

DECLARATION OF WILLIAM E. GILG

I, WILLIAM E. GILG, declare as follows:

1. I am an attorney at law licensed to appear before all the courts of the State of California.

2. I have been assisting Joe Hunt in Case # C15761, People v. Hunt, since February of 1989.

3. This case concerned what happened to Hedayat Eslaminia on July 30th and July 31st of 1984. The jury voted 8 to 4 in favor of acquitting Mr. Hunt after a 26 day deliberation period.

4. The people sought under Evidence Code section 1101, and were granted, the right to present evidence related to the disappearance of Ronald George Levin in their case-in-chief. The judge ruled that this evidence would be admissible for the jury's use for a limited purpose in their deliberations on the issues of intent, motive, and identity in the Eslaminia case. They were instructed that the evidence was not to be considered at all if the prosecution did not establish by a preponderance of the evidence that Mr. Hunt in fact robbed and then killed Ron Levin. True copies of the two jury instructions related to this evidence are attached hereto as Exhibits #1 and #2 to this declaration.

5. The People called 21 witnesses in their case-in-chief and 3 witnesses in rebuttal to testify concerning the Levin allegation. They were as follows:

1. Dean Karny
2. Tom May
3. Jerry Eisenberg

- 1 4. Evan Dicker
- 2 5. Jeff Raymond
- 3 6. Jack Friedman
- 4 7. Chuck LeBeau
- 5 8. Dean Factor
- 6 9. Michael Broder
- 7 10. Carol Levin
- 8 11. Martin Levin
- 9 12. Richard Liebowitz
- 10 13. Joe Vega
- 11 14. Robert Jordan
- 12 15. Blanche Sturkey (testimony from Joe Hunt's L.A. trial was
- 13 read by stipulation)
- 14 16. Les Zoeller
- 15 17. Scott Furstman (testimony from Joe Hunt's L.A. trial was rea
- 16 by stipulation)
- 17 18. James Foulk (testimony from Joe Hunt's L.A. trial was read
- 18 by stipulation)
- 19 19. Lori Leis
- 20 20. Anil Varma
- 21 21. Dr. Choi (testimony from Joe Hunt's L.A. trial was read by
- 22 stipulation)
- 23 22. Detective King (rebuttal)
- 24 23. Detective Convey (rebuttal)
- 25 24. Ted Woods (rebuttal)

26 6. In addition there were stipulations entered into by the defense and
27 the prosecution concerning the following:
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- A. That Jim Pittman's handwriting appeared on the records, which were People's Exhibits 68A through 68G in Case A090435, in several places. These exhibits were the records of the Plaza Hotel and related to Jim Pittman's visit to New York on June 7th to June 11th of 1984.
- B. That the phone records of the Plaza Hotel admitted in Joe Hunt's L.A. trial were the records of that hotel and reflected calls from its guest rooms during the period of Mr. Pittman's stay there.
- C. That the "7 pages" or the series of lists (i.e. "at Ron Levin's to do") found at Ron Levin's were all in Joe Hunt's handwriting.
- D. That the lists were checked for the fingerprints of Tom May, Evan Dicker, Martin Levin, Ron Levin, Jeff Raymond, Joe Hunt, Dean Karny, and Robert Levin, with only Dean Karny and Joe Hunt's prints finding a match on the pages. It was further stipulated that Ron Levin's prints, and not Joe Hunt's, were found on a green file folder in which a group of documents related to Microgenesis were found at Ron Levin's house. This file was People's Exhibit 94 in Case A090435.

7. The defense called 40 witnesses in its case-in-chief and 4 witnesses in rebuttal with something to say pertinent to the Levin case. They were:

- 1. Neil Adelman
- 2. Henry Cheung
- 3. Frank Hargrove

- 1 4. Bernard Krause
- 2 5. Connie Gerrard
- 3 6. Jerry Gerrard
- 4 7. Robert Robinson
- 5 8. Robert Tur
- 6 9. Nadia Ghaleb
- 7 10. Carmen Canchola
- 8 11. Jesus Lopez
- 9 12. Lynne Roberts
- 10 13. Robert Pacillio (testimony from Joe Hunt's L.A. trial was read
- 11 by stipulation)
- 12 14. Patricia Towers (testimony from Joe Hunt's L.A. trial was
- 13 read by stipulation)
- 14 15. Joe Hunt
- 15 16. Daniel Wilson
- 16 17. Daniel J. Holland
- 17 18. Jerry Verplancke
- 18 19. John Rollingson
- 19 20. Paul Edholm
- 20 21. Brent Kley
- 21 22. Robert Garden
- 22 23. Jonathon Hayes
- 23 24. Sandra Kammenir
- 24 25. Dr. Herbert Avery
- 25 26. Dr. Presley Reed
- 26 27. Karen Marmor
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Exh. 201

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- 1 28. Len Marmor
- 2 29. John Reeves
- 3 30. Erin A'Heran
- 4 31. Jeffrey Melczer
- 5 32. John Riley
- 6 33. John Duron
- 7 34. Justine Jagoda
- 8 35. Fedrico Cano
- 9 36. Oliver Wendell Holmes
- 10 37. Jon F. Martin
- 11 38. Josephine Casson
- 12 39. Frank Vassallo
- 13 40. Dr. John Thornton
- 14 41. Robert Mackey (rebuttal)
- 15 42. Dan Dobrin (rebuttal)
- 16 43. Antonio Samaniego (rebuttal)
- 17 44. Bill DiVita (rebuttal)

19 8. Between the defense and the prosecution, 31 witnesses who testified
20 in Joe Hunt's L.A. trial on the Levin allegation (Case A090435) testified in
21 this trial. In addition, the substance of three prosecution witnesses in
22 the L.A. trial (Mr. Clason, Mr. Kuhn, and Mr. Wagenbrenner), was covered by
23 stipulations concerning the identity of certain fingerprints on the "to do"
24 lists and Ron Levin's Microgenesis file. 36 witnesses were called by the
25 defense who did not testify in Joe Hunt's L.A. trial on the Levin allega-
26 tions. A list of the witnesses falling into the above-described categories

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Exh. 201


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1 is attached to this declaration as Exhibit #3.

2 I declare under penalty of perjury under the laws of the State of Cali-
3 fornia that the foregoing is true and correct, except as to those matters
4 stated upon information and belief, and as to them, I believe them to be
5 true.

6 Executed at Redwood City, California on December 24, 1992.

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10 WILLIAM E. GILG,
11 Attorney at Law
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