

1 DECLARATION OF JOSEPH CARSANARO

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3 I, JOSEPH CARSANARO, declare as follows:

4 1. I served as a juror on the case, People v. Hunt, C15761, for nearly
5 eight months. I served from April 13, 1992, which was the day of opening
6 statements, until a jury deadlock was announced and hence a mistrial was
7 declared on December 9, 1992.
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10 2. I listened to over 50 witnesses give testimony concerning the disap-
11 pearance (and subsequent sightings) of Ron Levin. I took notes of their
12 testimony throughout the 7 month trial. These are my thoughts and opin-
13 ions concerning what I heard.
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15 3. Dean Karny. Mr. Karny testified that in 1984 he would lie to further
16 his own goals. During Mr. Hunt's cross-examination, Mr. Karny was forced
17 to admit that he perjured himself on his State Bar application to cover up
18 the parts of his past that may have prevented him from becoming a lawye
19 I felt that if Mr. Karny lied on this application, even after receiving immu
20 nity, he was very capable of lying and/or perjuring himself on the witnes
21 stand.
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25 Mr. Karny's testimony suggested that Mr. Hunt was a brilliant and calcu
26 lating thinker, but his explanation of the "7 page to do" list did not fit
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1 this characterization. For example, Mr. Karny testified that Mr. Hunt paid
2 such great attention to detail that one item listed within the "7 pages"
3 was to "take punched holes", to make it appear that certain documents
4 were prepared elsewhere. His and other testimony suggested that these
5 "7 pages" were left scattered on Ron Levin's floor. This inconsistent be-
6 havior does not make sense and calls Mr. Karny's credibility into question.

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10 4. Tom May. Mr. May's credibility was shredded during Mr. Hunt's cross-
11 examination. Mr. Hunt uncovered the fact that Mr. May lied regarding his
12 bankruptcy filing and in fact had a one half million dollar trust fund when
13 he declared bankruptcy. Mr. May testified that he had not received his in-
14 vestment back from Mr. Hunt, although bank checks with his endorsement
15 suggested otherwise. Mr. May testified that his investment money was
16 spent by Mr. Hunt on lavish furnishings and a gold "BBC" sign. Documents
17 introduced as evidence and further cross-examination revealed the con-
18 trary. For example, Mr. May confirmed that BBC members assembled their
19 own furniture and that Mr. May himself had purchased the gold "BBC" sign
20 for only a few hundred dollars.

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25 5. Jerry Eisenberg. I found former BBC member Jerry Eisenberg's testi-
26 mony to lack any appreciable credibility. I totally discounted all of his
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1 testimony. An example of his bad faith while testifying is where he de-
2 nied that he was a party to a conversation that was tape recorded and in-
3 troduced into evidence. This evidence showed he was part of a conversa-
4 tion concerning a stolen car operation. Mr. Eisenberg's credibility was
5 seriously damaged.
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8 6. Karen Marmor. Ms. Marmor testified that she believed she saw the "7
9 page to do" list on Ron Levin's desk before his disappearance. This testi-
10 mony contradicts Mr. Karny's testimony which indicated that the list was
11 shown to Levin the night of his alleged murder, that is, June 6, 1984. Ms.
12 Marmor lived next door to Levin and her husband was one of Levin's closes
13 friends. Ms. Marmor was a very credible witness.
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16 7. Len Marmor. Mr. Marmor's testimony illustrated the superficial rela-
17 tionship that Ron Levin had with his mother. Mr. Marmor knew Levin for
18 years and his characterization of Levin and his relationship with his
19 mother was more credible than the people's witnesses, Dean Factor and
20 Michael Broder.
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23 8. Justine Jagoda. Ms. Jagoda lived in the apartment directly above Le-
24 vin's and consistently heard him ranting and raving, slamming doors, and
25 hitting his small dog. Ms. Jagoda testified that on the night of June 6,
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1 1984, she was home alone and in bed reading with the windows open and
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3 no other noises around her. Ms. Jagoda testified that she heard no gunshot,
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5 no trunk slamming, or any other sounds of scuffling coming from Levin's
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7 apartment. This testimony is in conflict with Mr. Karny's and tends to
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9 corroborate the defense's version of what happened at Ron Levin's on June
6, 1984.

10 9. Erin A'Hearn. Ms. A'Hearn conducted tests on the BMW trunk that Mr.
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12 Hunt and Mr. Pittman allegedly put Levin's bleeding body in. Her tests re-
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14 sults indicated that there was no evidence of blood in the trunk. Mr. Karny
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16 indicated that the body was placed into the BMW trunk causing a dent. The
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18 absence of blood and other bodily fluids or tissues would circumstantially
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20 suggest that no such crime occurred.

21 10. John Duron. Mr. Duron was a very important witness. He was Levin's
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23 hairdresser for years. Mr. Duron testified that he and Mr. Levin discussed
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25 the procedure for dyeing one's hair brown just before Mr. Levin's disap-
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27 pearance. Mr. Duron indicated that this was very strange because Mr. Levin
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29 was very proud of his silver hair. The police found a brown stain in Mr.
Levin's bathtub. This stain was tested for and found not to be blood.

Based on Mr. Duron's testimony and Detective Zoeller's testimony about

1 the stain in the bathtub, there is good reason to believe that the stain was
2 hair dye used by Levin to conceal his silver hair.

3
4 11. Scott Furstman and Oliver Wendell Holmes. Through these key wit-
5 nesses we can see that Levin had a motive to leave the Los Angeles area.
6 Mr. Furstman indicated that Levin released his father's house from his bai
7 bond collateral just before his disappearance. Mr. Holmes testified that
8 Levin asked him questions about the United States' extradition treaty with
9 Brazil. This testimony supports the defense's claim that Levin was plan-
10 ning to leave the country.

11
12 12. Connie and Jerry Gerrard. Mrs. Gerrard testified that she saw Levin
13 on the Greek island of Mykanos on Christmas day in 1987. Mrs. Gerrard
14 knew Mr. Levin and testified that she was certain she saw Mr. Levin in a
15 restaurant on that island. Mr. Gerrard testified that his wife communicat
16 ed to him in Greek at the time she saw Mr. Levin in the Mykanos restaurant
17 Mr. Gerrard's testimony supported and enhanced his wife's testimony.

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19 13. Carmen Canchola. Ms. Canchola testified that she saw Levin at a ga
20 station in Arizona in 1986. Ms. Canchola testified that she picked Levin
21 out of a photo lineup. Ms. Canchola was a very credible witness.

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23 14. Jesus Lopez. Mr. Lopez was Ms. Canchola's boyfriend at the time she
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1 saw Levin at the Arizona gas station in 1987. Mr. Lopez also identified
2 Levin from a photo lineup.

4 15. Nadia Ghaleb. Ms. Ghaleb was a hostess at Mr. Chou's, a Los Angeles
5 restaurant, in the early 1980's. Ms. Ghaleb testified that she frequently
6 saw Levin have lunch or dinner at Mr. Chou's and was familiar with his
7 look and character. Ms. Ghaleb testified that she saw Levin getting into a
8 Mercedes from her car while she was driving to work in early 1987. I be-
9 lieve that it is very possible to identify someone that you know in the
10 matter of seconds as Ms. Ghaleb indicated.

14 16. Robert Robinson. Mr. Robertson testified that he was a former new
15 reporter and lost his job as a result of coming forward with his Westwoo
16 sighting of Levin after June 6, 1984. Mr. Robinson indicated that Levin
17 came to him and engaged him in conversation. Mr. Robinson was a critica
18 defense witness because he was very credible. I believe that Mr. Robinso
19 believes he saw and talked with Levin after the date Mr. Hunt supposedly
20 killed him. I had no reasonable basis to discount Mr. Robinson's testimony.

24 17. Lynne Roberts. Ms. Roberts was a credible and honest witness. She
25 testified about a telephone call that she received from her daughter,
26 Brooke, and Mr. Hunt on the evening of June 6, 1984. This is in conflict
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1 with Mr. Karny's allegations regarding Mr. Hunt's actions on that evening.

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3 18. Carol Levin. Mrs. Levin is out of touch with reality relative to her
4 relationship with her son, Ron Levin. The two postcards from Ron that she
5 brought into court did not support a strong relationship between them.
6 Hospital documents and psychiatric reports that were brought out by Mr.
7 Hunt during cross-examination better illustrated their true relationship.
8
9 One hospital report indicated that Mrs. Levin had not talked to her son at
10 all during his 4 month stay at a hospital in Washington state. Court testi-
11 mony tends to suggest Mrs. Levin and her son had a superficial relation-
12 ship.
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15 19. Defense Witnesses Regarding Mr. Ron Levin. Taken as a whole, de-
16 fense witness testimony in People v. Hunt, C15761, raised more than a
17 reasonable doubt as to the people's assertion that Mr. Hunt killed Ron Le-
18 vin. The evidence regarding Mr. Levin in People v. Hunt, C15761, suggests
19 that Mr. Levin had compelling motives to leave the Los Angeles area, had
20 no meaningful ties to the community, and took steps to prepare for his de-
21 parture. Furthermore, several credible witnesses, that were addressed
22 above, testified that they saw Levin after June 6, 1984.
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27 I declare under penalty of perjury under the laws of the State of Cali-
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fornia that the foregoing is true and correct of my own personal knowl-
edge, and that as to those matters stated upon information and belief, I
believe them to be true.

Executed at Mano Park, California, on January 26, 1993.

Joseph Carsanaro
JOSEPH CARSANARO

DECLARATION OF ARDATH HELEN SORELLE

I, ARDATH HELEN SORELLE, declare as follows:

1. I was born on September 13, 1933. I work at the Department of Defense, Defense Logistics Agency. I have worked there for 11 years.

2. I served as a juror on the case, People v. Hunt, C15761, for nearly eight months. I served from April 13, 1992, which was the day of opening statements, until a jury deadlock was announced and hence a mistrial was declared on December 9, 1992.

3. I listened to over 50 witnesses give testimony concerning the disappearance (and subsequent sightings) of Ron Levin. I took notes of their testimony throughout the 7 month trial. These are my thoughts and opinions concerning what I heard.

4. Regarding the testimony of people's witnesses Dean Karry, Evan Dicker, Tom May, Jerry Eisenberg, and Jeff Raymond, I believe that they all willfully lied under oath on the witness stand to protect themselves. I also believe that they schemed and plotted with each other to avoid incriminating one another. I found them to be pitiful and on the whole, despicable, untrustworthy liars. They all had very selective memories when it came to their involvement. Their testimony fell apart on cross-

1 examination. Tom May's poor character was made clear by the cross-
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3 examination of him on financial matters. Jerry Eisenberg, pathetically,
4 refused to acknowledge his involvement in a conversation which the de-
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6 fense had on tape. Evan Dicker could only recall a few things he or any of
7 the other BBCers said or did but, was amazingly lucid about Hunt's actions
8 and statements.
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10 Tom May was cross-examined about some lists Mr. Hunt had discovered
11 in the Gardena warehouse trash can that described a plot to steal the Mi-
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13 crogenesis attrition mills. This lent support to the defense contention
14 that there were factions in the BBC. Tom May said the plan found in the
15 trash was a joke. I thought it was interesting that the prosecution
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17 seemed comfortable with their witnesses' explanation of a list describing
18 a theft-related plot as "a joke", but would not credit at all Mr. Hunt's ex-
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20 planation of the "to do" list as being something other than what it ap-
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22 peared to be on first reading. The testimony about the May/Gardena ware-
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24 house theft lists, revealed the double-standard the prosecution was using
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26 to evaluate testimony. I felt that this testimony helped to show the rea-
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28 sonableness of Mr. Hunt's explanation of the seven pages.

5. Carol Levin. I found Mrs. Levin to be very self-centered. She will al-

1 ways believe the portrait she had painted of her son, Ron Levin, and their
2 relationship. I felt the trial opened a lot of old wounds, or it should have
3 if she wasn't in self-denial. In today's world, she would have been
4 charged with child abuse. In a way I think Ron despised Carol. It was
5 proven that Ron had gone off before without her knowing it (e.g. in 1979
6 when he went to prison for mail fraud). I think that he wouldn't contact
7 her after fleeing to avoid further prosecution so as to make good his es-
8 cape. To him, I feel, being free of her was chucking off a big burden. The
9 Camarillo/boarding school cross-examination and evidence was very im-
10 portant. It gave another side to the "poor distraught mom" that the prose-
11 cution tried to portray. Carol came off as a very deluded person.

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17 6. Dean Karny. The state's star witness got total immunity and had to
18 come up with a story. A story that was so full of lies and scenario's that
19 it just did not make sense. For instance Mr. Karny contended that:

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21 A. "Levin's body was taken to Soledad Canyon in a BMW";

22 Fact: No evidence was found in the BMW by forensic

23 experts. Sheriff's criminalist Erin A'Hearn said that

24 no blood stains were found on the trunk carpet of the BMW;

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27 B. "Jim Pittman was sent to New York to masquerade as Levin";

1 Fact: Mr. Pittman, a burly black man, did not keep a low
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3 profile, that is, he rented limousines to visit friends and
4 relatives and made himself rather well known at the hotel;

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6 C. "He had nothing to do with the "to do" list";

7 Fact: Mr. Karny and other members of the BBC contributed
8 in making the "to do" list. The list was seen by Karen
9 Marmor the day before Levin disappeared at Levin's, and
10 when she asked him about it, Levin said it was a movie
11 script. I believe this gave him the idea to place the blame
12 of his planned disappearance on Mr. Hunt by making it
13 look like a murder;

14
15 D. "Levin had never met Jim Pittman, which allowed Mr.
16 Pittman to pose as a Chicago mobster";

17 Fact: Mr. Pittman was seen at and around Levin's
18 apartment before Levin disappeared. He was seen with
19 Levin outside the apartment by John Riley and inside the
20 apartment by Len Marmor; and

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22 E. Fact: Ron Levin was preparing to flee.

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24 1) Karen Marmor testified that Levin purchased clothes

1 prior to his disappearance that were not his usual style;
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3 2) Levin had purchased traveler's checks, approximately
4 two inches worth, according to Len Marmor, the day
5 before his disappearance;
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7 3) Levin requested the return of the extra apartment key
8 he had given out six months before to Oliver Wendell
9 Holmes. The key had been given to Holmes by Levin so that
10 Holmes could work on Levin's pending criminal case. The
11 criminal case was not over and Holmes hadn't finished
12 his work. So I asked myself why would Levin want the
13 key back on that of all days. Apparently something was
14 about to take place and I believe that was that Ron Levin
15 was planning to "take a hike", as the expression goes.
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17 Mr. Holmes also testified that Ron Levin was asking
18 about extradition treaties. I had to ask myself again, "Why?"
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20 Levin was born and raised in the U.S. What reason could
21 he have to investigate the Brazilian extradition treaty
22 other than that he was planning to leave. Holmes was a
23 pretty reputable witness;
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1 4) John Rollingson of Panasonic, John Reeves of American
2 Express, Brent Kley of Merrill Lynch, Jerry Verplancke of
3 Progressive, Dan Wilson of Fidelity, Jon Martin, an insurance
4 investigator, and other witnesses showed me that Levin had
5 piled up huge debts and had a variety of reasons to flee.
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7 Jon Martin was another witness that showed Levin's
8 personality and the scams he was involved in. There were
9 so many problems Ron would have had to face in Los Angeles
10 if he didn't flee;
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12 5) Dr. Avery testified that Levin was raped in jail. This
13 showed just how concerned Ron was about going back;
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15 6) The money Levin left behind, about \$20,000.00, was not
16 substantial to him. Criminals sometimes think differently
17 about money than people who work for it do. Some think
18 nothing of being broke. Ron Levin took in close to one
19 million dollars in the 18 months before he fled. This
20 sort of money was not so much as to be material to him,
21 in my view;
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23 7) I believe that the "to do" list was Levin's big
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1 opportunity to flee. It gave him a tool to throw the
2 police off his trail. I think he made his decision to
3 actually go ahead and take off, as opposed to just thinking
4 and investigating flight as a possible solution to his
5 problems, only after he got the list from Mr. Hunt. Levin
6 told Karen Marmor that someone had just threatened him,
7 that would have had to have been Mr. Hunt;
8

11 8) Levin was facing up to 8 years in jail for fraud and
12 grand theft. Levin told Karen Marmor on the day before
13 he vanished that, "He would never go back to jail, that
14 maybe he would not come back from New York the
15 authorities would have no reason to come after him"; and
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18 9) His hair dresser, John Duron, testified that Levin
19 wanted information on how to dye his hair right before
20 he disappeared. Detective Zoeller testified that there
21 was a stain on the bathtub. It all fit.
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24 7. John Duron. Mr. Duron really swayed me. He was a very believable
25 witness and very informative. He described how vain Levin was about his
26 hair. Ron even brought up shaving off his beard. All of that was very sus-
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1 picious. He was a very important witness. I believe Mr. Duron's testimony
2 gave the defense a believable explanation for the missing comforter. Le-
3 vin was fastidious. Once stained he would never let the comforter remain
4 in the house.
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7 8. I believe that Ron Levin is still alive, owing to the above and the tes-
8 timony of the credible witnesses below:
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10 Nadia Ghaleb. She knew Levin with and without a beard over a 10 year
11 period in a professional status and recognized him when she saw him mo-
12 mentarily, while stalled in traffic in 1987.
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14 Robert Robinson. Levin walked up to him and talked to him while wait-
15 ing in line at a theater in October of 1986. Mr. Robinson did not go to the
16 police at first, because he believed that the witnesses, whom he later
17 read about, would come forward and the case would be dismissed. Mr.
18 Robinson did not want to "be part of the story." When he did finally go to
19 the police in the spring of 1987, it cost him his job. Neither the police,
20 the prosecution, nor the defense pursued this witness during the first
21 trial, I believe. I felt Ron Levin was outrageous and brazen enough to ap-
22 proach Mr. Robinson as Mr. Robinson so described.
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27 It was very helpful to the defense that there were five sightings wit-
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1 nesses. The testimony of Carmen Canchola and Jesus Lopez was torn down
2 a little on small details related to the scene at the gas station by the
3 prosecutor, and also they had no pre-existing acquaintance with Levin.
4 The other three sightings witnesses were not impeached in the same way
5 at all. There were a lot of positive aspects to Ms. Canchola and Mr. Lopez's
6 identification, so I accepted it. However, the other three sightings wit-
7 nesses strengthened the legitimacy of their sighting in a sense. It is dif-
8 ficult to say how I would have felt if they were the sole sighting witness-
9 es.

14 Justine Jagoda. Although she lived above Ron Levin and heard him yell-
15 ing and abusing his dog many times, she did not hear a thing on the night
16 Levin was supposedly fighting for his life, being shot, and being carried
17 out of his apartment. Dean Karny said that even the allegedly silenced
18 weapon sounded like a loud clap when used. When Mr. Hunt demonstrated
19 such a clap, Ms. Jagoda said she would have heard such a loud noise up-
20 stairs. She didn't hear any ruckus and she didn't hear the trunk being
21 slammed either. Karny said the BMW trunk had been bent that night. Her
22 testimony was inconsistent with the prosecution's case.

27 Lynne Roberts. She spoke with Mr. Hunt and her daughter, Brooke, at
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1 10:30 PM on June 6, 1984. The time was confirmed as she was watching
2
3 the news at the time and it was about half over, it being an hour news
4 broadcast beginning at 10:00 PM. She at first thought that Mr. Hunt was
5 guilty because the police had arrested him. Later she then remembered
6 the phone call from Brooke and Mr. Hunt, and decided that Mr. Hunt couldn't
7 have done it and came forward. I found her testimony to be truthful, she
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9 had no reason to lie, and only reversed her opinion after remembering the
10 chain of events concerning that fateful evening. Her testimony was cor-
11 roborated in an important respect by the defense exhibit made from her
12 jury duty summons postcard. This corroborated her reason for coming
13 back from her Alaskan trip before June 6, 1984.
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17 The testimony of the manager of the La Scala Boutique corroborated Mr.
18 Hunt's and Lynne Roberts' testimony in an important way. The La Scala
19 Boutique closed at 8:30 PM. Levin had both made and received calls after
20 9:00 PM on June 6, 1984 (Dean Factor and Michael Broder). There were
21 food tins from the La Scala at Levin's home on the morning of June 7th.
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23 Both Mr. Hunt and Mr. Karny said Mr. Hunt had shared take-out food from
24 the La Scala with Levin that night of June 6th. In order for Levin to be
25 free to make those calls and for there to be the La Scala cartons at his
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1 house, Mr. Hunt would have had to have come and left before 9:00 PM. This
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3 is exactly what he said he did, but in contradiction to Karny's version.

4 Carmen Canchola and Jesus Lopez. They testified to seeing Levin at a
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6 gas station in Arizona sometime in September of 1986 at about 9:15 PM.
7 Ms. Canchola did not know whom she had seen until she saw a picture of
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9 Levin in an article in Esquire magazine concerning Mr. Hunt's first trial in
10 Los Angeles. Mr. Lopez did not want to get involved, but complied at Ms.
11 Canchola's urging. The police questioned them for 10 hours, but they stuck
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13 to their story. I believe that they saw Ron Levin.

14 Connie and Jerry Gerrard. I found their testimony very believable. Mrs.
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16 Gerrard's description of Ron Levin and his subsequent actions upon being
17 recognized in the restaurant on the Greek island of Mykanos, was beyond
18
19 reproach.

20 The most important Levin case-related witnesses were Karen Marmor,
21 John Duron, Connie Gerrard, Nadia Ghaleb, Robert Robinson, Oliver Wendel
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23 Holmes, Justine Jagoda, and Jack Friedman, in my opinion. If I was asked
24 to rank the sightings witnesses in order of importance I would do as fol-
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26 lows: Robert Robinson, Connie Gerrard, Nadia Ghaleb, Carmen Canchola, and
27 Jesus Lopez.
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1 9. Besides the danger of Ron Levin going to jail on the grand theft
2 charges, there were also all the companies, American Express for one,
3 that were lining up to prosecute, and also the many individuals who were
4 defrauded by Levin. I truly believe Levin had very good reasons and the
5 cunning to carry out his deliverance from all of his problems through
6 flight to avoid prosecution.
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10 10. Joe Hunt's testimony seemed factual. I felt Mr. Hunt was just re-
11 lating occurrences, not making up a story as Karny did. The chronology of
12 events was very clear in Hunt's testimony about Levin. The structure of
13 the "to do" list was consistent with Hunt's explanation of it being notes
14 taken at a group meeting where others were giving him input. The nota-
15 tion on one of the lists, "Jeff list", showed that BBC member Jeff Ray-
16 mond was involved with the lists. I felt Mr. Hunt was a person telling the
17 truth. Karny constantly said, "I don't know" and "I don't remember". I do
18 not recall Mr. Hunt using those type of statements except very infrequent-
19 ly. I believe that Mr. Hunt didn't hold back even on points that were very
20 embarrassing to him, that is, the investors.
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25 11. Karny's testimony about attempting to provide Hunt an alibi on June
26 6, 1984 did not ring true. None of the people who went to the movie were
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1 in on the supposed plan to provide an alibi for Hunt, and none of them
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3 needed an alibi themselves. After the movie Karny claimed to have gone
4 back to their apartment and went to sleep without waiting up for Mr. Hunt,
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6 or even making an attempt to check to see if he was back at that time. I
7 felt this testimony was quite improbable.

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9 12. Mr. Hunt was never impeached with any hard evidence. He offered a
10 more plausible alternative explanation for each of the prosecution's con-
11 tentions. As for the "to do" list, I kept thinking of Karen Marmor's testi-
12 mony where Levin told her, "The authorities won't have any reason to
13 come looking for me", or words to that effect.

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15 13. Karny got tripped up on cross-examination about the so-called "park
16 bench" conversation in June of 1984. In one transcript he said Jim Pitt-
17 man did not realize until that time that he, Karny, was in on the Levin
18 plan. In another version he testified to the opposite.

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20 14. Mr. Hunt's testimony about the reasons for the June 24th meeting
21 made sense. I believe he was trying to hold the group together, and to
22 squelch the factions that had developed through an intimidating boast un-
23 til he could get one of the Microgenesis deals to close.

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25 I declare under penalty of perjury under the laws of the State of Cali-
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fornia that the foregoing is true and correct of my own personal knowl-
edge, and that as to those matters stated upon information and belief, I
believe them to be true.

Executed at South San Francisco, California, on January 13, 1993.

Ardath Helen SoRelle
ARDATH HELEN SORELLE

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1 could find no compelling reason to be sure that they did not. I am left not
2 knowing whether Ron Levin is alive or dead. I found reasons in their testi-
3 mony (and in the evidence in general) to be left in a condition of uncer-
4 tainty, or substantial doubt, as to what happened to Ron Levin.
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7 6. I was not comfortable with a lot of the BBC witnesses. (Tom May,
8 Jerry Eisenberg, Jeff Raymond, and Evan Dicker.) I felt that, generally,
9 they were involved in many more things that went on than they would ad-
10 mit to. This hurt their credibility. I felt more comfortable, to some ex-
11 tent, with the Levin-sightings witnesses and Karen Marmor, because none
12 of them were in the BBC, they were outsiders.
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15 7. I recall that it was shown that Dean Karny lied on his State Bar ap-
16 plication after he had gotten immunity for his testimony. This was some-
17 thing that was discussed in deliberations, and we all agreed it worked
18 against Karny's credibility that he would willfully perjure himself after
19 he had left the BBC and made his deal.
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22 8. To me Connie Gerrard was the most believable sighting witness. It
23 was unfortunate that she did not speak to Levin but I understand her to
24 have been irritated with Levin at that time regarding his dealing with her
25 daughter. I am not 100% sure she saw Ron Levin, as opposed to seeing
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1 someone who looked very much like him. I was somewhat troubled by the
2 fact that she didn't come forward right away, but she sounded so convinc-
3 ing. Mrs. Gerrard did have a reason to know Levin through her dealings
4 with her daughter. Jerry Gerrard corroborated his wife's description of
5 the scene but was not a crucial factor because of his limited prior contact
6 with Ron Levin.
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10 9. Probably the most important factor related to the sightings witness-
11 es was the fact that there were 5 of them. It would have been easier to
12 write off such evidence as resulting from mistaken identity if there was
13 only one sighting. For example, Robbie Robinson claimed to have seen and
14 spoken to Ron Levin in October of 1986 in Westwood. Some of my fellow
15 juror's felt that Ron Levin was bizarre enough to do something so brazen.
16 I had a little trouble with that however. Yet, I did believe Robinson's ex-
17 planation for why he did not come forward immediately, namely that jour-
18 nalistic ethics made him concerned about getting involved in a news story.
19 Mr. Robinson, if he would have been the sole sighting witness, would have
20 had less impact. In the end, I felt he added to the reasonable doubt that I
21 had.
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27 10. My jury talked a lot about Karen Marmor. I felt she was a very cred-
28

1 ible witness on the stand. During deliberations we discussed how she ap-
2
3 peared to be exactly the sort of person who would be sufficiently nose-
4
5 y to be looking at papers on Ron Levin's desk. This made her more credible.
6 Karen Marmor was a big factor in the deliberations and in my thinking.

7 11. Some jurors pointed out that Mr. Hunt was already a convicted killer
8
9 due to the Levin situation. If the jury had been judging Joseph Hunt with-
10 out the Levin situation it would have been less difficult for us to have
11 reached a unanimous verdict of acquittal.

12
13 12. In so far as Mr. Hunt's testimony regarding the Levin case was con-
14 cerned, the prosecution never really shook that testimony. We ended up
15 discussing the other Levin related witnesses (like Karen Marmor and the
16 sightings witnesses) in an attempt to figure out what actually happened.
17 Joe Hunt's explanation of the 7 pages, although not overly compelling, was
18
19 within reason and was corroborated in an important way by the testimony
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21 of Karen Marmor.

22
23 I declare under penalty of perjury under the laws of the State of Cali-
24 fornia that the foregoing is true and correct of my own personal knowl-
25 edge, and that as to those matters stated upon information and belief, I
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1 believe them to be true.

2
3 Executed at PACIFICA, California, on December 30, 1992.

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7 HARRY JOSEPH MORROW
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1 some doubt about her testimony because of that. I understood that her
2 testimony was somewhat inconsistent with the people's theory and spe-
3 cifically inconsistent with the details of Dean Karny's testimony. If one
4 simplified that theory and Karny's testimony, one could still see the "to
5 do" list as a step leading up to a homicide. However, the overall affect of
6 Ms. Marmor's testimony on me was to reduce the impact of the people's
7 case. Her testimony added to the reasonable doubt that I came to believe.
8 Standing alone, her testimony would not have been enough to raise a rea-
9 sonable doubt about the truth of the people's allegation that Mr. Hunt
10 killed and robbed Ron Levin but, seen in conjunction with the 5 sightings
11 witnesses (Connie Gerrard, Robert Robinson, Nadia Ghaleb, Carmen Cancho-
12 la, and Jesus Lopez), her testimony had the affect of deepening my belief
13 that the people had not met their burden of proof on the Levin allegations.

14 5. Sightings Witnesses. The five people that testified to having seen
15 Levin made the largest impact on me of any of the Levin allegations relat-
16 ed witnesses. Of these witnesses, Connie Gerrard was the most impor-
17 tant, followed by Robert Robinson, Nadia Ghaleb, Carmen Canchola, and Je-
18 sus Lopez.

19 Carmen Canchola and Jesus Lopez were the least persuasive of these

1 witnesses because they were not acquainted with Ron Levin before the in-
2 cident at the gas station.

3
4 The fact that Robert Robinson both saw and spoke to Ron Levin in-
5 creased the value of his sighting in my mind. The fact that he had this
6 "voice print" as well as visual recognition to go with it, increased my
7 confidence in the accuracy of his identification.
8

9
10 Nadia Ghaleb claimed to have seen Ron Levin only briefly, for just a sec-
11 ond or two. I figure in her line of business she has had to learn to recog-
12 nize people quickly. People have differing capacities to do this. We dis-
13 cussed this during deliberations. When I drive I have nearly tunnel vision,
14 I see only what is on the road directly before me. My wife, on the other
15 hand, has excellent peripheral vision. She will notice things on the side of
16 the road (e.g. a deer grazing on a hill). Some people can pick-up on periph-
17 eral things and be right on. Others can not. I truly believe that. For Nadia
18 Ghaleb I was convinced that she could see and recognize Ron Levin under
19 the conditions she described. I found Ms. Ghaleb to be credible and I took
20 her sighting seriously.
21

22
23 Robert Robinson was not as high on my persuasiveness rating list of the
24 sightings witnesses as he could have been. I had a lingering uneasiness
25

1 that he may have been courting publicity or that he could have incorrectly,
2 and inadvertently, merged place and time. However, of all the witnesses
3 only he had a "voice print" of Levin to go with the visual identification, as
4 a result of actually speaking to Ron Levin. This was a very positive thing
5 for the defense. One of the jurors made a point during deliberations over
6 and over again. He said: "It only takes one sighting witness to raise a rea-
7 sonable doubt." I thought this was very astute. We spent a fair amount of
8 time on the sightings witnesses. In the final analysis their testimony
9 carried a lot of weight in my mind.

14 Connie and George Gerrard. I believed them. There is a small amount of
15 hesitation in my mind about whether they actually saw what they felt
16 they saw, that is, Ron Levin, since they didn't speak to him. It is possible
17 that the person they observed in the restaurant in Greece was not Ron Le-
18 vin but merely someone who became worried for some reason and so left
19 the restaurant suddenly. I think the unanswered question about the Ger-
20 rard's was not their sincerity but why they didn't come forward immedi-
21 ately. However, that concern was not so strong as to justify discounting
22 their testimony. These two witnesses had a big impact on me.

27 I think that it is not too surprising that there have been no recent sight-

1 ings of Levin. I gathered he was gay, he could have died of AIDS, and of
2
3 course, there is always death due to natural causes. TV coverage is likely
4 to bring out bona fide sightings witnesses. One sees that sort of phenom-
5 ena occurring with certain crime-related TV shows where people come
6 forward to reveal the location of suspects who have evaded the law for as
7 long as 10 to 20 years. Therefore it did not surprise me that most of the
8 sightings were during a period of intense media coverage.
9
10

11 6. Dean Karny. During direct examination, Dean Karny told a very horri-
12 fying story which indicted Mr. Hunt. However the cross-examination of Mr.
13 Karny began to nullify this indictment in my mind. In particular, that Mr.
14 Karny lied under oath in his application to the State Bar_x was a point that
15
16 really hit me during deliberations. We all discussed how this really hurt
17 his credibility with us. Here was the star prosecution witness within a
18 few months of his immunity deal, lying to the State Bar by leaving out his
19 involvement in two murder cases and the BBC. This became a very impor-
20 tant point in the jury room. Also significant, but somewhat less impor-
21 tant in its impeachment value, was that he had lied under oath during his
22 Cantor Fitzgerald deposition. We talked about that too and agreed it nega-
23 tively impacted his credibility. What really struck me and some of the
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1 other jurors about his testimony concerning the Cantor Fitzgerald deposi-
2 tion, was that it showed, along with other evidence, that he was part of
3 the financial misconduct at the BBC. The prosecution said he was com-
4 pletely out of this and that was Karny's testimony as well.
5

6
7 7. Tom May. When I think of Tom May, I first see him with his head hung
8 below the microphone during cross-examination on the witness stand. The
9 cross-examination of Mr. May was very effective. I felt Mr. May was tell-
10 ing the truth about some things like the June 24th meeting. The problem
11 becomes, if you lose confidence in the strength of a witness' commitment
12 to tell the truth then you have a hard time knowing what is true and what
13 is false in their testimony, and you begin to run the risk of sending an in-
14 nocent man to jail. If you do not know when they are telling the truth,
15 when they are exaggerating, and when they are lying out of spite or out of
16 self-protection, then it becomes risky to rely on anything that witness
17 says. There was so much in Tom May's testimony I felt was false that I
18 had trouble deciding what I could trust. I believed that his testimony con-
19 cerning his financial dealings (the bankruptcy declaration, his real estate
20 loan application, the ITC deal, the Cantor-Fitzgerald checks) to be false.
21 All of that was enough to show that he couldn't be trusted on financial
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1 matters. This had the effect of forcing me to look deeper into Mr. May's
2 possible motives for other statements that he made.

3
4 The testimony and evidence on the ITC movie deal caused me to reflect
5 that the publicity motive that the prosecution suggested might have been
6 present for certain sightings witnesses, could also be said to apply to
7 certain BBC witnesses.
8

9
10 8. Jerry Eisenberg. This was a witness who I felt was "willfully false".
11 The defense microcassette tape recording of Mr. Eisenberg and others dis-
12 cussing stolen automobiles was a very good piece of evidence. It was the
13 tape and Mr. Eisenberg's reaction to it that allowed us to throw out the
14 rest of his testimony using the "willfully false" jury instruction. Without
15 that tape it would have been just Mr. Hunt's word against Mr. Eisenberg's.
16 The tape supported Mr. Hunt's testimony and argument that there were
17 factions in the BBC. It helped explain why some BBC witnesses appeared
18 to be hostile to Mr. Hunt and some didn't. It gave us a feeling in the jury
19 room for how BBC members could be deceptive. I was also uneasy about
20 the fact that Eisenberg helped Gene Browning to set up a company while
21 the BBC was collapsing. It served to show that Mr. Eisenberg was sleazy.
22

23
24 9. Evan Dicker. I liked Mr. Dicker. During deliberations however, as we
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1 discussed him we reached a consensus that he had been less than candid
2 with us. Others recalled how he only recalled what Joe Hunt supposedly
3 said, never what he, or anyone else named as present, said. It was devel-
4 oped that he drank heavily during this period. When asked about whether
5 he brandished a gun at Tom and David May's, an incident described by two
6 other prosecution witnesses, he said he didn't recall doing so. This hurt
7 his credibility with me. Some jurors felt his testimony should be totally
8 disregarded. I was left not knowing what to do with his testimony, and as
9 a result what he had to say doesn't figure substantially, (except for reaf-
10 firmation of the June 24th admission by Mr. Hunt), in my thoughts on the
11 Levin allegations.
12

13 10. BBC Witnesses Overall. Mr. Hunt's cross-examination of these wit-
14 nesses was crucial. Without the cross-examination they would have ap-
15 peared to be victims of Joe Hunt. With the cross-examination, and with
16 the other points Mr. Hunt brought up, they came off as deeply involved and
17 people whose credibility was substantially called into question.
18

19 11. Justine Jagoda. I believed her. She was not making things up, in my
20 view. Nor do I feel that she was trying to get publicity. I felt perfectly
21 comfortable with her testimony. It was a factor which added to the doubt
22

1 that I had about what happened to Levin. It provided support for the sight-
2 ings witnesses. She lived upstairs from Ron Levin and heard nothing on
3 the night of June 6, 1984. The testimony of the sheriff's criminalist that
4 there were no blood stains in the trunk, was important and helped to fur-
5 ther the impression that nothing violent happened on the night of June 6,
6 1984 at Ron Levin's.

10 12. John Duron. He was Ron Levin's hairdresser. His testimony was
11 very important. I believed him. I linked Detective Zoeller's testimony
12 about the brown stain in the bath tub with Mr. Duron's testimony about Le-
13 vin's sudden interest in dyeing his hair. I saw it as an explanation within
14 reason for the missing comforter. Hair dye is very messy. While people
15 are letting it set, it can leak down below the protective cap that is worn.
16 I have seen this kind of leakage on occasion when my wife has dyed her
17 hair. Given such leakage, if Ron Levin dyed his hair on June 6, 1984, the
18 dye could have gotten on the comforter. Obviously given Levin's fastidi-
19 ousness, he would not want to leave a stained comforter on the bed.

24 13. Lynne Roberts. I found Ms. Roberts to be credible and a good wit-
25 ness. It was not totally clear to me that she exonerated Mr. Hunt. Never-
26 theless, her recall of June 6, 1984 is important. I believe, given the dis-
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Ⓟ

1 tance, times, and the testimony about no blood stains in the BMW trunk,
2
3 that it is not obvious how Mr. Hunt could have driven to Soledad Canyon and
4 back and still talk to her at 10:30 PM.

5
6 14. Detective King. He may be a good police officer but he made a very
7 shabby witness for the prosecution. He kind of blew it. I found it unbe-
8 lievable that he never took notes on his meeting with Mr. Hunt, then his
9 chief suspect. Based on his demeanor and his testimony, Detective King
10 was pretty much discredited.
11

12
13 15. Ted Woods. He was Mr. Hunt's high school debate coach. He was a
14 rebuttal witness for the people. Overall, his testimony had the impact of
15 supporting Mr. Hunt. Initially, I believed Mr. Woods when he said that Mr.
16 Hunt had a serious personality flaw even in high school, but Robert Mack-
17 ey, the defense witness who testified after him, nullified this testimony
18 by confirming what Mr. Hunt had testified to earlier.
19

20
21 16. Carol Levin. I don't believe that she knew her son. I base this feel-
22 ing on her cross-examination. While she testified on direct that Ron loved
23 her, I did not believe it after listening to her cross-examination. Ron Le-
24 vin didn't reciprocate her visits or phone calls often. Given the history of
25 their early relationship (Camarillo State Hospital, the boarding schools,
26
27
28

1 etc.), it isn't hard to believe that when and if the time came to flee, Ron
2 Levin could totally break off the relationship. Based on what I heard, I
3 could and did, discount her testimony that Ron Levin must be dead because
4 he hadn't written in 8 years. Without the defense evidence about Camarillo
5 and the boarding schools, Carol could say, "He loved me and of course he
6 would contact me if he was alive", and make it stick.
7

8
9
10 In light of the cross-examination, thinking about those postcards that
11 Carol Levin got saying "Love Ronnie" just made me want to squirm. Carol
12 Levin sold her son out when she sent him to live in boarding schools, etc.
13 Whatever he did in the relationship later, like the postcards, I felt was
14 calculated and not as a result of some deep affection for his mother.
15
16

17 17. The Option on 144 S. Peck. Martin Levin testified that Ron Levin
18 gave him this option on the duplex Ron lived in as a partial payment on the
19 sums Ron had borrowed from Martin and Carol Levin. Other evidence
20 showed that Ron Levin had later sold the same option to three other people.
21 This evidence, taken as a whole, was part of my understanding that
22 Ron would take advantage of anybody and everybody. Later when Len Marmor
23 testified that he was Ron's closest friend and that Ron would never
24 "screw him", I thought "Oh yes he would!"
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1 18. Joe Hunt's Testimony. Mr. Hunt's explanations of most of the events
2
3 were within reason and his testimony was quite lucid and detailed. His
4 testimony provided a backdrop that allowed me to appreciate the signifi-
5
6 cance of other defense witnesses. However, his testimony by itself would
7
8 not have been enough to raise a reasonable doubt about the Levin allega-
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10 tions in my mind. The sightings witnesses were the key witnesses in that
11
12 regard. His explanation of Jim Pittman's trip to New York provided a
13
14 framework in which to see the possible innocent intention of the trip. In
15
16 retrospect it did not seem reasonable that Mr. Hunt would send Mr. Pitt-
17
18 man, a burly black man, to impersonate Levin. Also, the BBC members did
19
20 use each others credit cards.

21 It was important that Mr. Hunt testified. The "to do" list needed an ex-
22
23 planation. While his explanation had its weaknesses, they were not ^{necessarily damning} ~~fatal~~
24
25 and Karen Marmor gave his version a big boost.

26 19. The most important witnesses on the Levin allegations were Connie
27
28 Gerrard, Nadia Ghaleb, Robert Robinson, John Duron, Karen Marmor, Lynne
29
30 Roberts, and Oliver Wendell Holmes. These were the witnesses that
31
32 helped change my mind. As I stated in jury selection, I had seen the NBC
33
34 miniseries and believed that Mr. Hunt was guilty. Despite this statement I

1 was not excused from service. I started with a strong disposition to be-
2
3 lieve the prosecution witnesses. I developed a more objective viewpoint
4 as I heard more of the defense case. I was left not knowing what happened
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6 to Ron Levin for sure. I was not totally comfortable believing either the
7
8 defense or the prosecution's version. We spent over two weeks in deliber-
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10 ations discussing the BBC and Levin-related witnesses. In my view the
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12 prosecution definitely did not prove beyond a reasonable doubt that Mr.
13
14 Hunt killed Ron Levin.

15 I declare that the foregoing is true and correct of my own personal
16
17 knowledge, and that as to those matters stated upon information and be-
18
19 lief, I believe them to be true.

20 Executed at Portola Valley, California, on January 22, 1993.

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DAVID SAPERSTEIN

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1 I did not believe that Karny had no knowledge or involvement in defraud-
2 ing investors either. It seemed to me everyone in the BBC was involved.
3 When he denied that knowledge or involvement, it was an outright lie.
4

5
6 5. Evan Dicker. I thought Mr. Dicker was a snake. The way he held him-
7 self during cross-examination suggested to me that he was lying. I
8 thought his failures of recollection were a ploy. Especially in the sense
9 that he had perfect recall of everything Mr. Hunt supposedly did and said,
10 but couldn't recall a thing about what he and Karny did and said. I wrote
11 him off.
12

13
14 6. Tom May. He seemed eccentric. His eyes were very shifty. He was
15 always looking at Mr. Vance and Mr. Piccinotti for help ^{IT SEEMED BC} when Mr. Hunt was
16 pressuring him in cross-examination. I viewed his testimony with a lot of
17 suspicion since he lied to the government in his bankruptcy petition, and
18 lied a lot in relation to his other financial affairs. I felt that in light of
19 this he would readily lie about Mr. Hunt's actions.
20
21

22
23 7. Jerry Eisenberg. Mr. Eisenberg testified that he redrafted and revised
24 the Microgenesis option agreement found at Ron Levin's apartment. How-
25 ever, Lore Leis, Mr. Hunt's secretary, contradicted him. She said that she
26 prepared the final agreement from a draft that was entirely in Mr. Hunt's
27
28

1 handwriting. Mr. Eisenberg hedged all of his answers. You could see the
2
3 gears turning every time Mr. Hunt asked a question. I decided he was cal-
4
5 culating his every statement and that he was not willing to give us his un-
6
7 filtered recollection. Mr. Eisenberg gave totally unbelievable responses to
8
9 Mr. Hunt's questions about the tape where he, Steve Taglianetti, and Jim
10
11 Pittman talked about stealing cars. Mr. Eisenberg denied that the tape was
12
13 of a conversation that he participated in. I didn't believe him.

11 8. Carol Levin. I felt Ron Levin's relationship with his parents was a
12
13 facade. He was using them. He was getting money from them while living
14
15 the high-life in Beverly Hills. He drove a Rolls Royce at the same time he
16
17 told them he couldn't pay his rent. He used them.

17 He probably regretted leaving them behind, but I believe Carol Levin
18
19 doesn't understand how he really felt ^{BC} The little gifts and two-line post
20
21 cards she brought didn't show a strong bond. I believe that Ron Levin held
22
23 a psychological grudge towards his mom. She had left him repeatedly. I
24
25 don't think he felt that she would really miss him. What goes around
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27 comes around. It is no surprise to me that he treated her in the end, the
28
29 same way that she treated him.

27 Carol claimed to have such a good relationship with her son, yet she had

1 no idea he was convicted of mail-fraud until Ron was already in jail. She
2 didn't even attend his preliminary hearing in Beverly Hills on the 12 grand
3 theft charges! She didn't seem to know her son at all.
4

5
6 9. Martin Levin. I felt that it was extremely odd that Martin and Carol
7 waited so long to report Ron's disappearance. It made me uncomfortable
8 about his testimony. I also found the long period between Martin's discov-
9 ery of the 7 pages in late June, and the point that he gave them to the po-
10 lice in mid-August, to be very suspicious. He may have been helping Ron
11 make good his escape, but of course he may not have been. However, Mar-
12 tin's testimony undermined my confidence in the value of the 7 pages and
13 the described circumstances in the house.
14
15
16

17 Mr. Hunt made a good point about the fact that Martin's testimony to the
18 effect that he found the 7 pages strewn all over the floor in the little of-
19 fice didn't make sense within the Prosecution's story-line. If Mr. Hunt
20 left them, he would have heard them fall. It seemed staged, almost as if
21 Ron threw them on the floor to call attention to them, IF THEY WERE ⁵¹
22 ON THE FLOOR AT ALL. (BC)
23

24 The fact that Ron's fingerprints were found on the Microgenesis file
25 proved that he had put that file together -- not Mr. Hunt. I believed he
26 kept the file so that he could have leverage on Mr. Hunt, Microgenesis, and
27
28

1 the BBC.

2
3 10. Justine Jagoda. Ms. Jagoda was pretty eccentric but I found her to
4 be believable. No one would put on an act like that! She proved that Ron
5 Levin consistently abused his dog. Also, her testimony made me feel that
6 it was far less likely that anything criminal happened at Ron Levin's that
7 night. She heard nothing that night, neither shots nor slamming trunks. I
8 think she would have heard something if there was something to hear, be-
9 cause she was in bed reading, *ACCORDING TO HER TESTIMONY.*^{BC}
10
11

12
13 11. Karen Marmor. I found Ms. Marmor's testimony that she saw the "to
14 do" list on Ron Levin's desk to be very important. I accepted her testimo-
15 ny. She knew Ron Levin and was his neighbor. She turned Ron Levin down
16 when she first met him. (Levin wanted to open some new accounts at the
17 bank she worked at.) I thought that showed good judgment.
18

19
20 She was very cooperative with both Mr. Hunt and Mr. Vance. I saw her as
21 being fair and neutral. I felt that she just testified to the facts without
22 bias. She also said that Levin beat his dog and that the dog went to the
23 bathroom on the carpet.
24

25
26 Dean Karny told us a story where the 7 pages could only have been left a
27 Ron Levin's the night of June 6, 1984 or the morning of June 7, 1984. Kar-

1 en Marmor saw the 7 pages during broad day light in Levin's presence.

2
3 They both couldn't have been telling the truth. I believed Karen Marmor. It
4 was an easy choice: a former officer at a bank vs. an immunized and self-
5 admitted perjurer (e.g. the State Bar application).
6

7 12. Dr. Herbert Avery. Dr. Avery gave us important information too. He
8 told us that Ron Levin had been forced to have sex in jail. Also, that Ron
9 Levin feared going back to jail, which was corroborated by other witness-
10 es (Karen Marmor and Oliver Wendell Holmes)
11

12 13. Jeffrey Melczer and Jerry Verplancke. Mr. Melczer was Ron Levin's
13 civil attorney. Mr. Verplancke was from the Progressive Savings and Loan
14 offices. Both said that Ron Levin knew that the FBI was investigating him
15
16 This was a key point. Even more reason why Levin would flee. However, I
17 add to this that Levin rescheduled his bail on June 5, 1984, making con-
18 cessions to get this accomplished. To me all of these things are a major
19
20 red flag that says: "I fled. I am alive and I got away with it." THEN AGAIN
21 I COULD BE WRONG, BUT IT MADE ME WONDER. (BC)
22

23 14. John Duron. Mr. Duron knew about Ron Levin wanting to dye his hair.
24 Levin came to his shop twice a month for years. Mr. Duron knew how vain
25 Levin was about his looks. Levin always made sure his hair was perfect.
26
27 Mr. Duron was surprised, and so was I, that Levin would want to dye his
28

1 hair. I couldn't understand why Levin would want to do it at home, it just
2 wasn't his style. It made me think: "What is this guy planning?"

3
4 I felt that the hair-dye testimony better explained why the comforter
5 and remote control were missing than the People's theory. Detective
6 Zoeller had seen a brown stain in the bathtub. This should have been test-
7 ed more thoroughly. Given that Levin called Mr. Duron right before he dis-
8 appeared it stands to reason that this was hair dye. Len Marmor said Ron
9 Levin's place was spotless. The evidence supported that the stain was
10 fresh. I felt Levin got the hair dye, which Mr. Duron said took 45 minutes
11 to set and was very messy, on his bedspread and then threw it out.

12
13 It made no sense that Mr. Hunt or Jim Pittman would shoot Ron Levin on
14 his bed and gamble that Levin's blood wouldn't soak through the bed or
15 that the bullet wouldn't go into the mattress. On top of this the Sheriff's
16 criminalist, Ms. A'Heren, analyzed the trunk carpet and found no blood.
17 This helped tip the balance even farther to the defense. Sure Mr. Hunt
18 could have had plastic in the trunk but why would Mr. Hunt think to put
19 plastic in the trunk but not under Levin before shooting him on the bed.
20 The main point is, there was no blood anywhere. Ms. A'Hearn was an im-
21 portant witness.
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1 15. Nadia Ghaleb. Ms. Ghaleb spotted Ron Levin on the street while driv-
2 ing slowly down the street. I have recognized people in similar circum-
3 stances. I am not 100% sure that she saw Ron Levin. However, she was
4 sincere. On balance she helped the Defense.
5

6
7 16. Robbie Robinson. Mr. Robinson was also credible. He knew that if he
8 came forward he would lose his job but he came forward anyway. I be-
9 lieve he actually saw Levin because he spoke to him. This was the most
10 believable of the sightings witnesses to me.
11

12
13 17. Carmen Canchola and Jesus Lopez. I felt Ms. Canchola and Mr. Lopez
14 were very believable. Mr. Lopez didn't want to come forward. Ms. Cancho-
15 la knew a lot of facts that were not in the Esquire article (e.g., the hair,
16 the scar, etc.). The scar was a very important and telling aspect of the
17 identification.
18

19
20 18. Connie and Jerry Gerrard. I thought the Gerrards were a little flaky.
21 However, I thought that she believed she saw Ron Levin. What took away a
22 little from her credibility was her description of the restaurant. It dif-
23 fered a bit from her husband's.
24

25 Over all I felt the sightings witnesses were a very powerful set of wit-
26 nesses for the Defense. The fact that there were several of them made me
27

1 take them seriously.
2

3 19. Oliver Wendell Holmes. Mr. Holmes was a key witness. Ron Levin
4 had researched the legal risks of becoming a fugitive. This is glaring evi-
5 dence of Levin's intentions.
6

7 20. All the evidence that was brought out points to Ron Levin being
8 alive. There certainly was reasonable doubt. I would even go a step fur-
9 ther. I do not even believe the Prosecution proved their case on Levin by a
10 preponderance of the evidence.
11

12 21. If I had to pick the 6 most important witnesses that support this, I
13 would pick: Oliver Wendell Holmes, Karen Marmor, Nadia Ghaleb, Scott
14 Furstman, Robbie Robinson, and John Duron. The thorough impeachment of
15 all the BBC witnesses, including Dean Karny, cleared the way for me to be
16 persuaded by the Defense witnesses. Levin said he never wanted to go to
17 prison.
18

19 22. Overall, I felt that Ron Levin had been preparing to flee for a long
20 time. I thought that he consciously manipulated Mr. Hunt and the BBCers
21 to make money. Later, Mr. Hunt had him under a lot of pressure to sign a
22 check. This angered Levin. I believe in this context, he saw the "to do"
23 list that Mr. Hunt tried to intimidate him with as both an opportunity to
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1 misdirect the authorities, and a way to get back at Mr. Hunt for threaten-
2 ing him. After Mr. Hunt left it at Levin's, I believe Levin decided to use
3 the "to do" list for these two purposes.
4

5 Ron Levin used a lot of people who never even realized they were being
6 used. He was involved in all different types of frauds. His use of the "to
7 do" list was just more manipulation.
8

9 What I liked about the Defense case most was that it was made up of all
10 independent witnesses. The Prosecution relied heavily on the BBC wit-
11 nesses. They were highly biased. They came off as the "liar's club", just
12 as Mr. Hunt said.
13

14 I declare under penalty of perjury under the laws of the State of Cali-
15 fornia that the foregoing is true and correct of my own personal knowl-
16 edge, and that as to those matters stated upon information and belief, I
17 believe them to be true.
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21 Executed at San Bruno, California on January 29 1993.
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24 BARRY DEAN CREEKMORE
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DECLARATION OF SANDRA MARIA ACHIRO

I, SANDRA MARIA ACHIRO, declare as follows:

1. I was born on May 7, 1965. I work as a dental assistant.

2. I served as a juror on the case, People v. Hunt, C15761, for nearly eight months. I served from April 13, 1992, which was the day of opening statements, until a jury deadlock was announced and hence a mistrial was declared on December 9, 1992.

3. I listened to over 50 witnesses give testimony concerning the disappearance (and subsequent sightings) of Ron Levin. I took notes of their testimony throughout the 7 month trial. These are my thoughts and opinions concerning what I heard.

4. A total of 8 of the 12 jurors ended our 26 day deliberation period making clear that they felt that the prosecution had not proved beyond a reasonable doubt that Joe Hunt had killed and robbed Ron Levin, or that he had committed the charged crimes against Hedayat Eslaminia. Beverly Paustenbach, Diane Farrar, and Barry Creekmore were vocal about believing that Ron Levin had fled to avoid prosecution. They also indicated by vote that they felt that the prosecution had not met its burden of proof on the Levin evidence under the jury instructions. (SA)

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2 5. Early in the deliberations, we reviewed the testimony of all the pros-
3 ecution BBC witnesses, (Dean Karny, Tom May, Evan Dicker, Jerry Eisen-
4 berg, and Jeff Raymond). The testimony of each in turn was set aside by a
5 unanimous vote at that time as being unreliable. We spent hours discuss-
6 ing each of these witnesses' testimony during deliberations. Despite con-
7 ccurring in this vote, 3 jurors, (Harriet Kumetat, Curtis Hackworth, and
8 Trilby Collins), later indicated that they felt that certain things these
9 witnesses said were true and that they were no longer prepared to disre-
10 gard their testimony completely. All the way to the end of the trial, we
11 all agreed that the prosecution's BBC witnesses had each lied during parts
12 of their testimony.

13
14 6. A point that there was a near unanimous agreement on was that Carol
15 Levin's belief that Ron wouldn't leave her without further contact was
16 wholly unfounded. We discussed how we were ^hocked by the revelations
17 during cross-examination of how, despite her earlier claim to a perfect
18 relationship with her son, she had institutionalized Ron at an early age
19 and how he had lived most of the rest of his childhood and adolescence at
20 boarding schools. The cross-examination on these points and on many oth-
21 ers, (e.g. how Ron took advantage of his parents financially and only super-
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1 ficially reciprocated his mother's interest in him), was very effective.

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3 7. I recall Diane Farrar, who works at the NASA Ames Research Center
4 as a public information specialist, saying at one point in the deliberations:

5
6 "If there is one thing I am sure of, it is that Ron Levin is alive."

7 I declare under penalty of perjury under the laws of the State of Cali-
8 fornia that the foregoing is true and correct of my own personal knowl-
9 edge, and that as to those matters stated upon information and belief, I
10 believe them to be true.
11

12 Executed at Milbrae, California, on January 15, 1993.
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16 SANDRA MARIA ACHIRO
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3. I listened to over 50 witnesses give testimony concerning the disappearance (and subsequent sightings) of Ron Levin. I took notes of their testimony throughout the 7 month trial. These are my thoughts and opinions concerning what I heard.

4. I thought that prosecution witnesses Tom May, Evan Dicker, Jeff Raymond, Jerry Eisenberg, and Dean Karny were lying throughout their testimony. In each case their credibility suffered, particularly during cross-examination.

5. Dean Karny. The proof that Karny had lied on his State Bar applications, both before and after he did his immunity deal, seriously damaged his credibility in my eyes. It showed that he was willing to down play his involvement in the BBC if he felt it was in his interest to do so. I thought

1 it extremely telling that he lied on his application even though the Cali-
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ifornia Department of Justice was involved in assisting him to become a
licensed attorney.

In cross-examination of Karny, Mr. Hunt asked him about a conversation
on a park bench that allegedly took place after Mr. Hunt returned from New
York in June of 1984. I did not believe that this conversation took place at
all due to an obvious contradiction that Mr. Hunt revealed by his question-
ing of Mr. Karny. At one point I recall Mr. Karny's testimony as being that
Jim Pittman had told him, prior to Mr. Hunt's return from London, all about
the events in New York. Mr. Karny said that Pittman described how he had
tried to impersonate Ron Levin. The problem with this testimony was that
Mr. Karny had testified at some other trial, that Jim Pittman did not real-
ize that Dean Karny knew about the alleged Levin murder plan until this
meeting on the park bench after Mr. Hunt had returned from London. This
was after the point that Karny had said that Pittman had supposedly told
him everything. This contradiction as it played out on the stand was rather
glaring. I decided that Karny had made up the entire "park bench" epi-
sode. It effected how I viewed Mr. Karny's credibility as a whole.

6. Tom May. I did not find Mr. May to be credible. One point that sub-

1 stantially affected my view of him was the deal he made with ITC Produc-
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3 tions concerning the BBC miniseries and his testimony about that deal. Mr.
4 May made a fool of himself on the stand on this topic. On cross-
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6 examination I learned that the deal he and his brother made with this pro-
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8 duction company guaranteed them that they would be portrayed as "he-
9 roes" and "innocent victims of Joe Hunt", as long as "facts to the contrary
10 did not come out at trial". Of course, we learned that Jeff Raymond and
11 Evan Dicker did deals with ITC Productions also. It became clear, and Mr.
12
13 Hunt later argued this in his summation, that if all these guys stuck to-
14 gether and corroborated with each other, they could really appear as he-
15 roes. But if they said anything embarrassing about themselves or each
16 other, they would be embarrassed on nationwide television. I felt this
17
18 gave them a powerful incentive to testify in such a way about each other
19
20 to make themselves appear in the best light.

21 7. The Levin Sighting Witnesses. I did not find the testimony of Carmen
22
23 Canchola and Jesus Lopez to be very persuasive by itself. However, con-
24 sidered along with the testimony of Mr. Oliver Holmes and Len Marmor that
25 Ron Levin had a faint scar on his forehead, I began to believe that they ac-
26
27 tually had seen Ron Levin. While the person Ms. Canchola described
28

1 matched Levin to a "T", she had never personally met Ron Levin before.
2
3 This weighed against her testimony. It was the addition of this one fact,
4 that Levin had a scar on his forehead which, against his normally fair
5 complexion, was almost invisible, that gave her identification the power
6 in my mind to raise a reasonable doubt. In the harsh September Arizona
7 sun, Levin's skin, except for the scar, would tan, thus making the scar
8 more visible. Nothing about a scar was mentioned in the Esquire magazine
9 article. At that point her testimony could no longer be dismissed as a
10 mis-identification.
11

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14 However, the testimony of Connie and Jerry Gerrard just about bowled
15 me over. They seemed to be very sensible and decent people. Ms. Gerrard
16 had been in Ron Levin's company on a number of occasions and she posi-
17 tively identified him. Particularly persuasive to me was her description
18 of how Mr. Ron Levin inexplicably and suddenly pulled up stakes and left
19 the cafe after he made eye contact with her, especially since she reported
20 over hearing Levin and his friend, only moments before, discussing their
21 good fortune in finding a restaurant open on Christmas day. She was not
22 impeached in my view at all. She was much more credible than any BBC
23 witness, and unlike that crowd, she had no reason to lie.
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1 Mr. Hunt also called Robert Robinson and Nadia Ghaleb. They had also
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3 seen Ron Levin in the 1986 to 1987 time frame. Though credible witness-
4 es they were, the 'clincher' witnesses about Ron Levin being alive were
5
6 Connie and Jerry Gerrard.

7 8. Levin To Flee. I have no doubt in my mind that Ron Levin fled to avoid
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9 prosecution for his many criminal acts. Not only did we learn of his insu-
10 rance frauds, the 12 grand theft charges, and his check frauds in the de-
11 fense case, but he also owed over one million dollars when he skipped
12
13 town. Mr. Jon F. Martin, an insurance investigator, had threatened Ron Le-
14 vin with jail for insurance fraud. We learned through Jeffrey Melczer, Le-
15 vin's civil attorney, and Jerry Verplancke, who worked at Progressive
16
17 Savings and Loan, that Levin was aware that the FBI was investigating the
18
19 Progressive check scam case that netted Levin \$150,000.00 in late 1983.
20
21 This was just six months before Levin fled. We also learned from Daniel
22
23 Wilson, an investigator who worked for Fidelity, I believe, that Fidelity
24
25 was seeking to prosecute Levin for the \$75,000.00 he had scammed from
26
27 them in May or June of 1984.
28

26 I believe that Levin was terrified about going back to jail. Dr. Avery
27 told us that Levin described being raped in jail back in 1979 on, when he
28

1 was doing time on the mail fraud case. When Carol Levin was on the wit-
2 ness stand, Mr. Hunt showed her a letter in her handwriting that said Ron
3 Levin had a terrible fear of being locked up dating back from when she had
4 committed him to the Camarillo State Mental Hospital. Mr. Oliver Holmes
5 testified that Levin had described to him how he had been researching the
6 extradition treaty between Brazil and the United States. This had a big
7 impact on me. Mr. Holmes even said that Levin had called the State De-
8 partment to find out when the treaty went into effect, apparently being
9 told that it did not do so for about one year. This was proof to me that Mr.
10 Levin had been considering fleeing for sometime. I believe that he ulti-
11 mately did so.
12

13 9. The Seven Pages.

14 Possibly the most important witness on the issue of what happened to
15 Ron Levin was Karen Sue Marmor. She was great! First of all, I trusted
16 her. She used to be an officer at a bank, she was married to a former
17 prosecution witness, she did not know Mr. Hunt at all, and she was very
18 straight forward. When she said that she saw the "to do" list on Levin's
19 desk, I was stunned. It all started to make sense to me. I believe Levin,
20 after he got a hold of the "to do" list, decided to use it as cover to make
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1 good his escape. He seemed to be thinking out-loud in Ms. Marmor's pres-
2
3 ence about doing just that. She testified that he said he was never going
4
5 to go back to jail and that he might leave for New York and not come back.
6 He also told Ms. Marmor that he had just been threatened . This corrobo-
7
8 rated Mr. Hunt's defense in several crucial ways. As Mr. Hunt often said,
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10 the lists were only used as "props in a plan to intimidate Ron Levin". The
11
12 biggest point about Ms. Marmor's testimony to me is that her testimony
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14 and the prosecution's theory were totally at odds. Either you believed one
15
16 or the other. Since Mr. Karny was the only witness that testified about
17
18 the origin of the seven pages and how it was to be used and/or was used,
19
20 it really came down to a question of whom did I believe, Karen Marmor or
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22 Dean Karny. On this level, there really was no contest. Mr. Karny had a lot
23
24 of reasons to lie and, I felt, had in fact lied to us about a lot of things. Ms.
25
26 Marmor did not have an immunity deal and was never impeached. Once I
27
28 decided I believed Ms. Marmor, I knew Joe Hunt was innocent. Since Ron
Levin had the "to do" list in his control and possession during broad day
light and at a time when Joe Hunt was nowhere in sight, there was no way
that this list could be the 'recipe for murder' that Karny claimed it was.
In my mind, Ms. Marmor was a one person justification for an acquittal,

1 though I admit that many other witnesses supported her testimony by
2 pointing to flight to avoid prosecution as an explanation for Mr. Levin's
3 disappearance.
4

5
6 10. John Riley. One of the more dramatic impeachments of Mr. Karny's
7 story of what allegedly happened on June 6, 1984, came about through the
8 testimony of Mr. John Riley. Mr. Riley was a former newspaper reporter
9 and magazine correspondent, he presently is a freelance writer. He was
10 very well-spoken. He testified that he had seen Ron Levin and Jim Pittman
11 talking at some length in front of Levin's house in 1984. He accurately
12 described Mr. Pittman's build, height, and weight. He also picked Pittman
13 out of a photo line-up. There was really no question in my mind that he
14 saw Jim Pittman with Ron Levin. However, according to Karny, Pittman
15 and Levin never met before June 6, 1984. Karny had this whole story about
16 what happened between Levin, Pittman, and Mr. Hunt on the night of June 6,
17 1984, built around the fact that Levin supposedly didn't even know Pitt-
18 man. Karny said that Mr. Hunt confirmed this to him during the "walk
19 around the neighborhood" conversation that Karny said took place after Mr.
20 Hunt allegedly killed Levin. Karny described how on this occasion Mr. Hunt
21 had supposedly described a "scenario" that he used to attempt to convince
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1 Levin to hand over his money under duress, but still leave Levin a basis to
2 hope that he would survive the night if he cooperated. Pittman was sup-
3 posed to have been introduced as a paid enforcer for the Chicago mob to
4 whom Mr. Hunt was to have said he was deeply indebted. Karny testified
5 that the idea was that Levin had never seen Pittman before and would not
6 realize that Pittman was a BBC member. (Mr. Len Marmor also had seen
7 Pittman at Levin's house in 1984.) As a result, Karny explained, the plan
8 was to hoodwink Levin into believing that both he and Mr. Hunt were being
9 pressured by this group whose representative was the physically imposing
10 Pittman. Of course the lie to this was all proven by the evidence that Le-
11 vin knew Pittman. How else could he have met Levin except through Mr.
12 Hunt? I felt Mr. Hunt's argument was persuasive that Karny, unaware of
13 their acquaintance with each other, had mistakenly woven into his scenar-
14 io for that night this highly revealing flaw. Karny's whole plot for that
15 night didn't make any sense with this in mind. Karny said that the "Chica-
16 go enforcer scenario" was what was meant "Explain situation" on the "to
17 do" list. In light of all of this, I didn't think so at all.

25 11. John Duron.

26 Mr. Hunt presented powerful evidence in support of his case through the
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28

1 testimony of John Duron. Mr. Duron was Levin's barber for years. Levin
2 visited him every 2 weeks through out their business relationship. Mr. Du-
3 ron was startled when, on the occasion of Levin's last visit to his hair sa-
4 lon, Levin inquired about dyeing his hair and beard brown. Mr. Duron stated
5 that this was surprising because the rather vain Levin and he had long
6 agreed that Levin's gray hair was his most striking feature. Mr. Duron
7 testified that he tried to talk Levin out of it. When Levin insisted, Mr. Du-
8 ron offered to do it for him. Levin refused the offer but called back a
9 week or or a week and a half later. Duron tried to talk him out of it again
10 but Levin would not be put off. Mr. Duron gave Levin instructions. Since
11 this was a week and a half after Levin's last visit and since Levin sched-
12 uled visits regularly every 2 weeks for years, this had to have occurred
13 right before Levin's flight. Detective Zoeller testified that he found an
14 unexplained brown stain in Levin's bathtub which he had tested to deter-
15 mine if it was blood, with negative results. Mr. Duron told us that hair dye
16 can stain porcelain. As a result of all of this, I became convinced that Le-
17 vin had altered his appearance to make good his escape. Obviously, he let
18 it grow out later, probably as he became more secure over the years.

19 It also provided me with a reasonable explanation for the missing com-
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1 forter. Mr. Duron told us about how these dyes must be left in one's hair
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3 for at least 45 minutes "to set". During that time one is free to get out of
4 the shower, walk around, and relax. He described how many hair-color
5 novices ruin their clothes and get it all over everything because of how
6 difficult it is to handle during this period. Of course I knew that already.
7
8 It was easy to see how, lying down to watch television on his bed, Levin,
9
10 even if he thought he was being careful, could have stained his bedding.
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12 Naturally he couldn't leave that tell-tale clue behind. Given all the other
13 evidence, Detective Zoeller's discovery of the stain, and Mr. Duron's testi-
14 mony, I believe that is what happened. Levin got the hair dye on his com-
15 forter and hastily scooped it up, along with the television remote control
16 device, and threw them out. Corroborating this was Blanche Sturkey, Le-
17 vin's maid, who testified that only Levin and she knew where the spare
18 comforter was.
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21 12. Justine Jagoda. Ms. Jagoda was very firm about her recollections of
22 the night of June 6, 1984. She had heard nothing that night. She testified
23 that on other occasions she had heard Levin beat his dog, a slap followed
24 by a yelp. Apparently, her bedroom was right over Levin's old bedroom.
25
26 She recalled the night because she was questioned by someone the next
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1 day as to whether she heard anything unusual. She testified that she was
2 up late reading a book. The television set was not on and the windows
3 were open. Karny had said that he had heard the silenced gun shot and that
4 it was very loud, as loud as a very loud clap of the hand. Ms. Jagoda felt
5 that she would have heard that easily. She said she heard nothing unusual
6 at all, not even a trunk being slammed or the dog yelping. This was more
7 evidence which was inconsistent with the People's theory. I thought her
8 testimony was important because it was ear-witness evidence, not hear-
9 say from biased witnesses.

10 13. I am aware that the Prosecution witnesses testified that Ron Levin
11 left some money behind, but it was a small amount in relation to the near-
12 ly one million dollars in illicit income he apparently had during his last 18
13 months or so in Beverly Hills. (\$150,000.00 from Progressive; \$50,000.00
14 from American Express; \$75,000.00 from Fidelity USA; \$250,000.00 worth
15 of camera equipment never returned; \$500,000.00 worth of insurance
16 fraud per Jon Martin; \$15,000.00 from Len Marmor; \$30,000.00 from Joe
17 Hunt and the BBC; \$100,000.00 from Merrill Lynch; \$20,000.00 to
18 \$30,000.00 from Levin's parents; \$20,000.00 from his maid; etc.; etc.)

19 14. Also, Ron Levin did do some things inconsistent with a fixed-

1 advance-planned-flight-to-avoid-prosecution scheme. His plans to fly to
2 New York, the address labels Martin Levin spoke of, and paying for his in-
3 surance in advance (I think) as well. However, the evidence reflected that
4 Levin ultimately decided to flee, not that he knew all along that he was
5 going to do so. Karen Marmor described Levin saying: "I'm not going to
6 jail", and "Maybe I won't come back from New York", during her very last
7 conversation with Levin. Oliver Wendell Holmes was summoned by Levin
8 on June 6, 1984 to return a key Levin had given him to Levin's house. That
9 key, Mr. Holmes said, provided him access to Levin's home so that he could
10 work in preparation for Levin's eventual trial on the 12 grand theft charg-
11 es. Why did Levin decide on June 6, 1984 that it was no longer necessary
12 to do that work? Scott Furstman said Levin did a surprising about-face on
13 his criminal case, agreeing to return property to the victims in exchange
14 for bail concessions on June 5, 1984. Why? So that his dad wouldn't be
15 left holding the bag, I thought. There was no other explanation. Ron Levin
16 had a year of premium left on his bail bond at that point! The list goes on
17 and on

15. In the end I felt that the set of circumstances that put the "to do"
list in Levin's hands, and the likelihood of more criminal charges on top of

1 the 12 felony counts he already faced, brought Levin to the decision to
2
3 flee. Of course, 5 people have seen him since then, so the fact that he did
4 flee is not really open to debate any longer.

5
6 16. I believe an innocent man is behind bars. In my own heart and based
7 on the proof that I have heard and seen, I believe that Ron Levin was alive
8 at least until Christmas of 1987, when he was seen by Connie and Jerry
9 Gerrard on the island of Mykanos in the Mediterranean. Setting aside Mr.
10 Hunt's notorious reputation, all the testimony coming from neutral and
11 non-partisan witnesses (those with no personal stake in the case), points
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13 with one accord to the fact that Ron Levin fled prosecution for a variety
14 of crimes that he had committed. The BBC witnesses were a thoroughly
15
16 disreputable and unreliable lot. Their statements were in conflict with
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18 an impressive number of facts attested to by more reliable witnesses.
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20 Carol and Martin Levin are only guessing. Basically, they believe what
21 they need to believe. There is not a shred of physical evidence to prove
22
23 violence occurred at Ron Levin's home other than the implications of a
24 missing comforter and remote control.

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26 However, Karyn got the Beverly Hills Police reports about the circum-
27 stances at Levin's home before he made the statement. I also found more
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1 believable, given Karny's general dishonesty, the hair dye scenario.
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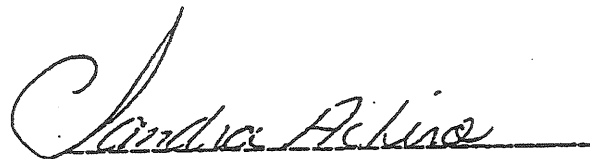
3 17. In the end I felt that the June 24, 1984 "confession", attributed to
4 Mr. Hunt, had to be interpreted in light of the fact that: (1) Levin was
5 planning to flee; (2) Karen Marmor saw the 7 pages at Levin's home before
6 the night of June 6, 1984; and (3) People have seen Ron Levin alive since
7 June 6, 1984.
8
9

10 In my view, it is silly, given all the evidence, to say I'm not going to be-
11 lieve Karen Marmor and 5 sightings witnesses because Mr. Hunt said he
12 killed Ron Levin. All those guys, and Levin too, pulled a lot of hoaxes, they
13 said a lot more than they meant rather frequently. There is the old saying:
14 "Just saying it doesn't make it so." I looked at the BBC and saw believa-
15 ble motives for Mr. Hunt to make that statement, given the white collar
16 crime and car stealing atmosphere of the BBC. However, the key point is
17 that the un-biased witnesses and the eye-witnesses are a much more di-
18 rect route to the truth than a "hearsay" case. One can spin theories about
19 what people like Levin and the BBC members knew versus what they said
20 endlessly. One can argue the whys and wherefores either way. In the end
21 the overall trend of the evidence coming from untainted sources was all in
22 one direction: towards Mr. Hunt's innocence. I believe Mr. Hunt is innocent
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1 and that Ron Levin was alive through, at least, late 1987.
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3 I declare under penalty of perjury under the laws of the State of Cali-
4 fornia that the foregoing is true and correct of my own personal knowl-
5 edge, and that as to those matters stated upon information and belief, I
6 believe them to be true.
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8 Executed at Millbrae, California, on December 23, 1992.
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12 SANDRA MARIA ACHIRO
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