

The actual motion for DE 91 says The U.S. will not introduce defendant's statements unless he testifies opening the door to using them for purposes of impeachment. DE 94 says the same, just replace statements with "evidence". QUESTIONS:

1.) WHY'd these simple responses take 4 years? 2.) Why does DE 91 say "re34" & "motion to suppress statements" with Zack's name whose name is inside the motion with Martinez & then DE 94 just says "RESPONSE" without a "re" or what the response was to & uses Leo's name when Zack & Martinez's names were in the DE 94 motion? 3.) Supreme Court case law says coerced statements cannot be used for purposes of impeachment (CL 32 Mincey), so when will a Appeals court do anything "sua sponte"? 4.) Will your court read CL # 8 Cooper to see a very similar interrogation as G's which said "Any competent Judge would have excluded his statements for ALL purposes including IMPEACHMENT" & realize this was done on purpose? 5.) Would you agree the knowledge the Gov't had with this illegal evidence for nearly 5 years is a Structural Error? 6.) CL # 10 Davis says admissibility of fruits of a confession was a mixed ? of fact & law subject to "PLENARY REVIEW". Would you agree G's statements & their fruits never got any review by any judge ever? 7.) Would you agree G's case is a repeat of history found in Chris Floods CL#55 US v. Zavala with District Judge Ewing Werlein Jr. [who is shown in a picture provided by R in a article titled "Rosenthal Rules Federal Courts With A Firm Hand" in Jan. 2018 by Gabrielle Banks (These 2 Judges play by the same unconstitutional games).], where the 5th Cir. found it inappropriate for the Gov't to be put in a better position than it would have been in but for the police misconduct? Werlein, just like Rosenthal illegally did not hold a suppression hearing and carried the motion until trial, ruling it "moot". Sound familiar? = REVERSED! 8.) CL 67 Waller, 25 Kentucky, 24 Jackson, 32 Hopt, say G was entitled to a hearing & his absence = a Structural Error requiring Automatic Reversal! 9.) DE 94 only mentions the 7-26-12 search and leaves out the 8-16-12 search where Johnson took G's tax boxes that Gov't Rpt. # 9 on 10-26-12 case # HO07QK12HO0026 says had, "travel doc's, financial records, & another laptop." Within this "Brady Material" is proof count 7 lied. G is on the record telling his attorney's (see Exhibit P email to Alston) to get the tax boxes back so his mom could do his taxes. Count 7 already had 3 jury questions in DE 163, 164 & 166. Did DE 94 leave out the 8-16-12 search b/c it wanted to hide the proof JA lied at trial?

V. COUNT 7 in G's case says Aug. 1st '07 to Nov. 3rd '07. Yet the same #METOO "victim", JA in civil action No. H-18-LV-1761 claims he met G in 2008 @ 17. See pg 9-10 of S.T. for the rest of JA's lies. How would JA look after swearing to tell the truth & then thanks to G's taxes, phone records, receipts etc. he is proven to have lied? Prosecutorial misconduct for encouraging "victims" to lie has happened alot in G's case. Prosecutor Zack has a reputation for coercing "victims" to lie according to inmates at FDC Houston. Since R turns a blind eye to it doesn't there need to be a Conv. Integrity Unit or special prosecutor to find where else this has happened? See CL 10, 15, 18-24, 27, 51-53, 29 mapp, & CL 26 Kyles v. Whitley where like G's

case the witnesses' stories were inconsistent to the point of 4 different versions. The investigation was limited by Zack & Johnson's uncritical readiness to accept the story. "Fairness" cannot be stretched to = "Fair Trial".

W. "It is Structural Error for a trial court to improperly restrict counsel from making an argument. If a Dist. Ct ERRONEOUSLY believed that there was no evidence in the record supporting a theory, then precluding the argument was improper." CL 46 US v. Brown (9th Cir. '17). See pg 1 of S.T. for details of what R said in DE #141 (recently transcribed in 2024) pg. 15 "It's not; It's just not; It's just not. That doesn't involve children. Full stop. I think that's enough...Far from it. I think we can simply eliminate any reference..". In response to Zack saying "The defenses voir dire has a whole section on the Me Too movement, which I don't believe is relevant at all in this case." IT WAS RELEVANT b/c count 5 & 7 were #METOO liars & G gave Buckley the proof, yet due to the above, his whole trial strategy changed to "G's guilty but it's State not Federal". This caused G to give up on life as Exhibit W's picture on 7-20-18 shows.

X. What can be done about the trial Judge & prosecutor speaking about fruits of G's illegally obtained statements in order to persuade the jury to convict & uphold his convictions? CL #43 Travis Haney v. US "The prosecutor stressed on the deft's words taken from the video taped statement" REVERSED. See pg. 8 of S.T. (Exhibit G) for more details. Based on G's illegally obtained statements some of which mentioned a picture taken and deleted, Gov't agents then decided to search the laptop that traveled to London & could not find any child porn. G's statements were also used to ask KV about pics taken of him by G. KV said in the 1st 4 interrogations spanning nearly a year that no pictures of him naked were ever taken & when the Gov't showed him a headless picture which was also illegally taken from G's house KV still denied that the headless pic was him & even invited them to search G's home & RV to see that G does not own any blue sheets seen in the background of the pic. The memorandum by Attorney Michael Levin on 10-1-25 explains how this police misconduct was enough to keep KV from having to be a witness or victim in G's case. (see Exhibit R, response to prosecutor Zacks response to DE 285) Especially since the prosecutor admitted at trial that KV had to be subpoenaed, didn't want to testify, (Exhibit S, Pg 1) G was KV's friend who was trying to protect G, & KV slips at trial and says ICE when referring to officials in London, meaning he fears ICE deporting his mom who was born in El Salvador & ICE, H.S., & the FBI had already threatened to put his siblings in foster care if...? (Copies of trial transcripts in Exhibit S & pg. numbers 5-14 of Exhibit G) The case law in Exhibit V, Levin's Memo CL#47 Ceccoloni & # 64 Scios plus #63 US v Santos (D.C. Cir. '78) "The testimony challenged is so immediate that we can't find the attenuation necessary to hold the test admissible. There is no indication that the connection between the crime & the witness would have been discovered.", are so closely aligned with G's case, he got goose bumps lol. Also CL 48 US v. Charles Felix, CL 53 US v. Jonathan Patrick

Blevins "Evidence & statements that were later discovered b/c of the interrogation will be suppressed as a direct consequence of the officers ignoring the limits on their authority/fruit of the poisonous practices. ,CL 45 U.S. v. Ghailani "defendant's coerced statements were not attenuated because the link was direct and close" ,CL 65 Sorrondo pressured him ,CL 66 Ramirez played on defendant's trust/use of deceit, ,CL 61, Chatman "2nd interview derivative of the 1st",CL 26 Kyles story inconsistent to the point of 4 different versions ,CL 52 U.S. v. Jesus Sandoval "This testimony is not admissible under any of the exceptions to the fruits doctrine. All of the above proves that KV is not a victim & G's case wouldn't exist without his illegally obtained statements. ,CL 54 U.S. v. Jones (11th Circuit) prosecutor committed plain error by urging jury to convict based off an exhibit never admitted into evidence.

Prosecutor Zack on Day 2 of trial ROA 1206 says "While we were unable to find these pictures within the DEVICES, we had access to for purposes of trial presentation. The fact is that they were taken...and focused on his naked genitalia." STOP!! DE#190 is Day 2 of trial pg 94/ROA 930 KV said G "Deleted it" and nowhere does KV ever say that he saw the picture that was taken so how can Zack tell the jury where a picture's focus was that is not in evidence and was deleted? The appeals court needs to watch ALL of KV's interrogations to see that he was coerced to lie and made up the "flash story at trial". Homeland Security Johnson showing KV illegally obtained evidence over and over combined with fear of his family being broken apart is why KV lied. CL#17 Frimmel v. H.S. shows how bold H.S. can be and reversals are how to stop them.

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