ^C I did not participate in the decision to file the case, ^D but strictly relied on the judgment of the experienced deputy district attorney who reviewed it and coordinated the investigation efforts.

I declare under penalty of perjury that the foregoing is true and correct. Dated this _____

day of February, 2002, at _____, California.

**** WE WERE TOLD BY A PARTY WE DEEM TO BE RELIABLE THAT O.C. PAID A SUBSTANTIAL SUM TO ASSIST IN PROSECUTING THE CASE. WE NEED AN ANSWER TO THAT.**

Tony Rackauckas
District Attorney

A) RECOGNIZING THAT "BRADY TRUMPS THE PRIVILEGE"; BARNETT V. SPR. CT. (2007) 54 CAL RPRT 3D 283, 319, NEWER RULING, 50 CAL 4TH 890 LEFT THIS INTACT, THE OTHER PAGES OF THIS 30 PAGE REPORT THAT INCLUDE POTENTIALLY EXCULPATORY INFO MUST BE PRODUCED. BARNETT RULES THAT THIS INCLUDES EVEN RUMORS THAT DEFENDANT WAS FRAMED.

BECAUSE EVIDENCE IRREFUTABLY PROVES THAT THE STATE HAS INTENTIONALLY SUPPRESSED EVIDENCE, SUBORNED PERJURY, FABRICATED, FORGED & DESTROYED EVIDENCE, & STATE AGENTS HAVE PERPETRATED OVER 100 (ONE HUNDRED PLUS) MATERIAL PERJURIES & FRAUDS ON THE COURT IN THIS INVESTIGATION/PROSECUTION (EVIDENCE OF AT LEAST 45 OF THOSE ARE IN EXHIBITS 5 THRU 15 TO THE 5/1/11 SPR. CT. FILING) STATE AGENTS CANNOT BE ENTRUSTED WITH "DECIDING" WHAT IS EXCULPATORY & WHAT IS NOT. EITHER THE DEENSE MUST SEE IT ALL OR A MASTER MUST REVIEW IT.

B) THE NOTES OF THIS BRIEFING/PRESENTATION, ONE OR MORE OCCASIONS OF IT OCCURRING, MUST BE PRODUCED IF THEY MAY CONTAIN EXCULPATORY MATTER. SINCE SO MUCH OF THE STATE CASE IS FABRICATED, MUCH OF THIS THAT MAY NOT BE OBVIOUS WILL BE EXCULPATORY. I'M ALSO RELIABLY TOLD THAT THESE PRESENTATIONS, FROM INVESTIGATORS TO PROSECUTORS, ARE NOT PRIVILEGED. IF DET. VERDUGO PARTICIPATED, HE TESTIFIED AS AN EXPERT, & EVERYTHING HE RELIED UPON, & ALL FINAL REPORTS HE PRODUCED MUST BE PRODUCED.

C) PRIMA FACIE EVIDENCE PROVES THIS IS PERJURY. WE NEED/DESERVE HIS FILES/FEE DETAILS WHILE HE WAS WITH ROCKWELL TO VERRIFY. BECAUSE "WHO DIED FIRST" WAS CENTRAL TO MY CONVICTION, IF HIS ROCKWELL FILES/FEE DETAILS ARE NOT AVAILABLE, THAT IS A PRE-ACCUSATION EVIDENCE LOSS" DUE PROCESS VIOLATION MANDATING REVERSAL.

D) AGAIN, SINCE "BRADY TRUMPS THE PRIVILEGE" & THE TIMING OF MY O.C. CHARGES THE WEEK AFTER I HAD OPENED FRAUD LITIGATION THAT WOULD HAVE EXPOSED MULTIPLE, MULTI-MILLION DOLLAR FELONIES BY RACKAUCKAS' CLOSE FRIEND, POLITICAL CRONY, & BENEFACTOR COLLENE CAMPBELL, 13½ YEARS AFTER THE MURDERS, AFTER THE L.A.D.A. HAD REPEATEDLY REJECTED THE PROSECUTION FOR LACK OF EVIDENCE, & I HAD BEEN CLEARED 13 YEARS EARLIER WAS SO SUSPICIOUS. WE NEED/DESERVE TO SEE THE O.C.D.A. CORRESPONDENCE ON THE TIMING OF THE CHARGING DECISION. EVIDENCE SUGGESTS RACKAUCKAS WAS INSTRUMENTAL.

03

IMPORTANT INFORMATION RE: ALL DISCOVERY REQUESTS

Evidence conclusively proves, and cannot be refuted, that the prosecution in this case has repeatedly violated their obligations to produce required evidence, notwithstanding 13 discovery/BRADY motions, additional informal requests, extensive litigation, and Court rulings/orders effecting production. In doing this they violated the presumption in Evidence Code § 664 that they would/had produce as is required.

Evidence proves this is in many cases intentional and included fabrication and destruction of the exculpatory value of evidence, scrambling so that the defense could not ascertain in many instances who was being interviewed in a given witness statement, when and/or by whom, or even what time period it was in, just after the murders, or ten or more years later. Evidence also proves that over 1000 pieces of discovery, many appearing to be potentially exculpatory were copied illegibly, we believe investigation will show intentionally, and evidence even proves forgery of a critical trial witness's statement.

This malfeasance that also amounts to Penal Code 182 (2) through (5) Conspiracy felonies to falsely convict is on top of 6 to 12 material Frauds on the Court, subornation of material perjuries, several outright lies to the Judge by the DDAS and introduction of a fraudulent stipulation, knowingly.^a

Thus, as per authority in BARNETT V. SPR. CT. 2007) 54 Cal Rptr 3d 283, 317 unsworn statements that evidence does not exist will not suffice. We request sworn statements that evidence does not exist, if it isn't produced, including details of what was done to try to secure the evidence, as per BARNETT, supra.

Because discovery confirms over 30 agencies plus more than a dozen non law enforcement individuals "assisted in the investigation"; which obligated the State to produce evidence accumulated or even exculpatory evidence they knew of or should have known of, The State must organize a thorough search immediately.

a) Some of the overwhelming evidence of this was sent to Deputy Attorney Gen. Johnsen within a package with a cover letter dated 12/22/10.

P1

CRIME SCENE RELEVANT EVIDENCE REQUIRED FOR IN RE: GOODWIN

This is required for the State to produce by in re: STEEL 32 Cal 4th 682 (2004) for file construction and reconstruction in anticipation of a habeas corpus filing.

1. The official suspect descriptions throughout the 18¹/₂ years pretrial, particularly for the 1st 9 months following the murders. These had to exist since they were used to eliminate suspects or potentially include them including at bps 34781, 34987 and 25302 and many others. Include all composites and copies of any charts and photos shown to witnesses to arrive at the composites.

See below under witness statements for our request for the witness statements related to these composites that were then used to establish the suspect descriptions.

2. The FBI memo(s) that are confirmed as having been sent out within the 1st 3 months describing the suspects and the crime scene "facts" that were surmised/theorized.
- 3) All witness statements related to the crime scene, anyone within earshot of the crime scene and/or who may have seen suspects fleeing or were thought to possibly have seen suspects fleeing. These are to include but not be limited to:
 - A) The witness statements for Anthony, Phyllis and Allison Triarsi.^a As for all witness statement requests these are to include all witness statements (WSS), not just the ones we list. The Triarsi statements should include those listed on the general list of evidence requested, 50 items, sent with the package to Deputy Attorney General Michael Johnsen with a cover letter dated 12/22/10.
 - B) The witness statements for the bp 00071 "show up" and all other show ups.
 - C) The WSS for the appointments confirmed at bp 00317.
 - D) All the interview WSS for the Lance, Sandra, Bear and Chantelle Johnson family including the IFNS (investigator field notes) for bp 33428.
 - E) For all WSS/interviews we need/expect/deserve the IFNS/tapes/police reports.
 - a) Including Phyllis' IFNS for bp 00310± and Allison's for bp 00512-514.

Continuation of item #3, crime scene relevant evidence needed by defense.^a

F) WSS referenced bp 00005 re: firearms description. See also firearms, item #13.

G) WSS noted at i) bp 33386, ii) 33385, iii) 33324 and iv) the verified field WS.^b

H) WSS noted by investigator Griggs in his reports between CT 5-1187 and 1227±.

I) All WSS for the Difilippo family and a sworn statement that those produced are the only ones that were taken.

J) WSS referenced, relating to the crime scene, on bp 00002-4 and the link analysis.

K) All WSS and/or notes of any kind made by any prosecutor or investigator interviewing medical examiner/coroner personnel, specifically that for the Anthony Rackauckas interview he swore to in his February 2002 affidavit.

L) All Det. Lillyfeld affidavits. 8 or more are confirmed. The defense has just 5.

M) The support for Lillyfeld's sworn statement at bp 25302:2 that the radio call on the murders went out/was heard at 6:04AM. That is critical. It is not true.

WE ALSO NEED/DESERVE A LOG OF ALL WITNESS STATEMENTS TAKEN, TO VERIFY ALL.

a) This item, #3 is exclusively about crime scene relevant witness statements (WSS). In re: STEELE, supra, others, rule that all WSS taken by any person in addition by the personnel of any official agency must be produced. Thus those taken by Anthony Rackauckas who worked as Collene Campbell's private attorney at the time on crime scene related matters must be produced; as well as those taken by Campbell herself, the appx. six investigators she has hired, and her other lawyers, all of which are confirmed. Because of this i've left additional space above for others.

b) This appears it was a statement by Anthony Triarsi. See bp 000039.

updated 10/23/11

P3

4. The crime scene (CS) techs/photographers' photos of the crime scene, taken by several photographers, specifically including those of the blood patterns around Mickey; Vol 17-6307-08, 6313-14, 6336, 6340, 6342-44 and others.
 5. The crime scene diagram described at Vol 17-6315..
 6. Liz Devine's crime scene diagram at Vol 14-5199 and the "Beautiful Graphic Arts" one.
 7. The officer Mullis report to Griggs on 3/18/88 verified on bp 33659.
 8. The officer Crawford report confirmed at bp 00068-69.
 9. All 911 call tapes/transcripts and a log of all calls. "Tons of calls", bp 000190.
 10. Tapes/transcripts of all radio car communications, including that of the dispatcher from LASD squad cars and all involved agencies, including investigator cars.^a
 11. The dispatcher's log of radio traffic/communications.^a
 12. I need to see close up photos of the bag found in the Thompson's van, and may need to see the bag. Vol 16-6019-20. This is extremely critical.^b
 13. All evidence and reports related to the murder weapons, including but not limited to A) the descriptions derived from the WSS at 3F prior page, B) the "profiles" (or whatever the correct nomenclature is) for potentially including or eliminating makes/models of pistols from "the universe of possible murder weapons" and C) All comparisons/research on weapons located to see what make/models were eliminated. This would include weapons owned by me. P4
- a) These need to include the time of day of the calls, the duration, & the remote site.
- b) We feel strongly that this will prove that the murders were a result of a robbery of the \$250,000 in gold coins that Thomspn took delivery of just before the murders that were not found following the murders. We feel this bag was like gold coins were delivered in. If we need to see the bag, we will need to see a sworn to complete chain of custody.

14. The original police report Lillyfeld quoted from at bp 25195:18 in a declaration.
15. The two higher level reports/interviews re: footprint analysis Devine testified to at Vol 14⁴5179 93.
16. The orange rinds found at the scene so we can perform DNA tests.
17. Contact information on the locksmith that LASD investigators met at the crime scene to investigate the safe. This is critical. I also stress that if Jackson/Lillyfeld are made aware of this, they will "persuade" the locksmith to lie.
18. Crime scene/suspect related media releases, communications to media, particularly:
 - A) TIME MAGAZINE for their 3/28/88 issue.
 - B) SPORTS ILLUSTRATED for the 4/1/88 issue.
 - C) AUTOWEEK for the 4/11/88 issue.
 - D) LOS ANGELES MAGAZINE, July 1988 issue, specific quotes by investigator Griggs.
 - E) CAR AND DRIVER, February 1999 issue, Dozens of provable false statements.
 - F) UNSOLVED MYSTERIES TV special. Aired multiple times on NBC. See Griggs report CT 5-1187+ for verification that Campbell gave input for this script.
 - G) HARD COPY. I believe on ABC, fall 1998 I believe.
 - H) MOST IMPORTANTLY. The crime scene script input for America's Most Wanted (AMW).
 - I) CBS 48 HOURS.
 - J) FOX MILLION DOLLAR MYSTERIES.
 - K) To Stuart Pfeiffer for his articles upon my arrest on 12/13/01 in the LA TIMES.
 - L) The data confirmed as supplied by L.A.S.D. on the suspect descriptions on the flyer on evidence pages R-R2 here. The composites became trial exhibit 51 (D.A.).
19. Tapes and passouts of the press conference(s) confirmed at bp 00008, item #109 and all press conferences including the one on or about 7/30/98 for the reward.

- 20.^a The presentations by investigators to the Sheriff and/or the prosecutors in both Orange County and Los Angeles County, plus to any other agencies, e.g. the Justice Dept., and any rejections/comments/reports arising from these presentations, attempting to obtain a charging. I'm told by a knowledgeable attorney that these are not privileged, and even if they were, "BRADY trumps the privilege."
- 21.^a All fee details and correspondence, including meeting notes, drafts of pleadings, all writings relating to the crime scene and who was killed/who died 1st in the files of Anthony Rackauckas both in his role as a private lawyer for Collene Campbell in 1988 and later as the OCDA who 1st prosecuted this case. Also from the files of Clark and Trevithick (CandT), the Thompson/Campbell lawyers, the probate lawyers for the estates of Mickey and Trudy Thompson and from the files of other lawyers/law firms who were involved in this, some of which are detailed in the letter which is included here as evidence pages A1 THRU A3.
- Who died 1st or who was killed 1st is very material to the D.A. case.
- 22.^a The tape of the family meeting confirmed in that letter at pages A2, such letter which also confirms that the consensus was that Mickey was killed 1st. This will eviscerate the very prejudicial "Choreographed Dance of Death", Mickey being made to watch Trudy be killed argument that permeated the D.A. case and the perjury by trial witness Allison Triarsi that was the only support for it.
- 23.^a All correspondence re: life insurance. This will assist in "who died 1st"
- 24.^a The notes made in and all reports arising from the 6 hour meeting that Campbell had with the probate lawyers, reported in the 3/20/88 L.A. TIMES. Again, this will be critical in the who died 1st analysis central to the D.A. case vs. me.

a) A primary goal is to secure all evidence of who died 1st, requested here or not. Thus we require a sworn declaration on this per in re: BARNETT 54 Cal Rptr 3d 283. A later ruling on this case is at 50 Cal 4th 890. It seems to leave this ruling intact.

P6

25. All coroner's reports related to the crime scene. The report at bp.00153 conflicts materially with many other police reports. And, i've reliably learned that the coroner in Los Angeles County is much more involved in most murder cases, particularly high profile cases such as this one, than the abbreviated reports we've received indicate.

This concern is compounded by conflicts and questions raised by the coroner's representative's trial testimony.

26. Allison Triarsi's "Diary of Nightmares" from which she testified to reconstruct her recall of the observations of the murders for her trial testimony. Since her prelim testimony conflicts materially with her trial testimony, and proves several material perjuries one way or the other, this diary/journal is critical. Lillyfeld had the right to seize this so the D.A./LASD have "constructive possession!"

27. The notes of Dr. LaMelle (sp), the psychiatrist who treated Allison for her post traumatic problems on this that may have altered her perception. This is particularly true since her only produced WS conflicted materially with her testimony.

28. Related to central figure Anthony Rackauckas, all related to him are critical, including that he was evidently interviewed as a witness, bp 26455 and involved in a claim by Campbell that the suspects had called and spoken to her.^a

29. Re: Clark and Trevithick, the Thompson/Campbell lawyers, their records, in the entirety will be critical, including meeting and phone notes, calenders, fee details, communications etc; for many reasons relevant to the crime scene. And Lillyfeld testified to reviewing these, Vol 20- 7578, thus "constructive possession!"

a) He also was involved with her and the felon "investigator to the stars" Pellicano. And, he gave a sworn dec in the OC case that he spoke with the coroner re: who was killed 1st. That is a critically material issue. We need those interview notes.

P7

30. Although we plan to eventually submit a detailed list of third party culpability & gold theft/robbery evidence, we submit our request here for all of that evidence. This includes 3 dozen+ suppressed reports on Hunter, Kennedy, Henrickson.

31. Should we not have been clear in the first six pages of this crime scene evidence request/demand under the authority of in re: STEELE, BRADY, BARNETT V. SUPERIOR CT., INES, THOMPSON supra, & others, we expect/deserve:

a) All witness statements taken by any person or agency or person who assisted in the investigation of the defendant, me, in this or any other case. This is a life without possibility of parole (LWOP) case & Penal Code (PC) 1054.9 mandates that production. These persons who assisted in the investigation include but are not limited to ESI BK company trustee Ronald Durkin (case SA-86-05280-JR), Collene Campbell, her lawyers & private investigators she hired. We have conclusive evidence of eight persons in this group that "assisted in the investigation" & interviewed witnesses.

We have specific evidence cites in evidence we do have in hand which confirm over 100 (one hundred) police reports/witness statements that are suppressed for confirmed interview^s, just with witnesses on the DA trial witness list. These are in addition to over 200 other witness statements that evidence proves were taken, & that are suppressed, e.g. 61+ next page.

b) Obviously the prosecution is obligated under BRADY & its progeny to produce any exculpatory or impeachment evidence as soon as they become aware of it.

c) Since Det. Verdugo was a DA crime scene trial expert, we need/deserve, all of the evidence on which he relied to develop his opinions, & when an expert testifies, the privilege is voided. Plus, per BARNETT, "BRADY trumps the privilege!"

32. The witness statements that Anthony Rackauckas, or anyone else, took from Lance & Sandra Johnson for the declarations re: who died 1st attached to pp. **K** initially.

33. All exculpatory evidence indicated in the Rackauckas declaration here at pp. **01-3,**

the 30 page fax, his files, fee details, the presentation, Brent's ^{"charging"} **V** notes, etc;

Some of those listed below may be redundant with some on the prior pages.

However, these are generally more specific, & in an abundance of caution, we want to be certain that the items we need & are entitled to are completely understood.

34. The presentation OCDA Rackauckas received re: this prosecution, as is referenced on page 01 here, by the LA investigators. It will include exculpatory portions.

35. Specifically the transcripts of the two 911 calls which trial witness Sandra Johnson testified to making, Vol 19-7041 (one call), & also reported elsewhere.

36. Again, to be more specific, we've identified about 16 crime scene area witnesses which are identified at one place or another, some of whom called 911, for which no witness statements were ever produced. Nor were the 911 call transcripts produced for all of their 911 calls. We have done a detailed study & there is a troubling pattern which has emerged as to which witness statements have been produced & which have not. There is material exculpatory evidence suppressed.

37. All of Det. Lillienfeld's "re-interviews" that DDA Patrick Dixon solemnly told the Judge occurred after Lillienfeld took over the case, and/or got involved.

This representation was made on March 1, 2007 at the hearing on our Speedy Trial-Pre-Accusation delay motion at RT-10511:27-28. This statement cannot be true if the defense has received all of Lillienfeld's interviews. We've identified about 50 trial witnesses for which we've received no Lillienfeld statements, & another 50+ percipient witnesses for which we've received no Lillienfeld statements. In both situations nor do we have statements by his partners.

This may be partially explained by the fact that we've received only one witness statement taken by Lillienfeld for the 1st 5 years it is confirmed he worked on the case. Herein 61 Lillienfeld suppressed IFNS are also listed.

38. For Lance Johnson, A) witness statements & the composites taken at the Sheriff's station the day of the homicides, Vol 13-4913-14, B) the witness statement (WS) taken by female officer Stallone, 4893, C) the WS taken by a black officer, 4919:9, D) the IFNS (investigator field notes for a typed statement, bp 33428, & E) Jackson's interview notes, CT 3-734. They are discoverable.

End P9

LIZ DEVINE EXCULPATORY EVIDENCE NO LONGER AVAILABLE

1 Devine is an ex-LASD criminologist, now working for CSI, which gave her
2 alot of credibility, who testified at Vol 14-5170-5239. She provided much of
3 what seemed to be true testimony about what she had observed at the crime scene
4 18½ years prior. The DDAS used this to support their fabricated script that
5 Mickey was made to watch Trudy be killed 1st, "to torture him since I hated him
6 so much", RT-8772:06 > 8773:12, 8744:5-23 "choreographed, deadly dance", 8734:1,
7 Vol 6-2731:16, 2733:25, many others. See 10 pages of argument at pages N-N9.

8 The "Dance of Death" with Mickey being forced to watch Trudy die was a
9 major thrust of the DA case, clearly intended to appeal to passion & prejudice.
10 It took up over 14 pages of the DDAS' 63 pages of arguments on the facts in the
11 opening & closing argument transcripts. That is almost one fourth. The most vol-
12 uminous argument was "it was not a robbery", over 20 pages. That segwayed into &
13 overlapped with it to stress this was a hateful assassination, not a robbery.
14 Evidence the judge would not allow in is compelling that this was in fact the
15 result of a robbery of \$250,000 in gold coins, but that is a separate study.

16 The third most voluminous argument per a count of the pages it occupied
17 was "the defendant was seen near the Stevens' home scouting the escape route on
18 which the killers were seen a few days later on bicycles." Our document (doc)
19 N-006 proves that to be provably not true. Most of the above was to explain to
20 you why Devine's missing crime scene diagram, V14-5199:21+, Graphics Art's
21 "beautiful, to scale diagram" & the "other units' rough sketches", 5199:13-20.

22 These are extremely material because there is such a huge conflict between
23 the trial testimony of the only crime scene eyewitness who testified, & her only
24 prior witness statement that has been produced, Allison Triarsi (see pp. Q-Q8)
25 & that although crime scene photographer Linda Arthur testified that there were
26 several techs photographing the crime scene, including the blood (V17-6340:20,
27 6307-8, 6313-14, 6336, 6344) no blood photos were produced. The blood patterns
28 were critical to the "Dance of Death". And, all of the initial evidence, newly
discovered, suppressed by the DA, conclusively proves Mickey was killed first.

61+ DET. LILLIENFELD SUPPRESSED WITNESS STATEMENTS ARE LISTED HERE

Because this proves that consecutive IFNS (Investigator Field Notes) for typed witness statements that were produced, at the listed bates page numbers in discovery, were not produced, it shows that entire IFN notebooks are suppressed. We don't know what interviews may in addition also have been taken & have IFNS in the suppressed IFN notebooks, but formal statements weren't typed/produced for them. Because we know of other IFNS that were not typed, there may be far more suppressed Lillienfeld witness statements in these missing notebooks. Penal Code 1054.9 requires their production. CODES USED IN THE CHART: OS MEANS RE: OTHER SUSPECTS. T MEANS ON DA TRIAL WITNESS LIST.

| BP# | DATE | WITNESS | BP# | DATE | WITNESS |
|---|----------|-----------------------------------|----------------|----------|--------------------------|
| 431 | 5/16/97 | Mildred Donnelly | 608 | 3/16/89 | Vance Counce-OS |
| 433 | 5/15/97 | Bill Wilson T | 609 | 3/20/89 | Robin Counce-OS |
| 435 | 5/08/97 | Paul McCauley | 610 | 4/11/89 | Vance Counce-OS |
| 437 | 6/06/97 | Mike DeStephano T | 610 | 4/12/89 | Michael Counce-OS |
| 438 | 5/19/97 | John Bradley T | 611 | 10/15/97 | Jason Bourne-OS |
| 440 | 6/06/97 | Barbara McPherson | 611 | 10/16/97 | Donna Reed-OS |
| 443 | 6/03/97 | Kathleen Giordano | 614 | 12/22/98 | Skip Clarke T |
| 447 | 5/28/97 | Bill Roetzer | 618 | 2/15/89 | Anthony Reese (dupe?)-OS |
| SEPARATE GROUP | | | 619 | 1/04/99 | Kevin DePriest-OS |
| 486 | 7/22/97 | Paul Gonzalez ² -OS | 619 | 1/14/99 | Walter Clinton-OS |
| 488 | 7/29/97 | Barbara Ruscitti ³ -OS | 620 | 1/13/99 | Donna Glazoreed-OS |
| 491 | 7/24/97 | Jerry Monroe - OS | SEPARATE GROUP | | |
| 491 | 7/21/97 | George Peloquin | 649 | 1/19/99 | Doug Stokes |
| 497 | 8/05/97 | Deke Houlgate | 650 | 1/19/99 | Bruce Flanders |
| 500 | 8/06/97 | Eric Snethen | 650 | 1/25/99 | Jefferson Andrew |
| 502 | ? | Mr. Walczak | SEPARATE GROUP | | |
| 504 | 7/30/97 | Blake (duplicate at bp 543) | 682 | 4/03/01 | Michael Jones |
| 506 | 9/22/97 | Nancy Wilkinson T | 686 | 10/04/00 | Randy Garell T |
| 508 | 9/22/97 | Bill Marcel | 688 | 11/20/00 | Kyle Dickerson |
| 508 | 9/22/97 | Ben Christ T | 689 | 11/25/00 | Eileen Fakas |
| 509 | 9/22/97 | Bill Lobel T | 689 | 11/30/00 | Joseph Grosso-OS |
| SEPARATE GROUP | | | 691 | 2/23/01 | A Mel Reeves |
| Separate group, bps 527-542 Timeline/Chronology, from where did it come? ⁴ | | | 692 | 2/25/01 | A Kenneth Hatch |
| | | | 692 | 2/26/01 | A Robert Reeves |
| 543 | 7/30/97 | Blake (duplicate at bp 504) | 692 | 2/26/01 | A Ron Stevens T |
| 545 | 9/23/97 | Ned Redway | 693 | 2/26/01 | A Tonya Stevens T |
| 549 | 9/08/97 | Rick Morton | 693 | 2/22/01 | Gaylord Warren T |
| 549 | 8/06/97 | Tom Giffin | 694 | 3/09/01 | Michael Herrera |
| SEPARATE GROUP | | | 695 | 3/20/01 | Dale Newman T |
| 594 | 8/03/98 | Dolores Cordell T | 696 | 3/19/01 | Deb Kintzing |
| 596 | ? | Pasillas | 696 | 3/20/01 | John Bradley T |
| 599 | 10/26/98 | Mike DeStephano T | 697 | 3/23/01 | A Ron Stevens T |
| | | | | 3/24/01 | Michael Jones |
| 607 | 2/15/89 | Anthony Reese ⁵ -OS | 703 | 3/28/01 | Dave Jacobs T |

A) THE SIX WITNESSES WITH AN A TO THE LEFT OF THEIR NAME HAVE WITNESS STATEMENTS THAT ARE SUPPRESSED FOR INTERVIEWS RE: THE ID OF ME.

¹ We really need to find how DL identified his interest in talking to this very tangential and remote witness. We believe this information could only come from Ms. Campbell, but it does not appear in any WS.

² This one is both important and mysterious. See exh. 9 to 5/1/11 Spr. Ct. filing by Goodwin, pp. C1-C6.

³ An FBI report analyzing a possible link between her husband's murder and Thompson's is noted in her WS but is missing. There are over a dozen FBI reports confirmed in other discovery that are suppressed, CRITICAL!

⁴ DL appears to give Dolores Cordell credit for this. However, the 1st WSS he has produced for an interview with her on the homicides is 15 months later. And no WS with her and any investigator gives this information.

⁵ This typed WS and the next 4 were misleadingly typed or retyped from 1989 WSS (note dates). The 1989 WSS were not produced. These WSS were made to look like, to the casual observer, that they were done in 1997. And, 3 important reports that were noted as originally attached, were not attached.

P11

11/5/11 UPDATE ON ALLISON TRIARSI FALSE TESTIMONY

Since the next five pages, Q1 through Q5 were written, we've discovered new evidence on Allison Triarsi which strengthens our probabilities of having her testimony stricken. This is well supported by California & United States Supreme Court law.

In the next five pages we identified at least 6 instances of material false testimony for Allison, the only crime scene eye-witness.¹ Without her the State case collapses, truly implodes.

Since this was prepared we've completed a much more detailed study, 25 pages long, vs. five here, which establishes at least ten instances of false testimony, plus we feel some of them appear to qualify as felony perjury. However, Penal Code 1473 (b) (1) does not require that we prove either A) perjury, or B) the prosecution's knowledge of the falsity to require reversal of the conviction.

However, possibly most important is that via the new evidence & consequent analysis of Allison's testimony using it, we can prove:

- 1) That she saw a white suspect, contrary to her testimony, "I can't recall." It appears she actually made note of the white.
- 2) Contrary to her trial testimony, she did not see Trudy get shot, nor Mickey outliving Trudy.

With these revelations the State case is steamrolled.

1) On the following list we have most often used perjury rather than false testimony. That is because it is shorter, & in either instance it requires reversal.

SUMMARY, MATERIAL TRIAL PERJURIES BY ALLISON TRIARSI, PROVEN ON THE RECORD.

Allison was the only witness to what occurred at the crime scene^a, & the only witness who could & did give testimony that Mickey survived Trudy. The DA turned this into the provably materially false crime scene script that Mickey was intentionally held & made to watch Trudy be shot before he was killed, in a gruesome & bizarre "Death Dance," RT-8744:5-23, 8734:1-14, 8773:6-12, many more.

Yet the evidence shows, at least to a prima facie level, that Mickey was killed 1st. This script was manufactured 9 years after the fact, which is the 1st time it surfaced, by provably corrupt Det. Mark Lillyfeld, to incriminate me. The argument was that I hated Mickey so much I wanted him to suffer by seeing Trudy killed before he was killed. This permeated the trial. And, we can prove material perjuries by Allison, as are summarized below.

Allison testified to this particular issue in heart wrenching details at Vol 12-4628, 4631-52, with an interesting sidebar at 4643, 4693-5 & 2 years earlier at the prelim, CT 2-535-544 & throughout the balance up to 563. When one looks closely they see fatal conflicts in Allison's sworn testimony between the prelim & trial, which I submit rise to the level of knowing perjury, violating Penal Code (PC) 118 and/or 125 felonies. I am confident that investigation will prove this perjury was suborned by the prosecution team^b. Allison also has several witness statements (WSS) that are suppressed for confirmed interviews. See our request for crime scene discovery sent to the Attorney General, & p. 6.

1. At the prelim, CT 2-552, she testified that she watched the entire attack through a large window in the bathroom after her mother came in & took her out of the shower after the shooting started.

But, at trial she changed that to she was taken to the dining room for the entire attack, from which she watched, Vol 12-4628:11, 4629:7, 4667:25, 4678:20. This alone should dispute her honesty & impeach her.

a) On the record.

b) Violating PC 127.

Q1

1 2. 2nd Perjury. Allison testified at the prelim, "The bathrom (in which I laid
2 down in to watch the entire attack) had a complete view of the attack, with
3 big floor to ceiling windows right next to the tub/were the wall of the tub",
4 (All of her quotes of testimony are accurately paraphrased), CT 2-552.

5 But, at trial she yet again changed her testimony 180° to not only her
6 admission/testimony in Perjury #1 on the prior page, that she watched the
7 entire attack from the dining room floor, but also she admitted that the
8 bathroom only had a small window, Vol 12-4668:4. This makes better sense
9 also than a window in the bathroom wide open to the world.* But, the issue
10 here is that contrary to her prelim testimony, she could not lie on the
11 floor & see out a small window that no doubt is at a high level to hinder
12 prying eyes.* (particularly with a 14 year old young lady in the house.)

13 3. 3rd Perjury. Here is where, when caught in her perjury, she tried to cover
14 it up with what turns out to be more perjury. When my trial lawyer cited
15 conflicts between her testimony & her only produced witness statement (WS),
16 7/30/97, bps 00512-515, IFNS suppressed, at the 2004 prelim, Allison said

17 "About 5 years ago (which would have put it in about 1999) I located my
18 journal (her "Journal of Nightmares" that her psychiatrist told her
19 to keep of dreams & thoughts about the trauma of witnessing whatever
20 it was she saw, or felt she saw^a), I reviewed it, & it helped me recon-
21 struct the true facts", CT 2-551:17, 560:20, 551:2-14.

22 Yet at trial Allison testified to reviewing her journal when she was 23
23 years old in Grad school, 4660:10, 4690). She testified at trial that she
24 was born in 1973, 4690:17. Thus when she was 23 years old in grad school,
25 when she testified to reviewing the journal, that would have been in 1996,
26 the year before the 1997 interview that she testified was only in conflict
27 with her prelim testimony because she did not review the journal until
28 after that 1997 interview, in 1999. The 1997 interview WS is the only one
that has been produced for Allison, although several others are suppressed.

a) The journal conveniently had disappeared, but the DA has constructive possession.

Q2

Each of the perjuries summarized herein are much more material to guilt or innocence than is obvious here. See my document (doc) #N-087 for details, & also a listing of much of the suppressed & otherwise missing evidence for her.

4. 4th Perjury. At the prelim Allison testified:

"I first heard bicycles from up at our house; it is easier to hear there." That was at CT 2-544:25. But by trial her testimony had changed yet again.

"I heard the bicycles while I was down at Trudy's body," Vol 12-4661-2 The DDAS (Deputy District Attorneys) argued that the bicycles she heard were bicycles that the allegedly fleeing black killers were riding. I was convicted on unidentified black bicyclists seen 2½ miles away, even though no crime scene witness ever said they saw a bicycle or a black person on the crime scene, & every crime scene witness reported a white suspect that they described similar physical descriptions for. Evidence cites are available.

The DDAS simply created Allison's testimony, or suborned perjury with her to "fit" their fabricated theory of the case. My trial lawyer missed 90% of this & refused to listen to me & challenge the inconsistencies when I noticed many of them, as she did with dozens of even more obvious issues.

Underscoring that Allison did not "correct" her recall by reviewing her journal after her 1997 interview, as she committed perjury on at the prelim, perjury #3, prior page, she had testified to the "I heard the bikes from up at our house" at the prelim, after she gave the 1997 witness statement that "she heard them from down near Trudy's body." And, as per perjury #3, she had already read the journal before the 1997 interview.

Note that she flip-flopped. In the witness statement she said she heard them from down near Trudy's body, bp 00514, top. Then at the prelim, "I heard them from up at the house", then at trial, "heard them at the body"

It is of note that the Triarsi home is considerably above & away from the Thompson home. Allison got down there via a long driveway, 4663:17, Exh 44.

Q3

Reinforcing that this was knowing perjury, which mandates reversal, is that Allison also testified that she "went down to the Thompson home after she heard the bicycles," CT 2-547:14.

4A. Possible Perjury. I won't yet count this one as an individual perjury, because a) it is more difficult to prove, & b) it may be more appropriate to include under perjury #4.

Allison testified "I heard the bikes clicking 15 seconds after the last shots in the attack," CT 2-547:10 at the prelim. Recall also that she testified that "I ran down to Trudy's body after all the shooting was over," V12-4680:8 & 19. Note that at trial she also testified to hearing the bikes while she was at Trudy's body. She testified at the prelim that after the shooting stopped she went outside to look for her parents & found her Dad outside, 544:8 & 554:16. She also testified to running down the long driveway to get to the Thompson home.

None of these impossible delays she testified to "fit" with getting down to Trudy's body quickly enough to be there to have heard the bicycles just 15 seconds after the last shots. Perjury #5 makes it even worse.

5. 5th Perjury. At trial she testified she did not see her Dad after the shooting started until after the police came, 4678:21. But at the prelim she testified to finding her Dad outside before she went down to the Thompson's home where the body's were, CT 2-544 & 554. One of these is impossible.^a

The conflicts never end. Although only in her witness statement, there she reported that during the shooting she went outside & watched the attack from a sideyard with her Dad, bp 00513 middle. All of this conflicts with her testimony at 4680 that her parents didn't know she went down to the Thompson home. That also conflicts with her father Anthony's report at bp 00424+, also taped, that Phyllis & Allison drove down together.

a) They are mutually exclusive.

Q4

Putting perjury #5 more into question as to Allison's truthfulness, her mother Phyllis stated in a witness statement that both she & Allison had stayed inside for the entire incident & seen nor heard anything, either bp 00030 or 0308.

And, perjury #6 below blows Allison's entire story that she went down.

6. 6th Perjury. Two "1st responder" law enforcement officers testified both to employing procedures on the crime scene that would have let them absolutely ascertain if anyone was on or near the crime scene, & that Allison nor any other civilians were there. Those are officers Ruben Gracia, Vol 14-5138:24 & Rodriguez at Vol 19-7004:24. Another, Mullis, didn't see her, bp 33651-6.

7. Allison's largest perjury is also provable but not with on the record items.

Her most damaging testimony was that Trudy was killed first in front of Mickey to torment him, which the DDAS argued was a manifestation of my alleged hate for him. The hate was also fabricated via perjury that I had threatened him.^a But, except for Allison's testimony that Trudy was killed 1st, all of the other compelling evidence shows that Mickey was killed 1st.

See my detailed brief on this, DOD (for "Dance of Death" coined by the DDAS), with supporting evidence attached. If you don't have, please request. Thus when we get all of the suppressed evidence on "Who Died 1st" as is listed in the Crime Scene evidence request list sent several times to the AG, we will be able to prove that she fabricated the crime scene script in a collaberative effort with the prosecution. This is PC 118 felony perjury by her, PC 127 felonies by the DDAS, & they all combined in a Penal Code 182 (1) through (5) Conspiracy to Falsely Convict using knowingly false & fabricated evidence, and Obstruction of Justice.

Evidence also indicates, & we will eventually prove, that the D.A. intentionally hid, fabricated & destroyed evidence in additional Penal Code 141(b) felonies to allow them to accomplish this Fraud on the Court.

There are even more material conflicts between her interview notes & testimony.

Q5

EVIDENCE THAT IS CONFIRMED, BUT SUPPRESSED OR OTHERWISE MISSING FOR ALLISON TRIARSI

1. Her Journal/Diary in which she recorded specifics, & reconstructed her memory for her 1997 witness statement and/or her later testimony, CT 2-550:24, also elsewhere.
 2. The files of Dr. Laamele (sp), the psychiatrist she saw for years about this episode, 12 RT 4656.
 3. Any notes or files made by the school teacher and/or counselor whom she broke down to originally before going to see the psychiatrist, 12 RT 4656-4689, CT 2-550-560.
 4. The IFNS (investigator field notes) and/or tape for the July, 1997 witness statement which was produced for her in typed form at bp 000512^A.
 5. Her witness statement for her day of the murders interview she confirmed at CT2-559.
 6. All other interview witness statements for Allison. Evidence that those may exist are at bps 35535 referencing 10/7, 10/14 & 12/13/88^B, clue #592, 33429 including a telephone number on which she was to be reached, or was reached, & CT 5-1262. The last one is peculiar & material. It says, "10/6/88, no information." If that reads correctly, how did she have so much information that perfectly "fit" the D.A. case later?
 7. It is not credible that with the only witness statement (WS, plural WSS) that was ever discovered for Allison, that her memory was so in conflict with the D.A. case, that they would have put her on as their star witness, the only witness who testified re: the actual crime scene, without 1st interviewing her again before her testimony. No competent prosecutor would do that. And, although evidence proves that these DDAS are corrupt, regularly lying to the judge & jury on material issues, they are competent.
- Prosecutor notes of interviews with witnesses are discoverable. See THOMPSON V. SPR. CT. (1997) 53 Cal App 4th 480, 483, People v. WILLIAMS (1979) 155 CR 414, 427.
8. The officer Mullis report confirmed at bp 33651-6, "one of 1st responders," yet no notation of Allison at scene as she claimed. Also, all crime scene officer reports.

A) In re: STEELE (2004 32 Cal 4th 682 requires all this evidence be produced in this LWOP case. BARNETT V. SPR. CT. (2007) 54 CR3d 295, 306, later ruling at 50 Cal 4th 890 leaving this intact, requires that all witness statements be produced for all interviews.

B) I believe, but cannot be certain since guards took my files & refuse to allow me to see them, that her mother Phyllis was interviewed on this day. It appears she was also.

9. Allison's mother Phyllis was interviewed on either 12/13/88 or 1/10/89, not clear. The IFNS are suppressed & we are entitled to those. In addition, it is very suspicious that no interview notes show up for this period for either Phyllis' husband Anthony or Allison. This is underscored by Anthony being the most graphic witness to the actual shooting on his 911 call, bp 000185-194±, & it seems being one of if not the most interviewed witness the day of the murders & just thereafter.

There is no witness statement even indicated for Anthony for the 9+ years after the murders until May 1997, & then none ever after that. It makes no sense for the apparently most reliable witness to the actual crime scene.

L.A.S.D. investigators featured Anthony on their AMERICA'S MOST WANTED (AMW) taping in May, 1997, bps 32644-53 & 32664-6. Just like the DDAS putting Allison on as their sole crime scene eyewitness after her allegedly only prior witness statement so badly contradicted their theory, it also makes little sense that L.A.S.D. would put Anthony on a big show intended to "flush out" suspects without a prior witness statement after those the day of & shortly following the murders.

This is particularly true for Anthony when he has always relentlessly said he saw a white shooter. Yet the AMW program was designed to break the story on the black shooters/Dance of Death, Mickey held & made to watch Trudy be killed.

Thus we stress the need & that we are entitled to all Anthony & Phyllis WSS. There is extensive evidence that many are suppressed & there is other very material evidence in them not available elsewhere beyond the shooter's race.

10. AMERICA'S MOST WANTED (AMW); This will be a true "smoking gun" which will prove Det. Lillienfeld's dishonesty by proving some of his outright lies & frauds, e.g. falsely dating interviews to hide problems for him on the case. Anthony Triarsi was interviewed for AMW ostensibly on 6/9/97, bps above. Two issues arise. Lillienfeld's interview notes for that date with Anthony have powerful "telitales" which I have identified/listed which show that his notes were taken from the AMW taping. See bp 026666 IFNS, typed at bp 000424. But that is not the big issue, a fraud. Q7

The big issue is this, & it is an outright false police report, a Pen C 118.1 felony by Lillienfeld, one of over 100 which evidence proves he committed in this investigation. Please request our study on that, including conclusive evidence.

As noted on the prior page, Anthony T. was interviewed on AMW, noted as 6/9/97, at bps 32644-53 & 32664-6, with the transcription of bps 32654-32663 strangely missing. I did note however that at the beginning of the second part of the segment that the interviewer told Anthony something like "tell us that again, like you told them." Who is them? I then looked for the missing segment of the transcript & voila!

Lance & Sandra Johnson are interviewed in the missing segment, which is transcribed at bps 32654-63. This may at 1st glance not seem like an issue, but:

A. Although it is clear that Lance & Sandra were the people that the narrator was referencing when he said "tell it again like you told them," the Lance & Sandra interview was listed by Lillienfeld as occurring 3 days prior on 6/6/97. Why would that be unless Lillienfeld was trying to hide something?

I submit that the "information" on this case has been shared so much between witnesses, with a hidden agenda injected by the victims' sister Collene Campbell, that it has become incutuous & the truth cannot be separated from hearsay, suggestion, innuendo, rumor & outright plants. It is in fact clear that the Lance & Sandra AMW interview is primarily hearsay. But there is more.

B. Lillienfeld presented the Anthony T. interview witness statement for 6/9/97 like it was a true correct interview he took. It strongly appears not to have been an interview at all, but merely Anthony's statements lifted from the taping.

Further, a witness statement should not be taken with other witnesses, here

Lance & Sandra, present. If they were, that is at least highly improper.

11. The CBS 48 HOURS taping for Allison, Phyllis, Anthony, confirmed at 12 RT 4683-84.

12. Verification of the date that prelim & trial exhibit photos were taken & also that the sightlines were as represented. There are indications they were fudged on.

There is much more, e.g the entire crime scene suppressed evidence list, 40+ items, follow up on bps 007293, 008824, composites prepared by Triarsi family input, etc; End

WANTED FUGITIVE

Unknown Thompson Killers Suspect #1
Murder
Data From: Los Angeles County S.D.
(AMW: 12/6/97; 3/27/99; 2/17/01; 2/9/02;
8/9/03)

SEND A TIP

| | |
|----------|-------------------------|
| AGE | 32-45 ² |
| D.O.B. | Unknown |
| HEIGHT | 6'0" ³ |
| WEIGHT | 175 ³ |
| HAIR | Brown |
| EYES | Brown |
| RACE/SEX | Black Male ⁴ |

| | |
|---------|--------------|
| LKA | Bradbury, CA |
| PA | N/A |
| NCIC | N/A |
| FBI | N/A |
| SS | N/A |
| UFAP | N/A |
| ALIASES | N/A |
| SCARS | N/A |

**Additional Quirks:**

SEE ANNOTATIONS FOLLOWING

1. Thin muscular build ³
2. Rode bicycle from crime scene
3. Had a partner (see suspect #2)
4. Wore a dark colored hooded sweat suit ⁵
5. Police believe he may be from Florida, Bahamas, Jamaica, Caicos, or the Grand Turk Islands

Story:

Police say, that on Wednesday, March 16, 1988, Mickey and Gertrude "Trudy" Thompson were gunned down in the driveway of their home in the exclusive community of Bradbury, CA (near Pasadena). Mickey Thompson was a famous race car driver and an inventor. He broke the land speed record in 1962 and was considered a pioneer in the car racing circuit.

Witnesses indicated to police that the suspects were possibly seen in the area days prior to the murders ⁶ unloading bicycles from a "brand new" maroon Volvo station wagon. Both suspects fled on bicycles after the murders. Police say, after seeing the story aired on America's Most Wanted, a witness came forward ⁷ and told authorities that he had seen the two suspects throw their bikes into the back of a Ryder moving truck and drive away.

There is a one million dollar reward for information leading to the identification and arrest and conviction of the people who perpetrated this crime.

R1

WANTED FUGITIVE

Unknown Thompson Killers Suspect #2
Murder
Data From: Los Angeles County S.D.¹
(AMW: 12/6/97; 3/27/99; 2/17/01; 2/9/02;
8/9/03)

SEND A TIP

| | |
|----------|-------------------------|
| AGE | 32-45 ² |
| D.O.B. | Unknown |
| HEIGHT | 5'10" ³ |
| WEIGHT | 185 ³ |
| HAIR | Brown |
| EYES | Brown |
| RACE/SEX | Black Male ⁴ |

| | |
|---------|--------------|
| LKA | Bradbury, CA |
| PA | N/A |
| NCIC | N/A |
| FBI | N/A |
| SS | N/A |
| UFAP | N/A |
| ALIASES | N/A |
| SCARS | N/A |

**Additional Quirks:**

1. Muscular stocky build
2. Rode bicycle from crime scene
3. Had a partner (see suspect #1)
4. Wore dark colored hooded sweat suit⁵
5. Police believe he may be from Florida, Bahamas, Jamaica, Caicos, or the Grand Turk Islands

Story:

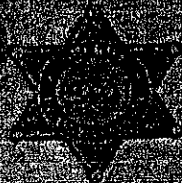
Police say, that on Wednesday, March 16, 1988, Mickey and Gertrude "Trudy" Thompson were gunned down in the driveway of their home in the exclusive community of Bradbury, CA (near Pasadena). Mickey Thompson was a famous race car driver and an inventor. He broke the land speed record in 1962 and was considered a pioneer in the car racing circuit.

Witnesses indicated to police that the suspects were possibly seen in the area days prior to the murders⁶ unloading bicycles from a "brand new" maroon Volvo station wagon. Both suspects fled on bicycles after the murders. Police say, after seeing the story aired on America's Most Wanted, a witness came forward⁷ and told authorities that he had seen the two suspects throw their bikes into the back of a Ryder moving truck and drive away.

There is a one million dollar reward for information leading to the identification and arrest and conviction of the people who perpetrated this crime.

R2

SPECIAL



B

1998 Wanted Poster
W/ 2 FBI Warrants

LOS ANGELES COUNTY

SHERMAN BLOCK, SHERIFF

WANTED FOR MURDER \$1 MILLION REWARD

Suspect #1 (left): Male, Black, 6' 0", 175 lbs.
thin muscular build, taller than suspect #2

Suspect #2 (below): Male, Black, 5' 10",
185 lbs. muscular stocky build, shorter than
suspect #1



Occurred: March 16, 1988
Location: 53 Woodlyn Lane
Bradbury, A. County)
Victim #1: Mickey Thompson, MW/59
Victim #2: Gertrude (Trudy) Thompson, FW/40
Weapon: Medium caliber handgun
Vehicle: 10 speed bicycles and
cassette player, 1988 maroon
Volvo station wagon

NONE OF THE SOURCE DATA, THE WITNESS
STATEMENTS WHICH "BUILT" THIS WERE
PRODUCED IN DISCOVERY. AND THESE
SUSPECTS CONFLICTED MATERIALLY WITH THE
SUSPECTS SEEN NEAR THE CRIME SCENE. ALSO
THE VOLVO STATION WAGON WAS OWNED BY THE
TRIGGER MAN FOR ANOTHER PRIME SUSPECT.

R3

1. Data provided by Los Angeles Sheriff's. The source data/witness statements from which these composites were never discovered for the defense. Since the physicals conflict so much with the suspects seen on the crime scene, all five witnesses reported only a white suspect on the crime scene, & also conflict with the physicals of the bike riders seen near the crime scene, we need & are entitled to this data. We have never been provided with the official suspect descriptions which were used to identify and/or eliminate suspects.
2. Again, the ages differ so much from the "teens to early 20s" reported by most witnesses, including trial witness Wilma Johnson, Vol 13-4955:15, we need, & are entitled to the source data from which this age description was ascertained.
3. Yet again, the physical descriptions on this sketch/composite, which became trial exhibit 51, & was extremely prejudicial in my false conviction, are so different than the only description given of suspects seen near, but not on, the crime scene, that we need this source identified. See CT 2-420:7, testimony by Lance Johnson, the only witness who described the size of the black bicycle riders seen near the scene. He testified to 6'2", 220 pounds. That is dramatically different than listed on this composite, 6', 175 pounds & 5'10", 185 pounds.

Note also thin on page one here. Lance Johnson testified to muscular, bulky. In one of his witness statements he described the suspects he saw as possibly larger. All of the other LASD reports we have seen, e.g. 000014 & 000073 say 6'2" 220 pounds. Another report says 6'3" & the two suspects Lance described were always described as looking almost alike. The suspects' sizes on the poster which became D.A. trial exhibit 51 belies that.

4. Race black. We, the defense, have not seen one witness statement (WS) from any of the five witnesses who claimed to see the actual shooting or the activities on the actual crime scene, the Thompson front driveway, who reported any suspect there except a white shooter or suspect. We have not seen any crime scene witness statement which says they saw a black or bicycle on the actual crime scene.

The speculation that the killers may be black comes only from black bicycle riders seen on the county bike path the morning of the murders. The bike path runs right by the Thompson property & possibly through it via an easement.

5. These hoods conflicts with trial testimony, CT 3-693:24. Source data please.
6. Many confirmed interviews & even entire reports are suppressed re: these suspects. They are very high probability. Please produce all relevant discovery.
7. Here again much confirmed investigation documentation is suppressed. Please produce.

- 1) This page is a summary only. There are seven more pages of details for "friendlies". The prior page is prosecution trial exhibit 51.

R4

VERIFICATION

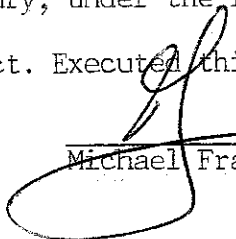
1. I Michael Goodwin declare that the following matters are declared of my own personal knowledge, & if required I could & would testify thereto truthfully under oath.
2. All statements made by me within the attached or enclosed document are known by me personally, except any which I have specifically attributed to being told by others.
3. This is specifically relevant to/intended for the argument & evidence included here proving to a prima facie level that the prosecution reversed the order of death of Mickey & Trudy Thompson. And, per P1-P11, Q6-Q8, R4 it is proven that there is extensive evidence that other evidence proves exists & that the prosecution had that is suppressed, & appears that it will be materially exculpatory.
4. In fact, I have both scrutinized the existing items on the 16 pages of suppressed evidence just preceeding this verification^A, & added to it, & swear to this. That evidence, when produced, will:

- A) VERIFY MY ACTUAL INNOCENCE BASED UPON THE PROSECUTION CASE, and
- B) PROVE THAT I WAS INTENTIONAL FRAMED BY THE PROSECUTORS/INVESTIGATORS, &
- C) CONCLUSIVELY PROVE NUMEROUS FELONIES WERE PERPETRATED TO FRAME ME.

5. If this evidence is produced, not tampered with or "cleaned", & I am unable to prove the above issues, I will forfeit all rights I have to an appeal and/or habeas corpus petition, resolving to stay in prison for the rest of my life even though I am not guilty of the crime of which I was fraudulent convicted.

- A) Pages P1 through P11, Q6 through Q8 & R4, actually not just preceeding. This is less than 5% of the suppressed evidence. There are 250+ BRADY violations.

I declare to the above under penalty of perjury, under the laws of the State of California, that the foregoing is true & correct. Executed this 15th day of November, 2011, in Susville, CALIF.


Michael Frank Goodwin.