

1 MICHAEL GOODWIN, IN-PRO PER FOR MY HABEAS CORPUS PETITION  
F69095, B-2-147L HDSP  
2 POB 3030, SUSANVILLE, CA. 96127

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

4 THE PEOPLE  
5 Plaintiff & Respondent  
6 v.  
7 MICHAEL GOODWIN  
8 Defendant & Petitioner

CASE# \_\_\_\_\_, RELATED TO CASE  
GA052683-01, 2nd Dist. Appeal B197574  
MOTION FOR ORDER DIRECTING THE LOS  
ANGELES DISTRICT ATTORNEY TO COMPLY  
WITH THE CONSTITUTIONAL OBLIGATIONS  
OF BRADY V. MARYLAND 373 U.S. 83, 87  
TO PRODUCE SUPPRESSED EXCULPATORY  
EVIDENCE & CONFIRMING D.A. MATERIAL LIES.

9  
10 Comes now petitioner, Michael Goodwin, being unlawfully incarcerated in  
11 violation of the Eighth Amendment of the United States Constitution, requesting  
12 an order from this Court ordering that the Los Angeles District Attorney comply  
13 with their obligations under Penal Code 1054, authority known as BRADY, & the  
14 progeny of BRADY, all of which require the discovery of material exculpatory  
15 evidence not repetitive & which cannot be obtained from any other source.

16 The California Supreme Court has ruled that this Court, the original trial  
17 Court is the Court of jurisdiction, in re: STEELE (2004) 32 Cal 4th 682, 10 Cal  
18 Rptr 3d 536, 542-547. This Court ruled that I deserve my PC 1054 evidence.<sup>1</sup>

19 This request/application for an order from this Court is based on the  
20 attached memorandum, exhibits & evidence, the files & records in this case,  
21 including the pleadings filed by petitioner since April 2011 & the exhibits-  
22 evidence appended thereto. The authority which this Court has been noticed on  
23 firmly establishes that petitioner is entitled to file his habeas corpus  
24 petition now because of the unjustified delay in his direct appeal being filed.  
25 Because of the doctrine of "one bite of the apple" in filing a habeas petition,  
26 ergo, petitioner restricted to filing only one habeas petition, petitioner needs  
27 the extensive suppressed material exculpatory evidence which petitioner has  
28 evidence to this Court exists, over 250 BRADY violations.  
1) But, has not yet ordered discovery thereof.

  
Michael Goodwin Date 9/14/11

3. "Mike McGhee seized the boat on which Goodwin was living in Guatemala, leaving Goodwin stranded with no home & no transportation. That is the only reason Goodwin is sitting in that chair being prosecuted," accurately paraphrased from Jackson's closing argument at RT-8784:27, evidence page B1 in exhibit C here.

DDA Dixon stated similar in his rebuttal close at RT-9027:13, evidence page C in exhibit C here.

Jackson & Dixon were only able to argue this because they had repeatedly told the Judge via "solemn representations," with no jury present, that Jackson had himself interviewed McGhee, a "boat hunter/reposser" & that McGhee had told Jackson that he had repossessed the boat in Guatemala. See those representations at evidence pages D1 > D6, Vol 19-6901-6906 in exhibit C here. Because of those representations the Judge gave them the stipulation at evidence page A in exhibit C. That stipulation was read to the jury at evidence pages F1 & F2, plus it was used to obtain an otherwise unobtainable "fled as consciousness of guilt" jury instruction, read to the jury at evidence pages G1>G2 in exh. C. However:

**McGHEE NEVER TOUCHED THE BOAT, NOR DID HE TELL JACKSON HE HAD DONE SO.**

In fact, as is 100% true, & extensive suppressed evidence which other evidence proves that Jackson & Dixon had & hid, proves is true, McGhee told them that he was waiting for Goodwin to bring the boat to Florida, evidence page I-2 in exh. C here. Evidence pages I-3 & I-4 prove that the boat was in Florida & McGhee told Jackson that. Evidence page H proves that Jackson was in the interview.

This is a HUGE FRAUD ON THE COURT, provably known by the DDAS as perjury when they attributed it to McGhee who never said what they said. They also had extensive other suppressed evidence proving that Goodwin brought the boat to FLA.

This is so black & white of a fraud by the DDAS that we included a much more detailed explanation in exhibit C, with extensive evidence. Evidence pages N & Q there are lists of suppressed evidence from our 186 page lawyer prepared inventory of 2100 suppressed documents the D.A. has. We've identified 250 BRADY vios therein.

EVIDENCE CONCLUSIVELY PROVES MULTIPLE SERIOUS FELONY CRIMES & LIES TO THE COURT  
BY LOS ANGELES DISTRICT ATTORNEY CANDIDATE ALAN JACKSON<sup>a & b</sup>

DEPUTY DISTRICT ATTORNEYS (DDAS) ALAN JACKSON'S & PATRICK DIXON'S REPEATED LIES, INTENTIONAL/BLATANT, TO OUR JUDGE, THAT MIKE MCGHEE SEIZED OUR BOAT IN GUATEMALA

These are felony crimes violating Penal Codes 118, 125, 127, 182 under the law:

"Attorneys are officers of the Court & when they address the Judge solemnly upon a matter before the Court, their declarations are virtually made under oath" People v. MROCZKO (1983) 35 Cal 3d 86, 112, 197 Cal Rptr 52, cited in People v. MIRENDA (2009) 174 Cal App 4th 1313, 1332, 95 Cal Rptr 3d 702, 716.

It is hornbook law, undisputed, that speaking falsely under oath is a felony crime. Penal Code (PC) 125 establishes that even making a statement that one does not know for certain to be correct is equivalent to making a statement you know to be false.

In short Jackson in particular, but Dixon also repeatedly solemnly represented to our Judge both that A) a person by the name of Michael McGhee had told Jackson in a face to face interview that he had seized the boat on which I was living in about 1991 in Guatemala, & B) that McGhee in fact had seized the boat in Guatemala.

Jackson knew that both of those were untrue & that he alone had fabricated those statements after McGhee in that face to face interview, evidence exhibit pages I1 thru I4, explained/argued at page 4 line 2 of the included narrative, told him,

**THAT HE, MCGHEE, HAD WAITED FOR ME TO BRING THE BOAT BACK TO FLORIDA FROM GUATEMALA, THAT THE BOAT WAS BACK IN FLORIDA, KEPT AT A MARINA, & HE SAID NOTHING ABOUT SEIZING THE BOAT. IN FACT I BROUGHT THE BOAT FROM GUATEMALA.**

And, other evidence Jackson had, much of which he intentionally hid from the defense, including a critical witness statement from my ex-wife Diane Seidel, evidence pg. J here, conclusively proved McGhee not only never seized the boat but he had not seen it or touched it. The investigators/prosecutors gave him the information they wanted him to know to regurgitate. But, he still didn't say what DDA Jackson made up out of thin air & attributed to him, lying to the Judge about it. Yet Jackson argued, at RT-8784 in his closing, evidence pages B1 & B2 herein:

**"The only reason Michael Goodwin is sitting in that chair (on trial for murder) right now, the only reason he's back in this country is because he was left standing on a dock in Guatemala with no home & no transportation!"**

## EXHIBIT C

- a) Jackson is also a National NBC television crime commentator "representing" Calif.
- b) We have five more similar packages of evidence & explanation proving multiple other serious felony crimes & lies to our Judge by Jackson available on request.
- c) Jackson knew i'd been in the U.S. continually for nine years before I was charged.

DDA JACKSON & DIXON'S REPEATED LIES THE THE COURT ON STIPULATION #17 STATING THAT MICHAEL MCGHEE HAD SEIZED GOODWIN'S BOAT IN GUATEMALA, LEAVING HIM STRANDED

Jackson knew this was not true, that Goodwin (me) had brought the boat back from Guatemala to Florida with the assistance of his brother Marc, & that McGhee was a drunk - liar that police reports said knew nothing & was only interested in the \$1,000,000 reward. McGhee had first called & made up a wild story that the investigator noted was crazy (bp 29327) just a few days after the reward was announced.

Nonetheless, 6 years later, when their case was in serious trouble under the new D.A. in Los Angeles, & after my brother was addicted to drugs so he could not provide corroborating testimony that we brought the boat back from Guatemala, the DDAS reinterviewed McGhee & then lied massively about what he had told them<sup>a</sup>. Even though he told them I was bringing the boat back to Florida, & did not say anything about him seizing the boat, which he did not, anywhere, DDAS Jackson & Dixon lied to the Court repeatedly that he had told them he had "seized my boat in Guatemala, leaving me stranded there on a dock". Via these lies they obtained stipulation #17, attached p. A.

Then DDA Jackson argued that seizure was the only reason I was being prosecuted:

"The only reason Michael Goodwin is sitting in that chair (on trial for murder) right now, the only reason he's back in this country is because he was left standing on a dock in Guatemala with no home & no transportation." RT-8784:27

See exh. pages B1-B2. DDA Dixon echoed that at RT-9027:12-14, page C. Then Jackson administered the coup de grace at RT-8785:11 in his closing argument, by stating:

"...escape of a person after a crime is something you can...you should consider in determining guilt," page B-2

As we will see later herein at p. 9 & exh. Q+, in the 2nd part to this evidence/exhibit, I did not flee, nor was there evidence introduced to lawfully allow the fled jury instruction that was given, to be given. However, our focus here is more the DDAS' massive Fraud on the Court that McGhee seized the boat when they knew that was a lie.

**EVIDENCE THE DA HID IRREFUTABLY PROVES MCGHEE HAD NOTHING TO DO WITH THE BOAT**<sup>b</sup>

- a) Evidence also proves many lies in what he allegedly did tell them based on what is in the witness statement, & proves that the State gave him the info to "regurgitate".
- b) The Evidence proving that the DDAS lied massively to the Court about what McGhee had told them begins at page 4 & exhibit page H. The DDAS perpetrated a felony here.

1 This Fraud on the Court is much more complex & prejudicial than this thus far indicat-  
 2 es. I feel the best way to demonstrate this is to walk through the enclosed exhibit  
 3 pages with explanations/arguments on each of them. Each, A, B etc; is an exhibit pg.

4 A. The stipulation, #17, with my annotations thereon, which allowed the DDAS to use  
 5 the false & actually nonexistent (not given by McGhee, see pp. I1-I4) "testimony"  
 6 by McGhee to allege he had seized the boat on which I lived, in Guatemala. But, he  
 7 never said anything like was in the stipulation. **THE DDAS LIED TO THE COURT.**

8 "Attorneys are officers of the Court & when they address the Judge solemnly  
 9 upon a matter before the Court, their declarations are virtually made under  
 10 oath!" People v. MROCZKO (1983) 35 Cal 3d 86, 112, 197 Cal Rptr 52, cited in  
 11 People v. MIRENDA (2009) 174 Cal App 4th, 1313, 1332, 95 Cal Rptr 3d 702, 716.

12 See pp. D1 - D6 for DDA Dixon's declarations to the Court that McGhee had told  
 13 DDA Jackson<sup>a</sup> that McGhee had seized the boat in Guatemala. We also note the law:

14 "The individual prosecutor is presumed to have knowledge of all information  
 15 gathered in connection with the government's investigation!" In re: BROWN (1998)  
 16 17 Cal 4th 873, 879, 72 Cal Rptr 2d 698, 702, citing KYLES V WHITLEY (1995)  
 17 514 U.S. 419, 437-438, the controlling BRADY obligations by the government case:

18 "The prosecution's responsibility for failing to disclose known, favorable  
 19 evidence rising to a material level is inescapable," also 115 S. Ct. 1555, 1567-8

20 BROWN also cites U.S. v. PAYNE 63 F3d 1200, 1208 (2nd Cir. 1995) & SMITH v. Secty.  
 21 Dept. of Corrections 50 F3d 801, 824-5 which are instructive on this key issue. It  
 22 is critical because of the vast amount of material exculpatory evidence the DDAS  
 23 had disproving their case, but suppressed. Some of this evidence will be evidenced  
 24 & cited herein later at page 9 & exhibit pages J-N-O-P-Q & R thru Z2 except for Y.

25 In short, the District Attorney, & the individual DDAS, Dixon, head of Major  
 26 Crimes for the L.A.D.A., & Jackson, a 2012 candidate for L.A. District Attorney,  
 27 knew beyond any doubt, that A) I had brought the boat back from Guatemala to Flor-  
 28 ida with my brother, B) that McGhee had nothing ever to do with the boat, and  
 C) they only got away with this Fraud on the Court by intentionally hiding evidence.  
 Further, the entire scam was made exponentially worse by the fraudulent addition  
 of the "Goodwin fled" allegation proven as another Fraud on the Court in section II,  
 which together led to the bogus fled jury instruction & false fled/seized argument.

a) Jackson sat & listened to Dixon lie to the Judge & did not correct the Fraud.

1 B1-B2; From DDA Jackson's closing argument where he falsely stated 1) that McGhee<sup>a</sup>  
2 had seized the boat in Guatemala (McGhee never touched the boat,\* certainly not in  
3 Guatemala, the DDAS knew this), & 2) that my alleged "escape," demonstrated by the  
4 bogus McGhee seizure that never occurred, should be considered in determining my  
5 guilt. The DDAS obtained a "fled as consciousness of guilt" jury instruction as a  
6 result of this farce, CT 7-1992-5, not included here. \*(We can prove he never saw her)  
7 C; At RT-9027 in his rebuttal close, DDA Dixon<sup>b</sup> joined the chorus of lies by repeating  
8 that the boat had been repossessed in Guatemala, & upping the ante materially by  
9 adding the additional knowing lies that 1) the stipulation said I had not been  
10 heard of again until 1991 (see page A. It does not say that), & stating four times  
11 that I had disappeared. As we see in section II, I was living highly visible, LASD  
12 confirmed they knew where I was all of the time, p. R, & the DDAS hid that evidence.  
13 D1-D6; DDA Dixon's solemn declarations to the Judge, violating MROCZKO, supra, & I  
14 believe thus a felony perjury,\*\* as this entire knowing introduction of a fraudulent  
15 stipulation should be, in particular when the DDAS simply made up the alleged  
16 "testimony" & attributed it to the witness. These stated, at D2 line 13 (D2:13) that  
17 "Jackson was there when the quote was given" & at D3:18+ he summarized the quote,  
18 lying that McGhee had repossessed the boat. \*\*(violating Penal Codes 118-125-127-182)  
19 E (perhaps more will be added) One or more of the numerous pages of DDA argument that  
20 McGhee was not available to testify, this 1st one is Vol 17-6482, stating that was  
21 because of a storm in the Bahamas affecting his travel. But they lied. We checked &  
22 there was no storm. My Public Defender refused to challenge this although I stressed  
23 to her that I had brought the boat back & gave her cites for the evidence in disco-  
24 very proving that was the case, & that McGhee had nothing to do with the boat.  
25 F1-F2; The Vol 19-6988-6989 stipulation/jury instruction read to the jury on this.  
26 G1-G2; The RT-8715:26 onto 8716 fled jury instruction read to the jury, UNLAWFUL!  
27 a) Jackson lied materially on issues he knew he was lying about because of evidence  
28 he had, 16 times in pages RT-8783-85. I have those briefed & may add them for depth.  
b) Dixon also lied multiple times, (6 to 12 depending on how stringent we are) in  
his RT-9027 argument. I again, may or may not decide to include those near the end.

EVIDENCE PROVING THAT DDAS DIXON & JACKSON LIED TO THE COURT & KNEW THEY WERE LYING

H; A typed police report proving that Jackson was in the McGhee 8/16/04 interview.

I1 thru I4; the cover page & applicable pages from the McGhee investigator field notes (IFNS) for that interview in which Jackson was present, with the key issues:

- 1) He had waited for me to bring the boat back to Florida, page I2, and
- 2) That he stressed that I had the boat by saying that he had worried that I may sink her on the way back, also page I2. and,
- 3) That I kept her in a marina, page I3, which meant the boat was back in Florida.
- 4) Also on I3 & I4 that I owed money to lots of people in Pensacola, & that he even found a specific mechanic I owed money to for work on the boat.

Evidence proves that I brought the boat back myself, & that McGhee never even saw her, plus that the boat was never in Pensacola<sup>a</sup>. However for here the issue is that:

**McGHEE DID NOT SAY HE SEIZED THE BOAT ANYWHERE, & I BROUGHT HER TO FLORIDA**

So, this is firm proof with irremediable prejudice to me that the DDAS knew they were lying to the Court that McGhee had told them he repossessed the boat in Guatemala.

And it gets worse for them, but first, I did not obtain this witness statement until over 3 years after trial although my Public Defender, Elena Saris, had it long before trial, did not give it to me, & ignored it<sup>b</sup> although I repeatedly told her that I had brought the boat back. Had I been aware of this witness statement I would have never agreed to the stipulation. Without it the fled jury instruction would have failed.

J; An email from my ex-wife to a friend stating that Jackson & investigator Lillyfeld had showed up & interviewed her about 6 weeks after the McGhee interview. She confirmed to them that my brother & I had brought the boat back from Guatemala. Prosecutors also knew this from Customs & Immigration records that they had, Vol 20-7632, yet suppressed. They also suppressed this interview with her & the bank records re: this.

a) Although I came into Florida, I did not come to Pensacola but rather put her in a boatyard at the Florida-Alabama border for repairs. Suppressed evidence of this is referenced in my white collar trial, "interviews with boatyard workers that Goodwin brought the boat back to the States & turned her over to Maryland Bank's agent!"

b) Her ineffective assistance is legion. I quit at listing 50 instances that violated STRICKLAND. For example she did not play the CD of the interview that would have completely impeached the nexus conviction witness on her nexus conviction testimony. Her "errors" go way beyond being explained by inexperience, incompetence or laziness.

1 K. At bp 25333 line 10 of his February 2001 wiretap affidavit, page 36, Det. Lilly-  
 2 feld swore that I left Guatemala with the boat, leaving my wife at the time, Diane,  
 3 stranded there on a dock. Although it is true that I took the boat, that is not  
 4 correct in total either,<sup>a</sup> the issue is that both the DDAS' argument at trial that  
 5 McGhee took the boat, leaving me stranded, & Lillyfeld's sworn declaration cannot  
 6 be true that I took the boat & left Diane stranded. One of them must be lying.

7 That kind of crazy impossible conflict permeates the case if someone who is  
 8 unbiased just looks closely enough.<sup>b</sup> The prosecutors & investigators have simply  
 9 made the case so complex & convoluted that no one wants to take the time to look.

10 L. This is an annotated copy of bp 25333,<sup>\*</sup> the same page from Lillyfeld's declaration  
 11 that is in K above. On this one I give brief explanations to some of his many lies  
 12 & misleading statements. I have evidence assembled to prove my points.<sup>\*</sup>(also bp 25226)

13 M1-M4; Sworn testimony by D.A. expert witness Karen Stephens Kingdon attesting to her  
 14 having the boat loan file & reviewing it. Some of these are in the preliminary hear-  
 15 ing, CT 3-750-751, & some in the trial, Vol 18-6761-6762. This file proved that Mike  
 16 McGhee had no connection with the boat whatsoever & that Maryland National, the  
 17 bank that made the boat loan, had hired Wayne Vann<sup>\*</sup> to accept the boat from me,  
 18 which he did at the boatyard mentioned earlier, for which the government suppressed  
 19 the evidence.<sup>\*</sup> (His statement of getting the boat in Alabama is at bp 28315-318.)

20 N; A page from our inventory of the D.A.'s evidence locker showing, in item #76 at  
 21 the top of the page that they did have this Maryland Bank file. It is suppressed.  
 22 Had we had this we could have proven that McGhee had nothing to do with the boat.  
 23 See annotations on that pg. for other conflicts/evidence/proofs this page provides.

24 a) Diane had left me for another man when I told her I wanted to come back to the  
 25 States to clear my name from the murders we'd been hearing about my involvement in  
 26 from friends, & to get the Bankruptcy trustees to pay the creditors including Mickey  
 27 Thompson. She was living on another boat with Ronald Ridgeway & Lillyfeld knew  
 28 this. He had interviewed Ridgeway. Lillyfeld lies virtually whenever he wants.  
 b) For example in exhibit 11 we gave conclusive evidence that Jackson argued & pre-  
 sented (perjured) testimony that a \$2,000,000 asset, JGA/Whitehawk, was sold, with  
 me allegedly "taking the money & running," and we also proved JGA wasn't sold but  
 funded over \$2,000,000 into my Bankruptcies that was enough to pay Thompson & all  
 creditors 100% with \$1,000,000 to spare. But, Thompson's own lawyers, also D.A  
 trial experts against me, looted those funds, conclusive evidence proves.



1 Re: Lillyfeld's sworn statement that I had taken the boat, vs. the DDAS' rep-  
 2 resentations to the Judge & Jury that McGhee had taken it from Guatemala, that con-  
 3 flict is enough to call for reversal of the conviction, based on the following law,  
 4 even if we did not have the evidence, which we do have, of the DDAS knowingly lying  
 5 to the Court about what McGhee had told them & that he had seized the boat.

6 "Because it undermines the reliability of convictions or sentences, the prosecut-  
 7 ions use of inconsistent & irreconcilable theories has been criticized as  
 8 inconsistent with the principles of public prosecution & the integrity of the  
 9 criminal trial system. A criminal prosecutor's function is not merely to pros-  
 10 ecute crimes, but to also make certain that the truth is honored to the fullest  
 11 extent possible during the course of the criminal prosecution & trial!"

12 In re: SAKARIS 35 Cal 4th 140, Jackson obviously forgot his oath of office.

13 Not only did the "government take inconsistent & irreconcilable theories" here with  
 14 Lillyfeld vs. the DDAS, 5 years apart, that I presume they felt we wouldn't catch,<sup>a</sup>  
 15 but on the JGA was sold Fraud on the Court, the most prejudicial of the prosecution  
 16 I feel, the IRS, a government agency, ruled with the Bankruptcy trustee position that  
 17 Diane had owned JGA through at least 1989, which is when the final distribution was  
 18 made. See exhibit page "B" in exhibit 11 here. They did this to successfully saddle<sup>b</sup>  
 19 Diane & me with over \$1,000,000 in taxes, interest & penalties on the distributions  
 20 the trustees had received. Those distributions were impossible if we had sold JGA/  
 21 Whitehawk (they are essentially one & the same, JGA is the financial partnership in  
 22 which Diane & the pension plan invested, Whitehawk is the name of the 200 home devel-  
 23 opment in which JGA invested & received profit distributions from). JGA wasn't sold.

24 As stated, these conflicts are throughout the case. See exhibit D for evidence  
 25 proving that Mickey was killed before Trudy. Current O.C.D.A. Rackauckas was Mickey's  
 26 sister Colleen Campbell's lawyer at the time. He petitioned the Court to change that  
 27 to "it couldn't be determined who died 1st" & got sworn declarations from two D.A.  
 28 witnesses in the murder trial, Lance & Sandra Johnson, friends of Colleen's, to  
 29 support that. Colleen got a financial windfall. But then, as O.C.D.A., Rackauckas yet  
 30 again changed the crime scene "script" falsely, to allege Trudy was killed first.

31 a) I've detailed, with supporting evidence, over 100 perjuries in Lilly's declarations.

32 b) Note that "B" is page 6 to that document. All the other pages are suppressed.  
 33 Exhibit 11 not included in this version, but the IRS page is in exhibit B here.

1 This argument that Trudy was killed 1st, which began when I was charged on the  
 2 murders in Orange County, with no support on the record there, & the record showed it  
 3 was not true, was later amplified substantially in the Los Angeles trial. There  
 4 this was only supported by provable perjury from D.A. witness Allison Triarsi, who  
 5 A) 180° contradicted her only pre-trial witness statement that was produced, & B) is  
 6 proven as impossible by evidence the D.A. suppressed, a portion of which is included  
 7 in exhibit 15 here. Evidence proves six material perjuries by Allison, many of which  
 8 are proven by impossible conflicts within her own testimony. A brief is available.

9 This argument was fomented, intentionally fabricated, wherein the DDAS reversed  
 10 the victims' order of death, so that the DDAS could argue that I hated Mickey so much  
 11 that I wanted to punish him by making him watch his wife Trudy be killed before he  
 12 was killed seconds later. But, the evidence proves he was killed 1st, which destroys  
 13 the DDAS' case-in-chief that took up, along with allegations that supported it, more  
 14 than 2/3s of the volume of the DDAS' argument on the alleged "facts", 45 of 63 pages.  
 15 These types of DDA Frauds on the Court can be proven to permeate the prosecution.  
 16 Back to the boat which proves more DDA subterfuge & deceit, outright Frauds & lies.  
 17 O; Bp 26874 from Lillyfeld's IFNS (investigator field notes) proving that he spoke  
 18 with the Asst. U.S. Attorney (AUSA) that had the file, Carl Biggs, from Maryland  
 19 bank, at page 5 & exhibit page N that proves that McGhee had nothing to do with the  
 20 boat. And, also that the D.A. expert Kingdon had the original boat broker's file. It  
 21 is item #82 on "M" & will prove other key Frauds on the Court. Both are suppressed.  
 22 See endnote 2 at page for details on other exculpatory issues on bp 26874. < NOT  
 INC.

23 Critical as to the DDAS' frauds which amount to Penal Code 182 (1) thru (5),  
 24 serious felonies by them, Obstruction of Justice & Conspiracy to Falsely Convict, is  
 25 that trial exhibit 3, Vol 7-3050, put up without authentication, were the photos of  
 26 the boat in the boatyard in the U.S. where I brought her. The photos were taken by  
 27 Wayne Vann, the Maryland Bank agent who I voluntarily turned her over to (there was  
 28 no repossession). The DA hid this. THE KEY IS THE DDAS CREATED THE MCGHEE PERJURY,  
LYING THAT MCGHEE HAD TOLD THEM HE REPOSSESSED THE BOAT IN GUATEMALA IN STIP # 17.

## II. JACKSON & DIXON INTENTIONALLY LIED TO, & DEFRAUDED THE JUDGE & JURY THAT WE FLED

Evidence herein conclusively proves each of the following critical facts:

1. That we did not flee or try to hide from the police, & that I had the top criminal attorney in Orange County, Alan Stokke, representing me during the time in question. I was regularly in touch with him, & we continually offered to have me come in if I was charged. They never asked for me to come back in.
2. That even more than that, we lived completely normally & visibly for most of the time that the DDAS lied I was out of the country, actually in the U.S.
3. When we did leave the U.S. on the boat, or return, often flying in via normal commercial airlines, we checked in as required via Customs & Immigration. Anyone with any sense knows that there would have been a red flag on our passports had there been an arrest warrant. If I was trying to hide/flee, why would I have been so unwise as to come through Customs & Immigration?
4. The District Attorney & individual prosecutors all knew this. The evidence "in their briefcases" is overflowing proving these issues. Much is suppressed.
5. Jackson & Dixon only got away with this because A) they repeatedly lied to the Judge about it, who had a strong tendency to favor them (provable with various issues), B) they hid a massive amount of the evidence they had which proved issues 1 through 4 above, 3) the Judge refused to allow material exculpatory testimony on me not fleeing & being represented by counsel, even from the initial lead investigator Michael Griggs, who was prepared to confirm this, & 4) my public defender Elena Saris refused to both investigate to locate evidence/witnesses I told her existed to prove we had not fled, or even to present the evidence of that which we did have. She threw the case.

The law does not permit the fled jury instruction that was given, evidence exh G1-G2:

"A change of address is not evidence of flight," People v BONTILLA (2007) 41 Cal 4th 313, headnotes 1 thru 4, 60 Cal Rptr 3d 221.

"Departure alone is not sufficient to warrant a fled jury instruction...(to give this instruction) does manifestly require evidence\* of a purpose to avoid being arrested or observed." People v. CRANDALL (1988) 46 Cal 3d 833, headnote 20, accord People v. JURADO (2006) 38 Cal 4th 72, 41 CR 3d 319, 362. Also People v. Goodwin (1927) 202 Cal 527, 261 P. 1009. \*(emphasis added)

1 DETAILS OF THE EVIDENCE PROVING WE DID NOT FLEE OR TRY TO HIDE, & THAT THEY KNEW IT

2 Exh.<sup>a</sup>

3 R. Statement from Los Angeles Sheriff's Department (LASD) spokesman Sgt. Ron Spear  
4 confirming that they knew where I was & could talk to me at any time. That was  
5 partially as a result of me having legal representation who stayed in touch.

6 But, the evidence that LASD has to support this conclusion by Spear is suppressed.

7 Q. A list of suppressed evidence in the D.A. evidence locker on this case including<sup>b</sup>  
8 checking account statements proving they knew we lived completely normally under  
9 our real names for more than 6 months of 1989 in Florida. We actually were in  
10 Florida for more than 9 months of late 1988 & 1989, as will be proven by other  
11 suppressed evidence that I have seen evidence which proves that they have & hid.

12 S. A letter from Thompson's lead collection attorney, Dolores Cordell, stating that  
13 as of 5/17/88 she knew we were living in Florida. We'd sold the house so we could  
14 have only been living on the boat. That is in discovery at bp 33759. Cordell knew  
15 this because we had voluntarily had one of our lawyers tell her that.

16 T. My passport issued in Los Angeles to me on 5/11/88. Thus contrary to the media  
17 disinformation that Lillyfeld had disseminated that "Goodwin fled within days  
18 following the murders"<sup>c</sup>, I was here for at least two months before we left to pick  
19 up the boat. More importantly, see page T2 which proves that I entered the U.S.  
20 via normal Immigration procedures on December 18, 1988. I would not have done  
21 that had I been fleeing or trying to hide. This entry by me, & the LASD knowledge  
22 of it is also confirmed at bps 32860 & 34320. This is one of the material issues  
23 that the Judge would not allow the initial investigator to testify to.

24 I could illustrate many more entries into the U.S. on this passport, but it  
25 was illegally taken upon my arrest in a search & seizure that materially exceeded  
26 the scope of the search warrant, & evidently was not returned.

- 27 a. The exhibit/evidence pages won't necessarily be referenced in alphabetical order to  
28 start with since some of them were referenced for different purposes in section I.  
b. This is just one page of a 186 page official inventory listing over 2100 pieces of  
evidence, over 10,000 pages that the D.A. has that have never been produced for us.  
c. Los Angeles Times 7/16/93 & 11/28/99, Orange County Register 7/15/93, also others.

COMMENTS BEFORE WE GO INTO THE EVIDENCE PROVING THAT MCGHEE DID NOT SEIZE THE BOAT

Although the volume of evidence here proves that McGhee did not seize the boat, in fact never touched her, there are faster, more conclusive methods. Two pages following this is a list of suppressed evidence re: McGhee not seizing the boat. Item #4 there is "SLAM-DUNK" sure & quick proof that I brought the boat back to the U.S., not McGhee & that he had nothing to do with her. Those are:

DECLARATIONS & WITNESS INTERVIEW STATEMENTS WITH THE BOATYARD OWNER & WORKERS WHERE I BROUGHT THE BOAT TO DIRECTLY FROM GUATEMALA.

The declarations were used in my white collar trial to prove i'd brought the boat back. The witness statements have never been produced. The law requires that they be produced, *BARNETT V. SPR. CT.* (2007) 54 Cal. 3d 283, 295, 306, later ruling at 50 Cal. 4th 890 (2010) leaving this intact. Since these will be materially exculpatory, BRADY both requires production & reversal as a denial of due process for the suppression of this evidence which other evidence proves the D.A. has.

On the exhibit list on the next page, we have not included exhibit O, since it is 10 pages long & primarily about other suspects, tangentially linked. Neither have we included the pages beginning with evidence page "U" since they are voluminous, many alphas including multiple pages, and they are "icing on the cake" proving that we did not flee, which is not our primary focus here.

**THE PRIMARY FOCUS HERE IS NOT NECESSARILY TO PROVE MY INNOCENCE, BUT RATHER TO PROVE JACKSON & DIXON LIED THAT MCGHEE SEIZED THE BOAT**

The next page here is the exhibit list, the page following that is a list of suppressed evidence re: McGhee seizing the boat, the page after that a list of suppressed evidence proving that we did not flee, & that authorities knew where we were all of the time. This proves another lie not focused on here extensively. That is that we disappeared in May 1988 until 1991. But, see pages R, S & T.

Evidence is legion disproving that either A) we fled & tried to hide from authorities, and/or B) that the authorities did not know where we were. Should you wish to see the balance of the evidence we have compiled proving we did not flee from authorities, please ask. It is compelling.

Should any of the pages of evidence included here, beginning at A, the false stipulation # 17 that McGhee had seized the boat, reference pages beyond page 9, please ignore the references. That is because pages 10 thru 22 are exclusively about us not fleeing. Since that is not the main focus they are not included.

EVIDENCE LIST FOR EXHIBIT 14, "McGHEE SEIZED THE BOAT IN GUATEMALA & GOODWIN FLED"

- A. Stipulation #17, "McGhee seized the boat in Guatemala, leaving Goodwin stranded."
- B. DDA Jackson argument on this stipulation, in his closing, RT-8784:27.
- C. DDA Dixon rebuttal close stating the same thing, plus "He disappeared," RT-9027.
- D. DDA lies to the Judge re: What witness McGhee told them, Vol. 19-6901-6.
- E. DDA representations to the Judge that McGhee was not available, Vol. 17-6482.
- F. "McGhee seized he boat" stipulation read to the jury, Vol. 19-6988-6989.
- G. Fled jury instruction read to the jury, RT-8715:26 into 8716.
- H. Evidence proving DDA Jackson was in the McGhee interview, bp 100201.
- I. Appropriate pp. from the McGhee interview proving that the DDAS lied to the Judge.
- J. An e-mail confirmation that Jackson knew he was lying about the "McGhee seizure."
- K. Det. Lillyfeld's sworn affidavit that contradicts the DDAS, bp 025333.
- L. An annotated copy of 025333 showing several Lillyfeld inconsistencies & lies.
- M. D.A. expert Karen Kingdon's testimony that she had the boat files. These, which are suppressed, will prove that McGhee had nothing to do with the boat.
- N. A page from the inventory of suppressed documents showing the boat files.
- O. Bp 26874 from discovery, much exculpatory evidence. Annotations follow, 0-6 thru 0-9, evidence linking the Thompson murders to drug dealing, ignored.
- P. Bp 26470 from discovery, much exculpatory evidence, including we didn't flee.
- Q. Another of the 186 pages of suppressed DA documents. This shows we didn't flee.
- R. Sheriff's Dept. statement that they always knew where I was & could have talked to me.
- S. Thompson lawyer letter proving that she knew we were living in Florida.
- T. My passport showing legit entry into the U.S. during the time period the DDA claimed I had allegedly "disappeared."
- U. Sheriff's timeline showing they knew where we were & more, plus annotations follow.
- V. Bp 025388 from a top level LASD report, plus annotations at V2-V3 proving DDAS lies.
- VI. Bp 000307 from discovery showing an attempt to falsely link me to the murders. This phone number was for the attorney for the bank I dealt with.
- W. Official records showing I did not flee or try to hide, & that the DDAS lied.
- X. Another page from the suppressed evidence inventory showing no attempt to hide.
- Y. Telephone records showing no attempts to hide.
- Z1-Z2. Another page from the suppressed evidence inventory showing no attempt to hide, & the bankruptcy trustee saying he knew where I was at the time the DDAS said I was hiding.

# SUPPRESSED EVIDENCE ON THE "McGHEE SEIZED THE BOAT" FRAUD

Number	Description	Page
1.	The Maryland Bank records proven that the D.A. has on page N, item #76, bank subpoena returns. Pages M1-M4 also prove that the D.A. has them & that their expert Karen Kingdon reviewed them. Page O, mid-page, shows Lillyfeld interviewing one of the prosecutors, Carl Biggs, who held that file for my white collar charges trial. That prosecution can also be proven to have been undertaken as a political favor for the victim's sister, Colleen Cambell. Lillyfeld knew the true facts 12 years before trial.	N
2.	The Safra Bank, Barnett Bank & Bank Atlantic subpoena returns, also most of the critical parts of which are suppressed (all of the records of critical Safra & Barnett Banks are suppressed), will disprove other parts of the McGhee witness statement.	N
3.	The Carl Biggs interview witness statement confirmed at the middle of page "O". There are several other suppressed pieces of evidence that will be materially exculpatory listed on this page. Those will be detailed in endnote 2 on page 9.	O
4.	The interview witness statements with the boatyard workers at the boatyard where I brought her upon my return from Guatemala. Those are confirmed via declarations in my white collar trial transcript.	NA <sup>a</sup>
5.	Custom's & Immigration records showing who in fact brought the boat into the U.S. & checked in. That was me. Lillyfeld verified that he worked with Customs at Vol 20-7632. Also exhibit page P here shows Lillyfeld obtaining information from Customs that we brought the boat into the U.S. on 9/19/99 which is just 6 weeks after we left the U.S. for a trial run, which is proven later here.	P
	Although this will be covered in detail in the section on "we did not flee", obviously this proves that DDA Dixon lied that we "disappeared", which he repeated four times on RT-9027, page C here.	
6.	The interview witness statement with my ex-wife Diane Seidel which she verified in her email in exhibit page J here.	J
7.	The interview witness statement(s) that the Maryland Bank agent to whom I turned the boat over confirmed to me he gave, Wayne Vann.	NA
8.	The witness statement(s) that my brother Marc confirmed to me that Lillyfeld & his partner(s) took from him, extremely exculpatory.	NA
9.	Certainly there must have been interviews with personnel at Maryland Bank re: this critical issue. They are referenced/suppressed.	NA
10.	Any other investigation interviews and exculpatory evidence. The former are required to be produced under Penal Code 1054.9, BARNETT V. SPR. CT. (2007) 54 Cal 3d 283, 295, 306, the latter by BRADY & its progeny plus in re: STEELE (2004) 32 Cal 4th 682.	NA
a)	NA means that the evidence to prove this isn't available in my cell.	

SUPPRESSED EVIDENCE THAT WILL PROVE THAT I DID NOT FLEE OR TRY TO HIDE

These DA allegations were very prejudicial & grossly expanded on by the DDAS, via additional lies (see exhibit 14 to our 5/1/11 Spr. Ct. filing). The basic lies of me fleeing & trying to hide/evade the police would have been destroyed by this evidence that we can prove the police themselves had & hid.

1. The support for the LASD (Los Angeles Sheriff) Statement in the 7/16/93 Los Angeles Times that "We knew where he was & could talk to him any time we wanted to, as far as I know," evidence page R in exhibit 14, an official LASD statement.
2. The support for the statement in the very top level LASD 12/14/88 report, at bp 25388, that I was seen in Marsh Harbor the Bahamas in October, 1988, p. V exh. 14.
3. The support for the notations in discovery at bps 32860 & 34320 that LASD knew of my entry to the U.S. on December 18, 1988, immediately. See page T in exh. 14.
4. All information by any law enforcement agency who assisted in the investigation, particularly the FBI (two dozen evidence cites prove their assistance), re: my whereabouts between May, 1988 & 1991, when the DDAS argued I "reappeared," RT9027. With an "Unauthorized flight to avoid prosecution" warrant allegedly having been issued, doc 186 in the SA-86-05280-JR Bankruptcy (BK), there must be some tracking.
5. Support for the notation at bp 32977 that I was in Aspen, Colorado, also bp 00540.
6. Support for the notation at bp 26470 that me & the boat entered into the U.S. on 9/19/88, plus all Customs & Immigration records for the appropriate time period. Lillienfeld testified that agency assisted in the investigation, Vol 20-7632, & the DA will have easy access to those records, including my passport.

All of the above prove that the DDAS knew they were lying that I disappeared until 1991.

7. The check records detailed on page 26 of our 186 pages of detailed inventories of 2100+ suppressed documents the prosecution hid, over 10,000 pages. These are on p. Q of exh. 14 & prove we lived in Florida fully visible for most of 1989.
8. The American Express Card SDT return confirmed at bp 07626 proves fully visible.
9. The NationsBank, BankAtlantic & Barnett Bank records on page N of exh. 14, another page from the DA suppressed inventory, also show no attempt to flee or hide, as will the C&S Bank records also on page Q, along with Safra Bank files. Also p. X #676.
10. The \$51,000 transaction on page 55 of the suppressed evidence inventory, items #680± with the Thomas-McKinnon investment firm on 3/30/89 actually wave a red flag as to our location since large cash transactions were scrutinized so closely in Florida at the time because of drug smuggling. See page X to exhibit 14.
11. Interview witness statements that are suppressed with persons who visited us on the boat such as Bill Redfield, my mother Merna, several others. These will confirm arrangements were made on open phone lines with no attempt to be secretive.
12. A thorough investigation with a UFAP warrant would have included checking & pulling our High-Seas Radiotelephone log & bill, easily obtainable by law enforcement, to see the areas from which we called & to track/interview who we called.

There are many more BRADY violations, but these alone decimate the State's case.



REFERENCED AT PAGE 2 LINE 16 (2:16) IN THE NARRATIVE.

STIPULATION #18\* (Verified as changed to # 17, read to the jury at RT Vol. 19 pp. 6988-89. See pp. F1-F2 here.

Counsel stipulates that if Frank Michael McGhee were called as a witness and duly sworn, he would testify that he is employed as a boat surveyor and has been so employed for the past two decades. Mr. McGhee would further testify that in or around May of 1991, he was retained by Maryland National Bank to repossess Michael Goodwin's yacht, referred to in People's Exhibit #100, with Coast Guard documentation # 675-88. Additionally, Mr. McGhee would testify that he spent ~~several~~ <sup>APRIL 3-4</sup> weeks in Guatemala attempting to locate and repossess the yacht, during which time he had a phone conversation with Michael Goodwin, wherein Mr. Goodwin told Mr. McGhee that he would never find his boat. Lastly, Mr. McGhee would testify that after ~~several~~ <sup>APRIL 3-4</sup> weeks of searching, he located the yacht and Michael Goodwin on the Rio Dolce River in Guatemala, at which time he repossessed the yacht in the name of Maryland National Bank.

See        pages here for an interview that Deputy District Attorney Jackson was in, H &

I1 through I4, for McGhee telling Jackson he was waiting on the boat in Florida.

Thus he did not seize the boat in Florida since he was waiting for me to bring it to FL.

\* My appeal attorney, Gail Harper, crimlaw5@gmail.com told me that this was changed for trial to stipulation # 17. The handwritten entries were made by the attorneys at trial before this was given to me.

The net of the lies here are:\*\*

The Maryland Bank SDT return that proves that McGhee had nothing to do with the boat turnover, & that he wasn't even hired by Maryland Bank is here at evidence page N, within that list. See at the top of the page within item #76 there.

- 1) McGhee was never retained re: this boat repo by Maryland Bank. The bank SDT proves that.
- 2) McGhee never spoke with Mr. Goodwin by phone or otherwise.
- 3) McGhee had nothing to do with the boat turnover, which was voluntary by Goodwin to the real agent for the bank, Wayne Vann, in Florida. Bps 28315-8 proves this.

But most importantly, McGhee never told ADA Jackson what Jackson lied to the court in this stipulation that McGhee had told him. Jackson was in on the interview with McGhee, bp 100201, when McGhee admitted that he was waiting in Florida for Goodwin to bring the boat back to the U.S., bp 10082, **PAGE 12.**

McGhee said nothing about repossessing the boat and he did not. The DA had extensive other evidence as well, in official discovery, in addition to suppressed exculpatory evidence (we have this identified/located), proving that McGhee had nothing to do with the boat turnover. It was voluntary by Goodwin to Wayne Vann, bp 28315-8.

We also believe that ADAs Jackson & Dixon can be proven to have lied to the court that McGhee couldn't be available to testify, & as to why he wasn't available.

\*\* There are many other provable lies in the witness statement, told by McGhee, proving he had nothing to do with the boat turnover, but they aren't in the stipulation.

A

DEPUTY DISTRICT ATTORNEY (DDA) ALAN JACKSON CLOSING ARGUMENT

HAVE BEEN VERY LUCRATIVE.

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

NOW WHY WOULD MICHAEL GOODWIN NEED TO GET OUT OF THE COUNTRY SO QUICKLY? EITHER HE IS THE UNLUCKIEST GUY ON THE FACE OF THE PLANET,<sup>\*</sup> FOLKS, OR HE HAD PLANNED MICKEY THOMPSON'S MURDER AND WANTED TO GET <sup>\*</sup> NOT THE UNLUCKIEST ON THE PLANET, BUT PRETTY UNLUCKY TO HAVE GOTTEN OUT. A THOROUGHLY CORRUPT PROSECUTOR LIKE ALAN JACKSON, A TRUE CRIMINAL.

\$500,000 IN GOLD AND CASH MOVED OFFSHORE.

A \$400,000 YACHT. THE LAST TIME ANYBODY SAW HIM WAS OUT OF SOUTH CAROLINA AFTER HE HAD HAD THE BOAT HUGE LIE BY JACKSON. THEY ALWAYS KNEW WHERE I WAS.<sup>a</sup>

REFURBISHED -- OR NOT REFURBISHED BUT HAD IT STOCKED WITH RADIO EQUIPMENT, ET CETERA, SOMEBODY WAVING TO HIM OFFSHORE. SEE YOU LATER, MIKE. AND WHERE DOES HE GO?

AS YOU HEARD THERE WAS A STIPULATION. YOU DIDN'T MEET FRANK MICHAEL MAGEE, BUT FRANK MICHAEL MAGEE IS A BOAT SURVEYOR. FRANK MICHAEL MAGEE'S ONE JOB IN THE WORLD BACK THEN WAS TO FIND PEOPLE'S BOATS.

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

a) SEE PAGE "R", THE STATEMENT BY LASD LT. RON SPEAR THAT THEY ALWAYS KNEW WHERE I WAS. ALSO SEE PAGE "Q" FOR OUR CHECK RECORDS PROVING THEY KNEW SPECIFICALLY THAT WE LIVED IN FLORIDA FOR MOST OF 1989 BUT HID THAT & OTHER EVIDENCE PROVING WE DID NOT FLEE OR TRY TO HIDE.

\*

B1

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

5 YOU HEARD EVIDENCE THAT HIS FAMILY LIVES  
6 IN FLORIDA. OF COURSE, HE'S GOING TO COME BACK. WHAT DO  
7 PEOPLE DO WHEN THEY'RE OUT OF OPTIONS? THEY COME RUNNING  
8 HOME TO MOMMA. THAT'S WHY MICHAEL GOODWIN IS BACK IN  
9 THIS COUNTRY. AND NOT OUT OF ALTRUISM. <sup>WHEN I BROUGHT THE BOAT BACK TO</sup> FLORIDA MY PARENTS LIVED IN COLO.

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

19 I SIMPLY ASK: WHERE DID IS THE EVIDENCE  
20 OF THAT? WHERE IS THE EVIDENCE THAT THIS WAS A ROBBERY<sup>a</sup>  
21 NOT AN EXECUTION? THERE IS NO EVIDENCE OF A BREAK-IN.  
22 THERE WAS NO EVIDENCE THAT THE SAFE WAS EVER TOUCHED.\*  
23 MS. SARIS AND THE DEFENSE SHOWING YOU PICTURES OF THE  
24 SAFE; AND SHOWING JACO SWANEPOEL PICTURES OF THE SAFE;  
25 AND ASKING IF HE HAD SEEN VIDEOS OF THE SAFE. THAT'S ALL  
26 A RED HERRING. \* OUTRIGHT LIE BY JACKSON. THE PHOTOS PROVED THE SAFE  
HAD BEEN DAMAGED, BUT THE DDAS LIED TO COVER THAT UP.

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

a) JACKSON KNEW THAT \$250,000 IN GOLD COINS HAD DISAPPEARED DURING

THE MURDERS. BUT HE HAD LIED TO THE JUDGE ABOUT THE EVIDENCE WE DID HAVE  
OF THAT, & HIDDEN MUCH MORE EVIDENCE OF IT, KEEPING THE JURY FROM HEARING  
ANYTHING ABOUT THE MISSING GOLD & THAT THE ESCAPING RIDERS WERE SEEN BY  
EVERY WITNESS TO HAVE BAGS WITH THEM LIKE GOLD COINS WERE DELIVERED IN.

B2

1 AND THEN IS WORRIED ABOUT GETTING CAUGHT AND SO HE HAVE  
2 DRIVES TO LAS VEGAS.

3 MIKE GOODWIN I THINK SOMEBODY SAID  
4 YESTERDAY WAS A MILLIONAIRE. I MEAN HE HAS A LIFE-STYLE.  
5 HE DOESN'T JUST CATCH A BUS OUT OF TOWN. NO. HE BUYS A  
6 \$400,000 -- AND THIS IS BACK THEN, 1986 -- A \$400,000  
7 OCEAN GOING YACHT. LIQUIDATES HIS HOME AND OTHER  
8 INVESTMENTS FOR GOLD; SENDS IT OFF TO OFFSHORE BANK  
9 ACCOUNTS SO HE CAN MAINTAIN HIS LIFE-STYLE AND  
10 DISAPPEARS.<sup>a</sup>

11 AND, LADIES AND GENTLEMEN, THAT'S WHAT  
12 HAPPENED. WE NEXT HEAR OF HIM IN 1991<sup>a</sup> ACCORDING TO THE  
13 STIPULATION. HE DISAPPEARED<sup>a</sup> UNTIL THEY REPOSSESSED THE  
14 BOAT IN GUATEMALA. HE WAS OUT OF HERE. NOW SOMEBODY --  
15 MS. SARIS I THINK SUGGESTED YESTERDAY, WELL, MAYBE HE  
16 WENT ON A CRUISE OF THE EASTERN SEABOARD. WELL,  
17 GUATEMALA IS WAY DOWN IN THE CARIBBEAN. WELL, MIGHT HAVE  
18 BEEN; COULD HAVE BEEN, I THINK SHE SUGGESTED THAT.

19 LOOK AT THE FACTS HERE AND THE TIMING OF  
20 THIS. HE GOT OUT OF HERE AS QUICKLY AS HE COULD IN LIGHT  
21 OF THE FACT THAT HE WANTED TO MAINTAIN HIS LIFE-STYLE AND  
22 HE WAS BUYING A BOAT SO HE COULD DISAPPEAR.<sup>a</sup> AND THAT'S  
23 EXACTLY WHAT HE DID. HE DISAPPEARED.<sup>a</sup>

24 YOU HAVE IN EVIDENCE PICTURES OF THIS  
25 THING. THIS IS A HUGE OCEAN GOING YACHT. I SUGGEST TO  
26 YOU THAT THAT THING COULD GO ANYWHERE. AND THERE ARE  
27 THOUSANDS OF ISLANDS IN THE CARIBBEAN.

28 WELL, MS. SARIS TELLS YOU, WELL, WHO

a) TO UNDERSTAND HOW OBVIOUS IT IS THAT "DISAPPEARS" IS A KNOWING LIE  
BY DIXON SEE PAGE "R" HERE, A STATEMENT BY A SHERIFF'S SPOKESMAN THAT THEY  
KNEW WHERE I WAS ALL THE TIME, & PAGE "Q" SHOWING THE CHECKING ACCOUNT STATE-  
THEY HAD & HID PROVING WE LIVED HIGHLY VISIBLE IN FLORIDA FOR MOST OF 1989,  
& THAT THEY KNEW THAT. IN PART II WE DETAIL MUCH MORE EVIDENCE WE DIDN'T FLEE.

REFERENCED AT PAGE 3:13 IN THE NARRATIVE. THIS IS DDA DIXON'S FALSE REPRESENTATION TO JUDGE SCHWARTZ THAT MCGHEE HAD TOLD JACKSON THAT HE, MCGHEE, HAD SEIZED THE BOAT IN GUATEMALA. BUT, SEE PAGE 12. HE DIDN'T SAY THAT. 6901- VOL 19

THE JURY WAS NOT PRESENT FOR ANY OF THE COURT PROCEEDINGS IN SECTION D1 THRU D6 HERE.

1 CASE NUMBER: GA052683  
2 CASE NAME: PEOPLE VS. MICHAEL FRANK GOODWIN  
3 PASADENA, CALIFORNIA THURSDAY, DECEMBER 7, 2006  
4 DEPARTMENT NE "E" HON. TERI SCHWARTZ, JUDGE  
5 REPORTER: LORI D. CASILLAS, CSR NO. 9869  
6 TIME: A.M. SESSION

7  
8 APPEARANCES:

9 DEFENDANT MICHAEL FRANK GOODWIN, PRESENT WITH  
10 COUNSEL, ELENA SARIS<sup>a</sup> AND THOMAS SUMMERS, DEPUTY  
11 PUBLIC DEFENDERS; PATRICK DIXON AND ALAN JACKSON,  
12 DEPUTY DISTRICT ATTORNEYS, REPRESENTING THE PEOPLE  
13 OF THE STATE OF CALIFORNIA.

14  
15 (THE FOLLOWING PROCEEDINGS WERE  
16 HELD IN OPEN COURT OUTSIDE THE  
17 PRESENCE OF THE JURY.)

18  
19 THE COURT: RESUMING IN THE GOODWIN MATTER. HE  
20 IS PRESENT WITH COUNSEL. THE PEOPLE ARE REPRESENTED.

21 BEFORE WE BRING THE JURORS DOWN, WHAT DO  
22 WE NEED TO DISCUSS?

23 MS. SARIS: YOUR HONOR, THERE IS A WITNESS THAT  
24 THE PEOPLE ARE ATTEMPTING TO CALL OR HAVE TAKEN CARE OF  
25 THROUGH STIPULATION NAMED FRANK MAGEE. WE HAVE AN  
26 OBJECTION TO THE RELEVANCE OF THIS WITNESS IN GENERAL AND  
27 A RULING ON THAT MAY HELP US DECIDE WHETHER OR NOT WE  
28 HAVE TO PUT THIS CASE OVER TO MONDAY.

a) HAD SARIS MADE ME AWARE OF THE MCGHEE WITNESS STATEMENT AT PAGES

"11 THRU 14" I WOULD NOT HAVE AGREED TO THE STIPULATION BECAUSE I BROUGHT THE BOAT BACK TO THE U.S. & MCGHEE HAD NOTHING TO DO WITH IT. HOWEVER, EVEN THOUGH SARIS GOT THE WITNESS STATEMENT BEFORE TRIAL, I DIDN'T GET IT UNTIL 3 YEARS AFTER TRIAL, ALONG WITH MANY OTHER MATERIAL EXCULPATORY DOCUMENTS SHE HAD PRE-TRIAL YET IGNORED. D1

CONTINUATION OF DDA DIXON'S LIE TO JUDGE SCHWARTZ ABOUT WHAT MIKE McGHEE HAD TOLD  
DDA JACKSON & DET. LILLYFELD IN A FACE TO FACE INTERVIEW. WHAT IS MORE AMAZING IS  
THAT DIXON WAS HEAD OF MAJOR CRIMES FOR THE LADA AT THE TIME. 6902-VOL 19

1 THE COURT: PUT THE CASE OVER TO MONDAY?

2 MS. SARIS: MR. MAGEE APPARENTLY ISN'T AVAILABLE.

3 MR. DIXON: WELL, THAT'S NOT THE ONLY  
4 ALTERNATIVE, YOUR HONOR.

5 THE COURT: I'M NOT INCLINED TO PUT THIS CASE  
6 OVER ANY MORE. SO WHAT IS GOING ON?

7 MR. DIXON: WELL, WE'VE OFFERED A STIPULATION.  
8 THERE HAS BEEN DISCUSSION ABOUT A STIPULATION TO  
9 MR. MAGEE'S TESTIMONY. BOTH SIDES HAVE THE REPORTS.\* THE  
10 STIPULATION, IN MY VIEW, IS FAIR. THERE'S A QUOTE IN THE  
11 STIPULATION FROM THE DEFENDANT THAT APPEARS IN THE  
12 REPORT.\* AND, IN FACT, DETECTIVE LILLIENFELD AND DEPUTY

13 D.A. JACKSON WERE THERE WHEN THE QUOTE WAS GIVEN. AND  
14 THAT'S WHAT IS ON THE TABLE. \* THIS IS A BLATANT LIE TO THE JUDGE. SEE  
15 THERE IS NOTHING THAT WOULD SUGGEST THAT JACKSON  
16 COUNSEL HAS TO STIPULATE TO HIM. WE WOULD LIKE HIM TO WAS THERE.

17 COME IN, WE WOULD LIKE HIM TO TESTIFY. I UNDERSTAND THAT  
18 THE COURT WOULDN'T WANT TO PUT THIS CASE OVER. AND WE  
19 AREN'T ASKING THE COURT TO PUT THIS CASE OVER.

20 I ALSO UNDERSTAND THAT DEFENSE COUNSEL  
21 WOULD LIKE TO SEE US REST SO THEY CAN HAVE AN 1118  
22 MOTION.

23 HERE'S MY PROPOSED SOLUTION TO THIS IF WE  
24 CAN'T REACH A STIPULATION, IS THAT WE REST, WE'RE  
25 COMFORTABLE WITH THE COURT HEARING THE 1118 MOTION  
26 WITHOUT MR. MAGEE'S TESTIMONY. THE DEFENSE PUTS ON THEIR  
27 CASE. AND THE ONLY THING WE WOULD ASK IS LEAVE OF THE  
28 COURT TO PUT MR. MAGEE ON AFTER THE DEFENSE CASE AS A

a) NOTE FROM THE PRIOR PAGE THAT DDA JACKSON WAS IN THIS HEARING, &

HE SAT THROUGH THE NEXT PAGE, HEARING THE LIE & DIDN'T CORRECT IT. HE IS  
A SWORN OFFICER OF THE COURT & THAT IS A SWORN OBLIGATION HE HAS TO DO. D2

CONTINUATION OF DDA DIXON'S LIE TO JUDGE SCHWARTZ ABOUT WHAT MIKE MCGHEE HAD TOLD DDA<sup>a</sup> JACKSON. JACKSON SAT THERE & LISTENED TO DIXON DEFRAUDING THE COURT 6903 & DID NOT CORRECT HIM, AS HIS OATH OF OFFICE OBLIGATES HIM TO DO.

1 REBUTTAL WITNESS, EVEN THOUGH HE MAY NOT TECHNICALLY BE A  
2 REBUTTAL WITNESS.

3 THAT WAY THE COURT COULD CONTINUE TO USE  
4 COURT DAYS. THERE WOULD BE NO DELAY. WE WOULD GET OUR  
5 EVIDENCE IN. THEY WOULD BE ABLE TO BEGIN WHEN THEY WANT  
6 AND HAVE THEIR 1118 MOTION HEARD AT THE END OF OUR CASE  
7 WHEN WE REST. THAT WOULD BE MY PROPOSAL.

8 THE COURT: WHAT IS THE OFFER OF PROOF AS TO  
9 MR. MAGEE? WHAT WOULD HE TESTIFY TO?

10 MR. DIXON: WELL, ACTUALLY, WE HAVE -- I DON'T  
11 KNOW. DO WE HAVE THE STIPULATION OUT HERE? THAT WOULD  
12 PROBABLY BE THE EASIEST WAY IS TO READ THE STIPULATION.

13 THE COURT: BUT I MEAN, COUNSEL --

14 MR. DIXON: BUT BASICALLY I CAN REPEAT IT TO YOU.

15 THE COURT: YES.

16 MR. DIXON: MR. MAGEE IS A BOAT SURVEYOR AND HAS  
17 BEEN FOR ABOUT 20 YEARS. AS KIND OF A SIDE BUSINESS TO  
18 THAT, HE REPOSSESSES BOATS FROM TIME TO TIME. IN 1991, I  
19 BELIEVE, HE WAS RETAINED BY MARYLAND NATIONAL BANK TO  
20 REPOSSESS THE DEFENDANT'S BOAT. HE MADE LOTS OF CALLS  
21 AND DID LOTS OF INVESTIGATION IN AN EFFORT TO ACCOMPLISH  
22 THAT.

23 ALL OF THAT LED HIM TO GUATEMALA WHERE HE,  
24 AFTER GOING THROUGH THE BARS AND TALKING TO PEOPLE AND  
25 TALKING TO DIVERS<sup>c</sup>, FOUND THE DEFENDANT'S BOAT AND  
26 REPOSSESSED IT. ALONG THE WAY, HE HAD A TELEPHONE<sup>d</sup>  
27 CONVERSATION WITH MIKE GOODWIN WHERE MIKE GOODWIN SAID --  
28 AND I WILL GIVE YOU THE CLEANED UP VERSION OF IT, BUT

a) I RESPECTFULLY SUGGEST THAT THE LAW RULES THAT THIS LIE IS A  
SERIOUS PENAL CODE (PC) 118, AND/OR 125, AND/OR 127 PERJURY VIOLATION BY AT  
LEAST DDA DIXON FOR MAKING KNOWINGLY FALSE REPRESENTATIONS TO THE COURT. SEE  
PEOPLE V. MROCZKO (1983) 35 CAL 4TH 86, 112 & IN RE: BROWN (1998) 17 CAL 4TH  
873, 879. MROCZKO RULES, ACCURATELY PARAPHRASED, "A LAWYER'S SOLEMN REPRESENT-  
ATIONS TO THE COURT ON A MATTER BEFORE THE COURT ARE VIRTUALLY MADE UNDER OATH"  
HERE THE DDAS FABRICATED A STATEMENT & ATTRIBUTED IT TO A WITNESS WHO HAD TOLD  
THEY DID NOT OCCUR.

NOTE \*\*\*\*  
OFFER OF  
PROOF. THIS  
IS STRONGER  
THAN JUST A  
STANDARD  
STATEMENT.

b THERE WAS  
JUST ONE  
BAR.

c THERE WERE  
NO DIVERS.  
IT WAS 30  
MILES FROM  
THE OCEAN.

D3

d  
THERE  
WERE NO  
PHONES

CONTINUATION OF DDA DIXON'S PRESENTATION OF THE LIE TO JUDGE SCHWARTZ ABOUT WHAT  
McGHEE HAD TOLD DDA JACKSON. ALSO SEE PAGE "J" HERE FOR ADDITIONAL 6904- VOL 19  
JACKSON KNOWLEDGE THAT McGHEE DID NOT SEIZE THE BOAT.

1 BASICALLY, "YOU STAY AWAY FROM ME AND STAY AWAY FROM MY  
2 BOAT. YOU'LL NEVER FIND IT." WORDS TO THAT EFFECT.  
3 AND, AGAIN, THE EXACT QUOTE IS IN OUR STIPULATION.  
4 THAT WOULD BE OUR PRESENTATION. I'VE NEVER SEEN OR SPOKEN  
WITH McGHEE. THIS IS A LIE.

5 MS. SARIS: OUR ISSUES ARE BOTH WITH RELEVANCE.  
6 THIS IS THREE YEARS AFTER THE MURDER.

7 SECOND, IF THE STIPULATION WOULD INCLUDE  
8 THE REST OF THE REPORT OR THE EARLIER REPORT WHERE  
9 DETECTIVE LILLIENFELD WRITES AND I QUOTE, "INFORMANT IS A \*  
10 B.S. ARTIST, ONLY INTERESTED IN THE REWARD," PERHAPS THE  
11 JURY MIGHT HAVE A BETTER FLAVOR OF HOW TO INTERPRET THIS  
12 \* THIS REPORT IS AT BP 29327. I'M NOT YET 100% CERTAIN, BUT IT  
WITNESS. APPEARS TO ME THAT THEY DIDN'T GO BACK TO McGHEE UNTIL AFTER MY  
BROTHER WAS DRUG ADDICTED & COULDN'T TESTIFY TO THE TRUTH.

13 HE HAS ALSO CALLED THE L.A. SHERIFF'S<sup>a</sup>  
14 OFFICE TWICE DRUNK OFF HIS BUTT OFFERING INFORMATION THAT  
15 IS COMPLETELY INACCURATE, TOTALLY UNTRUE, HYPING HIMSELF  
16 UP AS THE PERSON WHO FOUND THE KILLER OF MICKEY THOMPSON.  
17 SAYING THAT IN ONE OF THE REWARD POSTERS, ONE OF THE  
18 BLACK MEN IS MICHAEL GOODWIN'S BROTHER. AND THAT, IN  
19 FACT, MICHAEL GOODWIN PULLED A GUN ON HIM. THEY'VE NEVER  
20 MET FACE-TO-FACE AND HE'S WILLING TO COME UP WITH ALL OF  
21 THESE JUST CRAZY STORIES OVER THE PHONE.

22 SO ASKING US TO STIPULATE TO A WITNESS --  
23 IT'S ALMOST LIKE ASKING US TO STIPULATE TO GALE HUNTER.  
24 IT'S TOTALLY UNBELIEVABLE TESTIMONY.

25 BUT LET'S ASSUME FOR THE PURPOSE OF THIS  
26 DISCUSSION THE COURT WERE TO BELIEVE THAT HE WOULD COME  
27 IN AND SAY HE REPOSSESSED THE BOAT IN 1991, THE RELEVANCE  
28 OF THAT TO THIS PROCEEDING IS NIL. THAT'S THREE YEARS

a) IT IS SHOCKING TO ME THAT IN LIGHT OF LINES 9-24, PLUS ME GIVING

HER EVIDENCE THAT I BROUGHT THE BOAT BACK WITH MY BROTHER, PLUS THE McGHEE  
WITNESS STATEMENT IN "11 THRU 14" HERE STATING THAT HE AWAITED ME BRINGING  
THE BOAT BACK TO FLORIDA, SUCH STATEMENT WHICH I WASN'T AWARE OF, THAT MY PD  
WOULD HAVE FORCED ME TO ACCEPT THIS FALSE STIPULATION, BUT SHE DID SO. IT SMELLS.

D4



DDA DIXON LIES TO THE JUDGE RE: McGHEE TO OBTAIN STIPULATION #17, PAGE "A" HERE.  
I DON'T BRIEF ALL OF THE LIES THAT WE CAN PROVE AS LIES. THERE ARE JUST 6905  
TOO MANY. I MERELY COMMENT ON SOME OF THE EASIER ONES TO EXPOSE.

1 AFTER THE FACT. THEY'VE ALREADY DETERMINED WHERE THE  
2 MONEY GOES, THE MONEY'S GONE<sup>a</sup>, MIKE WAS ON THE BOAT. THE  
3 FACT THAT HE LOST THE BOAT THREE YEARS LATER, THAT WOULD  
4 PRESUPPOSE THAT HE KNEW IN ADVANCE HE WAS GOING TO LOSE A  
5 BOAT AND THEREFORE WAS AT MICKEY THOMPSON EIGHT YEARS  
6 BEFORE HE EVEN THOUGHT ABOUT BUYING IT MAKES NO SENSE.

7 MR. DIXON: OUR VIEW, AND I THINK IT'S CLEAR FROM  
8 THE EVIDENCE, YOUR HONOR, IS THAT THE DEFENDANT GOT OUT  
9 OF TOWN AS SOON AS HE COULD<sup>b</sup>; PUT HIMSELF IN A FINANCIAL  
10 POSITION TO DO THAT. AND DO THAT AND MAINTAIN THE  
11 LIFESTYLE THAT HE HAD BEEN USED TO, THAT'S THE REASON FOR

12 MOVING THE MONEY OFFSHORE AND THE GOLD BOUILLON AND THE  
13 <sup>b)</sup> THESE CONTINUOUS LIES ARE TRULY INSANE...THEIR OWN EVIDENCE PROVES  
14 LIKE. THEY KNEW WE WERE IN THE STATES FOR 5 MONTHS AFTER THE MURDERS, BPS  
00540, 00307, 32415 & 32417, & THAT IN 1989 WE LIVED IN FLORIDA, P. Q.  
AND HE ESCAPED. HE USED AN OCEAN-GOING

15 YACHT TO DO SO THAT COULD LITERALLY TAKE HIM ANYWHERE IN  
16 THE WORLD. AND HE WENT TO THE CARIBBEAN AND THE COAST OF  
17 SOUTH AMERICA<sup>c</sup> WHERE IT WOULD BE VERY DIFFICULT TO FIND

18 <sup>c)</sup> WE NEVER WENT TO THE CARIBBEAN OR  
ANYONE, AND THIS WAS HIS ESCAPE. WITHIN MORE THAN 1200 MILES OF SOUTH  
19 AMERICA. CHECK WITH MY EX-WIFE. AND WE  
20 OFTEN RETURNED TO THE UNITED STATES.

THE COURT: ALL RIGHT.

MS. SARIS: BUT THAT'S BEEN ESTABLISHED.

MR. MAGEE OFFERS NOTHING TO THAT.

22 MR. DIXON: AND JUST TO ADDRESS COUNSEL'S POINT  
23 WITH RESPECT TO THE CROSS-EXAMINATION. WE CAN PUT THE  
24 STIPULATION IN AND SHE CALL DETECTIVE LILLIENFELD AND  
25 IMPEACH HIM IF SHE LIKES IN HER CASE IN CHIEF. I DON'T  
26 HAVE A PROBLEM WITH THAT.

27 THE COURT: THE RELEVANCE IS OBVIOUS. IT TENDS  
28 TO SHOW CONSCIOUSNESS OF GUILT BASED ON WHAT THE PEOPLE

d) THESE DEPUTY DISTRICT ATTORNEYS SIMPLY MAKE THINGS UP OUT OF  
THIN AIR, WITH NO EVIDENCE ON OR NOT ON THE RECORD TO SUPPORT THEM. THE  
FARTHEST WE EVER GOT WAS GUATEMALA, NOT "IN THE CARIBBEAN WHERE THERE ARE  
THOUSANDS OF ISLANDS TO HIDE IN" PER PAGE "C" LINE 27.

a) MY LAWYER  
JUST PLAIN  
SCREWED UP  
BECAUSE SHE  
REFUSED TO  
VERIFY EVID-  
I GAVE HER,  
E.G. THAT THE  
MONEY WASN'T  
"GONE" EVID-  
PROVED THAT  
OF THE \$580K  
DIANE GOT,  
\$425,000 OF  
IT CAME BACK  
TO LEGIT  
CREDITORS!

d  
c) WE NEVER WENT TO THE CARIBBEAN OR  
ANYONE, AND THIS WAS HIS ESCAPE. WITHIN MORE THAN 1200 MILES OF SOUTH  
AMERICA. CHECK WITH MY EX-WIFE. AND WE  
OFTEN RETURNED TO THE UNITED STATES.

DS

FINAL PAGE TO DDA DIXON'S MISREPRESENTATIONS TO THE JUDGE THAT I FEEL QUALIFY AS  
PENAL CODE FELONY VIOLATIONS PER MROCZKO 35 CAL 3D 86, 112. HE TOLD, 6906- VOL 19  
I BELIEVE, ANOTHER "WHOPPER" HERE AT LINES 8 THROUGH 16.

1 ARE OFFERING IS THEIR THEORY. AND I DON'T CARE IF YOU  
2 GUYS STIPULATE TO IT OR IF THE PEOPLE REST SUBJECT TO HIM  
3 COMING IN.

4 THIS IS THE WITNESS THAT WASN'T AVAILABLE  
5 UNTIL TODAY?

6 MR. JACKSON: THAT'S CORRECT, YOUR HONOR.

7 THE COURT: AND NOW NOT AVAILABLE UNTIL MONDAY?

8 MR. JACKSON: IT APPEARS MS. KASABIAN HAS BEEN IN<sup>a</sup> << JACKSON  
9 CONTACT WITH HIM. THEY'VE TRADED PHONE MESSAGES. IT TAKES OVER.  
10 APPEARS THAT THE WITNESS IS IN THE PROCESS OF BRINGING A  
11 BOAT BACK. I DON'T KNOW THE EXACT NATURE OF IT, BUT HE'S  
12 BRINGING ANOTHER BOAT BACK FROM THE BAHAMAS. AND RAN  
13 INTO SOME WEATHER PROBLEMS THAT DID NOT ALLOW HIM TO GET  
14 BACK TO FLORIDA SO WE COULD FLY HIM OUT. HE SAID HE  
15 WOULDN'T BE BACK AS OF YESTERDAY, HE SAID IT WOULD BE A  
16 DAY AND A HALF. SO I DON'T KNOW WHAT THAT MEANS EXACTLY,  
17 BUT HE'S NOT HERE TODAY.

18 MS. SARIS: AND WE'D ASK FOR SOME FURTHER  
19 SHOWING. I MEAN --

20 THE COURT: SOME FURTHER SHOWING ON WHAT?

21 MS. SARIS: WAS HE SUBPOENAED? IS THERE REALLY A  
22 WEATHER SITUATION? WE HAVE CHECKED THE HURRICANE REPORTS  
23 ONLINE, WE HAVEN'T SEEN ANY BAD WEATHER IN THE BAHAMAS.  
24 IF THIS INDIVIDUAL IS JUST FINISHING UP A PLEASURE CRUISE  
25 OR WORKING INSTEAD OF COMING TO COURT AFTER A DULY SWORN  
26 SUBPOENA, THEN OUR CASE SHOULD BE NOT INTERRUPTED FOR HIS  
27 PRESENCE.

28 MR. DIXON: AND I'M NOT ASKING IT TO BE

a) IN LIGHT OF THE FACTS THAT i) WE CHECKED & THERE WERE NO WEATHER

PROBLEMS IN THE BAHAMAS AT THIS TIME, ii) THAT THERE ARE DOZENS, MAYBE OVER  
100 DIFFERENT AIRSTRIPS IN THE BAHAMAS, & THAT iii) THEY KNEW McGHEE WOULD  
FOLD UNDER CROSS EXAM, I'M 99% CONFIDANT THAT JUST MINOR INVESTIGATION WILL  
PROVE THAT THE DDAS LIED TO THE JUDGE AGAIN HERE ABOUT McGHEE'S UNAVAILABILITY. D6

VOL 17, 12/5/06, NO JURY PRESENT, ADDITIONAL DDA ARGUMENT ON MIKE MCGHEE SEIZING THE BOAT, THAT THEY KNEW DID NOT OCCUR. HERE THEY ALSO ARGUE, AS THEY DID IN PAGE D-6, THAT MCGHEE COULD NOT BE PRESENT BECAUSE OF A STORM. I AM 99% 6482 - VOL 17 CONFIDANT THAT HE WAS AVAILABLE BUT THEY DID NOT WANT HIM THERE.

REFERENCED PAGE 3 LINE 19

1 I HAVE JUST A MOMENT? ONE OF OUR WITNESSES IN A STORM IN  
2 THE BAHAMAS APPARENTLY.

3 MR. DIXON: KIND OF LATE FOR HURRICANE SEASON.

4 MR. JACKSON: FRANK MICHAEL MAGEE REPOSSESSED THE  
5 BOAT IN -- WHENEVER IT WAS. I DON'T REMEMBER THE DATE.

6 THE COURT: SO THAT'S THE WITNESS THAT'S NOT  
7 AVAILABLE UNTIL WHEN? a) DDA JACKSON KNOWINGLY LIES. HE WAS IN THE INTER-  
VIEW WITH MCGHEE WHEN MCGHEE TOLD HIM THAT I WAS  
BRINGING THE BOAT TO FLORIDA, & DID NOT SAY THAT HE

8 MR. JACKSON: PROBABLY THURSDAY, JUDGE. REPOSSESSED THE BOAT.  
HE DID NOT. SEE PAGES

9 THE COURT: OKAY. SO CAN THE DEFENSE START WITH H & I1-I4.  
10 THEIR CASE BEFORE HE TESTIFIES?

11 MR. JACKSON: I HAVE NO PROBLEM WITH THAT.

12 MS. SARIS: WE PREFER NOT TO, FRANKLY, ESPECIALLY  
13 IF MR. MAGEE IS TESTIFYING AS TO STATEMENTS THAT HE HEARD  
14 OR IS HE JUST TESTIFYING AS TO THE FACT OF THE  
15 REPOSSESSION? IF IT'S JUST THE FACT OF THE REPOSSESSION,  
16 WE MAY BE ABLE TO WORK OUT A STIPULATION. IF HE'S GOING  
17 TO TRY AND ENTER IN A STATEMENT, THAT'S GOING TO TAKE  
18 QUITE SOME TIME BECAUSE HE HAS TWO CALLS THAT HE MADE TO  
19 THE L.A. COUNTY SHERIFF'S OFFICE WHERE HE WAS SEVERELY  
20 INTOXICATED. ELENA SARIS, PLUS HER COMMENTS/DISCLOSURES AT PAGE D4, & THE  
MCGHEE WITNESS STATEMENT AT P. 1, WHY WOULD SHE HAVE AGREED TO

21 THE COURT: LET ME KNOW AT 10:00 TOMORROW. THE STIP-  
22 UATION?

22 MR. DIXON: WE'LL TALK ABOUT IT.

23 THE COURT: AND WHO ELSE IS COMING UP TOMORROW?  
24 IS THAT THIS?

25 MR. JACKSON: NO. WELL, KAREN STEPHENS AND JOEL  
26 WEISSLER AND FRANK MAGEE AND THE CORONER.

27 MS. SARIS: MS. STEPHENS SHOULD TAKE SOME TIME.  
28 WE HAVE NO WITNESSES FOR TOMORROW. WE'RE TRYING TO GET

b) MS. STEPHENS IS KAREN STEPHENS KINGDON, THE D.A. FINANCIAL EXPERT E

EXPERT WHICH EVIDENCE PROVES COMMITTED SIXTEEN VERY MATERIAL PERJURIES, KNOWINGLY. SOME OF HER TESTIMONY & ONE OF HER PERJURIES IS HERE IN PAGES M1 THRU M4. ONE OF HER BIGGEST PERJURIES OF THE TRIAL, THAT "JGA WAS SOLD" IS PROVEN AS PERJURY IN EXHIBIT B. SHE ALSO COMMITTED PERJURY THAT SHE HAD NOT ACCOUNTED FOR A \$20,000 CHECK THAT THE DDAS ARGUED WAS USED TO PAY THE KILLERS.

REFERENCED AT PAGE 3 LINE 25

1 MS. SARIS: -- A FINITE AMOUNT OF FUNDS. WHEN  
2 THERE'S A STIPULATION, I'VE CHOSEN TO USE THOSE FUNDS TO  
3 HAVE HIM COME AND TESTIFY.

4 THE COURT: ALL RIGHT. WELL, THEN, IT SOUNDS  
5 LIKE WE'RE ALL IN AGREEMENT THAT WE WILL PROCEED.

6 MS. SARIS: HE'S NOT EVEN OUR NEXT WITNESS. OUR  
7 NEXT WITNESS IS IN THE BACK OF THE COURTROOM, BUT I THINK  
8 THE PEOPLE HAVE TO REST.

9 THE COURT: YES.

10  
11 (THE JURY ENTERED THE COURTROOM  
12 AND THE FOLLOWING PROCEEDINGS WERE  
13 HELD IN OPEN COURT.)  
14

15 THE COURT: ALL RIGHT. ALL OF OUR JURORS AND  
16 ALTERNATES ARE ONCE AGAIN PRESENT. THE PARTIES ARE  
17 PRESENT.

18 AND MY UNDERSTANDING IS THE PEOPLE AND THE  
19 DEFENSE ARE ASKING THE COURT TO READ ONE MORE STIPULATION  
20 AT THIS TIME?

21 MR. JACKSON: WITH THE COURT'S PERMISSION, YOUR  
22 HONOR. BELOW DDA JACKSON READS TO THE JURY THE "MCGHEE  
SEIZED THE BOAT IN GUATEMALA" STIPULATION THAT

23 THE COURT: YES. HE KNEW HE HAD FABRICATED & WAS FALSE. JACKSON  
IS RUNNING FOR DISTRICT ATTORNEY OF LOS ANGELES.

24 ALL RIGHT. LADIES AND GENTLEMEN, I'M AMAZING!!!  
25 GOING TO READ YOU ANOTHER STIPULATION. THIS IS  
26 STIPULATION NUMBER 17. AND YOU'LL RECALL WHAT A  
27 STIPULATION IS. AND IT READS AS FOLLOWS:

28 COUNSEL STIPULATES THAT IF FRANK MICHAEL

a) BY THE DDAS SINCE AS SEEN HERE IN "I" MCGHEE DID NOT SAY THIS & IN  
IN FACT SAID HE WAITED IN FLORIDA FOR ME TO BRING THE BOAT BACK, 12.

F1

1 MAGEE WERE CALLED AS A WITNESS AND DULY SWORN, HE WOULD  
2 TESTIFY THAT HE IS EMPLOYED AS A BOAT SURVEYOR AND HAS  
3 BEEN SO EMPLOYED FOR THE PAST TWO DECADES. MR. MAGEE  
4 WILL FURTHER TESTIFY THAT IN OR AROUND MAY OF 1991 HE WAS  
5 RETAINED BY MARYLAND NATIONAL BANK<sup>a</sup> TO REPOSSESS MICHAEL  
6 GOODWIN'S YACHT REFERRED TO IN PEOPLE'S EXHIBIT 100 WITH  
7 COAST GUARD DOCUMENTATION NUMBER 675188. WE WERE GOING  
8 TO PUT AN EXHIBIT -- THERE IT IS. OKAY. THAT'S PEOPLE'S

9 \* \* THE DDAS FABRICATED THIS EXHIBIT. IT IS NOT AN OFFICIAL DOCUMENT. I  
10 100. CANNOT RECALL ALL DETAIL, & MY LAWYERS HAVE REFUSED TO PROVIDE ME A  
11 COPY, BUT I'M 90%+ CONFIDENT IT CAN BE PROVEN AS FRAUDULENT.

12 ADDITIONALLY, MR. MAGEE WOULD TESTIFY THAT  
13 HE SPENT APPROXIMATELY THREE TO FOUR WEEKS IN GUATEMALA  
14 ATTEMPTING TO LOCATE AND REPOSSESS THE YACHT, DURING  
15 WHICH TIME HE HAD A PHONE CONVERSATION WITH MICHAEL  
16 GOODWIN WHEREIN MR. GOODWIN TOLD MR. MAGEE THAT HE WOULD  
17 NEVER FIND HIS BOAT.

18 LASTLY, MR. MAGEE WOULD TESTIFY THAT AFTER  
19 APPROXIMATELY THREE TO FOUR WEEKS OF SEARCHING, HE  
20 LOCATED THE YACHT AND MICHAEL GOODWIN ON THE RIO DULCE  
21 RIVER IN GUATEMALA, AT WHICH TIME HE REPOSSESSED THE<sup>b</sup>  
22 YACHT IN THE NAME OF MARYLAND NATIONAL BANK.

23 SO STIPULATED BY THE PEOPLE?

24 MR. JACKSON: YES, YOUR HONOR.

25 THE COURT: AND THE DEFENSE?

26 MS. SARIS: YES, YOUR HONOR.

27 THE COURT: ALL RIGHT. DO THE PEOPLE HAVE ANY  
28 ADDITIONAL WITNESSES AT THIS TIME?

MR. JACKSON: WE DO NOT, YOUR HONOR. SUBJECT TO  
THE ADMISSION OF THE PEOPLE'S 1 THROUGH 103, THE PEOPLE

a) SUPPRESSED EVIDENCE, THE BANK FILES, N, PROVE HE HAD NOTHING TO DO

WITH THE BOAT SEIZURE/TURNOVER & WAS NOT RETAINED BY THE BANK TO DO IT.

b) AGAIN, HIS WITNESS STATEMENT PROVES THIS IS A LIE. HE WAITED FOR ME TO  
BRING THE BOAT BACK TO THE UNITED STATES, EXH. PP. 11-14 & P. 4 IN BRIEF.

FZ

PROVIDE TO ME ALTHOUGH I'VE ASKED FOR 4 YEARS. REFERENCED PAGE 3:26

1 IS NOT IN THE RELATIVE NUMBER OF WITNESSES, BUT IN THE  
2 CONVINCING FORCE OF THE EVIDENCE.

3 THE FACT THAT A WITNESS HAS BEEN CONVICTED  
4 OF A FELONY, IF THIS IS A FACT, MAY BE CONSIDERED BY YOU  
5 ONLY FOR THE PURPOSE OF DETERMINING THE BELIEVABILITY OF  
6 THAT WITNESS. THE FACT OF A CONVICTION DOES NOT  
7 NECESSARILY DESTROY OR IMPAIR A WITNESS'S BELIEVABILITY.  
8 IT IS ONE OF THE CIRCUMSTANCES THAT YOU MAY CONSIDER IN  
9 WEIGHING THE TESTIMONY OF THAT WITNESS.

10 EVIDENCE OF THE CHARACTER OF A WITNESS FOR  
11 HONESTY OR TRUTHFULNESS MAY BE CONSIDERED IN DETERMINING  
12 HIS OR HER BELIEVABILITY.

13 YOU SHOULD GIVE THE UNCORROBORATED  
14 TESTIMONY OF A SINGLE WITNESS WHATEVER WEIGHT YOU THINK  
15 IT DESERVES. TESTIMONY CONCERNING ANY FACT BY ONE  
16 WITNESS WHICH YOU BELIEVE WHOSE TESTIMONY ABOUT THAT FACT  
17 DOES NOT REQUIRE CORROBORATION IS SUFFICIENT FOR THE  
18 PROOF OF THAT FACT. YOU SHOULD CAREFULLY REVIEW ALL THE  
19 EVIDENCE UPON WHICH THE PROOF OF THAT FACT DEPENDS.

20 MOTIVE IS NOT AN ELEMENT OF THE CRIME  
21 CHARGED AND NEED NOT BE SHOWN. HOWEVER, YOU MAY CONSIDER  
22 MOTIVE OR A LACK OF MOTIVE AS A CIRCUMSTANCE IN THIS  
23 CASE. PRESENCE OF MOTIVE MAY TEND TO ESTABLISH THE<sup>a</sup>  
24 DEFENDANT IS GUILTY. ABSENCE OF MOTIVE MAY TEND TO SHOW  
25 THE DEFENDANT IS NOT GUILTY.

26 THE FLIGHT OF A PERSON AFTER THE  
27 COMMISSION OF A CRIME OR AFTER HE IS ACCUSED OF A CRIME  
28 IS NOT SUFFICIENT IN ITSELF TO ESTABLISH HIS GUILT BUT IS

a) THE DDAS FOISTED ANOTHER LARGE FRAUD ON THE COURT RE: MOTIVE BY  
ALLEGING THAT I HAD THOMPSON KILLED SINCE I REFUSED TO PAY HIS ILL-GOTTEN  
JUDGMENT. BUT THEY HID THE FACT & THE EVIDENCE THAT I'D DEPOSITED OVER  
\$830,000 INTO A TRUST ACCOUNT THAT I COULDN'T TOUCH, TO PAY HIS \$794,000  
JUDGMENT, 3 MONTHS BEFORE HIS DEATH. HIS OWN LAWYERS LOOTED IT, BLAMING ME.

< GI

1 A FACT WHICH IF PROVED MAY BE CONSIDERED BY YOU IN THE  
2 LIGHT OF ALL OTHER PROVED FACTS IN DECIDING WHETHER A  
3 DEFENDANT IS GUILTY OR NOT GUILTY. WHETHER OR NOT  
4 EVIDENCE OF FLIGHT SHOWS A CONSCIOUSNESS OF GUILT AND THE  
5 SIGNIFICANCE TO BE ATTACHED TO SUCH A CIRCUMSTANCE ARE  
6 MATTERS FOR YOUR DETERMINATION.

7 A DEFENDANT IN A CRIMINAL TRIAL HAS A  
8 CONSTITUTIONAL RIGHT NOT TO BE COMPELLED TO TESTIFY. YOU  
9 MUST NOT DRAW ANY INFERENCE FROM THE FACT THAT A  
10 DEFENDANT DOES NOT TESTIFY. FURTHER, YOU MUST NEITHER  
11 DISCUSS THIS MATTER NOR PERMIT IT TO ENTER INTO YOUR  
12 DELIBERATIONS IN ANY WAY.

13 IN DECIDING WHETHER OR NOT TO TESTIFY THE  
14 DEFENDANT MAY CHOOSE TO RELY ON THE STATE OF THE EVIDENCE  
15 AND UPON THE FAILURE IF ANY OF THE PEOPLE TO PROVE BEYOND  
16 A REASONABLE DOUBT EVERY ESSENTIAL ELEMENT OF THE CHARGE  
17 AGAINST HIM. NO LACK OF TESTIMONY ON THE DEFENDANT'S  
18 PART WILL MAKE UP FOR A FAILURE OF PROOF BY THE PEOPLE SO  
19 AS TO SUPPORT A FINDING AGAINST HIM ON ANY ESSENTIAL  
20 ELEMENT.

21 AN ADMISSION IS A STATEMENT MADE BY THE  
22 DEFENDANT WHICH DOES NOT BY ITSELF ACKNOWLEDGE HIS GUILT  
23 OF THE CRIMES FOR WHICH THE DEFENDANT IS ON TRIAL, BUT  
24 FOR WHICH STATEMENT TENDS TO PROVE HIS GUILT WHEN  
25 CONSIDERED WITH THE REST OF THE EVIDENCE.

26 YOU ARE THE SOLE JUDGES AS TO WHETHER THE  
27 DEFENDANT MADE AN ADMISSION. AND IF SO, WHETHER THAT  
28 STATEMENT IS TRUE IN WHOLE OR IN PART.

a) DDA JACKSON COMMITTED AN ILLEGAL "GRIFFIN ERROR" AT RT-8755 BY

COMMENTING THAT I SHOULD BE TESTIFYING TO AN ALIBI. THIS IS SICK BUT  
HILARIOUS. HE HID THE EVIDENCE I NEEDED, & HE SUGGESTED THAT I SHOULD  
RECALL AN ALIBI FOR A 10 DAY PERIOD 18½ YEARS AFTER THE CRIME WHEN I WASN'T  
EVEN CHARGED UNTIL 13½ YEARS AFTER THE CRIME. JACKSON'S DECEIT IS ENDLESS.

GZ

REFERENCED AT PAGE 4 LINE 1 OF THE NARRATIVE. THIS IS THE 1ST PAGE ONLY OF THE  
TYPED WITNESS STATEMENT FOR FRANK "MIKE" MCGHEE WHICH FOLLOWS, AT PAGES I1 THRU I4.  
THIS PAGE IS INCLUDED TO SHOW THAT DDA ALAN JACKSON WAS IN THE INTERVIEW WITH MIKE  
MCGHEE WHEN MCGHEE CONFIRMED I BROUGHT THE BOAT BACK TO FLORIDA, PAGES I2 THRU I4.

**COUNTY OF LOS ANGELES - SHERIFF'S DEPARTMENT - SUPPLEMENTARY REPORT**

**DATE:** SEPTEMBER 5, 2004

**FILE NO.:** 088-04387-0511-011

**C:** MURDER - 187 P.C.

**ACTION:** ACTIVE/ INVESTIGATION  
CONDUCTED/WITNESSES  
INTERVIEWED

**V:** (SEE BELOW)

**D:** 03-16-1988

**L:** 53 WOODLYN LANE, BRADBURY

**S:** (SEE BELOW)

\*\*\*\*\*

**VICTIMS:**

V#1: THOMPSON, MARION LEE MW, DOB: 12-07-1928 (Deceased)

V#2: THOMPSON, GERTRUDE FW, DOB: 02-19-1943 (Deceased)

**SUSPECTS:**

S#1: GOODWIN, MICHAEL FRANK MW, DOB: 02-04-1945  
Booking #8178058

\*\*\*\*\*

On 08-16-2004, Monday, at 0930 hours, Detective Lillienfeld and Deputy District Attorney  
(DDA) Alan Jackson contacted Witness **FRANK MICHAEL MC GHEE**, MW, DOB: 03-19-  
1953, in Fort Lauderdale, Florida. Mr. McGhee is employed as a boat surveyor and has  
been so employed for the past two decades.

H  
100201



REFERENCED AT PAGE 4 LINE 3, APPROPRIATE PAGES FROM THE DDA JACKSON & DET. LILLY-FELD INTERVIEW WITH MIKE MCGHEE INVESTIGATOR FIELD NOTES, PAGES I1 THRU I4 HERE. IF YOU WISH THE ENTIRE INTERVIEW NOTES I WILL PROVIDE, BUT IT IS LENGTHY. IN THE ENTIRE WITNESS INTERVIEW NOTES I'VE DETAILED MORE THAN TWO DOZEN PROVABLE LIES BY MCGHEE AND/OR INSTANCES WHERE THE PROSECUTION LIED ABOUT WHAT HE SAID IN THE NOTES WHEN THE NOTES WERE FORMALLY TYPED AT BPS 100201, THE 1ST PAGE OF WHICH IS THE PRIOR PAGE HERE, "H"

8-16-04, MRN. 0930  
W/ FRANK MICHAEL MCGHEE  
MW/ 3-19-53

C. [REDACTED]  
E. [REDACTED]

W/ IS A BOAT "SURVEYOR"  
BOAT LE-PO.-

THE SUPPRESSED MARYLAND BANK RECORDS SHOWN AT PAGE "N" IN ITEM #76 WILL PROVE THAT MCGHEE HAD NOTHING EVER TO DO WITH THE BOAT. DDAS JACKSON & DIXON KNEW THIS (E.G. SEE PAGE "J" HERE) & ARE CHARGED UNDER THE LAW WITH THIS KNOWLEDGE OF EVIDENCE IN THEIR POSSESSION. SEE IN RE: BROWN (1998) 17 CAL 4TH 873, 879, 72 CR 2D 698, 702.

W/ IN 91, CONT'D BY  
MARYLAND NAT'L BANK TO  
FIND PLATE M 6 BOAT

W/ ASKED TO FIND A  
MOTOR SAILOR-  
"SCALAWAG"  
DOUBLE MASTED 60 FT.  
SAIL BOAT - MOTOR SAILOR-  
"YALHT"  
WELLINGTON

W/ Hired BY BANK -

I WILL STIPULATE TO FORFEITING MY APPEAL & OPTING FOR THE DEATH PENALTY IF THE STATE CAN PRODUCE ANY LEGITIMATE EVIDENCE THAT MCGHEE HAD ANYTHING TO DO WITH THE BOAT TURNOVER. I BROUGHT HER BACK TO A UNITED STATES BOATYARD & VOLUNTARILY TURNED HER OVER TO THE TRUE MARYLAND BANK AGENT, WAYNE VANN. THE 100071  
BANK EVEN PAID PART OF THE BOATYARD BILL. I'M 90%+ CONFIDANT THAT WE'LL BE ABLE TO PROVE THAT MCGHEE NEVER SAW THE BOAT, BUT THAT THE PROSECUTION "FED" HIM THE INFOR THEY WANTED TO REGURGITATE.

REFERENCED AT PAGE 4, LINE 5. THESE ARE FROM THE MIKE McGHEE INVESTIGATOR FIELD NOTES (IFNS) WITH HIS INTERVIEW WITH DDA JACKSON & DET. LILLYFELD. NOTE BELOW HE STATED THAT HE WAITED IN FLORIDA (NORTHWEST FLORIDA, PENSACOLA) FOR ME TO BRING THE BOAT BACK. CUSTOMS RECORDS PROVE SHE ONLY CAME INTO NORTHWEST FLORIDA, ACTUALLY THROUGH THE MOBILE, ALABAMA PASS, WHICH

IS ADJACENT, ONCE. THUS, HOW

COULD THE PROSECUTION COULD

HAVE HAD ANY REAL IDEA THAT

HE REPOSSESSED THE BOAT IN

GUATEMALA. LILLYFELD

CONFIRMED THAT CUSTOMS COOP-

ERATED IN THE INVESTIGATION,

VOL 20-7632. THUS THE D.A.

IS CHARGED WITH KNOWLEDGE

OF THIS, & THE OBLIGATION

TO PRODUCE THE EXCULPATORY

EVIDENCE CUSTOMS HAD OF

ME, NOT McGHEE, BRINGING THE

BOAT INTO THE UNITED STATES.

THAT FAILURE IS A BRADY VIO-

LATION THAT ALONE MANDATES

REVERSING THE CONVICTION.

HOWEVER, THE ISSUE HERE IS

NOT ME, BUT RATHER THE DDAS'

DISHONESTY, PARTICULARLY WITH

DDA JACKSON RUNNING FOR DISTRICT ATTORNEY

OF LOS ANGELES

IF JACKSON IS ELECTED, ALOT MORE INNOCENT PEOPLE WILL BE FRAUDULENTLY  
CONVICTED & THE STATE WILL SPEND ALOT MORE MONEY NEEDLESSLY, PLUS  
LOSE THE PRODUCTIVITY & TAX REVENUE FROM THOSE HONEST CITIZENS  
BECAUSE OF THE AMBITION OF A DISHONEST PROSECUTOR, JACKSON.

100082

OLL 2<sup>ND</sup> DAY w/ NOT  
IN GUATEMALA-

M6 WAS WITH B16  
PHOTO A B16A-

IN PENSACOLA, w/  
WMT BY M6 HOME-

M6 DRIVING A PORCHE-  
M6 POINTED FINGER AT W/-  
STARE AT HIM-

W/ WAITING AT THIS TIME  
FOR BOAT TO BE TRNSPT'D  
TO U.S.

W/ WMT AT M6  
WOULD SINK BOAT-

W/ WAS "CLEAN" OF M6-

W/ USED TO DRINK-  
BUT NO LONGER DOES-

I2

REFERENCED AT PAGE 4 LINES 8 & 9, FROM THE MCGHEE IFNS. THESE ARE NOT IN ORDER. I PUT THE 1ST PAGE 1ST FOR IDENTIFICATION, BUT THEN, I2 SECOND, BECAUSE THAT NOTATION "WAITING FOR MG TO BRING BOAT BACK TO THE U.S" BEST PROVES THE DDAS' LIES ON THESE ISSUES. THESE PAGES, I3 & I4 ARE SIMPLY FROSTING ON THE CAKE.

MOM, BEFORE SHE DIED,  
NEVER MENTIONED THIS, &  
SHE WOULD HAVE.

W/ WNT TO PENSACOLA,  
FL -

W/ CONT'D MOM OF  
M6 -

MOM DIRECTED W/ TO  
~~THE~~ MARC IN BK YD.

MARC SAID M6 GONE,  
1 WK -

MARC WITH MARC -

\*\* IF I KEPT THE BOAT IN A  
MARINA (IN FLORIDA) HOW  
COULD MCGHEE HAVE PICKED  
HER UP IN GUATEMALA,  
PROBABLY 1000+ MILES AWAY?

MARC SAID M6 USUALLY  
KEPT BOAT AT MARINA - <

MARC WAS A SMITHSON TO  
W/ -

ALTHOUGH THIS ISN'T TRUE,  
IF I HAD WORK DONE ON THE  
BOAT & OWED MONEY THE BOAT  
WOULD HAVE HAD TO HAVE BEEN

W/ SAID M6 OWED \$  
TO EVERYBODY IN PENSACOLA, <  
MARINAS - BARS - BOAT  
EQUIPMENT STORES -

IN FLORIDA. IF SO, HOW COULD MCGHEE HAVE SEIZED HER

IN GUATEMALA? AS TO OWING MONEY, THE BOAT WAS ONLY IN ONE YARD/ MARINA &  
I PAID MY BILL IN FULL, WITH MARYLAND BANK, VIA THEIR AGENT WAYNE VANN, PAYING  
ADDITIONAL FOR SOME ADDITIONAL REPAIRS & UPGRADES. YOU CAN'T TAKE A BOAT FROM A  
YARD WITHOUT PAYING YOUR BILL.

I3

100076

REFERENCED AT PAGE 4 LINE 9 IN THE NARRATIVE.

1. BELOW, WE CAN PROVE HE NEVER FOUND THE BOAT. SEVERAL DIFFERENT PERSPECTIVES/PIECES OF EVIDENCE PROVE THAT. BUT, SINCE THAT IS NOT THE ISSUE HERE & WE DON'T WANT TO GIVE PROVABLY DISHONEST DDA ALAN JACKSON A HEAD START ON FABRICATING MORE EVIDENCE, WE'LL KEEP THOSE TO OURSELVES FOR NOW.

AS WE SEE THERE ARE MANY UNTRUTHS ON THIS PAGE, EVEN MORE THAN I POINT OUT. HOWEVER, THE MOST SALIENT ISSUE IS THAT IF MCGHEE'S STATEMENT BELOW WAS TRUE, ESPECIALLY IN COMBINATION WITH THE STATEMENTS ON PAGES I-2 & I-3 THAT HE WAS WAITING FOR ME TO BRING THE BOAT TO FLORIDA, & THAT I KEPT HER IN A MARINA IN FLORIDA, HOW COULD HE HAVE POSSIBLY SEIZED HER IN GUATEMALA AS THE DDAS CLAIMED AT TRIAL?

W/ FOUND SCALING 6-1.  
FOUND OUT ABOUT D. 6.-  
KNOW MAJOR NAME-

M 6 SEAM ARTIST-  
"FACE DIVER"

W/ STARTED CK 6 FOR  
"FREE DIVERS"

W/ CK'S BRIDGE TENDERS  
IN PENSACOLA-

W/ CK'S W/ M 6 INS.  
COMP.

CAPTAIN PENSACOLA SURVEYOR-

THIS IS NOT TRUE. I NEVER HAD THE BOAT IN PENSACOLA. I ONLY HAD HER IN A MARINA/BOATYARD ABOUT 40 MILES WEST OF PENSACOLA, MUCH NEARER MOBILE, ALABAMA, WHICH IS WHERE I BROUGHT HER IN THROUGH THE PASS. THEY WERE PAID IN FULL BEFORE THE BOAT LEFT. THAT IS ALSO IN THE MARYLAND BANK FILE, EVIDENCE PAGE "N" HERE, AS PART OF THE BILLS BY THE BANK'S AGENT WHO I TURNED THE BOAT OVER TO VOLUNTARILY. THERE WAS NO SEIZURE.

W/ FOUND A MECHANIC M 6  
DUES \$ TO FOR WORK <  
DONE ON BOAT-

M 6 TURNED IN AN  
INSURANCE CLAIM FOR A  
LIGHTNING STRIKE

IA

100072

**John Bradley**

REFERENCED AT PAGE 4 LINE 21 IN THE WRITING

**From:** Diane Seidel [diseidel@hotmail.com]  
**Sent:** Monday, September 27, 2004 4:52 AM  
**To:** jjb@johnbradley.com  
**Subject:** RE: Update on Michael Goodwin 9-25-04

THIS IS MY EX-WIFE WHO LIVED WITH  
ME ON THE BOAT IN GUATEMALA UNTIL  
SHE LEFT ME FOR ANOTHER MAN & WENT  
TO LIVE WITH HIM ON HIS BOAT IN  
THE SAME MARINA AREA. SEE NEXT PG.

Hi John,

Funny thing happened this weekend. My nephew from Oakland was out here visiting us and we were having lunch on the deck on Saturday, when the an LA District Attorney named Alan Jackson showed up...along with Lillenfield. He was asking questions about a Jack McGee or Capt McGee who repossessed the boat in Guatemala? Maybe it was Mike McGee or McFee, at any rate, I told them I didn't know or remember such a person and that he didn't take the boat in Guatemala because Mike and his brother had taken it back to Pensacola. At any rate they were very interested in that time line. When he started getting into Lillenfelds report of what I had said at the halfway house, I told them to go through my attorney, this was after serveral requests for them to leave. And then I said that if he called me he better have my attorney on the phone with him.

He was supposed to fly out Monday, today, so I don't expect to here from him. I don't know what tangent they are now on but thought you would want to know. Maybe it was just bait to see if I fed you information. Good luck.

Diane

J

1 REFERENCED AT PAGE 5 LINE 1, A PAGE FROM A DET. LILLYFELD SWORN AFFADAVIT TO GET  
A WIRETAP IN FEBRUARY, 2001, AFTER MCGHEE HAD INITIALLY TOLD HIM IN 1998 THAT HE,  
2 MCGHEE HAD SEIZED THE BOAT. LILLYFELD CALLED HIM A DRUNK, JUST SEEKING THE REWARD.  
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.

3 On June 23, 1997, your affiant contacted Ronald Luellen Ridgeway. Mr. Ridgeway said  
4 that he had met Michael Goodwin and his wife, Diane Seidel Goodwin, while sailing in either  
5 Belize or Guatemala. He stated that he met them after the Thompson murders, and that the  
6 Goodwins were sailing around the Carribean on their newly purchased motorsailer.

7 Mr. Ridgeway told your affiant that the Goodwins got into a dispute, with Michael  
8 Goodwin wanting to return to the United States and begin some real estate ventures, while Diane  
9 Seidel Goodwin wanted to continue sailing in the Carribean. This disagreement ultimately ended  
10 up with Diane Seidel Goodwin being left behind on a boat dock in Guatemala, and Michael  
11 Goodwin sailing away.

12 Mr. Ridgeway said he assisted Diane Seidel Goodwin in returning to the United States,  
13 where they entered into a relationship in his home state of Texas. It was in Texas that Diane and  
14 Michael Goodwin ultimately obtained a devorce.

15 According to additional police reports obtained from the Aspen, Colorado Police  
16 Department, on January 28, 1993, Aspen police officers responded to a home at 635 Sneaky  
17 Lane, Aspen, Colorado. Michael Goodwin reported to the officers that he had found his girlfriend  
18 in a coma after attempting suicide. This incident was documented under Aspen Police  
19 Department report # 93-334, which your affiant has obtained.

20 During this incident, the attempt suicide victim, Gail Moreau, was transported to a local  
21 hospital and treated for a variety of injuries, including an overdose of over the counter cold  
22 medications.

REFERENCED AT PAGE 5, LINE 10.

This is a page from lead investigator Lillienfeld's sworn affidavit for a wiretap in February, 2001. I have over three dozen material perjuries briefed in it, including evidence cites proving the perjuries. the evidence Lillienfeld had prior to these perjuries proves they were told "in shocking disregard of the truth," COOK 22 C3 67.

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. (MG note; yes for .05 blood alcohol)

On June 23, 1997, your affiant contacted Ronald Luellen Ridgeway. Mr. Ridgeway said that he had met Michael Goodwin and his wife, Diane Seidel Goodwin, while sailing in either

Belize or Guatemala. He stated that he met them after the Thompson murders, and that the

Goodwins were sailing around the Carribean on their newly purchased motorsailer. We never sailed in the Carribean at all. The DDAS also lied about this at trial to appear that we were fleeing.

Mr. Ridgeway told your affiant that the Goodwins got into a dispute, with Michael a See pages C:27 & D5:16. Goodwin wanting to return to the United States and begin some real estate ventures, while Diane

Seidel Goodwin wanted to continue sailing in the Carribean. This disagreement ultimately ended

up with Diane Seidel Goodwin being left behind on a boat dock in Guatemala, and Michael Lillienfeld anything like this.

Goodwin sailing away. What happened was that Diane fell out of love with me & left with Ridgeway. I flew down from the U.S. & sailed the boat to Florida.

Mr. Ridgeway said he assisted Diane Seidel Goodwin in returning to the United States, where they entered into a relationship in his home state of Texas. It was in Texas that Diane and

Michael Goodwin ultimately obtained a devorce. For the issue beginning at line 15, re: Gail Moreau (Hunter at trial) the DDA suborned perjury that i'd tried to kill her at this time.

According to additional police reports obtained from the Aspen, Colorado Police Department, on January 28, 1993, Aspen police officers responded to a home at 635 Sneaky Lane, Aspen, Colorado. Michael Goodwin reported to the officers that he had found his girlfriend in a coma after attempting suicide. This incident was documented under Aspen Police

Department report # 93-334, which your affiant has obtained. Again, even though the DDAS had the evidence proving this was an attempted suicide they suborned attempted murder.

During this incident, the attempt suicide victim, Gail Moreau, was transported to a local hospital and treated for a variety of injuries, including an overdose of over the counter cold

medications.

a) We had no dispute. She simply did not support my obsession with often returning to the U.S to attempt to clear my name in the Thompson murders & to push to get the bankruptcy creditors paid.

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Q. AND WERE THESE DOCUMENT IN REFERENCE TO THE  
CASE OF A BOAT BY THE GOODWINS?

MS. SARIS: OBJECTION.

Q. BY MR. JACKSON: EITHER DIANE OR MIKE  
IN?

MS. SARIS: I'M GOING TO OBJECT AS VAGUE AS TO THE  
USE OF THE TERM "GOODWINS."

THE COURT: SUSTAINED. THE ANSWER WILL BE  
KEN. \*\*BUT AT TRIAL THE JUDGE ALLOWED THEM TO CALL IT MY BOAT.

Q. BY MR. JACKSON: WHOSE NAME WAS THE SIGNATORY  
E BOAT DOCUMENTS?

Q. DID YOUR INVESTIGATION EVER REVEAL ANY  
ATION THAT MIKE GOODWIN MAY HAVE BEEN INVOLVED WITH  
URCHASE OF THE BOAT DOCUMENTS -- I'M SORRY -- THE

MS. SARIS: OBJECTION. LACK OF FOUNDATION. CALLS  
CONCLUSION.

Q BY MR. JACKSON: AT SOME POINT DID YOU EVER  
INVESTIGATE FURTHER THE PURCHASE OF THAT BOAT?

Q. AND DID YOU REACH A CONCLUSION AS TO HOW THE  
WAS PURCHASED?

M1



1 MS. SARIS: OBJECTION.. LACK OF FOUNDATION.

2 MR. JACKSON: WHETHER OR NOT SHE REACHED A  
3 CONCLUSION?

4 MS. SARIS: THE RELEVANCE OF HER CONCLUSION.

5 THE COURT: I THINK YOU MEAN OPINION, BUT ASSUMING  
6 IT'S OPINION I'M GOING TO OVERRULE THE OBJECTION.

7 MS. SARIS: THEN IT WOULD BE RELEVANCE AS TO HER  
8 OPINION AS TO HOW IT WAS PURCHASED IF THE DOCUMENT  
9 CLEARLY AS NO SIGNATORY.

10 THE COURT: WELL, THE QUESTION WAS: DID SHE HAVE  
11 AN OPINION. WHY DON'T YOU REPHRASE THE QUESTION THAT WAY  
12 AND THEN WE WILL SEE WHAT THE ANSWER IS AND I WILL TAKE  
13 IT FROM THERE.

14 Q. BY MR. JACKSON: DID YOUR INVESTIGATION LEAD  
15 YOU TO THE OPINION THAT SOMEBODY OTHER THAN DIANE GOODWIN  
16 HAD ALSO CO-SIGNED OR SIGNED AS A BACK-UP CREDITOR FOR  
17 THE PURCHASE OF THE BOAT?<sup>A</sup>

18 A. YES.

19 Q. WHO WAS THAT?

20 A. MR. GOODWIN.<sup>A</sup> PERJURY. I SIGNED NOWHERE ON ANY PART  
21 OF THE BOAT LOAN. I WAS NOT EVEN

22 Q. I'M SORRY? ALLOWED TO SIGN SINCE I WAS IN

23 A. MR. GOODWIN. BANKRUPTCY. JACKSON KNEW THIS.

24 Q. TURNING YOUR ATTENTION TO -- AND, BY THE WAY,  
25 THE DATE -- IS THERE AN ORIGINAL LOAN CONFIRMATION  
26 DOCUMENT?

27 A. YES.

28 Q. AND WHAT IS THE DATE ON THAT?

A. MARCH 10TH, 1988.

A) MATERIAL PERJURY BY KINGDON, & DDA JACKSON KNEW IT FROM DOCUMENTS HE  
USED AT TRIAL PROVING I DIDN'T SIGN ON THE BOAT LOAN, TRIAL EXH. 89, TEST-  
IFIED TO BY KINGDON AT VOL 18-6720, PLUS MANY SUPPRESSED DOCUMENTS THAT ARE  
CONFIRMED IN THE 186 PAGE INVENTORY OF SUPPRESSED DOCUMENTS THE D.A. HAS.

M2

REFERENCED AT PAGE 5 LINE 13.

1 A YES.

2 Q WHAT WERE THOSE CONCLUSIONS?

3 A IN LOOKING AT THE FINANCIAL RECORDS, IT  
4 APPEARED THAT IN ABOUT 1986, EARLY 1986 FUNDS AND ASSETS  
5 WERE IN BOTH MR. AND MRS. GOODWINS' NAME AND THEN ABOUT<sup>A</sup>  
6 THE FIRST QUARTER OF 1986 FUNDS STARTED TO -- AND ASSETS  
7 BEGAN TO GO STRICTLY INTO MRS. GOODWIN'S NAME ALONE.

8 Q AND WHAT DID THAT TELL YOU?

9 MR. SUMMERS: OBJECTION. VAGUE, YOUR HONOR.

10 THE COURT: ALL RIGHT. SUSTAINED.

11 Q BY MR. JACKSON: DID THAT -- DID THAT  
12 OPINION ASSIST YOU IN FURTHER INVESTIGATING WHAT WAS  
13 GOING ON IN SAY LATER YEARS? YOU MENTIONED EARLY 1986.  
14 I'M TALKING ABOUT MAYBE 1987 OR '88 DID THAT ASSIST YOU  
15 IN ANY WAY?

16 A YES.

17 Q AND DID YOU LOOK AT OTHER TRANSACTIONS  
18 THAT WENT ON IN 1987 AND 1988?

19 A YES, I DID.

20 Q SPECIFICALLY CONCERNING 1988, I WANT TO  
21 TRY AND PUSH THE TIME WHEEL FORWARD JUST A LITTLE BIT.  
22 DID YOU REVIEW TRANSACTIONS CONCERNING A BOAT?

23 A YES, I DID.

24 Q TAKE A LOOK AT WHAT'S BEEN MARKED AS  
25 PEOPLE'S 100. YOU SEE THE P-100 ON THE UPPER RIGHT-HAND  
26 CORNER? THIS, D.A. EXHIBIT 100, IS FABRICATED, NOT AN OFFICIAL  
DOCUMENT. I'M 90%+ CONFIDANT WE CAN PROVE IT IS FRAUDULENT.

27 A UH-HUH.

28 Q TAKE JUST A SECOND, IF YOU WILL, AT YOUR

A) CONCLUSIVELY PROVABLE MATERIAL PERJURY. NEED SUPPRESSED RECORDS.

BUT, EXH. 12 HERE, EVIDENCE THEREIN, PROVIDES PRIMA FACIE PROOF OF PERJURY.  
(NOT INCLUDED)

M3

REFERENCED AT PAGE 5 LINE 13

1 LEISURE AND TAKE A LOOK -- I'M MORE INTERESTED IN THE  
2 ACTUAL DOCUMENTS, NOT OF THE PHOTOGRAPHS OF THE ACTUAL  
3 DOCUMENTS ON THIS PAGE AND TELL ME IF YOU RECOGNIZE THOSE  
4 DOCUMENTS AS SOMETHING YOU'VE SEEN BEFORE?

5 A YES, I'VE SEEN THESE.

6 Q HOW DO YOU RECOGNIZE THOSE DOCUMENTS?

7 A THESE DOCUMENTS WERE PART OF A BANK LOAN  
8 THIS PROVES JACKSON HAD THE BOAT FILE WHICH IN THEM-  
9 FILE FOR A BOAT. SELEVES FROM MCGHEE HAD NOTHING TO DO WITH THE BOAT.

10 Q AND HOW DID THEY RELATE TO YOUR  
11 INVESTIGATION, THOSE DOCUMENTS?

12 A IN LOOKING AT THE FINANCIAL TRANSACTIONS,  
13 MRS. GOODWIN HAD FUNDS IN HER NAME THAT WERE USED TO  
14 PURCHASE THE YACHT.

15 Q AT THE TIME, MRS. STEPHENS, THAT -- WHAT  
16 IS -- WHAT'S THE TIME FRAME SURROUNDING THE PURCHASE OF  
17 THE YACHT ACCORDING TO YOUR REVIEW OF THE DOCUMENTS?

18 A IN ABOUT JANUARY 1988 THERE'S -- HERE FOR  
19 INSTANCE A CHECK FOR A DEPOSIT ON THE BOAT. AND THEN IN  
20 APRIL 28TH, 1988 IT LOOKS LIKE DIANE GOODWIN TOOK

21 SO? AS DIVERS/UNDERWATER PHOTOGRAPHERS THIS HAD a  
22 POSSESSION OF THE BOAT. BEEN OUR DREAM FOR YEARS. WHEN DIANE'S JGA PROJECT  
23 WENT SO WELL WE DECIDED THE PRIOR AUGUST TO DO IT.

24 Q ALL RIGHT. IS THERE A -- DO YOU SEE A  
25 CHECK FOR A DEPOSIT OR A DOWN PAYMENT IF YOU WILL?

26 A YES, I DO.

27 Q WHAT'S THE DATE ON THAT CHECK?

28 A JANUARY 20TH, 1988.

29 Q ALL RIGHT. IS THAT WHAT YOU'RE TALKING  
30 ABOUT WHEN YOU SAY BEGINNING ABOUT JANUARY 1988?

31 A YES.

a) IT WAS CONFIRMED TO US IN THE SUMMER OF 1987 THAT DIANE'S SEPARATE

PROPERTY INVESTMENT IN JGA/WHITEHAWK WOULD MAKE A \$2,000,000 CASH PROFIT IN  
JUST 18 MORE MONTHS. THAT PLUS THE THOMPSON PROBLEMS & A SPECTACULAR TRIP TO  
PAPUA NEW GUINEA DIVING IN AUGUST 1987, CEMENTED THE PLANS. AND, EVIDENCE  
I HAD DEPOSITED MORE THAN ENOUGH TO PAY THOMPSON IN FULL BEFORE HIS DEATH.

M4

THIS PAGE LISTS SUPPRESSED DOCUMENTS THAT WHEN PRODUCED WILL COMPLETELY IMPEACH  
SEVERAL DA ALLEGATIONS & PUT OTHERS INTO QUESTION

White Banker's Box

SEE THE NEXT PAGE FOLLOWING  
THIS FOR EXPLANATION NOTES.  
**MANY BIG BRADY VIOLATIONS.**

A.

①  
\*

B.

76. Subpoena returns from Safra Bank February 12, 1993, Southwest Bank no date on it, NationsBank (Citizens), April 5, 1993. B. Manufacturers Bank for Los Arcos July 7, 1993. Bank of America. An empty Airborne Express pocket box it is addressed to the Grand Jury at 312 North Spring St. Bank of America for Leisuretech. Gold'n Coins checks. C. Barnett Bank, Bank Atlantic. Maryland Bank. \* A file from Downey Bank with a package of photocopies on it. A Grand Jury subpoena returned from Bank of America for a Visa Account. A return from Wells Fargo's bank to OCDA, March 31, 1983. A return from Manufacturer's Bank to the OCDA April 23, 1993.

\* Is Manufacturer's Bank the same as Mitsui  
Manufacturer's Bank? If so there will be  
exculpatory dox re: the \$20,000 check. a

New Box

77. It has subpoena returns for Manufacturers Bank postmarked July 18, 1993. ITT Federal Bank post-marked July 21, 1993, there are 3 envelopes in that one. A Clayton Deposition from Burton H. Ward Inc. Lawyers. These depositions were taken August 23, 1988, November 3, 1987 and November 3, 1987. Next is a subpoena response by Ronald Durkin February 9, 1993 with A First Report of Accountants to Trustee.

78. Next box is a box full of microfiche check copies from Bank of America. This is for an account of Diane Seidel Goodwin 0097-6383-1, it says Laguna Beach Branch 0097, 299 Ocean Avenue, Laguna Beach. These were produced for the Grand Jury on June 23, 1993 at 9:00 a.m.

②

79. A copy of a Criminal Investigation Division Department of Treasury memo to the Orange County District Attorney by Special Agent William Smith, October 17, 1991. THIS WILL PROVE THAT  
JGA WASN'T SOLD.

80. A Grand Jury Subpoena returned from Bank of America June 7, 1993.

81. Copy of a Grand Jury Subpoena from Durkin February 9, 1993.

I believe that the Frazier Yachts original file, #82 below, proves at least a prima facie case of felony evidence tampering. The firm name was Fraser, not Frazier. Lillienfeld confirmed that Kingdon had the original file, bp 26874. It had a copy of the "missing" \$20K chk. a

\*  
③ 82. Frazier Yachts file, with a tag on it that says Rebel Venture III 57 foot Wellington, Confidential Sale Information. It is a legal size file manila colored. All the papers in this file are loose for some reason. This appears to be an original file, most of the signatures are blue ink. W-2's or tax returns in the file.

N

?

83. Letter dated April 26, 1988 from Diane Goodwin to

This is pg 7/8 of the 9/13/95 Elliot McIntosh inventory of documents at the U.S. Attorney's Office. Code EMI-4.

a) That Kingdon testified she couldn't account for & the DA argued that we paid the killers with. A check????

Referencing exhibit page "N".

1. Within the item #76 group at the top of the page, in addition to the Maryland Bank subpoena (SDT) return that was the primary focus here to prove that McGhee had nothing to do with the boat, there are several other bank SDT returns that will contain materially exculpatory evidence. Amongst those are:

A. Safra Bank (see evidence p. Q) which includes Diane's checking account statements when we lived in Florida wide open, not hiding or fleeing, during 1989\*. This would have impeached the flee argument. This also shows that Diane's money was not commingled which would have proven yet another perjury by D.A. expert Kingdon that she tracked the funds to Florida & our funds were completely commingled. The checks themselves will allow us reconstruct many other issues to most probably impeach other D.A. argument that I choose not to disclose here. (for at least 8 mos)

B. Southwest Bank & Manufacturer's Bank will allow us to prove, via the information in their SDT returns, that the \$20,000 chk D.A. expert Kingdon testified was not accounted for, & the DDAS argued was used to pay the killers was in fact accounted for by Kingdon as a boat down payment by Diane. The Manufacturer's return for JGA which is also shown at the top of exhibit p. Q here will prove D.A. expert Kingdon's perjury that "JGA was sold" which the DDAS also falsely argued.

See "Big" exhibit B (not an individual alpha page within the Big alphaed exhs) for details on the "JGA was sold" Fraud on the Court, a \$2,000,000 DDA scam which was supported yet again\* by i) provable material perjury by D.A. expert Kingdon, & ii) suppression of these & other documents by the District Attorney. \* (only by her)

C. Barnett Bank, Bank Atlantic & NationsBank will also provide checking account records proving that we did not flee or try to hide. We used our true names & as anyone knows, Banks run a check on people before they accept the account. We often changed banks as we moved the boat to new locations to explore while we lived there.

D. The VISA account will also prove we lived wide open, just like the Platinum \* American Express records will, confirmed at bp 007626. We spent over \$50,000 on that card in 1989 while living on the boat in Florida, primarily near Fort Lauderdale in Hollywood I feel it was. Most of those funds were spent on boat equipment with the suppliers installing things right on the boat. The Government could have located us in minutes via these expenditures. \* (on the American Express)

**BUT, ALL OF THE ABOVE ARE SUPPRESSED.** Pages N, Q & possibly others to be added prove that the D.A. has these documents. These pages are from a 186 page official inventory of over 2100 documents, totalling over 10,000 pages in the D.A. evidence locker for this case that are suppressed. I've meticulously cross referenced & identified, by issue, over 250 groups of materially exculpatory documents therein.

2. #79 will prove that JGA was not sold. This is linked to the IRS issue in Big exhibit B. That is only page 6 of the IRS ruling that is very exculpatory. All of the rest of that document & hundreds of other pages of related materially exculpatory documents related to JGA was not sold are suppressed.

3. #82 the "FRAZIER" Yachts file will prove the "unaccounted for \$20,000 check" at line 9 above was used for a boat down payment & not to pay killers, plus several other materially exculpatory issues. This also proves Govt. evidence tampering. FRAZIER is misspelled. It is FRASER. The company would not have made that error.

Every document on page "N" will contain materially exculpatory evidence of some sort.

1. LILLYFELD COMMITTED MATERIAL PERJURY RE: MS. REEVES IN THE ARREST AFFADAVIT AT BP 25173 BY SWEARING THAT SHE TOLD HIM MICKEY HAD TOLD HER THAT I'D THREATENED HIM. HOWEVER, HER TAPE OF HER ONLY LILLYFELD INTERVIEW PROVES THAT AS PERJURY. SHE STATED THAT OTHERS HAD THREATENED MICKEY & THAT HE HAD NO CONCERN OF ME.
2. THIS PROVES YET ANOTHER MATERIAL PERJURY BY LILLYFELD. HE SWORE IN A DECLARATION THAT HE HAD CHECKED THOMPSON'S POSSIBLE DRUG LINKS. BUT SEE THAT HE ONLY CHECKED THOSE RE: ME, M.G.
3. IT IS TELLING OF THE FOCUS TO LINK ME INSTEAD OF INVESTIGATION TO SOLVE THE MURDER FROM THE WAY-OUT CHECKING INTO THE COMINGS & GOINGS OF MY FRIENDS/FAMILY 8 & 9 YEARS AFTER THE MURDERS, SLEEPER & CAROL ORMOND (EX-SISTER IN LAW), YET THE DEARTH OF INVESTIGATION INTO OTHER PRIME SUSPECTS. I HAVE THOSE SUSPECTS DETAILED W/EVIDENCE.
4. NOTE ALSO HERE THAT WE ENTERED THE U.S. ON THE BOAT ON 9/19/88. THAT IS JUST FIVE WEEKS AFTER WE LEFT ON 8/11/88, BP 00307, 00540, OTHERS. CUSTOMS RUNS A "RED FLAG" CHECK FOR ARREST WARRANTS EVERY TIME YOU ENTER. HOW COULD WE HAVE BEEN TRY-TO FLEE OR HIDE?

1. SABEE CHRISTINE REEVES  
FW/ 2-15-89

COC MD796000

R- [REDACTED]

2. 5-8-97, THU. (1900) CONT'D  
BY S/A M. JONK, AEA - E.P.L.C.

SGT. GLEN BARTHOLOMEW, AEA  
MAKE AN INQUIRY ON M.G. IN  
1992. -

3. JEANNE SLEEPER ENT. MONOCULY  
FROM KINGSTON-SMITH AIRPORT,  
SYDNEY, AUSTRALIA ON 3-16-96 -

4. ON 9-19-88 THE 57 FOOT  
MOTOR SAIL BOAT WAS ENT. INTO  
THE T.E.C. - RECORD # B8800029000

4. C.L.A.  
ENTRY BY U.S. CUSTOMS S/A CARL  
SABEE - BIOJ 980-3170 -

UPDATED 2-20-91 BIG BRADY VIO!!  
THE CUSTOM'S LIST WILL INCLUDE ALL OUR ENTRIES  
WITH THE BOAT FROM OUT OF THE U.S. INTO U.S. PORTS  
THOSE WILL BE AT LEAST HALF A DOZEN.

COAST GUARD  
"BELIEVE" I.D. # 6751888  
OUR SEARCHES BY THE COAST GUARD WILL ALSO PROVE  
THAT WE WERE IN THE U.S. ALOT, & THAT I BROUGHT  
3. THE BOAT BACK FROM GUATEMALA.

CAROL ORMOND ENTERED PHOENIX  
AIRPORT VIA INS ON 1-10-97 -

E.S.I. INC., @ 3170 ALWAY AV.  
026470 COSTA MESA

ENTERED INTO T.E.C. BY S/A  
JEFF MATTHEWS, U.S. CUSTOMS  
T.E.C. # X 8600972900 CLA  
LA # 1A ONTRALA 014

P

\* This is one sample page out the inventories of suppressed evidence in the DA evidence locker on my case, This one is page 26 from the 130 page inventory done on 4/25/95 through 5/1/95. every one of the twelve items/groups of evidence listed here contain materially exculpatory evidence, that JGA wasn't sold, #314-315 & the balance that we

SDT we deserve STILL INSIDE THE WHITE BOX lived in Florida fully disclosed for most of 1989. ENVELOPE, TWO DAY PRIORITY MAIL STAMP, WITH POSTMARK APRIL 26, 1993 FROM MANUFACTURERS BANK TO OFFICE OF THE DA ATTN. JEFF ARNOLD AND A POST IT THAT SAYS JGA INCOME PAID, IN THIS ENVELOPE IS THE FOLLOWING:

expert testified wasn't accounted for, was accounted for by her, but that evidence is suppressed. This SDT return had proof that the \$20,000 check which the DA 314. Account card for JGA Group consisting of 2 pages and bank statements addressed to JGA Group beginning 12/31/87 and ending 12/31/90.

315. Signature card for John Gates & Associates and bank statements beginning to 2/27/87 and ending 2/28/91.

SDT we deserve STILL INSIDE THE WHITE BOX A WHITE ENVELOPE SAFRA BANK ENVELOPE DOCUMENT THAT'S POST MARKED MIAMI FLA. 2/12/93 ADDRESSED TO THE OFFICE OF THE DISTRICT ATTORNEY ATTN: JEFF ARNOLD SPECIAL DEPUTY U.S. MARSHALL RETURN RECEIPT REQUESTED ANOTHER POST-IT ON THE ENVELOPE THAT SAYS COPY ALL PLEASE - INSIDE THE ENVELOPE IS THE FOLLOWING:

PROVES  
WE DID  
NOT  
FLEE OR  
TRY TO  
HIDE

316. Statement of Account for Diane Goodwin, 9/15/89.

317. Statement for Diane Goodwin 8/15/89. Note that these bank statements are solely in Diane's name. That 318. Statement for Diane Goodwin 7/14/89. would have impeached 319. Statement for Diane Goodwin 6/15/89. the commingling perjury & argument. 320. Statement for Diane Goodwin 5/15/89. 321. Statement for Diane Goodwin 4/15/89.

322. Letter from Diane Goodwin dated August 4, 1989 to Citizens and Southern General.

323. Cashier's check with the words "payment stop" on it dated 12/16/88.

324. Michael Goodwin, Diane Goodwin, statement date 3/15/89 for Diane Goodwin.

325. Request for Taxpayer Identification and Certification for Michael Goodwin. A signature card with 2 signature lines: 1 for Mike and one for Diane looks like 2 different accounts. Then there are numerous checks and deposits slips all in a pile. Q

a) In addition to showing that we were living fully visable in Florida for at least 8 mos. of 1989, the no doubt hundreds of checks here would prove specific disclosures such as our payments to Amercan express for boat work that would have allowed us to be instantly located, the telephone bill for the phone on the boat proving Jackson lied no phone, RT-2739:23. b) JGA & John Gates & Associates are the bank accounts for JGA/Whitehawk that will prove that JGA wasn't sold, that Diane paid \$345,000 to the Thompson payment fund before the murders, just 90 days prior, that that \$345K was 100% of what she'd received & much more.

Despite recent press reports that placed Goodwin in the Caribbean, Honig said Goodwin has "certainly been around (this area) for a while," but he would not say where. **THE AUTHORITIES STARTED THE FALSE MULTIPLE BRADY VIOLATIONS<sup>a</sup> CARIBBEAN RUMOR.**

Sgt. Ron Spear, a spokesman for the Los Angeles Sheriff's Department, also maintained in an interview that investigators have known Goodwin's whereabouts for some time, although he would not say where that had been. As a result, he said, Goodwin's arrest should not make it any easier for investigators to crack the Thompson murders.

"We knew where he was and we could talk to him any time we wanted to, as far as I know," he said.<sup>a</sup>

Caption:

PHOTO: Michael F. Goodwin, ex-partner of racing promoter **Mickey Thompson** when the latter was killed in 1988, in his Laguna Beach home in 1986.

PHOTOGRAPHER: Los Angeles Times

Copyright, The Times Mirror Company; Los Angeles Times 1993

Record Number: 000071806

**E-Mail   Text Only Display   List   Previous   Next**

a) MULTIPLE BRADY CONSTITUTIONAL VIOLATIONS ARE INDICATED HERE SINCE ALL EVIDENCE THAT LASD USED TO REACH THIS LEGITIMATE CONCLUSION THAT "THEY KNEW WHERE I WAS & COULD TALK TO ME ANY TIME THEY WANTED" IS SUPPRESSED. THAT IS EXTREMELY MATERIAL SINCE THE DDAS STRESSED THAT I HAD FLED, & GOT A "FLED AS CONCIIOUSNESS OF GUILT JURY INSTRUCTION" SEE EVIDENCE PAGES "C" PLUS "B-2" & "G-1, G-2" HERE.

SPECIFICALLY SEE PAGE C WHERE DDA DIXON STATED FOUR TIMES THAT I'D "DISAPPEARED" UNTIL 1991, IN ADDITION TO LYING THAT IT SAID THAT IN THE STIPULATION. IT DID NOT. SEE THE STIPULATION AT EVIDENCE PAGE "A" & "F-1" STARTING AT LINE 28. IN ADDITION SEE EVIDENCE PAGE "Q", WHICH IS A LIST OF SUPPRESSED EVIDENCE ON THE CASE IN THE D.A. EVIDENCE LOCKER, WHICH PROVES:

- 1) WE LIVED COMPLETELY NORMALLY & VISIBLY IN FLORIDA FOR MORE THAN HALF OF 1989 USING OUR CORRECT NAMES ON BANK CHECKING ACCOUNTS, ITEMS #316-321 PLUS 324, SAFRA BANK.
- 2) THAT THE INDIVIDUAL PROSECUTORS KNEW THIS SINCE THEY ARE CHARGED WITH KNOWLEDGE OF ALL EVIDENCE ACCUMULATED IN CONNECTION WITH THE INVESTIGATION, IN RE: BROWN (1998) 17 CAL 4TH 873, 879, 72 CAL RPTR 698, 702. THERE IS ALSO OTHER EVIDENCE CONFIRMED THERE WHICH PROVES THEY KNEW OUR LOCATIONS AT OTHER PLACES IN 1989 WHEN WE MOVED THE BOAT TO EXPLORE NEW AREAS & THEN OPENED NEW LOCAL ACCOUNTS. WE ALWAYS USED OUR REAL NAMES, & ANYONE KNOWS THAT BANKS RUN CHECKS ON YOU BECAUSE OF DRUG ISSUES IN FL.
- 3) THE PROSECUTORS INTENTIONALLY HID & UNLAWFULLY SUPPRESSED THIS EVIDENCE TO ALLOW THEM TO DECEIVE THE JUDGE & JURY, DEFRAUDING THE COURT THAT WE HAD FLED & HID. THEY KNEW WE HAD NOT, & WITH THIS EVIDENCE WE COULD HAVE PROVEN IT. THUS THERE ARE DOZENS OF BRADY VIOLATIONS CONFIRMED BETWEEN THIS PAGE & EVIDENCE PAGE "Q" EVIDENCE PAGE "N" CONTAINS ADDITIONAL BRADY VIOLATIONS, DOZENS MORE OF THEM.

**R**

THE EVIDENCE INVENTORY OF THE SUPPRESSED D.A. EVIDENCE IS 186 PAGES LONG, PRECISELY DETAILING OVER 2100 DOCUMENTS/OVER 10,000 PAGES THAT ARE SUPPRESSED. I'VE LABORIOUSLY CROSS REFERENCED OVER 250 BRADY VIOLATIONS THEREIN, LINKING THEM TO IMPEACHING 51 D.A. FALSE ALLEGATIONS ALLEGEDLY SUPPORTING GUILT.



# CLARK & TREVITHICK

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May 17, 1988

OF COUNSEL  
JOHN A. TUCKER, JR.

WESLEY G. LA FEVER  
(1908-1985)

IN REPLY PLEASE REFER TO:

T8442-601

DONALD P. CLARK  
RONALD L. TREVITHICK  
JAMES E. MCCORMICK III  
ALEXANDER C. MCGILVRAY, JR.  
PHILIP W. BARTENETTI  
GREGORY HOULE  
DOLORES CORDELL  
PAUL L. BASILE, JR.  
VINCENT TRICARICO  
LEONARD BRAZIL  
JANE B. WINER\*\*  
PAUL M. SAMSON  
TAMMY L. SEDIN  
MICHAEL K. WOFFORD

\*ALSO ADMITTED IN NEW YORK  
AND DISTRICT OF COLUMBIA  
\*\*ALSO ADMITTED IN NEW YORK

REFERENCED AT PAGE 9 LINE 11

## PERSONAL AND CONFIDENTIAL

Sergeants Jerry Jansen  
and Ray Verdugo  
Los Angeles Sheriff's Department  
211 West Temple Street, Room 704  
Los Angeles, California 90012

Re: Mickey and Trudy Thompson

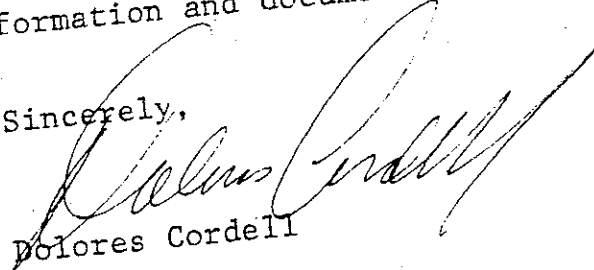
Dear Sgts. Jansen and Verdugo:

It is our information that Mike Goodwin has recently moved from his residence at 667 Alta Vista Drive, Laguna Beach. According to his attorney, the Goodwins are presently in Florida and all of their personal effects are in storage. Once they return from Florida they will attempt to find a new residence.

Also enclosed you will find a copy of the escrow instructions for the sale of the Goodwins' residence.

I thought the foregoing information and documents might be of interest to you.

Sincerely,

  
Dolores Cordell

DC/mm  
LSGT2:18  
Enclosures

cc: Philip W. Bartenetti, Esq.

5.  
033759

Departures/Sorties

REFERENCED.  
PAGE 9 LINE 15

THIS PASSPORT SHOWS GOODWIN  
COMING INTO THE U.S. ON 12.18.88.  
HE KNEW HE WOULD BE GRABBED IF  
HE WERE WANTED. HE DIDN'T FLEE &  
HAD NOTHING TO FEAR.

RECEIVED  
JAN 10 1968

20  
21  
22  
23  
24  
25  
26  
27  
28

ADMITTED	CLASS	UNTIL

11

*The Secretary of State  
of the United States of America  
hereby requests all whom it may concern to permit the citizen/  
nationals of the United States named herein to pass  
without delay or hindrance and in case of need to  
give all lawful aid and protection.*

Le Secrétaire d'Etat  
des Etats-Unis d'Amérique

**SIGNATURE OF DEARER SIGNATURE D. TICLAIRE**

UNITED STATES OF AMERICA

Type / Catégorie  
Date d'émission / date of issue  
Date d'expiration / date of expiry  
Date of birth / date de naissance  
Sex / sexe  
State / État  
Country / Pays  
Passport No. / No. du passeport  
032785259

GOODWIN

MICHAEL FRANK

UNITED STATES OF AMERICA

Accessed by email / subject

5718363770

44-38861-1040

CONFIDENTIAL - U.S.A.

DATE OF EXPIRATION / Date of expiration

NAME	DATE OF EXPIRATION	DATE OF EXPIRATION / DATE OF EXPIRATION
STANLEY, JAMES	88	10 MAY / MAT

AMERICAN AIR MAIL CO 10 MAY 1940  
 NEW YORK, N.Y.  
 TO: NEW YORK  
 FROM: NEW YORK  
 SUBJECT: AMERICAN AIR MAIL CO  
 RE: AMERICAN AIR MAIL CO

**RECEIVED**

LABORATORY AGENCY - SEE PAGE

LOS ANGELES

P<USAGOODWIN<<MICHAEL<FRANK<<<<<<<<<<<<<<<<  
00327852597USA4502041M9805105<<<<<<<<<<<<<<<<

THIS PASSPORT SHOWS MR. GOODWIN IN LOS ANGELES ON 5.11.88. HE COULD NOT HAVE BEEN THERE IF HE HAD FLED.

**F**

DDA DIXON LIED TO THE COURT MORE THAN A DOZEN TIMES JUST ON PAGE RT-9027<sup>a</sup>

Recall that People v. MROCZKO (1983) 35 Cal 3d 86, 112, 197 Cal Rptr 52 rules that:

"Attorneys are officers of the Court & when they address the Judge solemnly on a matter before the Court, their declarations are virtually given under oath!"

I suggest that Dixon is guilty here of multiple felony Counts of Penal Code 118 and/or 125 Perjury based on his statements here. Many of these are very material.

1. "He buys..."; meaning me, the defendant, & then he goes on to lie that I bought a \$400,000 Yacht. Evidence he hid, & of which he is charged with knowledge of the contents of, in addition to the obligation to produce, proves that not \$1 of mine went into the boat purchase. The only way that he & Jackson perpetrated this Fraud on the Court, intentionally, was to hide the evidence & suborn material perjury from D.A. financial expert Karen Kingdon in a Penal Code 127 felony.

I will generally not cite the specific law or evidence cites here in the interest of brevity, but the law which charges him with knowledge of the evidence which has been accumulated in the case is in re: BROWN (1998) 17 Cal 4th 873, 879.

2. The boat was just \$331,000, not \$400,000, stipulated to at Vol 18-6709, no jury.

3. The boat purchase was in 1988, not 1986 as he stated at line 6. This was no doubt to make the inflation value of the purchase price sound larger.

4. This one is a biggie. He says I "liquidated my home...for gold" Evidence at trial & in discovery, combined with evidence that Dixon & Jackson can be proven to have knowingly suppressed, proves I did not get one dollar out of the house sale. That evidence proves that the sale was done, as it should have been, by the bankruptcy trustee, six months after we left California, during November 1988<sup>a</sup> during a period that Dixon said, untruthfully, we had disappeared. See items #6, four times.

5. Suppressed evidence conclusively & irrefutably proves that not \$1 of the money that was sent offshore was mine, & that yet again Dixon & Jackson only were able to perpetrate this Fraud on the Court by hiding the evidence & suborning material perjury from D.A. witness Karen Kingdon. See exhibit 12 to our FELONY FRAUDS ON

THE COURT BY DDAS JACKSON & DIXON NOTICE & MOTION. a) See the third page here.

a) Jackson confirmed the November 1988 sale, to the Judge, Vol 18-6748:19.

BB

1 6. "He disappeared," four times at lines 10, 13, 22 & 23 plus "the next we hear of  
2 him...," line 12 & "he got out of here" lines 14 & 20. But, exhibit 14 here,<sup>1</sup> & the  
3 extensive evidence included prove that Sheriffs always knew where I was, & said  
4 so at evidence page "R". The evidence also proves we did not try to flee or hide &  
5 that we lived wide open, highly visible. Read beginning at page 9 to the narrative.  
6 Further, many pages of evidence included here, e.g. "Q" shows massive suppression  
7 of evidence that we did not flee/try to hide & that the District Attorney knew it.  
8 7. "The next we hear from him in 1991..." The evidence in exh. 14<sup>1</sup> proves that as a lie.  
9 8. "...according to the stipulation" (the next we hear of him in 1991). See evidence  
10 page "A". The stipulation says nothing like that, & it is a fraud anyway.  
11 9. **THIS IS THE BIGGEST FRAUD ON THE COURT WHERE THE DDAS CREATED THEIR OWN PERJURY &**  
12 **ATTRIBUTED IT TO WITNESS MIKE MCGHEE.** This is detailed in exhibit 14<sup>1</sup> with evidence  
13 but the bottom line is that McGhee said I was bringing the boat back to Florida,<sup>\*</sup> &  
14 he said nothing about repossessing it. McGhee never touched the boat & evidence  
15 that Dixon & Jackson had & hid conclusively, irrefutably proves that.<sup>\*</sup> (I did.)  
16 10. "Maybe cruising..." Yet again suppressed evidence proves that is exactly what we  
17 did for months in 1988 & then we lived in Florida for most of 1989. See page "Q"  
18 11. Guatemala is not "Way down in the Caribbean!" We never went with the boat into the  
19 Caribbean. We got to Guatemala by sailing along the coast of Mexico, very close.  
20 12. "I think she (my lawyer) suggested that cruising the Eastern seaboard)" This ind-  
21 icates the deceit & sophistry here. Dixon knew the truth from the evidence he hid.  
22 13. "He got out of here quickly!" See the timeline & evidence in exhibit 14<sup>1</sup> for proof  
23 that we were in the country for 5 months after the murders & in & out of the U.S.,  
24 mostly in for the next 18 months until we were permanently back, never hiding.  
25 14. This is another big Fraud on the Court. This speaks of the pictures of the boat  
26 that the DDAS introduced into evidence, the boat that they repeatedly lied that  
27 Mike McGhee had seized in Guatemala & brought back to the U.S. They made it sound  
28 like the photos were his. The photos were taken where I brought her back by my guy.

1) "Exhibit 14" is this entire exhibit, including NO FLED in another pleading.

End  
BB1

1 AND THEN IS WORRIED ABOUT GETTING CAUGHT AND SO HE HAVE  
2 DRIVES TO LAS VEGAS.

3 MIKE GOODWIN I THINK SOMEBODY SAID  
4 YESTERDAY WAS A MILLIONAIRE. I MEAN HE HAS A LIFE-STYLE.  
5 HE DOESN'T JUST CATCH A BUS OUT OF TOWN. NO. HE<sup>1</sup> BUYS A  
6 \$400,000<sup>2</sup>-- AND THIS IS BACK THEN, 1986<sup>3</sup>-- A \$400,000<sup>2</sup>  
7 OCEAN GOING YACHT. LIQUIDATES HIS HOME AND OTHER<sup>4</sup>  
8 INVESTMENTS FOR GOLD; SENDS IT OFF TO OFFSHORE BANK<sup>5</sup>  
9 ACCOUNTS SO HE CAN MAINTAIN HIS LIFE-STYLE AND  
10 DISAPPEARS.<sup>6</sup>

11 AND, LADIES AND GENTLEMEN, THAT'S WHAT  
12 HAPPENED. WE NEXT HEAR OF HIM IN 1991<sup>7</sup> ACCORDING TO THE  
13 STIPULATION.<sup>8</sup> HE DISAPPEARED<sup>6</sup> UNTIL THEY REPOSSESSED THE  
14 BOAT IN GUATEMALA.<sup>9</sup> HE WAS OUT OF HERE. NOW SOMEBODY --  
15 MS. SARIS I THINK SUGGESTED YESTERDAY, WELL, MAYBE HE  
16 WENT ON A CRUISE OF THE EASTERN SEABOARD.<sup>10</sup> WELL,  
17 GUATEMALA IS WAY DOWN IN THE CARIBBEAN.<sup>11</sup> WELL, MIGHT HAVE  
18 BEEN; COULD HAVE BEEN, I THINK SHE SUGGESTED THAT.<sup>12</sup>

19 LOOK AT THE FACTS HERE AND THE TIMING OF  
20 THIS. HE GOT OUT OF HERE AS QUICKLY AS HE COULD IN LIGHT<sup>13</sup>  
21 OF THE FACT THAT HE WANTED TO MAINTAIN HIS LIFE-STYLE AND  
22 HE WAS BUYING A BOAT SO HE COULD DISAPPEAR.<sup>6</sup> AND THAT'S  
23 EXACTLY WHAT HE DID. HE DISAPPEARED.<sup>6</sup>

24 YOU HAVE IN EVIDENCE PICTURES OF THIS<sup>14</sup>  
25 THING. THIS IS A HUGE OCEAN GOING YACHT. I SUGGEST TO  
26 YOU THAT THAT THING COULD GO ANYWHERE. AND THERE ARE  
27 THOUSANDS OF ISLANDS IN THE CARIBBEAN.<sup>11</sup>

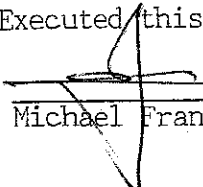
28 WELL, MS. SARIS TELLS YOU, WELL, WHO

BB2

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 verification is specifically intended for my statements & the evidence i've included with Exhibit C, re: the DDAS' false statements that Michael McGhee had seized the boat on which I lived in Guatemala, & their various statements about me fleeing & hiding from law enforcement authorities.

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 14<sup>th</sup> day of September, 2011, in Sussexville, Lassen County, Calif.

  
Michael Frank Goodwin.