

To: Media Interested in Honesty in our Criminal Justice System Date: 9/14/11

From: Michael Goodwin, AN INNOCENT INMATE, F69095, B-2-147L, High Desert State Prison, Susanville, CA. 96127

Re: 60+ material perjuries by "The #1 source of case information, D.A. expert & lawyer for the victims & victims' sister, Colleen Campbell, Dolores Cordell.

The conviction would not have occurred without these perjuries by Cordell, & additional false information she provided to investigators/prosecutors on which the case was built. Cordell was confirmed as "The #1 source of case information... she laid out the financial (motive) case," by the D.A.'s financial expert. Vol 19-6939. Also see bp 32369 & discovery is rife with "Dolores says..." e.g. bps 10108-12.

In addition, all of Cordell's files & records were ostensibly "lost" even after the District Attorney had constructive possession of them, Vol 20-7578. Those total 80 boxes of records. Defendant/petitioner has identified over 100, (one-hundred) exculpatory documents therein which qualify as BRADY violations. A dozen witness statements for Cordell are suppressed for interviews which are confirmed in other evidence which was produced. Many of them are sworn to exist.

Meaningful cross-examination was impossible without these records of Cordell's which must be produced when an expert testifies, HINES V. SUPERIOR CT. (1993) 25 Cal Rptr 2nd 712, 714, U.S. V. NOBLES (1975) 422 U.S. 225, 339, 241. All of her witness statements must be produced per BARNETT V. SUPERIOR COURT (2007) 54 Cal Rptr 3d 283, 295, 306, later ruling at 50 Cal 4th 890 leaving this ruling intact.

**THE GOAL HERE IS TO PROVIDE FACTS FOR INVESTIGATION OF CORDELL FOR FELONY PERJURY**

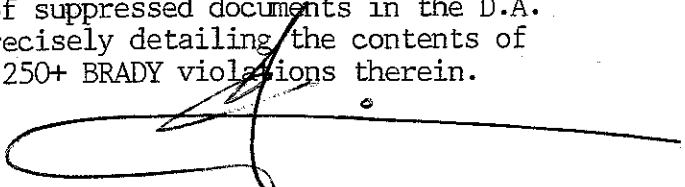
Following this cover letter are single page summaries which respectively list:  
1) The 16 Cordell Los Angeles perjuries which are proven with on-the-record evidence,  
2) The 22 additional Cordell perjuries for which not-on-the-record evidence, either in discovery, or suppressed in the D.A. evidence locker on this case, which defendant<sup>1</sup> has identified, are needed to prove, & 3) Cordell's 25 perjuries to the Grand Jury.

Later a list of the 10 instances of false testimony to the Orange County prelim by the lead investigator under Proposition 115, attributed to Cordell, will be added. Those led to a holding order which put defendant in Orange County jail for 2½ years but which was later dismissed by the Fourth District Court of Appeals. These Los Angeles charges were then refiled based on most of the same "evidence"

Following these summaries are briefs of the 16 Cordell perjuries which are proven by on-the-record evidence, plus the four most prejudicial for which no-on-the-record evidence is needed. Next comes official evidence which conclusively proves many of Cordell's perjuries in the 1st group, although there is trial testimony by Cordell & other witnesses to also prove these & the rest of the 16 in the first group as perjuries. This evidence is simply for quick reference now. Exh A was prepared by the U.S. Dept. of Justice appointed Bankruptcy trustee.

We will eventually add briefs of all of Cordell's perjuries. However, just these are sufficient to warrant an investigation of Cordell for felony perjury. These also seriously "undermine confidence in the verdict," a keystone of our law. And, the Attorney General is now required to advise the Court of this perjury by their number one witness, NAPUE V. ILLINOIS (1959) 360 U.S. 264, 269, U.S. V. ALLI (2003) 344 F.3d 1002 & People V. DICKEY (2005) 35 Cal 4th 884, 909. Thank You.

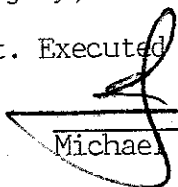
1) Defendant has a lawyer prepared inventory of suppressed documents in the D.A. evidence locker on this case 186 pages long precisely detailing the contents of 2100+ documents, over 10,000 pages. There are 250+ BRADY violations therein.



VERIFICATION

1. I Michael Goodwin declare that the following matters, unless otherwise noted, are declared of my own personal knowledge, & if required I could & would testify thereto under oath.
2. All statements made by me within the attached, enclosed or referenced document are known by me personally, with the isolated & identified exceptions that I specifically have or will have attributed to others or identified as based solely on information & belief.
3. I do not have 99.9% of the evidence i've described as suppressed in the enclosed, specifically the 80 boxes of records that D.A. expert Dolores Cordell described at Vol 9-3749 that she had (see exhibit B), and as are described within exhibit O.
4. The only reason I don't say that I don't have 100% of those records is that I may unknowingly have a very few pages out of evidence that are contained therein, but until I see those boxes I won't know what is included therein in total.
5. I specifically swear that I do not have, and they have not been discovered in any of the discovery produced for me, the whole items listed in exhibit A) to which Cordell testified, and B) the Cordell witness statements listed also in exhibit O.
6. I also swear that I am knowledgable enough about the case facts and what should be contained within the 80 boxes of Cordell records to know that these records:
  - A) Contain at least 100 pages of materially exculpatory evidence not available anywhere but from the state, & that they are not repetitive to what we have.
  - B) And the evidence within these files will allow the defense to conclusively prove more than one dozen material perjuries/instances of false testimony.

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 15<sup>th</sup> day of October, 2011, in Susanville, California.

  
Michael Frank Goodwin F69095

16 MATERIAL TRIAL & PRELIM PERJURIES BY "THE #1 SOURCE OF CASE INFORMATION," D.A.  
EXPERT DOLORES CORDELL, IRREFUTABLY PROVEN BY ON-THE-RECORD (OTR) EVIDENCE

22 additional Cordell perjuries at the L.A. trial & prelim are proven with evidence which is not-on-the-record (NOTR) & yet another 25 are proven at the 8/22/01 Grand Jury by Cordell. Those are 60+ perjuries by Cordell, the most material D.A. witness. Evidence proves that without her a prosecution would not have been brought. The vast majority of the perjuries can be proven to have been known of in advance by Cordell & the Deputy District Attorneys & suborned by them.

Det. Lillienfeld, the lead investigator, obtained the initial holding order by providing material false testimony to the Orange County preliminary hearing in ten more instances under Proposition 115 attributed to Cordell.

1. "No payments were made on the \$500,000 Insport note by petitioner's wife,"<sup>1</sup> pg. 5.
2. "Because no payments were made the Bankruptcy trustee repossessed Insport!" p. 5.
3. "Thompson paid \$500,000 for Insport after the repossession, beating Goodwin!" p. 6.
4. "JGA/Whitehawk is the only asset that went into the Bankruptcy (BK)" page 12.
5. "All the rest of the Goodwin assets had been dissipated by them!" page 13.
6. "There were no assets to be found!" (in August 1988) page 13. HUGE PERJURY.
7. "Caldwell would have taken all the assets of ESI for just \$150,000." page 14.
8. "Had the Caldwell offer been accepted ESI would have had just \$150,000 to pay creditors, essentially nothing!" page 14.
9. "We (the Thompson lawyers/claim) received nothing from the Insport purchase!" p. 16.
10. "JGA/Whitehawk (JGA) paid nothing near the judgment amount!" page 16.
11. "After the March 18th, 1988 murders, the non-discharge hearing was moved!" pg. 17.
12. "Mickey Thompson did not lose to petitioner in Court!" page 19.
13. "The interpleader was not litigated!" page 21.
14. "By early 1988 petitioner's company was defunct!" page 23.
15. "Yes (during the Bankruptcy in early 1988), we were levying...we were the most vigorous creditor in trying to levy on assets." page 23.
16. "All of Goodwin's (petitioner's) lawyers were paid ahead of us!" page 24.

Similar summaries of the perjuries provable via not-on-the-record evidence at Los Angeles, for Cordell, at her 8/22/01 Grand Jury & for Lillienfeld at the Orange County preliminary hearing. Many are even more prejudicial than those above.

- 1) All of these will be accurately paraphrased for brevity.

CORDELL'S 22 ADDITIONAL L.A. PERJURIES PROVEN WITH NOT-ON-THE-RECORD EVIDENCE

17. "No JGA/Whitehawk funds were paid to the bankruptcies before the murders" pg. 26.
18. "The Goodwins invested in JGA/Whitehawk" page 29, the root of the largest DA fraud.
19. "Mickey Thompson had the valuable AMA Supercross sanction for Anaheim Stadium" p 34.
20. "Assets disappeared in petitioner's Bankruptcies" (due to petitioner) page 35.
21. "He continued to dump assets" (those would be Federal crimes in BK) page
22. "He moved alot of assets out of state, transferred them" page
23. "Assets were moving all of the time" page
24. "If the proceeds of the Colosseum box office went to ESI Goodwin would control" p
25. "Mike Goodwin disappeared" page
26. "We would not allow Goodwin to withdraw \$300,000 from his asset" page
27. "ESI (petitioner's company) was not saleable" page
28. "The representations re: Chuck Clayton were not true" page
29. "There were other judgment creditors" page
30. "There were transfers of a substantial amount of assets from Diane to Mike Goodwin with no consideration" page
31. "Our levies vs. Diane Goodwin were not successful" page
32. "Mike Goodwin never made good on his cash flows" page
33. "The Mercedes was worthless"
34. "Diane Goodwin never put JGA/Whitehawk up as a surety" page
35. "Had the Caldwell offer been accepted there would have been no assets of consequence left in ESI" page
36. "Mickey really wanted to settle the litigation/judgment" page
37. "Mickey did not want to make petitioner suffer" page
38. "Victor Sahn handled the interpleader litigation" page

These were accurately paraphrased for brevity. Some of them may (?) be felt to be merely materially misleading rather than outright knowing perjury. Even in that situation United States Supreme Court law requires reversal for leaving the jury with a false impression, *ALCORTA V. TEXAS* 355 U.S. 28, 78 S. CT. 103 (1957). These perjuries were cleverly woven together to make petitioner appear to be doing many illegal & fraudulent acts to avoid paying Thompson, leading up to killing Thompson. The jury believed this, actually stating it. See CT 8-2082 by the jury foreman.

25 MORE PERJURIES BY #1 D.A. EXPERT DOLORES CORDELL TO THE 8/22/01 GRAND JURY

We skipped numbers 39 & 40 to save for other L.A. Cordell perjuries we expect to find. Numbers 41-42-43 here essentially mirror numbers 1-2-3 at the L.A. trial.

41. "The Bankruptcy estate never got a dime from the Insport sale" page
42. "The Judge Auctioned the Insport Agreement in December 1987" page
43. "Thompson outbid Goodwin in the fall 1987 auction & got Insport" page
44. "Goodwin (petitioner) was furious when Thompson got Insport" page
45. "When Goodwin lost Insport his final cash cow was gone" page
46. "The only funds paid to creditors were from Whitehawk via the lawsuit that the Thompson attorneys filed" page
47. "Two million dollars in assets transferred to Diane for virtually nothing" p
48. "There was no attempt by Goodwin to pay" page
49. "All along the Goodwins were taking cash back, hiding the cash, dummy corporations, liens not disclosed to the Court" page
50. "The Bankruptcy (BK) trustees could never get their hands on the assets" page
51. "Fifty thousand dollars disappeared out of the company" page
52. "(The Goodwins) drained cash up until the murders" page
53. "A million dollars disappeared from the pension" page
54. "Cash in the pension was wrongly paid to the Goodwins" page
55. "Whitehawk money paid the Goodwin lawyers \$1,000,000" page
56. "The nondischarge trial was set for March 18 at the time of the murders" p
57. "Goodwin assets were worth 4.5 million lost 6 million in value via Goodwin nefarious activities" page
58. "We could never pin Goodwin down (to sign on the dotted line)" page
59. "Misleading that the Goodwins didn't file a BK plan listing all assets" p.
60. "Goodwin was there & screaming when the Sheriff repossessed the Mercedes" p
61. "The Mercedes was liened" (implication taken by Thompson) page
62. "Fear of Goodwin, Thompson had" page
63. "Turks/Caicos Islands funds transfers a few weeks after the murders" page

Many of these were much more egregious. There was no defense cross examination.

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 ) CASE# \_\_\_\_\_, RELATED TO CASE  
5 Plaintiff & Respondent ) GA052683-01, 2nd Dist. Appeal B197574  
6 v. ) REQUEST FOR ORDER COMPELLING ATTORNEY  
7 MICHAEL GOODWIN ) GENERAL TO PRODUCE EVIDENCE REQUIRED  
8 Defendant & Petitioner ) PER PENAL CODE 1054, PETITIONER'S  
DECLARATION THAT HE DOES NOT POSSESS  
THIS EVIDENCE, WHICH IS MATERIAL TO HIM  
BEING ABLE TO FILE HIS HABEAS PETITION.

9  
10 This Court ruled, correctly, on June 16, 2011, that petitioner  
11 is entitled to the evidence Penal Code 1054 rules he is entitled to.  
12 The Court also ruled that it needed sufficient evidence to identify  
13 that petitioner does not currently have this evidence. That proof  
14 is enclosed herein, a sworn declaration that petitioner does not  
15 have that evidence. No better evidence of the true facts exists.

16 Since no one but petitioner knows what he has & does not have  
17 in his cell and otherwise is available to him. The specific  
18 enclosed declaration is best evidence. Petitioner cannot envision  
19 any evidence which can possibly offer proof otherwise, since again,  
20 no one but petitioner knows what he has.

21 In addition, per the declaration here, petitioner is informed  
22 and aware that at least 99.9% of the evidence he represents has not  
23 been produced, as is described in "exhibit O", specifically including  
24 Dolores Cordell's 80 boxes of records, Vol 9-3749, exhibit B, have  
25 never been produced. Further, petitioner has scrutinized all of the  
26 witness statements produced by the state and attests that the state-  
27 ments listed as suppressed for Dolores Cordell in "exhibit O" are  
28 not in any of the discovery he has seen. This evidence is necessary  
for petitioner to prepare and file his habeas corpus petition.

1 Petitioner is entitled to file his habeas corpus petition  
2 (habeas) now because of authority ruling on Title 18 § 2254(b).

3 "Indeed, we noted that extraordinary delay in the state courts  
4 can render state corrective processes "ineffective" within the  
5 meaning of 2254(b) and that exhaustion is not required in such  
6 cases. COE V. THURMAN (9th Cir. 1991) 922 F.2d 528, 530.  
7 Similarly, in OKOT V. CALLAHAN (9th Cir. 1986) 788 F.2d 631,  
8 633, we noted that when a prisoner "receives ineffective relief  
9 in state court because of unreasonable delay, he may file a  
10 habeas proceeding in federal court. In such cases, federal  
11 habeas relief may well be available without exhaustion of state  
12 remedies" OKOT, 788 F.2d at 633; see also STORY V. KINDT (3rd  
13 Cir. 1994) 26 F.3d 402, 405, cert. denied, 130 L.Ed. 2d 506,  
14 115 S.Ct. 593 (1994); BURKETT V. CUNNINGHAM (3rd Cir. 1987)  
15 826 F.2d 1208, 1218.

16 PHILLIPS V. VASQUEZ (9th Cir. 1995) 56 F.3d 1030, 1035.

17 The delay has been nearly four years and ten months since petit-  
18 ioner's Constitutionally invalid conviction, because of many  
19 provable denials of due process, and the direct appeal has not yet  
20 been filed. In fact, the record just got settled on or about 9/20/11.

21 In a similar situation, with much less prejudice to the defend-  
22 ant from the delay, in COE V. THURMAN, the Ninth Circuit ruled that  
23 3 years and 8 months of delay was alarming, and the defendant must  
24 be released in 90 days if the appeal had not been heard.

25 Here, based on statutory briefing schedules, and anticipated  
26 continuances, the appeal cannot possibly be heard for about 5½ years  
27 after conviction on or about 1/4/07. That is about 50% longer than  
28 in COE. For that reason the habeas filing is justified now.

Because of petitioner's "one bite at the apple," one opportunity  
to file his habeas, petitioner needs access to all BRADY and other  
required evidence before he prepares and files the habeas.

Petitioner legitimately feels that the suppressed evidence  
described herein for Dolores Cordell will allow petitioner to  
reverse the conviction and possibly to have it dismissed with

1 prejudice. Cordell's evidence, the lack thereof, enabled the  
2 improper conviction, and is critical to innocence or guilt.

3       Underscoring the absolute necessity of obtaining this evidence  
4 is that Cordell & her partner Phil Bartinetti's law firm, Clark and  
5 Trevithick, was the "#1 source of case information...she laid out  
6 the case financials"; accurately paraphrased from Vol 19-6939, by  
7 D.A. financial expert Karen Kingdon, who was an employee of the  
8 District Attorney on this case for several years. Cordell and  
9 Bartinetti were also D.A. experts, which considerably broadens the  
10 scope of the evidence which the D.A. is obligated to produce for  
11 this witness. See that law in "exhibit N".

12       Detective Lillienfeld, the lead case investigator, confirmed he  
13 read the Clark and Trevithick files, so the state has constructive  
14 possession and must produce the evidence to which petitioner is  
15 entitled under Pen C 1054 and the authority which interprets it/  
16 rules on it. See exhibit B for Cordell confirming she had 80 boxes  
17 of records. Cordell & Bartinetti testified about this evidence. See  
18 Vol 20-7578 for Lillienfeld confirming he read this evidence. Also  
19 therein is Vol 19-6939 confirming Kingdon's testimony about Cordell  
20 being the "#1 source of information," lines 15 thru 22.

21       The authority of In re: STEELE (2004) 32 CAL. 4th 682, 10 CAL.  
22 RPTR. 536, 542-547 rules that this court has jurisdiction, and, the  
23 prosecution has a continuing obligation to produce exculpatory  
24 evidence even after conviction. See e.g. IMBLER V. PACHTMAN (1976)  
25 424 U.S. 409, 427 n25, 47 L. Ed. 2d. 128, 96 S. Ct. 984.

26       Within this pleading and exhibits, petitioner has produced  
27 citations of dozens of specific pieces of evidence which will be  
28 materially exculpatory. Petitioner is also sufficiently knowledgeable



1 about the evidence which Cordell and Bartinetti will have in their  
2 80 boxes of files relevant to this case, that petitioner swears in  
3 his attached declaration that more than 100 pages of evidence  
4 contained therein will be materially exculpatory and obtainable  
5 nowhere else except through the government.

6 This evidence is not repetitive with evidence we have. These  
7 facts qualify this evidence as BRADY violations.

8 Petitioner has exhausted his attempts at "informal discovery"  
9 of this evidence as is recommended by in re STEELE, supra. Thus the  
10 only avenue petitioner has with which to obtain this evidence which  
11 the law is clear he is entitled to is via the Court.

12 Petitioner has supplied the Attorney General and the District  
13 Attorney, over the past ten months, hundreds of pages of evidence  
14 establishing that this exculpatory evidence exists. The government  
15 has refused to comply with their obligation to produce this, or any  
16 of the evidence which STEELE says petitioner is entitled to. Thus  
17 the government is in gross violation of IMBLER, supra, and BRADY.

18 "After conviction the prosecutor also is bound by the ethics  
19 of his office to inform the appropriate authorities of after  
20 acquired or other information that casts doubt upon the  
21 correctness of the conviction" 424 U.S. 409, 427 n25. Also see:

22 "Prosecutor improperly withheld police reports of gang-related  
23 incident involving chief prosecution witness that occurred  
24 between defendant's 1st & 2nd trials"

25 People v. JOHNSON (2006) 142 CAL APP 4th 776, 782.

26 Petitioner has provided the government, repeatedly, with irrefutable  
27 evidence proving specific and extensive suppressed materially  
28 exculpatory evidence. Both the Attorney General and the District  
Attorney have refused to comply with Constitutional law obligating  
them to produce this evidence. Petitioner's only remedy is to obtain  
a court order compelling them to comply with ironclad authority.

1 Petitioner stresses that whether this evidence was produced  
2 in the past or not, and as per the enclosed sworn declaration petit-  
3 ioner knows and represents it was not, all that matters per in re  
4 STEELE is that petitioner does not have this evidence now. Petition-  
5 er swears to that fact in the enclosed declaration.

6 And it is impossible physically for petitioner to have 80  
7 boxes of records in his cell. He is only allowed, per CDC rules,  
8 seven cubic feet of property in his cell including all personal  
9 equipment, e.g. television, typewriter, hot pot, clothing, food  
10 items, etc; When the court orders this evidence produced, and the  
11 government complies, petitioner will be allowed to access one box of  
12 evidence per week here at the prison, returning the prior box when  
13 he wishes to see the box for the next week. This snail's pace of  
14 being allowed to look at the 80 boxes of evidence to find the BRADY  
15 evidence he knows exists somewhere therein underscores the urgency  
16 of obtaining his mandated evidence as soon as possible.

17 This motion is based upon the instant pleading including all  
18 attached exhibits-evidence-argument within the exhibits labeled A  
19 through O, the other files and records in this case, and petitioner  
20 respectfully requests that this court take judicial notice of the  
21 other requests for discovery and lists of suppressed evidence filed  
22 with this court, by petitioner, beginning in March, 2011, through  
23 the present.

24 The declaration follows on the next page. Following that,  
25 prior to the list of Cordell suppressed evidence in exhibit O is  
26 argument and evidence detailing 23 (twenty-  
27 three) of Cordell's 63 perjuries  
28 or instances of false testimony. Those are included to explain the  
materiality of this evidence. Respectfully submitted

Michael Goodwin

1 16+ MATERIAL PERJURIES BY THE #1 D.A. EXPERT WITNESS, DOLORES CORDELL, PROVABLE  
2 WITH ON-THE-RECORD (OTR) EVIDENCE

3 Cordell was the victims' sister Colleen Campbell's lead lawyer,<sup>1</sup> evidence  
4 proves her responsible for initiating the witch-hunt, fabricated prosecution vs.  
5 the defendant/petitioner, was acknowledged as "instrumental in the Goodwin pros-  
6 ecutions/convictions," bp 01241 & was acknowledged at trial as the:

7 "#1 SOURCE OF CASE INFORMATION...SHE LAID OUT THE FINANCIAL CASE," V19-6939.

8 This was testified to by the official D.A. financial expert who worked on the  
9 case for years, Karen Kingdon, who also stated this at bp 32369 in a report.  
10 Kingdon's financial reports are rife with "Dolores says..." or similar, e.g. at  
11 bps 10096, 10108-12 repeatedly, 10119, 10172 & 10175-6. There are also notations/  
12 communications at 06100, 06228-30, 8500, 8505-6, 32371, others.

13 Yet Kingdon testified at trial that she only spoke with Cordell once, Vol 18-  
14 6788:26. However, she testified at the preliminary hearing (prelim) that "she had  
15 worked with Cordell," CT 3-784:1. Which of these is true & which is perjury?

16 Since evidence proves 16, sixteen, material perjuries or instances of false  
17 testimony by Kingdon on financial motive matters which were the backbone of the  
18 case, most of which were based on incorrect information that evidence shows most  
19 probably came from Cordell, it appears that Kingdon committed perjury that she  
20 "only spoke with Cordell once." Kingdon's perjuries are briefed & available. They  
21 have been submitted to the Superior Court & Attorney General along with evidence  
22 proving them as perjury/false testimony. They have been ignored.

23 Cordell also provided records to the D.A. which evidence indicates had been  
24 tampered with, & their authenticity was in question, yet not verified. Based on  
25 statements to the Judge by DDA Jackson it appears some of these may have been  
26 used by the D.A. as trial exhibits. We can provide more information on this.

27 ADDITIONAL NOT-ON-THE-RECORD EVIDENCE PROVES 47 MORE CORDELL PERJURIES

28 1) Campbell said she will "do whatever is necessary to bury Goodwin," petitioner,  
bp 31503. Evidence shows that Cordell was her "tool" to do this, illegally.

1 In evaluating Cordell's credibility & how she may have incorrectly prejudiced  
 2 the petitioner (pet.) the Court should also be cognizant that Cordell provided  
 3 false information to Federal law enforcement authorities which led to Bankruptcy  
 4 (BK) fraud indictments against petitioner & his then wife Diane Seidel which were  
 5 immediately dismissed & never refiled in any form as soon as the authorities  
 6 saw the true evidence, & thus realized that the information provided to them by  
 7 Cordell was bogus. Providing false information which leads to false charges is a  
 8 crime, petitioner believes. However, as testimony to Colleen Campbell's "juice"<sup>1</sup>  
 9 with law enforcement no charges were ever brought vs. Cordell for this.

10 And amazingly, as noted earlier, the OCDA lauded Cordell for being  
 11 "instrumental in the Goodwin convictions," bp 01241. But, she falsified the evidence.  
 12 The dismissed Federal indictments for BK fraud by petitioner & his then wife  
 13 are very material to the murder conviction, although this was hidden by the D.A. &  
 14 not introduced by petitioner's public defender, Elena Saris. Those dismissed  
 15 Counts/charges were about the two assets that formed the nexus of petitioner's  
 16 conviction based upon the alleged financial motive of "Goodwin refused to pay  
 17 Thompson, killing him instead," RT-8765, Vol 6-2718, 2721, 2722, 2741, ad nauseum.

18 Those were a \$365,000 passive partnership DISTRIBUTION by an asset, JGA/  
 19 Whitehawk which DDA (Deputy District Attorney) Alan Jackson argued was a sale, RT-  
 20 8783:28 & Vol 6-2740:25. Jackson suborned perjury from DA expert & multi-year DA  
 21 employee on this case that this was a sale when it was not, Vol 19-6927-6928, also  
 22 see Vol 18-6767 & Vol 19-6908. Evidence proves Jackson knew it wasn't a sale.<sup>2</sup>

23 The other asset was a \$215,000 sale of Desert Investors which Jackson argued  
 24 was illegal/improper since the asset belonged to the BK estate. But the Feds had  
 25 pronounced that neither of these belonged to the BK estate by the dismissal of the  
 26 indictments. That is RES JUDICATA, STARE DECISIS. There are also multiple other  
 27 Federal Court rulings (cites) that the BK estate/Thompson had no claim to these.

28 <sup>1</sup>) E.g. she was 4 times Chair of the CA. PEACE OFFICERS PROCEDURES/TRAINING Comm.

<sup>2</sup>) Evidence proves Jackson knew the BK nor Thompson had any claim to these assets.

1 CORDELL'S 16+ KNOWING L.A. PERJURIES PROVABLE WITH ON-THE-RECORD EVIDENCE, SUMMARY

2 Recall that there are 47 more Cordell perjuries that we can prove right now, 22  
3 more at the L.A. trial & prelim, & 25 at the 8/22/01 Grand Jury. These do not  
4 count the approximately a dozen lead investigator Lillienfeld testified to,  
5 attributing them to information supplied by Cordell (for which no witness state-  
6 ments have been produced<sup>1</sup>) at the Orange County prelim on 4/15/02.

7 Petitioner, in the interest of brevity, will generally not elaborate on the  
8 materiality of these perjuries, although evidence is available to prove that. They  
9 were fold, with the DDAS complete knowledge<sup>2</sup>, to give petitioner the appearance of  
10 a con-man, a defrauder who flaunted his obligations & the law to avoid paying the  
11 Thompson debt. The jury believed this to the point that the jury foreman stated in  
12 a post-trial sworn declaration that "(petitioner) lacked a moral compass...was the  
13 kind of person who would do this (kill to avoid paying the debt)" CT 8-2082.

14 The jury was defrauded by the DDAS & their four financial experts, Cordell,  
15 her partner Bartineti, Kingdon, supra, & Jeff Coyne, into believing pet. "lacked  
16 a moral compass"\* by the DDAS alleging 14 uncharged financial crimes vs. petitioner  
17 based on more than 50 (fifty) material perjuries by the D.A. experts.\*(CT 8-2082)

18 Every one of those 14 uncharged crimes was untrue. Ten of them were support-  
19 ed only by perjury that will be proven as perjury with suppressed/identified files.  
20 Four others had no support on the record & are thus BRUTON/Sixth Amendment due  
21 process violations. Each of the allegations of uncharged crimes is also a due  
22 process violation requiring reversal of the conviction, STATE FARM.V. CAMPBELL  
23 (2003) 538 U.S. 408, 423, OLD CHIEF V. U.S. (1997) 519 U.S. 172, 180, 117 S.Ct 644.

24 Again in the interest of brevity, & that the focus here is Cordell's false  
25 testimony, about which the State was aware, which requires reversal on its own,  
26 JACKSON V. BROWN 513 F3d 1057, 1075-1076 (9th Cir. 2008) & the State's obligation  
27 to notice the Courts about the perjury (citations), we avoid additional details.

28 1) Pet. has cites proving 12+ extremely important Cordell statements are suppressed.  
2) BROWN 17 Cal 4th 873, 879 (1998) charges the DDAS with knowledge of this perjury.

1 The Court will better understand however why Cordell was inclined to commit  
2 these perjuries when petitioner explains, & as per the sworn declaration attached  
3 hereto verifies the truth of this, that Cordell was attempting to cover up her  
4 frauds on the Court & criminal perjuries in leading the looting of over two  
5 million dollars from the petitioner's BK estates & pension plans beginning in 1988.

6 Cordell filed knowing, material false statements about the company pension  
7 plans in summer 1988. Those pensions initially purchased the JGA/Whitehawk asset  
8 which was central to the petitioner's murder trial & conviction. Petitioner repeat-  
9 edly offered what he would eventually receive from the pensions re: JGA/Whitehawk  
10 (JGA) to the Thompson group before BK filing, & to the BK trustee after BK filing  
11 to insure 100% payment of the Thompson & all other debt. Legions of suppressed  
12 evidence which petitioner has identified prove this, & many other material exculp-  
13 atory issues re: the JGA asset. Cordell's actions stopped Thompson's 100% payment.

14 That exculpatory evidence is suppressed in the 2100+ documents, over 10,000  
15 pages for which petitioner has an official lawyer prepared inventory of the D.A.  
16 evidence locker on this case. In addition, similar evidence exists in the BK files,  
17 in the Cordell evidence on which she relied for the opinions to which she testified,  
18 & in the Kingdon evidence on which she relied for her opinion testimony. Law is  
19 absolute that the D.A. had possession of & must produce this suppressed evidence.

20 After Cordell defrauded the Court on the pension (evidence proves she did);  
21 she later filed a clearly fraudulent/perjurious declaration with the Court to be  
22 appointed SPECIAL COUNSEL TO THE BANKRUPTCY TRUSTEE, claiming to have no conflicts  
23 with other estate creditors when she had many large conflicts with those creditors.  
24 To allow that to occur, Campbell signed an indemnification to cover any losses that  
25 Cordell's actions, if unlawful/inappropriate, may cost estate creditors. Cordell's  
26 continuing/additional frauds cost estate creditors at least \$750,000 to possibly  
27 over \$2,000,000. Petitioner was in the process of exposing these frauds & losses.  
28 Campbell's juice got petitioner prosecuted, Cordell's perjuries got a conviction.

1 CORDELL'S 16+ L.A. TRIAL/PRELIM PERJURIES PROVABLE WITH ON THE RECORD EVIDENCE

2 Some of Cordell's testimony will be accurately paraphrased for brevity.

3 1. "No payments were made on the \$500,000 obligation of Diane Goodwin, her partner  
 4 Chuck Clayton & their company Supercross Inc, which Michael Goodwin ran, for the  
 5 purchase of the Insport Supercross event franchising agreement" Vol 8-3527, Vol  
 6 9-3700-3701, 3723, 3729-30-31-32 & CT 1-183-184, at least five times.

7 But, between \$385,000 & \$452,630 was paid on that obligation. The BK trustee  
 8 & also a D.A. expert Jeffrey Coyne testified that \$385,000 in payments had been  
 9 made on that obligation, Vol 10-4061:15 & Vol 11-4224:27. In fact, \$452,630 of  
 10 those payments had been made. See exhibit A here. The lower \$385,000 amount  
 11 was incorrectly arrived at when it appears that for some unexplained reason the  
 12 trustee, after the fact decided to eliminate the payments made on the obligation  
 13 prior to the due date even though those payments signified that they were on the  
 14 obligation. On the crime date the payments were about \$275,000 ahead of schedule.

15 However, for here this proves that Cordell lied when she testified repeatedly  
 16 that no payments were made on the Supercross obligation for Insport.

17 2. "BK trustee Jeffrey Coyne repossessed the Insport Agreement from Diane Goodwin,  
 18 Chuck Clayton, their Supercross Company because none of those payments had been  
 19 made", Vol 9-3723-3725, 3729-30-31-32,

20 But, BK trustee Coyne testified he did not repossess the Insport Agreement,  
 21 Vol 11-4226. Defense exhibit O<sup>1</sup> supports Coyne's testimony that he did not reposs-  
 22 ess the Insport Agreement although DDA Jackson & Cordell intentionally tried to  
 23 persuade the jury that Coyne had repossessed the Insport Agreement because the  
 24 defense had a copy of the Court docket, exh. O, with unclear notations on it.

25 Other evidence in discovery & that is confirmed in the suppressed evidence  
 26 inventory proves that Insport wasn't repossessed, that petitioner's group kept it.

27 Nonetheless DDA Jackson argued petitioner lost Insport, RT-8766, Vol 6-2718-  
 28 2719 as part of "Thompson won everything, (inciting Goodwin to kill Thompson)"

1) Trial exhibit. Also see bps 33749-53, 23447, 27971, 29614, 31667, & 32398-9.

3. "Mickey Thompson paid \$500,000 for the Insport Supercross Event Franchising Agreement, after trustee Jeffrey Coyne had repossessed it because no payments had been made on the \$500,000 purchase obligation by (petitioner's then wife, her partner in the company Chuck Clayton or the company Supercross)"; Vol 9-3725, 3726, 3730 & 3746. DDA Jackson lied in argument on this, RT-8766, Vol 6-2718-19.

But yet again, another of the D.A.'s own experts, the BK company trustee who would have best known the true facts confirmed he did not sell the Insport agreement to Thompson, or to anyone (since he had not repossessed it to be able to sell it), Vol 11-4226, 4233. Discovery & suppressed evidence proves that the "Goodwin camp" still owned Insport even after the murders, having paid \$275,000 in advance on payments that were not due until later. See bp 28093-4, 23447, 27971, 29614, 31667, 32398-9, a copy of the \$452,000 accounting at bp 22222.

THUS DDA JACKSON KNEW HE SUBORNED PERJURY & LIED IN ARGUMENT RE: INSPORT

It bears explaining here that later many big frauds were done re: Insport. Those were that Colleen Campbell & Cordell committed major Bk Fraud, a Title 18 § 152 felony, by taking the Insport Agreement from the Supercross company even though it was pledged for the balance of the \$500,000 note, without notice to the other creditors or the Court & without the required Court approval. They did this in conspiracy with the BK trustee after Jeffrey Coyne, Ronald Durkin.

They then bled tens of millions of dollars from events run because they had the AMA (American Motorcyclist Association) sanctions which could only be obtained in at least 1989 & 1990 if one had the Insport Agreement. They eventually Bankrupted that company in which they ran those Supercross events, Mickey Thompson Entertainment Group (MTEG), in a huge, easily provable additional Title 18 § 152 BK Fraud. That is evidenced in exhibit L to the DISCOVERY MOTION filed in this case with the Superior Court in mid-June 2011. The evidence of their felony is absolute.

Petitioner began to expose this in civil fraud litigation that began 12/7/01. Petitioner was charged in this case 3 days later, out of jurisdiction, in Orange



County for the Los Angeles County murders. Petitioner was charged by Campbell's close personal friend, business associate, ex-personal attorney & political crony, Anthony Rackauckas, the Orange County District Attorney, for whom she had been instrumental in his election, again, out-of-jurisdiction in O.C. for an L.A. crime.

Rackauckas charged petitioner on what appeared to be the same evidence that had been known of for over 13 years after the murders<sup>1</sup>, & on which the proper jurisdiction, Los Angeles County, had repeatedly rejected the prosecution for lack of evidence. However, the lead piece of evidence to charge petitioner in Orange County, "that it appeared that a 9mm pistol that petitioner owned was one of the murder weapons," repeated over & over, can be proven with irrefutable evidence

**TO HAVE BEEN KNOWN BY RACKAUCKAS TO BE IMPOSSIBLE TO BE TRUE.**

That is all briefed, with conclusive evidence for anyone who wishes to do the correct thing & expose and/or prosecute Rackauckas. Two & one-half years after petitioner was charged, spending that time without bail in the notorious Orange County jail, supervised by now convicted felon, ex-Orange County Sheriff Mike Carona, the Fourth District Court of Appeal, when learning of the pistol fraud by the OCDA (although not of Rackauckas' complicity in it) dismissed the charges.

However, on the day petitioner was released in O.C. he was charged in L.A. on the same crime, but on less evidence than L.A. had when they repeatedly refused to prosecute because of lack of evidence. That is because the lead item, the bogus pistol allegation, had been uncovered/exposed & was now gone. There is little doubt that the LADA charged petitioner as a favor to Rackauckas since Rackauckas was hanging out miles for huge RICO - § 1983 damages for the malicious & false prosecution. Now the LADA have joined the OCDA & LASD (Los Angeles Sheriff's Dept) in culpability for the damages. The prosecution frauds have gotten much larger. Authority shows \$7083 to \$19,200 damages per day before 3X punitives for fraud.

1) Every trial witness was known of within 10 months after the murders, all except two within weeks. The last evidence list was 11/16/89, 17 years before trial, 00006. The LADA pretended to have lost early witness statements & "just learned new info," but evidence proves they were aware of the information all along.

1 The most stunning fraud re: Insport is as follows. Although truly hard to  
2 believe, evidence, most of which the D.A. has suppressed, but other evidence  
3 proves they have, conclusively proves this is true.

4 The Thompson lawyers, lead by murder trial experts Cordell & Bartinetti,,  
5 forced an auction of the Insport Agreement by petitioner's in Bankruptcy company  
6 ESI (Entertainment Specialities Inc., fbda as Stadium Motorsports, SMC). This was  
7 held in the fall of 1986, just months before the Anaheim Stadium event which pet-  
8 itioner had sold out to almost 70,000 fans for the prior 9 years.<sup>1</sup>

9 Petitioner arranged for a business associate with an \$11,000,000 financial  
10 statement, Chuck Clayton, to joint venture with petitioner's wife, to bid at the  
11 auction, or Thompson could have come in & had the Insport Agreement for next to  
12 nothing since there would have been no bidders against him.\* It is clear that this  
13 was the Thompson strategy. The entire structure of "the Goodwin-Clayton camp"  
14 business was fully disclosed to the Court,<sup>2</sup> including that petitioner would be paid  
15 \$240,000 per year to run the new company.<sup>3</sup> \*(This would have cheated the creditors)

16 All was fine, & although there was some difference of opinion re: about an  
17 offset against the purchase price for \$120,000 in Court approved, post-petition,  
18 (after BK filing) loans when trustee Coyne was appointed, as evidence proves, supra,  
19 payments were \$275,000 ahead 3 months prior to the murders<sup>4</sup>. Also the events were  
20 well run, made excellent money, all bills were being paid, etc; Petitioner & his  
21 then wife, Diane Seidel Goodwin, decided that the pressures of the BK & that it  
22 appeared that the trustees plus their attorneys were out to bleed the estate\*, were  
23 not worth continuing to cope with.\* (The bleeding was worse than ever imagined.)<sup>5</sup>

24 Thus petitioner's wife, who had her own pre-marital separate property, bought  
25 a 57' boat with petitioner/his wife deciding to go cruising on it.

- 26 1) Had the auction not occurred ESI would have had \$200,000+ more to pay Thompson.  
27 2) Petitioner's public defender refused to investigate this & introduce it at the  
28 3) This was far less than the \$300,000 per year petitioner earned in 1984.  
4) The payment schedule was \$166,666 per year through July 1990, plus interest.  
5) Evidence proves the bleeding/looting was caused by Cordell frauds & perjury.

1 After the murders, & after retaining a top flight criminal attorney, Al  
 2 Stokke, with whom petitioner stayed in regular touch, petitioner & his wife left  
 3 California. This was in mid-May 1988, about two months after the murders. They  
 4 lived completely visible, using credit cards, commercial flights etc; with no  
 5 attempt to hide from law enforcement, plus they were regularly in touch with Mr.  
 6 Stokke. Nonetheless, the D.A. alleged fled & obtained a jury instruction on that.

7 However, to stay focused, (that was background) this is the next fraud. Cordell &  
 8 Campbell, in conspiracy with the ESI trustee subsequent to Coyne, Ronald Durkin\*,  
 9 took the benefits of the Insport Agreement without notifying the Court or other  
 10 creditors, which Federal law requires them to do. \* (A disgraced ex-FBI Agent)

11 Then, & this is the stunner, trustee Ronald Durkin filed a claim by the ESI  
 12 (company) BK estate, against petitioner's personal BK estate for about \$1,000,000  
 13 based upon Durkin's claim that petitioner had defrauded the creditors of the ESI  
 14 BK by allowing the auction of the Insport Agreement! Recall that the Thompson  
 15 lawyers forced this auction, petitioner could do nothing about it, a Federal BK  
 16 Judge approved, set & ran the auction, with full disclosure of all by petitioner.

17 Recall also that had petitioner not bid (& eventually paid \$452,000 on, plus  
 18 the \$125,000 down payment), Thompson would have taken INsport for next to nothing,  
 19 cheating the creditors. Petitioner's actions made over \$400,000 additional avail-  
 20 able for creditors, although "trustee" Durkin, whose sworn responsibility was 1st  
 21 to protect the unsecured creditors, burned that all up in unnecessary fees. A study  
 22 conclusively proves that Durkin paid at least \$350,000 less to Bankruptcy estate  
 23 creditors after he spent years & hundreds of thousands of dollars in fees, than  
 24 was available to those creditors when he was appointed, about \$830,000, Vol 11-4246.

25 In an obvious fee churning scam, the personal BK trustee paid Durkin \$200,000  
 26 cash illegally out of the JGA trust account. To disguise this fraud Durkin labeled  
 27 the \$200,000 as income from petitioner's parents who owed no money to the BK.

28 1) Evidence, including a Court ruling, proves double billing by Durkin as well as  
 dozens of material perjuries, \$4,000,000 in false Bankruptcy claims, felonies, etc;

1 Bringing this immaculately planned BK Fraud full circle was the Campbell camp  
2 Bankrupting MTEG in 1994 while Campbell's husband was President & Mickey's son in  
3 top management as well. Evidence is conclusive, absolutely irrefutable that they  
4 sold the assets under the table, undisclosed to other creditors or the BK Court,  
5 to Pace Management, who then put those assets & Danny Thompson, Mickey's son, to  
6 work, & had continuing involvement with Colleen as well. Colleen owned stock.

7 Petitioner does not know the details of the price they got, but he does  
8 have it on good authority that a Bill West, whom petitioner knows, who was a  
9 principal in Pace Management, met with representatives of the Campbell camp/group  
10 within weeks before Bankruptcy. MTEG then sold the assets for a rumored seven  
11 figure sum to Pace, via Bill West. Petitioner does know that the felony sale took  
12 place although not exactly what was paid, since MTEG transferred their Supercross  
13 events to Pace, including the "crown-jewel", Anaheim Stadium, which was central to  
14 the murder trial. MTEG had a long term contract with Anaheim Stadium that went  
15 beyond the date of the BK filing (pet. has a copy) that they transferred to Pace.<sup>1</sup>

16 Petitioner's lawyers have copies of "declarations against interests" by the  
17 Campbell group's co-conspirators in this felony Title 18 § 152 Federal BK FRAUD OF  
18 OTHER CREDITORS, via concealing & selling valuable assets without disclosure or  
19 approval of the Court. These co-conspirators gave sworn declarations of participat-  
20 ion in these felony transfers which directly implicate the Campbell group.

21 Additional felonies were perpetrated directly by the Campbell group by them  
22 lying on BK applications that these valuable assets did not exist, nor disclosing  
23 the unlawful sale. These Supercross events they sold illegally were the very same  
24 events that Campbell & Cordell stole from the ESI BK six years earlier in another  
25 criminal BK Fraud described earlier. These assets were worth millions of dollars.

26 Pace Management soon after illegally getting these assets, sold them to a  
27 publicly traded company for \$130,000,000. The Anaheim Stadium event stolen in two  
28 separate criminal BK Frauds was the centerpiece of this sale. These are BIG frauds.

1) Just this is a substantial Title 18 § 152 Bankruptcy fraud felony, slam-dunk.

1 Campbell ran the MTEG company for five years after the 1st BK Fraud where  
2 she stole the Insport Agreement/Supercross events that were subject to a security  
3 interest to ESI, the BK company. She ran it into the ground, bleeding it of  
4 millions of dollars which came into it via the illegally obtained Supercross  
5 events. To distance herself from the upcoming BK Fraud she resigned just before  
6 that, but as noted she disingeniously had her husband as President.

7 This most recently described set of criminal frauds was what petitioner had  
8 meticulously evidenced & filed with the Court which prompted the murder charges  
9 being filed against him 13½ years after the murders on the same evidence that the  
10 State had for the prior 12½ years & on which he was originally cleared, plus the  
11 LADA had repeatedly refused to prosecute on. Petitioner was charged 3 days after  
12 he caused this litigation to be filed which would have exposed Campbell's crimes.

13 Campbell & her associates, including L.A. trial D.A. expert witnesses  
14 Cordell, acknowledged as "the #1 source of case information," & Bartinetti, would  
15 have been seriously exposed to a decade or more in prison, millions of dollars in  
16 restitution & fines, & serious public & peer group humiliation.

17 The last one would have been very troublesome for Campbell since she was  
18 highly lauded as a "hard on crime-victims" rights advocate" & political "king-  
19 maker". She was on a number of Statewide & Federal law enforcement committees,  
20 Chairing one or more for at least four years, spoke to the United States Senate  
21 Judiciary Committee on June 9, 2009 (or 10), was on the Republican National Comm-  
22 ittee, & headed what she called the largest victims' rights group in the World,  
23 or at least the Country, M.O.V.E., Memories of Victims' Everywhere. That means  
24 lots of votes for politicians aligned with her, & many are, including Steve  
25 Cooley, the Los Angeles District Attorney who agreed to prosecute petitioner after  
26 his predecessor Gil Garcetti had repeatedly rejected the prosecution, no evidence.

27 Petitioner was the largest creditor of MTEG & had he been "out" to pursue his  
28 litigation, Campbell would have ended up in prison & owing petitioner millions.

1 4. "JGA was the only asset which went into the estate," Vol 9-3703. On-the-record  
 2 evidence proves that testimony as false since BK trustee Coyne, who is the  
 3 witness who handled the money testified that there were \$385,000 in payments on  
 4 the Insport Agreement sale from ESI to Supercross Inc., Vol 10-4061 & Vol 11-  
 5 4224. This is backed up by not-on-the-record (NOTR) but official Bankruptcy  
 6 accounting evidence in exhibit A showing that the money into ESI from Super-  
 7 cross Inc. was actually \$452,000, no matter how it was accounted for.

8 Cordell also contradicted her own testimony that no money but JGA went  
 9 into the estate when she admitted that the \$450,000+ in interpleador funds on  
 10 which petitioner's "camp/side" had prevailed over Thompson went into the estate,  
 11 Vol 9-3746. ESI trustee Coyne also testified that there was \$830,000 cash in  
 12 the ESI BK trust account, Vol 11-4246.

13 Those are sufficient to prove her material perjury & to reverse the con-  
 14 viction, since evidence proves that the DDAS knew she was lying, but there is  
 15 a mountain of other irrefutable evidence that about \$1,500,000 in addition to  
 16 the approximately \$2,000,000 from JGA/Whitehawk went into the BK estates.

17 As brief examples there were \$120,000 in post-petition Court approved loans  
 18 by petitioner's then wife Diane, which she was never repaid although it was a  
 19 priority claim via the Court approval to be repaid even before the trustee,  
 20 attorney & accountant (T&A) fees, real estate investments in Lake Tahoe &  
 21 Durango, CO. which the Thompson interests were illegally paid, one, Durango, in  
 22 a giant fraud on other creditors without the legally required notice to the  
 23 Court & other creditors, & Court approval, the house, Mercedes, race cars &  
 24 petitioner believes \$100,000 to \$200,000 in other income to the estates.

25 What occurred to all this money was that the BK T&AS, led by Cordell & CO.  
 26 looted the estates, billing over \$2,600,000 in unnecessary fees, paying the about  
 27 \$1,500,000 in real unsecured creditors only about 7½% average (although the  
 28 Thompson claim got much more) when there was 100% to pay all with lots left over.

1 5. "All the rest of the Goodwin's assets (except JGA) had been dissipated by them"  
 2 Vol 9-3704. Obviously based upon Coyne's testimony as well as Cordell's detailed  
 3 on the prior page, at least \$830,000 cash, more than enough to pay the Thompson  
 4 claim, certainly at the \$500,000 which Cordell put in writing (NOTR) they would  
 5 have accepted, all other assets weren't dissipated. So, this is clear perjury.

6 And, when we receive the suppressed evidence we have identified which  
 7 Cordell & the D.A. have it will conclusively prove A) Cordell knew she was comm-  
 8 itting felony Pen C 118 perjury, B) the DDAS suborned this perjury in felony vio-  
 9 lation of Pen C 127, & C) there was a total of about \$3,500,000 which went into  
 10 the BK estates, including about \$1,500,000 in addition to JGA.

11 6. "...because there were no assets to be found," Vol 8-3509:6. Obviously this is  
 12 not true based upon the testimony of Cordell herself, (the \$2,000,000 JGA asset,  
 13 evidence cites on that later herein) & admitting to the \$450,000+ in the inter-  
 14 pleader which went into the BK) & trustee Coyne at trial that there was \$830,000  
 15 cash in the account, Vol 11-4246:25. Exh. C. lists assets of which they knew.

16 6A. This is not counted as a new number since this perjury is by her partner Phil  
 17 Bartinetti carrying along the same plainly rehearsed "party line," at Vol 7-3193,  
 18 "We could find no assets" (That petitioner stole all assets was the theme)<sup>1</sup>

19 This cannot be true either based upon the assets that were confirmed at trial,  
 20 even by Cordell, the \$450,000+ interpleader cash & the \$2,000,000± from JGA.  
 21 There is also Coyne's testimony on the \$830,000 cash which included the inter-  
 22 pleader funds & the \$452,630 from Supercross Inc., which itself included the 1st  
 23 \$344,250 income from JGA, the only JGA revenue before the murders.

24 That Diane Goodwin paid that from her separate property voluntarily dispels  
 25 the motive for the case that the DDAS espoused ad nauseum, "Goodwin refused to  
 26 pay Thompson & would not have even had he had the money, killing Thompson instead,"  
 27 (paraphrased accurately), RT-8765, Vol 6-2718 & 2741. No one testified to that,  
 28 there was no evidence introduced to support it & suppressed evidence impeaches it.

1) Suppressed evidence proves all BK assets stayed there plus \$2,000,000 more.

1 7. "Mr. Caldwell would have taken all of the assets of ESI for \$150,000!" Vol 8-  
 2 3482:24. This was in an inquiry/testimony session from Vol 8-3475:23 through  
 3 3487 re: a \$150,000 loan that the company ESI was trying to get short term to  
 4 allow it to stay in business & do the upcoming Anaheim Stadium event in January  
 5 1987. There were numerous perjuries by Cordell as well as false & misleading  
 6 inquiries by DDA Jackson & answers by Cordell, but for here we focus on this.

7 The asset put up for bid was the Insport Agreement, a franchising contract  
 8 which allowed the holder to obtain the critical AMA (Americian Motorcyclist  
 9 Association) sanction event to run Supercross events in stadiums, & certain  
 10 rights which attached to that, not all assets of ESI. Documents prove this also.

11 Cordell admitted to this at Vol 8-3525 & she admitted at Vol 9-3746:24 that  
 12 there was also, not included in the \$150,000 security that was offered, the  
 13 \$460,000 cash from the Los Angeles Coliseum interpleader which went to the BK.  
 14 Those are OTR evidences. NOTR (not on the record) evidence will prove \$200,000+  
 15 in cash in other assets that went into ESI.

16 8. "Had the Craig Caldwell offer to ESI been accepted ESI would have had just  
 17 \$150,000 to pay creditors, essentially nothing, & thus ESI would have been merely  
 18 a shell company," Vol 8-3482-3284. This ignores that the interpleader \$450,000 to  
 19 \$470,000, which Cordell was well aware of since she had filed litigation on it  
 20 in May or June of 1986, did belong to the company. That is outright perjury  
 21 by Cordell, but the prejudice to petitioner is much worse because of the  
 22 implication to the jury that petitioner was "trying to pull a fast one" to avoid  
 23 paying Thompson, which was a key component of the D.A. case in chief.

24 This is also not simply perjury which evidence OTR also proves the DDAS were  
 25 aware of or should have been aware of, per the law, but it also grossly is in  
 26 violation of ALCORTA V. TEXAS 355 U.S. 28, 78 S. Ct. 103 (1957).

27 Worse, suppressed evidence proves that ESI did have income slated to repay  
 28 the \$150,000 Caldwell loan, vs. what Cordell testified to, a default. This would



1 have left several hundred thousand dollars more in the ESI BK estate with which  
2 to pay creditors, because of reduced legal fees & all of the profit of the 1987  
3 Supercross events staying directly in ESI. Plus, profit of the Supercross Inc.  
4 produced events were off because of the uncertainty of the Bankruptcy & all of  
5 the negative posturing of the Thompson camp, which scared off sponsors.

6 More profit for Supercross Inc. would have allowed an even quicker, complete  
7 pay-off of the \$500,000 Insport note (on which Cordell testified five times that  
8 nothing was paid). As seen, even with the reduced profit, although more clearly  
9 provable with NOTR (not-on-the-record) evidence, Supercross Inc. had paid off all  
10 except \$46,000 of the principal in just 40% of the term length of the note, 1½  
11 years early. The terms of the note are also in exhibit A.

12 In addition, even with just the \$150,000 & the \$450,000+ interpleader, NOTR  
13 evidence proves that the creditors would have received far more than they ended  
14 up being paid years later after hundreds of thousands of dollars in trustee,  
15 attorney & accountant fees were spent to "help" the creditors.

16 Suppressed evidence proves that there was enough to pay all creditors 100%  
17 with over \$1,000,000 to spare. Instead, the real pre-petition unsecured creditors  
18 of about \$1,500,000 total received an average of about 7½% on the dollar owed,  
19 after waiting 6+ years for payment, & while some of them spent over \$100,000  
20 trying to collect. The T&AS also created over \$2,000,000 in new phony debt while  
21 running up their fees, more debt than the original real unsecured debt. None of  
22 that new, totally unnecessary \$2,000,000 in debt will ever get paid.

23 These Bankruptcies, which had enough to pay all creditors including Thompson  
24 100%, & were intended to do so<sup>1</sup>, became a feeding trough where the T&A hogs  
25 turned to pigs. They billed \$33 for every \$1 paid to real unsecured creditors  
26 except for the Thompson group. The Thompson group got four times what all other  
27 similarly situated creditors & their attorneys got combined. Cordell led this.

28 1) The trustee's lawyer said there was enough to pay all, docs. #82 & 83 in the  
SA 86-06166-JR BK. He also elsewhere to the FBI said pet. intended to pay.

1 9. "We received nothing out of the Supercross Inc. purchase of the Insport  
 2 Agreement"; CT 1-183. This was intended to follow the rehearsed party line of  
 3 nothing being paid on the Insport sale, item #1 here, making petitioner look bad.

4 However, as we've repeatedly seen via OTR evidence, & exhibit A, at least  
 5 \$385,000 up to \$452,000 was paid on the Insport \$500,000 note, in addition to the  
 6 \$125,000 down payment which Cordell confirmed at Vol 8-3527:4, Vol 9-3723:20,  
 7 3731:16 & 3745:6. That is OTR. NOTR is that the \$125,000 was paid directly to the  
 8 Thompson group (or lawyers).

9 Cordell also testified that her firm had billed the BK estates & been paid,  
 10 Vol 9-3707-9 & that fee applications were under penalty of perjury, Vol 9-3716.  
 11 Thus is yet another perjury that they "received nothing" from the Insport sale  
 12 since the Bankruptcy funds from which they were paid, by definition included the  
 13 income from the Insport sale. And NOTR suppressed evidence in Cordell's 80 boxes  
 14 of records that the D.A. had constructive possession of, Vol 20-7578, exh. B  
 15 will also prove that they received the \$125,000 cash down payment.

16 10. "JGA paid nothing near the judgment amount"; Vol 9-3750. This is paraphrased as  
 17 accurately as petitioner can since this page of the transcript was lost in one of  
 18 the many times that legal mail disappeared when leaving High Desert State Prison  
 19 (HDSP) after the law library refused to copy it. Problems such as that abound at  
 20 HDSP which is run like a wild west concentration camp with little regard for even  
 21 their own rules or the United States or California Constitutions. It is abusive.

22 However, even though DDA Jackson fraudulently & frivolously objected five times  
 23 in just 43 lines between Vol 9-3702:28 & 3704:15 trying to keep out that about  
 24 \$2,000,000 went into the BK estates, it is clear that the witness agreed with  
 25 that fact, which is true.<sup>1</sup> Since the judgment was \$794,000 this is perjury & is  
 26 materially misleading per ALCORTA V. TEXAS 355 U.S. 28 (1957). This is material  
 27 since had Cordell not led a looting of the BK estate Thompson would be fully paid.

28 1) From JGA alone.

1 Although the following, at least #11, are just as prejudicial, if not moreso  
 2 than some of the earlier perjuries/false testimonies, some should be looked at  
 3 differently than numbers 1 through 10 (which are actually 15 instances of perjury/  
 4 false testimony, since #1 was told five times). For example #11, very prejudicial,  
 5 has only prima facie evidence of Cordell's false & misleading testimony because  
 6 she included an easily overlooked "qualifyer/disclaimer," very deceitfully/slyly.

7 However, #11 may be one of the best examples of misleading testimony which  
 8 calls for reversal because of the ironclad evidence the D.A. knew she was being  
 9 deceitful, & the extreme prejudice of the false/misleading testimony.

10 "...outright falsity in a particular answer need not be shown, if the  
 11 testimony, taken as a whole, intentionally gave the jury a false  
 impression!" ALCORTA V. TEXAS (1957) 355 U.S. 28, 78 S. CT. 103.

12 11. "After the murders the March 18th Court date for the non-discharge hearing was  
 13 moved (not before)"; CT 1-165:28. This was also testified to at CT 1-159:15-22:

14 "The trial date (for the non-discharge hearing) was set for March 18, 1988,  
 15 two days after Mickey & Trudy Thompson were killed".

16 However, defense exhibit M, Vol 9-3714, trial testimony by Cordell, proves she  
 17 was lying. See Vol 9-3709-3720 & 3741. The hearing was moved before the murders.

18 This was extremely prejudicially & deceitfully argued at Vol 6-2723:27:

19 "The case (the non-discharge or objection to discharge) was to go to hearing  
 20 on March 18th. Mickey Thompson was killed two days beforehand!"

21 Although the following is NOTR, it proves that DDA Jackson, who made the above  
 22 argument (& three dozen+ other knowing materially false arguments) knew he was  
 23 lying in his argument, which is not permitted, by reams of Supreme Court law.  
 24 At bp 29967 an investigator, it appears Det. Lillienfeld, noted that the date  
 25 for the hearing had been moved to April 1. Petitioner believes that is also in  
 26 the typed document at the second page. This is the crucial non-discharge agree-  
 27 ment which mirrored the one that petitioner had agreed to prior to the murders,  
 28 & which was signed just 13 days after the murders, with an approval by a Federal  
 judge the next day, April 1st. This document is at bps 29967-78 and is critical

1) Suppressed in Cordell's 80 boxes of records, Vol 9-3749, in exh. B.

1 for several additional material reasons although most will, I presume, be NOTED.  
 2 They will however, even now, show the amazing depths of deceit & fraud on which  
 3 DDA Jackson & Cordell conspired, & additional material perjuries by Cordell.

4 In short, Cordell will commit felony perjury at the drop of a hat & did so  
 5 to convict petitioner. Evidence proves over 60 perjuries by her, most material.

6 In addition, this non-discharge document shows that the prosecution committed  
 7 felony evidence tampering, violation Pen C 132, 134 and/or 141(b) by removing  
 8 the signature pages, with signatures, from that document, & inserting them 55  
 9 boxes away at bps 31656-8, 1650 pages separated, making it appear unexecuted.

10 Extremely telling as to the dishonesty of the prosecution & their witness  
 11 Cordell is that the Thompson group could not possibly have prevailed at the  
 12 hearing on the non-discharge<sup>1</sup>. They had filed under the incorrect statute, missing  
 13 the statute of limitations deadline to modify their complaint to plead under §  
 14 523 of the BK code, so they were stuck with § 727, under which they automatically  
 15 lost. Petitioner gave them a \$794,000 gift in still agreeing to the nondischarge.

16 It is obvious that Cordell was also prepared to commit additional  
 17 perjury at CT 1- 160 as to what petitioner's lawyer Ron Coulombe had allegedly  
 18 told her, "that Goodwin had no chance of prevailing," when that is impossible.  
 19 DDA Jackson in effect lied to the Judge about this at CT 1-160:15 when he made  
 20 an offer of proof on this. A lawyer is not allowed to misstate the law, U.S. V.  
 21 591 F.2d 526, 528 (9th Cir 1979) nor argue facts not in evidence.

22 This document also proves that contrary to Cordell's testimony at Vol 9-  
 23 3738-3739 that they would not allow \$300,000 to be taken out of Desert Investors,  
 24 that they in fact approved that \$300,000 to come out. See bp 29972, in exhibit C.

25 The document also proves both Cordell & Bartinetti were perjuring themselves  
 26 when they testified they could find no assets, at Vol 8-3509 & Vol 7-3193. This  
 27 doc lists assets they "had." This document lists/agrees to encumber investments in  
 28 which \$1,000,000<sup>+</sup> were invested by pet's "camp," & put \$2,000,000+ into the BKs.

1) Yet DDA Jackson argued petitioner was losing the nondischarge, RT-8766:17.

1 And there are far more documents both in discovery & suppressed by the D.A. which  
 2 conclusively prove they knew of & were pursuing all the assets which the Bank-  
 3 ruptcy and/or Thompson could possibly have a legitimate claim to.

4 Two of these are a TRO where petitioner & his wife agreed not to further  
 5 encumber certain assets, bps 26633-49 \* & Cordell verified this was voluntary at  
 6 bp 31707, 31719, 31734. Cordell's firm also confirmed their knowledge of these  
 7 assets in a 12/3/87 letter bp 33680. \*(Signed in February 1988)

8 12. "Mickey Thompson did not lose (to petitioner) in Court!" CT 1-170:18-22. This is  
 9 absolutely & provably not true & this plus similar testimony by Cordell's part-  
 10 ner Bartinetti was used as the basis for the DDAS to argue ten times that:

11 "(There was) a series of fights inside the Courtroom that would rival any  
 12 Court battle anytime anywhere. And what is notable about those battles is  
 13 that Mike Goodwin(petitioner) lost every single one!" Vol 6-2717:23, RT-  
 14 8733:21, 8764, 8766:14-15-16, 8768:18, 8770:27, 8783:09, 9002:28 & 9030:10.

15 The DDAS argued this as an adjunct to the motive, "that Thompson was beating  
 16 (petitioner) at every turn, which fueled petitioner's anger & desire to kill  
 17 Thompson." This segwayed into alleged threats by petitioner to Thompson.

18 However, at CT 1-170-171, the defense proved that Thompson lost to petition-  
 19 er on the \$450,000 L.A. Coliseum interpleader, the 2nd largest "issue" of the  
 20 entire proceedings. Then at CT 1-182 Cordell confirmed that petitioner's camp  
 21 prevailed in Court for the extremely valuable Insport Agreement. That was a  
 22 \$625,000 victory for petitioner, Vol 8-3723:19. Cordell committed extremely  
 23 material perjury on that one there by testifying that Diane (petitioner's then  
 24 wife) had paid nothing on that note. But, as seen in #1 here she had paid at  
 25 least \$385,000 as confirmed by the BK trustee at trial.

26 So, on-the-record evidence proves that petitioner prevailed on more than  
 27 \$1,175,000 in victories while the only OTR evidence of Thompson prevailing is  
 28 for the \$794,000 judgment Vol 7-3191. So petitioner won \$375,000 more or 47%  
 more as is proven with OTR evidence. But NOTR evidence, when included, proves  
 that petitioner prevailed on \$3,700,000 in issues, or 4½ times more "victories!"

1 Petitioner will wait for the not-on-the-record evidence section to detail the  
 2 evidence proving the \$3,700,000 in value of victories for the defense in these  
 3 proceedings, in over 15 separate proceedings, vs. about 8 for the Thompson group.\*  
 4 However, the facts of the petitioner's wins, even just the two for \$1,175,000  
 5 total, vs. the \$794,000, of which evidence proves the DDAS were aware begs three  
 6 other critical issues.\* (Bartinetti also testified Thompson won it all, CT 1-103)

- 7 • The DDAS' false arguments on the prior page that "Thompson won every single  
 8 legal battle" were after they had heard in open Court, in case they try to  
 9 deny their prior knowledge, that petitioner had prevailed on the \$450,000+  
 10 in the interpleader plus the Supercross win, CT 1-182. They knowingly lied.
- 11 • The Insport Agreement on which Diane Goodwin & Chuck Clayton prevailed over  
 12 Thompson in the December 1986 auction bidding was actually worth millions of  
 13 dollars, not just the \$625,000 which was paid for it. Just the first event  
 14 that petitioner did after the auction grossed over \$1,000,000 which only  
 15 could be accomplished with this Insport Agreement.

16 Later, as is explained earlier in this document, Colleen Campbell & her  
 17 lawyer Dolores Cordell, stole the agreement from the ESI BK, who had a  
 18 security interest in it, & made millions with it.

19 Still later Campbell & Co. again committed BK fraud by selling it under  
 20 the table to Pace Managment, who in turn sold it to publicly traded SFX Corp.  
 21 as one of the centerpieces-"crown jewels" of a \$130,000,000 sale of assets.

- 22 • Thompson's lawyers admitted (although they lied about the amounts, NOTR  
 23 evidence proves) that Thompson had put \$380,000 into the joint business  
 24 venture, & that he had spent at least \$286,000 in legal fees which were still  
 25 due upon his death, Vol 8-3399, 3523. They also admitted that they had  
 26 collected at the time of Thompson's death just a few thousand dollars for an  
 27 engine, Vol 8-3496. Yet, had he accepted the surety his lawyers admitted that  
 28 he would have been protected/paid in full, bp 23792:17. By winning that he lost.

13. "The interpleader was not litigated," Vol 8-3498:22. It was litigated as was proven at trial, Vol 8-3514-16 including introduction of a published Court ruling granting this \$450,000+ to petitioner's camp (69 Bankruptcy Reporter 556, in discovery at bps 28829-29883, so the DDAS were on notice they were allowing the introduction of false testimony). This grew to almost \$470,000 before it was released to the BK trustee. It remained in the estate until the trustee, Ronald Durkin, in provable collaberation with Cordell, looted it.

The truth of the fact that the interpleader was litigated, & that the petitioner's "camp/side" prevailed in it proves numerous other issues as well:

- A. The need for Cordell's records re: this issue which effect the above perjury & the following issues/perjuries as well. See exhibit B.
- B. Because this \$450,000+ (\$460,000, Vol 9-3746:24) went into the BK estates, this also reinforces Cordell's perjury in item #4 here that "JGA was the only asset which went into the BK!" JGA was not the only asset that went in.

In fact ESI trustee Coyne also testified to \$385,000 being paid on the Insport purchase by Supercross Inc vs. Cordell's 1st perjury detailed herein, #1. Between these two that proves over \$845,000 went into the BK besides the approximately \$1,657,000 from JGA which suppressed check records that petitioner has identified in the D.A.'s possession which went into the BK estate. Those JGA funds prove the largest DA fraud of the case.

Re; that \$1,657,000, checks paying that, are recorded on the very page from which the D.A. used several trial exhibits between exhibits 90 & 97, but they hid these checks which would have proven as perjury their expert's testimony, Vol 19-6927-6928 (also see Vol 18-6767, 6791 & Vol 19-6908) & DDA Jackson's argument at Vol 6-2740:25 & RT-8783:28 that:

"HE (petitioner) SOLD ALL OF JGA/WHITEHAWK, WHICH WAS REALLY HIS!"<sup>2</sup>

- 1) Page 115 in the 186 page official inventory of 2100+ documents, over 10,000 pp. of suppressed evidence in the D.A. evidence locker, including 250 BRADY violations.
- 2) Evidence at page 30 of the inventory proves Kingdon & Jackson lied about this also.

As noted, the multiple D.A. frauds related to JGA were the largest of the case, & without them the D.A. case would have imploded. But since the perjuries which supported them were by D.A. expert Kingdon, petitioner addresses those in the section on perjury by Kingdon, sixteen of them.

C. Cordell also testified that "All the other Goodwin assets had been dissipated by them," Vol 9-3704, item number 5 herein at page 13. That must be perjury/false testimony since here is \$460,000+ in the BK estate, only not "dissipated" because petitioner spent substantial legal fees to have the law prevail & be enforced rather than default to the Thompson camp. Note that Cordell's name is on the published opinion re: the \$460,000+.

Had the Thompson camp been willing to accept the assets petitioner offered at the surety, including these funds petitioner believes, Thompson would have been paid in full more than a year prior to his death. Since evidence that was not introduced at trial (some in discovery, some that is identified but suppressed) gives at least prima facie proof that Thompson was killed because of drug money or cowboy banking debts he could not repay, in essence his lawyers killed him by refusing the surety. Recall that the lawyers admitted in filed pleadings, bp 23792:17:

**"HAD THOMPSON ACCEPTED THE SURETY HE WOULD HAVE BEEN PROTECTED (PAID)"**

It is easy, no one to argue, to blame it on Thompson after he is dead.

D. This also proves, & in concert with other assets such as the Insport Agreement, which sold for \$625,000 cash, item #1 here, that Cordell & her law partner Phillip Bartinetti, both D.A. experts, committed material perjury when they both testified "we could find no assets," Vol 8-3509:6, item #6 here for Cordell, & at Vol 7-3193 for Bartinetti, which i've briefed separately, including all evidence to prove his perjury.

Evidence proves, irrefutably, that they always knew of over \$3,000,000 in assets including over \$500,000 which they always had secured or protected.



1 14. "By early 1988 petitioner's company was defunct", CT 1-157:19. The MIRRIAM-  
 2 WEBSTER Dictionary defines "defunct" as dead-extinct. Although the company,  
 3 ESI, was not operating events as they had in the past, it had in December 1987  
 4 collected \$344,250 (not on the record but confirmed in exhibit A) & had in a  
 5 trust account \$830,000, Vol 11-4246:25. That is far from dead or extinct.

6 Not-on-the-record (NOTR) evidence proves that ESI had accounts & notes  
 7 receivable/monies that it still would collect as of early 1988, or should have  
 8 collected, over \$250,000 for a total in or to come in the company of over  
 9 \$1,000,000. Later, "trustee" Ronald Durkin, in collaboration with Cordell & the  
 10 other BK T&AS (trustees, accountants & attorneys) looted this, through  
 11 petitioner believes, about 1993. NOTR evidence proves that most, petitioner  
 12 believes, \$600,000+ of these unnecessary fees & costs were incurred after early  
 13 1988. That could not have occurred had the company been defunct, dead, extinct.

14 But then just the on-the-record (OTR) \$830,000 proves that perjury.

15 15. "Yes (during the Bankruptcy in early 1988), we were levying...we were the most  
 16 vigorous creditor in trying to levy on assets", accurately paraphrased from CT 1-  
 17 157-159:1. However, levying is illegal when a person and/or a company is in BK,  
 18 as was repeatedly testified to at trial, Vol 7-3198:27, Vol 8-3476 & 3704.

19 The reason this is prejudicial is that it followed the D.A. theme, strongly  
 20 supported it, of "Goodwin had hidden assets & we had to continually chase them,"  
 21 specifically testified to as follows: (plus more by Kingdon & Coyne)

- 22 • "We couldn't find any assets," Vol 7-3193:15, Bartinetti, Vol 8-3509:6, Cordell.
- 23 • "All the Goodwins' other assets (besides JGA) had been dissipated by then (1988)  
 24 by them," Vol 9-3704:1.
- 25 • "Assets were moving all over the place," CT 1-165:19.
- 26 • "We were chasing assets until 1991," CT 1-165:24.
- 27 • "We lost because the assets kept being moved," CT 1-170:22.

28 This was the D.A. motive case, argued at Vol 6-2740:17 & RT-8783:24.

Those DDA arguments were outright knowing lies by DDA Jackson, a candidate for Los Angeles District Attorney in 2012, & the L.A.D.A. "Prosecutor of the Year" recently. He lied that petitioner had hidden assets which belonged to the Bankruptcy (BK) in his wife's name & then sold the largest one of them, JGA/Whitehawk, when evidence Jackson had & hid from the defense & Court proved 3 lies there:

1. The assets did not belong to the BK. Several Federal Court rulings are Res Judicata on that, & Jackson knew it. Jackson had & hid those rulings.
2. Petitioner did not hide these assets, JGA/Whitehawk & Desert Investors, in his wife's name or hide them at all. Federal Court rulings are Res Judicata on this also, & Jackson knew it. He had the rulings & hid them also.
3. JGA/Whitehawk, the \$2,000,000 to the BK estates asset that Jackson argued "Goodwin sold all of" (as part of the murder scheme, taking the money & fleeing), was not ever sold. Suppressed evidence proves this.

However, little of the available evidence on any of this except some on item 3 is on-the-record, so the details of this are addressed elsewhere.

Recall that all of this pleading is sworn to under penalty of perjury by petitioner, attached hereto.

Cordell's perjury here supported the D.A. case-in-chief that "Goodwin would do anything to avoid paying Thompson, all kind of dirty tricks & financial crimes,<sup>1</sup> up to & including killing Thompson,"<sup>2</sup> repeatedly in Jackson's opening statement & closing argument, Vol 6-2718, 2721, 2722, 2741, RT-8765 & elsewhere.

16. "All of Goodwin's lawyers were paid ahead of us...we stood in the BK Court & Mr. Goodwin's lawyers were paid ahead of us, yes," Vol 8-3521:4. Absolutely not true.

Cordell got caught in this perjury & admitted at Vol 9-3708:5 that at least one of petitioner's lawyers did not get paid at all. NOTR it is proven that only one of petitioner's lawyers got paid a priority claim from the BK, very little

<sup>1</sup>) The DDAS alleged 14 false Title § 152 felony Bankruptcy frauds by petitioner, uncharged crimes. Those are each due process violations requiring reversal.

<sup>2</sup>) Accurately paraphrased, the backbone of the case. It is provably fabricated.

1 compared to the Thompson lawyers. The only evidence necessary to prove Cordell's  
2 perjury/false testimony here is that Fitzgerald did not get paid, Vol 9-3708.

3 That is far from the total picture. Of petitioner's estimated eight post-  
4 petition (after filing BK) lawyers, just the one got paid via a priority claim,  
5 Ronald Rus, & it is doubtful that he was paid ahead of Cordell; petitioner feels  
6 that is not how it works. The defense needs Cordell's files & the BK records to  
7 find all details of this perjury/false testimony. Petitioner is confident that  
8 the net of payments vs. receipts from his lawyers put substantial money into BK.

9 That is because petitioner's main lawyer was sued, & rather than face the  
10 expense of defending vs. a vicious enemy (Cordell sued as SPECIAL COUNSEL TO THE  
11 TRUSTEE, pet. feels) who was fueled not only by hate, but by the windfall of the  
12 \$1,657,000 JGA money illegally stolen into the personal BK,\* (Another \$344,250  
13 was paid to the company, ESI, by Diane Goodwin in December 1987 as part of the  
14 Insport purchase), he, Bill Lobel, repaid the estate the fees he had been paid.  
15 See Vol 9-3694. \*(Via provable criminal acts, pet. swears under penalty of perjury.)

16 But the issue here is that Cordell committed perjury that "all petitioner's  
17 lawyers were paid before she was". Even if that was not intentional perjury, it  
18 is still perjury per Pen C 125, punishable just like Pen C 118 perjury pet. feels.

19 This is material because this "fit" & supported the prosecution argument  
20 that petitioner had slyly set things up to "make out" while avoiding paying  
21 Thompson, killing him instead.

22 However, the truth is that except for petitioner's one lawyer, Ron Rus, pet.  
23 believes that the only lawyers for any creditors who were paid by the estates,  
24 beyond those hired by the estate trustees to do work for them, were the Thompson  
25 lawyers. Petitioner believes they received about \$140,000 even though:

26 EVIDENCE PROVES THEY LOST ESTATE CREDITORS \$750,000 TO \$2,000,000+  
27 These lawyers also got the Thompson claim & themselves paid 84% of all funds  
28 paid to similarly situated creditors & their lawyers total combined.

1 CORDELL'S ADDITIONAL 22 PERJURIES AT THE L.A. TRIAL & PRELIMINARY HEARING PROVEN  
BY EVIDENCE THAT IS NOT ON THE RECORD

2  
3 Some of this evidence is in discovery & is signified by bp (for bates page  
4 numbers, applied by the District Attorney), some is evidence we've located & may  
5 include. Other evidence is proven by evidence we have such as our inventory of  
6 evidence in the D.A.'s evidence locker for this case that has been suppressed  
7 which contains over 250 BRADY violations we've identified,<sup>1</sup> & still other is  
8 evidence we know exists & know generally where it "lives," e.g. in \_\_\_\_\_  
9 document in the Bankruptcy (BK) files, or in Cordell's 80 boxes of records that  
10 she testified to having, Vol 9-3749, but which weren't discovered & must be.<sup>2</sup>

11 For the law requiring production of this evidence and requiring reversal  
12 of the conviction for the failure to have produced it for trial see our sections  
13 on the law, (not included in this version)

14 17. "No JGA money went to the BK estates before the murders," Vol 8-3528-3529. LIE.

15 Evidence proves that every bit of money from JGA prior to the murders went to  
16 the BK estates voluntarily. Evidence\* also proves that the BK estates had no  
17 right to these funds, \$344,250, & that Diane Goodwin had no obligation to pay  
18 them to the BK estate, but did so at petitioner's urging.\* (Federal Court rulings)

19 The two payments totaling \$344,250 at the bottom of the Supercross Inc. (SXI)  
20 payment schedule in exhibit\_\_\_\_ came from JGA/Whitehawk (JGA). See copies of the  
21 checks at bps 26996-8. We do need the suppressed evidence in the ESI BK estate  
22 to show the checks from JGA to Chuck Clayton for these payments, as well as the  
23 correspondence to/from trustee Coyne to "complete the circle." This all occurred  
24 in late November through December of 1987 & is linked to the testimony re: the  
25 nonexistent 1987 "Insport Auction," Vol 9-3724-5, 3745-49 where Cordell testified  
26 that Thompson had bought the "repossessed" Insport Agreement for \$500,000 cash.

27 1) Petitioner has located a 186 page lawyer prepared inventory of 2100+ documents  
28 totalling over 10,000 pages that are suppressed re: this case in the DA evidence  
locker. Pet. has precisely identified 250+ BRADY violations therein, 500+ pages.

2) Exhibit B.

1 As explained in the section on Cordell perjuries which can be proven by trial  
 2 evidence, there was no auction in 1987 & Thompson never bought or got Insport.  
 3 Coyne confirmed that the auction did not take place, Vol 11-4026 & that Thompson  
 4 did not buy it at Vol 10-4058, Vol 11-4233. Those are items #2 & 3 herein.

5 Cordell's records, since she was SPECIAL COUNSEL TO THE TRUSTEE, as she test-  
 6 ified at trial, & is true, have copies of all of the evidence needed to prove that  
 7 she knew this \$344,250 from JGA went to the BK prior to the murders, & thus that  
 8 she knew she was committing material perjury.

9 Because the D.A. had constructive possession of these records\* & they are  
 10 charged with knowledge of "all information accumulated by the government in the  
 11 investigation of the case," in re: BROWN (1998) 17 Cal 4th 873, 879, the D.A.  
 12 knowingly allowed introduction of this false evidence. Thus reversal is virtually  
 13 automatic, JACKSON V. BROWN (9th Cir. 2008) 513 F.3d 1057, 1075-1076 which also  
 14 requires reversal for the suppression of evidence here even if there was no  
 15 perjury/false evidence. \*(Lead Dt. lillienfeld read these records, exhibit B.)

16 However, this testimony is indicative of the larger D.A. Fraud on the Court  
 17 which permeated the case & cast petitioner as a villian, very prejudicially &  
 18 falsely. The DDAS argued pet. committed many criminal acts not to pay Thompson. This  
 19 was the theme of the D.A. motive case. Perjury had been suborned from the D.A.  
 20 witnesses in a pattern to weave together a story which repeatedly stressed that  
 21 petitioner had hidden assets that should have gone to pay the Thompson judgment  
 22 and/or later to the BK. Then they lied that petitioner had illegally stolen these  
 23 assets that had been hidden and/or surreptitiously transferred to his then wife to  
 24 keep them from Thompson and/or the BK, & that petitioner had sold them & run with  
 25 the money as part of the murder scheme, e.g. RT-8783:24-8785, Vol 6-2740:17.

26 However, Cordell's & other suppressed evidence conclusively proves that  
 27 ALL FUNDS THAT EITHER THOMPSON OR THE BK COULD POSSIBLY HAVE ANY CLAIM TO AFTER  
 28 THE JUDGMENT WENT TO THE BK, AS THEY SHOULD HAVE, PLUS ANOTHER \$250,000+ EXTRA!!!

1 Three statements which petitioner swears to under penalty of perjury cover this.

- 2 1. None of the truly transferred assets generated \$1 that petitioner, or his  
3 wife or anyone connected to them received. The transferred assets were all  
4 fully disclosed to the Court, bp 01158, & unless the BK or Thompson got any  
5 funds from them they generated no funds. See exhibit D.
- 6 2. Although JGA/Whitehawk was never owned by petitioner or transferred from his  
7 ownership to anyone else's including his wife, it has been repeatedly  
8 alleged that he did own & transfer it.<sup>1</sup> Thus, for discussion purposes we  
9 here "calculate" it like it was transferred, which would be worse case for  
10 petitioner.

11 Even though it was not transferred, & it was petitioner's wife's and  
12 the company pensions' legitimate property, as Court appointed examiners<sup>2</sup>  
13 researched & decided, which was accepted by the Court, the only money which  
14 came out of JGA prior to the murders was the \$344,250 which was paid as  
15 discussed on the prior page. Thus statement #3 is also true.

- 16 3. All assets that were alleged to be transferred, whether they were or not,  
17 paid all funds that generated from them prior to the murders to the BK.

18 All of this is conclusively proven by evidence in discovery and/or that we  
19 have identified in the suppressed evidence, e.g. Cordell's 80 boxes of suppressed  
20 records, the Bankruptcy files that the D.A. investigator testified to the Grand  
21 Jury that he had taken possession of (5/5/93 Grand Jury, Jeffrey Arnold), the 186  
22 page inventory of evidence suppressed in the D.A. evidence locker, and/or the 20  
23 boxes of records which D.A. expert Karen Kingdon had & relied on to form her  
24 opinions & to prepare her database of petitioner's & his wife's, plus their  
25 businesses' financial transactions. Bp 00409 & 26528 proves the 20 boxes. The dbase  
26 is at 32277-367, seriously & unlawfully redacted/incomplete in discovery.

27 1) The BK trustee's lawyer, the person who would know best, confirmed in a 6/3/91  
hearing at pages 41-43 that petitioner had never owned or transferred JGA. True.

28 2) See the Court appointed examiners' reports at bps 23218+, 22057+, 05114 #50 & 56.

1 18. "(JGA/Whitehawk) was an investment that the Goodwins made that had ended up in  
2 Diane Goodwin's control," CT 1-174:27.

3 This is completely & easily provable as untrue, & was the basis for the  
4 largest perjury & false argument/fraud of the case by the DDAS.

5 The D.A.'s own chart, prepared by their own forensic CPA Karen Kingdon, who  
6 worked on the case for about five years, establishes that the JGA/Whitehawk  
7 asset, the key component of the D.A. motive case, was purchased by the company  
8 pension plans, bp 10122, exhibit E hereto.<sup>1</sup>

9 Pension plan law rules completely that assets purchased in a well structur-  
10 & maintained pension are not to be treated as property of a debtor. See exhibit  
11 F, an interview by an undisclosed interviewer, with trustee's lawyer Kirk  
12 Rense,<sup>2</sup> confirming that the pensions were well structured, maintained &  
13 defensible. What he did not admit is that they intentionally designed a fraud to  
14 avoid serving petitioner, his wife, the pension administrator or the other<sup>3</sup>  
15 pension beneficiaries on the actions to take JGA/Whitehawk from the pensions,  
16 plus a small portion which had been legitimately distributed to petitioner's  
17 wife when the smaller of the two pensions was liquidated for tax purposes.

18 And, when one files BK, if one files an appropriate "exemption" as petition-  
19 er undisputably did, & said exemption is not objected to, such objection which  
20 was never filed in this case, the asset(s), JGA/Whitehawk (JGA hereafter) & other  
21 assets, forever are exempt from the BK & BK creditors & thus belong exclusively  
22 to the debtor. See TAYLOR V. FREELAND & KRONITZ 503 U.S. 638, 112 S. Ct. 1644 (1992).

23 The entire fraud on JGA began with lies Cordell's firm told to the court in  
24 1988 that the pension exemption had been objected to when she learned, & put in  
25 her own fee details the day before that the pension objection had not been object-  
26 ed to. Because of firm BK rules, the time period during which the exemption could  
27 have been objected to had expired 18 months prior to this. See exhibit G here.

28 1) It is incorrect, as is stated thereon, that JGA was 1st transferred to pet.

2) The investigator field notes are suppressed. 3) Evidence proving this available.

1 As stated, this perjury by Cordell, #18 on the prior page, which in itself  
 2 was built on a foundation of FRAUDS ON THE BANKRUPTCY COURT 18 years before trial,  
 3 was the keystone, the foundation for a string of cleverly designed FRAUDS ON THE  
 4 COURT in the murder trial, supported by perjury only, such perjury which would  
 5 not have been possible had reams of materially exculpatory evidence on these  
 6 issues not been suppressed. \*(See prior page at line 23. There were many more.)

7 For example, on page 30 of pet!'s 186 page inventory of suppressed evidence  
 8 in the D.A. evidence locker, items #383, 384 & 386, hundreds of pages of initial  
 9 structuring documents between the pensions & JGA, plus disclosure/explanation of  
 10 the passive distribution of \$365,000 in May 1988 from profits of JGA will  
 11 destroy the D.A.'s motive case, which was the backbone of the case.

12 The single largest part of the JGA fraud, the climax to it at the end of  
 13 numerous slyly engineered perjurers & false arguments leading up to it was:

14 "HE SOLD WHITEHAWK INVESTMENTS", opening statement, Vol 6-2740:25

15 "HE SOLD ALL OF DIANE GOODWIN'S INTEREST IN WHITEHAWK. BUT DIANE GOODWIN'S  
 16 INTEREST IN WHITEHAWK WAS REALLY MICHAEL GOODWIN'S INTEREST IN WHITEHAWK.  
 HE HAD BEEN HIDING ASSETS IN HER NAME...& HE DUMPED THEM ALL. RT-8783:23

17 This was argued as done within weeks following the murders as part of an  
 18 elaborate, but non-existent plan by petitioner to kill Thompson, grab this money  
 19 & flee. Numerous perjuries were suborned to "build" this DDA FRAUD ON THE COURT.

20 But first to prove it is a lie. Evidence in discovery proves that key parts  
 21 needed to support the big lie were known of by Jackson as false, e.g. bp 10122  
 22 proving that the pension bought JGA, not petitioner or his wife. See exhibit D.

23 Suppressed evidence, items #383, 384, 386 above, on page 30 of the inventory  
 24 of suppressed D.A. documents (dox) prove all of this even more. See exhibit H.

25 But even trial evidence on-the-record (OTR) proves that Jackson lied to the  
 26 Court that JGA was sold. See exhibit I for details of that strong evidence.

27 "Attorneys are officers of the Court & when they address the Judge solemnly  
 28 upon a matter before the Court, their declarations are virtually made under  
 oath." People v. MROCZKO (1983) 35 Cal 3d 86, 112, still good law.



Petitioner submits that in light of that law, & that evidence in the D.A.'s possession proves that Jackson knew he was lying to the Court here,<sup>1</sup> that those lies were Pen C 118 or 125 felony perjuries by him. These are in addition to the Pen C 127 felony perjuries he perpetrated in suborning material perjury from numerous witnesses including Cordell & the other experts with leading questions which evidence in his possession, & suppressed noticed him were false, untrue.

"The individual prosecutor is presumed to have knowledge of all information accumulated in the government investigation of the case".

In re: BROWN (1998) 17 Cal 4th 873, 879, 72 Cal Rptr 2nd 698, 702.

There is absolutely no doubt that Jackson knew that the inquiries/testimony he was soliciting from Cordell & Kingdon on JGA (Kingdon below & briefed separately, 16 total perjuries by her) were material perjury, including:

A. "The Goodwins bought JGA/Whitehawk", by Cordell, CT 1-174:27

"JGA/Whitehawk was bought with commingled funds by Mike & Diane Goodwin"<sup>2</sup> by D.A. financial expert Kingdon who prepared the chart showing this was not true, bp 10122, exhibit\_\_\_\_, Vol 18-6768:27 & CT 3-779.

This was the 1st building block in the bigger fraud leading to "Goodwin sold JGA," allegedly in fraud of the BK (an uncharged Title 18 § 152 Federal Felony, a due process violation to argue it). Had the truth come out that the pensions bought JGA, & the correct law been employed, then it would have been quickly seen that neither the Bankruptcy nor Thompson had any claim to JGA. As stated earlier, numerous Federal Court rulings, which should be Res Judicata, & the BK examiner's reports, bp 23218-23225, 22057± plus ESI docket at bp 04975, item #109, adopted by the BK Court, prove that the BK nor Thompson had any claim to JGA.

Also see bp 05114 items #50 & 56. JACKSON HAD THESE IN HIS POSSESSION YET LIED.

**WITHOUT THE FALSE JGA ALLEGATIONS THE D.A. CASE WOULD HAVE COLLAPSED**

"We are taken aback by the Government assertion that it is ever fair advocacy for a lawyer to make a false statement in Court!"

In re: KOYAJAN 8 F.3d 1315, 1321 (9th Cir. 1993)

1) And much worse in other places, e.g. he told the Court that the boat on which petitioner lived was seized in Guatemala, & that was the only reason petitioner was back in the U.S. on trial. But he knew none of that was true, no boat seizure.

2) As stated before, petitioner accurately paraphrases some testimony for brevity.

1 This alleged hiding of assets went beyond just the allegation that petition-  
 2 er surreptitiously hid them in his wife's name. The direct statement was made to  
 3 the jury by DDA Jackson in his opening statement that petitioner had defrauded  
 4 the BK & Thompson by fraud, deceit & lying to the Court.<sup>1</sup> The false allegations  
 5 vs. petitioner were made worse at Vol 6-2740 where DDA Jackson made the outright  
 6 false statement that petitioner had "Hidden assets from Mickey Thompson. Hidden  
 7 assets from the Bankruptcy Court;" at line 21. See exhibit J.

8 We illustrate below where the petitioner repeatedly disclosed, meticulously  
 9 & completely honestly all details of all financial transactions relevant to the  
 10 proceedings. First however, & very materially, hiding assets from the Bankruptcy  
 11 Court when one is in Bankruptcy is a Federal felony violating Title 18 § 152.  
 12 Yet these alleged "hiding of assets" were never alleged<sup>2</sup> or charged. They were  
 13 simply made up for the murder trial by the DDAS.

14 No testimony supporting those allegations was presented by the DDAS. That is  
 15 in itself unlawful, prosecutors are not allowed to make allegations in their  
 16 opening statement for which they will not be presenting evidence to support.

17 But there is a much worse violation here by Jackson, a due process violation  
 18 which requires reversal, allegation of uncharged crimes. The law is:

19 "Due process is violated if evidence of uncharged conduct is introduced  
 20 which tempts the trier of fact to convict on a basis other than proof  
 21 beyond a reasonable doubt of the charged offense!"

22 STATE FARM. V. CAMPBELL (2008) 538 U.S. 408, 423, 123 S. Ct. 1513  
 23 OLD CHIEF V. U.S. (1997) 519 U.S. 172, 180, 117 S. Ct. 644

24 Between argument & false testimony petitioner was accused of 17 uncharged  
 25 felonies, although the DDAS were shrewd enough not to call them felonies. The  
 26 jury however saw them as dishonest conduct leading to the conviction, CT 8-2078.

27 For here however the issue is that exhibit K shows an example which Cordell  
 28 filed with the Court, originally from petitioner, with detailed, full disclosure.

There is far more evidence of full disclosure in the suppressed D.A. evidence.

1) At Vol 6-2723:23, included in exhibit J. Jackson's lies were all interlinked.

2) Prior to them being fabricated for the murder trial. They were never charged.

1 C. "Diane liquidated her investment in JGA in May, 1988," Vol 19-6927-28, &  
2 "Liquidating is selling," Vol 18-6767, Vol 19-6908:17, by DA expert Kingdon.  
3 This is the third "leg" of the JGA fraud by the DDAS.

4 It segwayed right into "Goodwin fled with the money after selling JGA"  
5 when Jackson argued "He sold all of JGA" at RT-8783, which he had also argued  
6 at Vol 6-2740, both in exhibit J here.

7 Again, exhibit I details the various evidence cites which prove that JGA  
8 was not ever sold, & that the \$365,000 passive distribution (exhibit F) was  
9 repeatedly ruled by Federal Courts as legitimate, the BK having no claim to it.

10 This brings full circle why Cordell's perjury #19 that "The Goodwins  
11 bought JGA" was so very material & prejudicial.

12 19. "Mickey had the AMA sanction for the January 1988 Anaheim Supercross race!"  
13 Vol 9-3749.\* This is not true & there is no evidence to even indicate it may be  
14 true. Cordell had explained how valuable the AMA (American Motorcyclist  
15 Association) sanction was to these Supercross events. The promoter of the event  
16 cannot get the factory team riders without the AMA sanction.

17 The factory team riders are necessary to draw the big crowds. Petitioner  
18 had drawn nearly 70,000 fans to Anaheim Stadium, sellouts, for about 10 years.  
19 That is OTR by the Stadium manager Greg Smith. Also OTR is that the promoter had  
20 to have the Insport Agreement, items #2 & 3 herein, to be allowed to obtain the  
21 AMA sanction. Without the Insport franchising agreement the AMA sanction was  
22 unobtainable. Cordell lied about Thompson getting the Insport agreement for  
23 \$500,000, item #3, to support that Thompson got the AMA sanction. He did not.

24 Not-on-the-record is that from not having the AMA sanction & Insport Agree-  
25 ment Thompson lost between \$500,000 & \$1,000,000 at the 1988 Anaheim Supercross  
26 he ran. He drew just about  $\frac{1}{2}$  the crowd which petitioner had drawn for years.

27 This "Thompson got the AMA sanction" was designed to falsely support the  
28 argument made ten times "that Thompson beat Goodwin at every turn." Not true.

1 20. "ASSETS DISAPPEARED IN PETITIONER'S BANKRUPTCIES (due to petitioner)" Vol 8-  
 2 3493-3494. This & the next three listed perjuries are amongst the most bizarre  
 3 & ironic since evidence irrefutably proves that:

- 4 • Every single asset which the Bankruptcy (BK) had any legitimate claim to was  
 5 100% put into the BK & left there by petitioner, plus at least \$250,000 cash  
 6 to which the BK had no possible claim, as was ruled in repeated Federal Court  
 7 rulings. I do not want to give those cites, because I don't want to give the  
 8 government a head start on fabricating evidence to counter these.

9 In other words, no assets disappeared via petitioner, but,

- 10 • Evidence proves that Cordell & her client Colleen Campbell, the sister of the  
 11 victims, & the political/law enforcement heavyweight who "sponsored" having  
 12 petitioner framed, stole the Insport Agreement from the company BK<sup>1</sup>, see pages  
 13 6 thru 11. Insport was worth over \$500,000. This theft was in mid-1988 after  
 14 the trustee had control of the assets, & petitioner had left California.

15 Evidence also proves that Cordell used repeated sworn perjuries &  
 16 outright lies to the Court in filed pleadings to A) get appointed as SPECIAL  
 17 COUNSEL TO THE TRUSTEE, & B) then to lead a looting of over \$2,000,000 from  
 18 the BK estates to pay grossly inflated & unnecessary trustees', accountants', &  
 19 attorneys' (T&AS) fees & costs, rather than pay the general unsecured creditors  
 20 which is who she was sworn to protect. Some of Cordell's frauds are stunning.

21 The combined BK estates paid the T&AS \$33 for every \$1 paid to unsecured  
 22 creditors other than the Thompson group. The Thompson claim including the  
 23 Thompson lawyers received 84% of all funds paid to all similarly situated  
 24 creditors. This fraud was engineered by Cordell while in her fiduciary role in  
 25 which she was sworn to protect all creditors. Cordell's perjuries & frauds:

26 **KEPT THE THOMPSON CLAIM FROM BEING PAID 100%, FOR WHICH PETITIONER**  
 27 **WAS BLAMED & CONVICTED**

28 The lack of the Thompson judgment being paid was part of the case-in-chief.

1) In collaboration with the BK trustee Insport was stolen, a BK fraud felony.

VERIFICATION

1. I Michael Goodwin declare that the following matters, unless otherwise noted, are declared of my own personal knowledge, & if required I could & would testify thereto under oath.
2. All statements made by me within the attached, enclosed or referenced document are known by me personally, with the isolated & identified exceptions that I specifically have or will have attributed to others or identified as based solely on information & belief.
3. This verification is for all statements made in the enclosed listing of Dolores Cordell perjuries & false testimonies, as well as all explanations of relevant & accompanying circumstances.
4. For now, as of 8/25/11, 16 perjuries/instances of false testimony are listed which can be proven by evidence which is on-the-record at the Los Angeles trial and/or preliminary hearing. One of those, #1, "Nothing was paid on the \$500,000 Insport purchase note," (accurately paraphrased) was testified to falsely 5+ times. There are also the first four instances of false testimony/perjury by Cordell listed for which evidence which is not on the record is needed for solid proof.
5. Eventually there will be 60+ perjuries/instances of false testimony demonstrated for Cordell, including approximately 25 to the 8/22/01 Grand Jury. All will have evidence cites to prove them as perjury/false testimony.
6. The vast majority of these perjuries/false testimonies are material.
7. Petitioner stresses that his statements herein re: JGA/Whitehawk & that Federal Courts made rulings that underscored that the Bankruptcy nor Thompson had any claim to it are true & correct, as are the claims that Cordell defrauded on JGA.

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 \_\_\_\_ day of \_\_\_\_\_, 2011, in Susanville, California.

Michael Frank Goodwin F69095

1 The next three of Cordell's perjuries are on the same subject as #20, the bogus  
 2 "Goodwin illegally-fraudulently-improperly took assets that belonged to the  
 3 Bankruptcy (BK) and/or Thompson." As was explained on pages 35-36, plus also pages  
 4 27-28 & in exhibit D prove that nothing inappropriate was done to those assets  
 5 by petitioner, & that Cordell was behind the looting of those assets, keeping  
 6 Thompson & the other creditors from being paid.

7 The materiality of Cordell keeping Thompson & the other creditors from being  
 8 paid, even when it is undisputed that there was over \$3,000,000 cash in the BK  
 9 estates to pay just about 1/2 that in real prepetition debt, \$1,500,000, cannot  
 10 be overstressed. Thompson's full debt is within the \$1,500,000, 100% of it.

11 Petitioner was convicted in great part on the murders because Cordell & her  
 12 partner Bartinetti testified that petitioner committed all kinds of illegal acts  
 13 to keep Thompson from being paid. The DDAS argued that this was because petition-  
 14 er planned to kill Thompson instead of paying him, & did so. But this testimony  
 15 is all provably false & materially prejudicial. Evidence proves petitioner did all  
 16 he was required to & much more to insure Thompson's payment once petitioner had  
 17 a final judgment against him. The other three related perjuries were:

18 21. "He (petitioner) continued to dump assets," Vol 8-3516:7. The suppressed  
 19 evidence conclusively proves that not one dollar in assets which belonged to  
 20 the Bankruptcy estates was inappropriated used, or "dumped." This was perjury.

21 22. "(During the Bankruptcy) Goodwin had moved alot of those assets (speaking of  
 22 assets that belonged in the Bankruptcy estates) out of State or transferred  
 23 them," CT 1-157:23. Again, suppressed evidence, Cordell's own 80 boxes of files,  
 24 exhibit B, or the BK files, both of which the D.A. has & suppressed, will  
 25 prove this is an outright, knowing lie, felony perjury violating Pen C 118/125.

26 23. "Assets were moving all of the time...we chased them from 1988 until 1992 when  
 27 the BK closed," CT 1-165:15. The suppressed evidence will show that all BK assets  
 28 & even assets that did not belong to the BK were controlled by them in 1988 & on.