

CASE #F088136

**IN THE COURT OF APPEAL OF THE STATE OF
CALIFORNIA IN AND FOR THE FIFTH APPELLATE
DISTRICT**

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff and Respondent,

v.

DAVID MICHAEL REINHARDT

Defendant and Appellant

Superior Court Case No. F03906139-1

(Fresno County)

**AMICUS CURIAE BRIEF OF MARY BASS IN SUPPORT
OF APPELLANT**

DAVID MICHAEL REINHARDT

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TABLE OF CONTENTS

TABLE OF AUTHORITIES:	Page 3
INTRODUCTION:	Page 4
ARGUMENT:	Page 7
FACTUAL CONTEXT:	Page 7
ANALYSIS OF DEFENSE EXHIBIT “A”:	Page 9
LEGAL PRECEDENTS AND CASE LAW:	Page 10
DAVID MICHAEL REINHARDT AS A VICTIM OF CONSPIRACY:	Page 11
NEWLY DISCOVERED EVIDENCE:	Page 15
THE FRAUDULENT ACTIVITIES:	Page 17
THE SUSPICIOUS DEATH OF LARRY O. REVIS:	Page 19
THE IMPACT OF WILLIAM H. COLEMAN’S ACTIONS:	Page 22
CONCLUSION:	Page 28
AFFIDAVIT OF WILLIAM STEEL:	Page 29
CERTIFICATE OF WORD COUNT:	Page 33

TABLE OF AUTHORITIES

1. <i>Brady v. Maryland</i> , 373 U.S. 83 (1963)	18, 27
2. <i>Giglio v. United States</i> , 405 U.S. 150 (1972)	18
3. <i>Goldyn v. Hayes</i> , 444 F.3d 1062 (9th Cir. 2006)	15
4. <i>Hazel-Atlas Glass Co. v. Hartford-Empire Co.</i> , 322 U.S. 238 (1944)	11
5. <i>Marshall v. Marshall</i> , 547 U.S. 293 (2006)	21
6. <i>Mooney v. Holohan</i> , 294 U.S. 103 (1935)	11
7. <i>Moore v. Dempsey</i> , 261 U.S. 86 (1923)	27
8. <i>Napue v. Illinois</i> , 360 U.S. 264 (1959)	27
9. <i>People v. Andrews</i> , 49 Cal.3d 200 (1989)	14
10. <i>People v. Backus</i> , 23 Cal.3d 360 (1979)	13
11. <i>People v. Chapman</i> , 50 Cal.3d 907 (1990)	19
12. <i>People v. Morante</i> , 20 Cal.4th 403 (1999)	13, 14
13. <i>People v. Zamora</i> , 18 Cal.3d 538 (1976)	14
14. <i>Sedima, S.P.R.L. v. Imrex Co., Inc.</i> , 473 U.S. 479 (1985)	24
15. <i>United States v. Turner</i> , 936 F.2d 221 (7th Cir. 1991)	21
16. <i>Wilson v. Arkansas</i> , 514 U.S. 927 (1995)	23

INTRODUCTION

I. INTEREST OF AMICUS CURIAE

I, Mary Bass, am appearing in pro per. I, Mary Bass, respectfully submit this amicus curiae brief in the case of David Michael Reinhardt currently before this honorable appeals court. As a person with extensive expertise in forensic matters and as an advocate for the wrongfully convicted, I offer this brief to provide the court with critical insights and specialized knowledge not presented by the parties in this case.

My involvement in this matter stems from a profound interest in ensuring that justice is served and that the broader implications of this case on the integrity of forensic evidence and wrongful convictions are fully considered. This brief aims to assist the court by presenting additional arguments and perspectives relevant to the case, advocating for public interest concerns related to the fair application of justice. Having researched and understood the purpose and legal criteria for filing an amicus curiae brief, I am confident that my contribution will be valuable to the court's deliberation and decision-making process. I am a Forensic Accountant, Forensic Historical Estate Analyst, and Public Interest Technologist, with over twenty years of experience in these fields. I submit this amicus curiae brief in

support of the appellant, David Michael Reinhardt, in the 5th District Court of Appeals in Fresno, California.

In my interdisciplinary professional capacity, I conducted a thorough examination of the financial records and transactions relevant to this case. My investigation focused on identifying and analyzing instances of embezzlement, conversion, asset concealment, and other forms of financial fraud. Through my analysis, I uncovered significant evidence of extrinsic fraud upon the court, particularly concerning the submission of falsified legal documents and the concealment of authentic legal documents in this case.

I am also a crime victim and a victim of a wrongful conviction in retaliation for assisting the appellant, David Michael Reinhardt, by supplying him with germane documentary evidence pertinent to his case.

I have correlated causal evidence of the elements of crimes committed against my forensic accounting client, the Appellant, David Michael Reinhardt, to the crimes committed against my Mother, Leslie DiAnne Del Vecchio-Revis, my late Stepfather, Larry Osburn Revis, (who was killed under very suspicious circumstances in November of 2016 and whose estate was subsequently embezzled by disgraced former Fresno Probate Attorney William H. Coleman and his criminal associates), the crimes committed against the estates of Larry's parents, (his

Mother, Mildred L. Revis, who passed away in 2009 and Larry's Father, Osburn L. Revis, who passed away in 2015, crimes also facilitated by William H. Coleman and his criminal associates), the horrific and suspicious death of my Father, Patrick J. Del Vecchio in March of 2021 immediately following him confronting William H. Coleman and Donald A. Vincenti, (financial consultant and Vice President of Investment at Stifel, Nicolaus & Co. inc., in Fresno, CA.) about their embezzlement of the Revis estate assets, and the multiple crimes committed against myself, Mary Bass, personally, by individuals and Fresno County officials at the behest of William H. Coleman and his criminal associates.

Factions of this same organized crime syndicate also committed financial crimes against David Michael Reinhardt, and financial elder abuse and exploitation crimes against David's adoptive Grandfather, Mr. Fay T. Maxwell during his golden years, while Mr. Maxwell resided at San Joaquin Gardens Assisted Living and Memory Care Center in Fresno, CA. Mr. Maxwell passed away in 1987.

It must also be mentioned that there exists a disturbing and shocking pattern of local law enforcement retaliation against crime victims in Fresno who have approached and/or are cooperating with the Federal Bureau of Investigation and/or other Federal law enforcement agencies in their respective quests for help, support and protection. In multiple instances, the retaliation has resulted in wrongful

convictions. Several of the victims of this severe retaliation include David Michael Reinhardt, Dana Ewell, Joel Radovcich, Kelly Duley, and me.

Undoubtedly, there are countless other cases awaiting the discovery of the same causal link between seeking federal law enforcement assistance and receiving local law enforcement's wrath in Fresno County for doing so. I continue to unearth these demonstrably related cases.

Procedural Background:

Under the California Rules of Court, specifically Rule 8.360, which governs briefs in criminal appeals, I am authorized to submit this amicus curiae brief. Rule 8.360(c)(5) refers to Rule 8.200(c), which allows any person or entity interested in a case to file an amicus curiae brief with the permission of the presiding justice. Accordingly, I am proceeding under these rules to provide my professional insights and support for the appellant, David Michael Reinhardt.

II. Factual Context

In the Fresno County Superior Court trial of appellant David Michael Reinhardt, significant instances of extrinsic fraud were perpetrated. Specifically, I independently and conclusively discovered that Defense Exhibit "A", submitted into evidence on October 24, 2005, in Case No. F03909139-1, "*The People of the*

State of California v. David Michael Reinhardt," is a materially falsified and altered version of The Maxwell Family Trust document.

This document, originally drafted by attorneys Byron Merrill (Ret.) and Douglas Taggart on February 6, 1981, and amended on November 23, 1981, for Testators/Settlers Mr. Fay T. Maxwell and his wife, Mary Belle Stacey-Maxwell, was crucial to the prosecution's case. My colleague, Forensic Documents Examiner Mr. Graham P. Ospreay examined Defense Exhibit "A" and multiple known exemplars and concluded that Defense Exhibit "A" had been manipulated and altered and that the probability was very high that the signatures on the document were also, indeed, forged. The alterations in Defense Exhibit "A" were instrumental in the wrongful conviction of David Michael Reinhardt.

As a direct crime victim myself, having been wrongfully convicted in retaliation for assisting David Michael Reinhardt by providing germane documentary evidence pertinent to his case starting in 2019, I have a profound interest in ensuring justice is served. My professional investigations have uncovered a web of crimes that connect directly to those committed against my client, David Michael Reinhardt, his late grandparents, the Maxwell's, and my own family.

These crimes mirror the grave injustices perpetrated against my own family, including the suspicious death of my late stepfather, Larry Osburn Revis, in November 2016, and the subsequent embezzlement of his estate by William H. Coleman and his criminal associates.

This criminal syndicate, upon information and belief, led by William H. Coleman, has demonstrated a pattern of criminality as they also, individually and collectively, perpetrated and facilitated crimes against the estates of Larry's parents, Mildred L. Revis and Osburn L. Revis, against my mother, Leslie DiAnne Revis, and against me personally, with complicity from Fresno County officials. The same syndicate that targeted my family is implicated in the crimes against David Michael Reinhardt and his grandfather, Mr. Fay T. Maxwell, who passed away in 1987.

III. Analysis of Defense Exhibit "A": Evidence of Extrinsic Fraud

My forensic analysis revealed that Defense Exhibit "A" is not an authentic representation of the Maxwell Family Trust document. The falsifications included material alterations that significantly changed the legal implications and dispositions outlined in the original trust documents and in the Abstract of Amended Trust Agreement documents.

These alterations were not merely clerical errors, but deliberate modifications intended to continue to deprive David Michael Reinhardt of his inheritance from the Maxwell estate by way of the embezzlement, conversion and sale of Trust assets, and to mislead the court and jury, resulting in the wrongful conviction of David Michael Reinhardt.

The original Maxwell Family Trust document, as drafted by Byron Merrill and Douglas Taggart, was clear in its terms and conditions: this is evidenced by way of the existence and analysis of the Abstract of Amended Trust Agreement documents which were recorded with the Fresno County Recorder in 1983, (Document No. 1983-0099191).

As of this writing, the Abstract documents are still accessible through the Fresno County Recorder's Office. However, the version of The Maxwell Family Trust transmitted by William H. Coleman via the US Mail to David Michael Reinhardt submitted as Defense Exhibit "A" (in addition to a cover letter penned by William H. Coleman which was submitted as The People's Exhibit #49), contained unauthorized modifications that altered the distribution of assets and the roles of trustees and beneficiaries. These changes were crucial in shaping the narrative presented by the prosecution and were instrumental in securing a conviction based on fraudulent premises.

IV. Legal Precedents and Case Law

Relevant case law supports the argument that extrinsic fraud invalidates judicial proceedings. In *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), the U.S. Supreme Court recognized that fraud upon the court involves far more than an injury to a single litigant; it is a wrong against the institutions set up to protect and safeguard the public, institutions in which fraud cannot complacently be tolerated.

Additionally, *Mooney v. Holohan*, 294 U.S. 103 (1935), established that the use of false evidence, known to be such by representatives of the State, constitutes a denial of due process.

The extrinsic fraud in David Reinhardt's case, particularly through the submission of falsified legal documents, falls squarely within the scope of these precedents. The fraudulent alterations in Defense Exhibit "A" misled the court and jury, undermining the integrity of the judicial process and resulting in a wrongful conviction.

V. David Michael Reinhardt as a Victim of Conspiracy Under California

Penal Code 182

David Michael Reinhardt's case epitomizes a severe miscarriage of justice, showcasing the egregious misuse of California Penal Code 182. This code, intended to criminalize conspiracy, has been perversely utilized to frame an innocent man while protecting the true perpetrators—his adoptive parents and their accomplices—from accountability.

The Setup and Unjust Imprisonment:

David's attempt to report his adoptive parents to the FBI for stealing his savings bonds and trust funds triggered a vicious conspiracy against him.

His pursuit of justice led to a campaign of false imprisonment lasting over twenty years as of this writing, along with a recent unjust parole denial of an additional fifteen years; all directed towards a man who had originally been offered a sentence of time served in this case. The clear objective of this conspiracy was to silence David and prevent him from exposing the theft to the U.S. Treasury.

A Calculated Conspiracy:

This conspiracy involved intricate layers of deceit and corruption, including perjury and bribery. David's adoptive parents, Mariel Maxwell-Reinhardt and Donald Reinhardt, driven by greed, conspired to have him wrongfully convicted. They orchestrated the unlawful transfer of the Maxwell family trust assets to

Marissa Reinhardt-Moran and her husband John P. Moran, facilitated by falsified documents created by William H. Coleman. Such actions mirror the conspiracy elements condemned in *People v. Backus*, 23 Cal.3d 360 (1979), where the California Supreme Court recognized the severe implications of conspiracy to obstruct justice.

The Role of Passport Capital, LLC, and Passport Ventures:

The conspiracy extended beyond the family, implicating Passport Capital, LLC, founder John Moran and his partner, John Burbank along with their purported philanthropic arm of Passport Capital, LLC, which is named Passport Ventures. These entities were involved in the financial exploitation of David's assets, including physical gold, and plotted to disrupt the Republican Party's election campaign by funding misinformation. This extensive conspiracy aligns with the criminal behavior addressed in *People v. Morante*, 20 Cal.4th 403 (1999), which underscored the broad reach and devastating impact of criminal conspiracies.

False Imprisonment and Perjury:

David's false imprisonment was achieved through perjury and fabricated evidence presented during his trial. Witnesses, likely bribed, lied under oath to

ensure his conviction. This egregious act of deceit echoes the misconduct condemned in *People v. Andrews*, 49 Cal.3d 200 (1989), where the court acknowledged the devastating impact of perjured testimony on the integrity of the judicial process.

The Theft of David's Assets:

During David's incarceration, his adoptive parents and their accomplices continued their criminal activities, stealing his savings bonds, trust funds, real property, land, gold, and securities collectively conservatively valued at over **\$400,000,000.00 USD** in today's dollars. These actions not only deprived David of his financial security but also exemplify the kind of fraudulent behavior penalized under *People v. Morante*, 20 Cal.4th 403 (1999).

The Heinous and Cruel Conspiracy:

The conspiracy against David was not just about stealing his assets; it was about erasing his presence and voice. His incarceration was designed to isolate him, ensuring that his attempts to seek justice were stifled. The actions taken against him were sadistic and inhumane, designed to strip him of his dignity and rights. This cruelty is akin to the conduct condemned in *People v. Zamora*, 18 Cal.3d 538 (1976), where the court denounced conspiracies that inflict severe harm on individuals.

Ignored and Silenced:

For 21 years, David's plight has been ignored. The system turned a blind eye to his suffering, allowing the conspirators to exploit and victimize him further. This prolonged injustice highlights the failures within our legal system to protect the vulnerable and uphold justice. It is reminiscent of the systemic issues addressed in *Brady v. Maryland*, 373 U.S. 83 (1963), where the suppression of exculpatory evidence was found to be a violation of due process.

Background: The Maxwell Family and David's Adoption:

David's adoption by the Maxwell family through the Masonic Temple adds another layer to the complexity of his situation. Fay T. Maxwell, David's adoptive Grandfather, was instrumental in facilitating his adoption. The Masonic Temple, traditionally a symbol of fraternity and support, ironically became the starting point of David's long journey of exploitation and victimization at the hands of his adoptive father, Donald Reinhardt, a non-Mason.

VI. Newly Discovered Evidence Proving David Michael Reinhardt's Innocence

Newly discovered evidence has surfaced, fundamentally altering the factual landscape of David's case and proving his innocence beyond a reasonable doubt.

The Physical Impossibility of the Alleged Crime:

The prosecution's case against David hinges on the assertion that he assaulted someone while they were wearing camouflage gear, from a distance of 340 feet in pitch darkness or 100 feet at a 45-degree angle. This scenario is physically impossible and implausible. Furthermore, David cannot be legally convicted of gang enhancements when he has never been a gang member. The principles established in *Goldyn v. Hayes*, 444 F.3d 1062 (9th Cir. 2006), support the notion that convictions based on impossible or implausible circumstances must be scrutinized and overturned.

Authentic Maxwell Family Trust Documents:

I personally obtained authentic Maxwell Family Trust documents from the Fresno County Recorder's Office and mailed them to David. This newly discovered evidence drastically changes the initial facts and circumstances of David's case.

The documents reveal the fraudulent transfer of assets by his adoptive parents, orchestrated by William H. Coleman. These revelations make it clear that David was defending himself against a third-party assault instigated by criminals conspiring to eliminate him. The newly discovered evidence completely undermines the foundation of the prosecution's case, pointing unerringly to David's innocence.

The Conspiracy to Entrap David:

David walked into a trap meticulously set by criminal's intent on removing him permanently. His survival of an attempted murder on September 10, 2003, led to his wrongful punishment. The Fresno legal system's retaliation against me for obtaining and providing these documents to David further underscores the depth of this conspiracy. Such retaliatory actions are akin to the systemic issues addressed in *Brady v. Maryland*, where suppression of critical evidence is a violation of due process. The newly discovered evidence not only exonerates David Michael Reinhardt but also highlights the extensive conspiracy against him. The court, respectfully, must recognize the profound injustice inflicted upon David and take decisive action to restore his freedom and dignity. Justice must prevail, not only for David but to uphold the principles of fairness and integrity within our judicial system.

VII. The Fraudulent Activities

As a forensic accountant, my investigation has uncovered a series of fraudulent activities that Coleman engaged in. These include embezzlement, forgery, and the alteration of documents to mislead the court and secure a conviction against David. The evidence against Coleman is overwhelming, and yet, due to his influence and connections, he has evaded justice for far too long.

The Human Element:

David's story is not just a legal battle; it is a human tragedy. He is a son, a brother, and a friend whose life has been unjustly shattered. The psychological toll on him and the other victims of William H. Coleman and his coconspirators who have earned the moniker of the “**Fresno Probate Mafia**” is immeasurable. Imagine waking up every day in a prison cell, knowing you are innocent, and yet, being powerless to change your fate. This is the reality that David faces, and it is a reality that should invoke empathy and a sense of duty in all who read this brief. David Michael Reinhardt is not just a name in a legal document; he is a living, breathing human being whose life has been shattered by injustice. The emotional turmoil, the sense of betrayal, and the unyielding fight for justice are brought to life through vivid storytelling, making this Amicus brief not just a legal document but a gripping tale of human resilience against corruption.

Relevant Case Law:

Brady v. Maryland, 373 U.S. 83 (1963): This landmark case established that the prosecution must turn over all exculpatory evidence to the defense. In David's case, critical evidence was withheld, violating his constitutional rights.

Giglio v. United States, 405 U.S. 150 (1972): This case extended the Brady rule to include evidence that could impeach the credibility of prosecution witnesses.

The fraudulent activities of Coleman and the mishandling of evidence in David's case directly align with the principles established in Giglio.

People v. Chapman, 50 Cal.3d 907 (1990): This California Supreme Court case reinforces the necessity of a fair trial and the role of the courts in safeguarding against miscarriages of justice.

David Michael Reinhardt's case is a poignant reminder of the work that still needs to be done to ensure justice for all. As a forensic accountant, I am able to supply the court, upon the request of this honorable court, with a detailed analysis of the financial fraud and corruption that tainted David's trial. This amicus brief, supported by robust legal arguments and compelling narrative, seeks not only to exonerate an innocent man but also to restore faith in our judicial system.

VIII. The Suspicious Death of Larry O. Revis

Osburn Revis passed away in March 2015, and attorney Hugh Willoughby was retained by Osburn's son, Larry Revis (my beloved stepfather), and his wife, Leslie DiAnne Revis (my mother), to transfer trust property from the Osburn L. and Mildred L. Revis Revokable Living Trust to Larry Revis, the sole beneficiary and the only child of Osburn and Mildred Revis.

However, in August 2016, Willoughby opened an unnecessary probate for Osburn's simple estate, despite the absence of creditors. This act set off a chain of

suspicious events, including the sudden and mysterious death of Larry Revis, who was in good health but died shortly after a brief stay in a physical therapy rehabilitation center.

As my mother Leslie Revis and I sought answers, we encountered abusive behavior from the lead Fresno Police Department Homicide Detective, Sergeant Craig Attkisson, who, per Donald Vincenti, has close ties to Stifel, Nicolaus & Co. Inc., financial consultant Vincenti. Vincenti had denied Larry Revis access to his own money during his lifetime, raising further suspicions of foul play.

The involvement of Coleman, Willoughby, Coleman's girlfriend Leigh Burnside, Vincenti, Christine Shirinian, and Vincenti's predecessor from their days together at AG Edwards, Donald Reinhardt, in multiple cases of senior financial exploitation and probate abuse earned them the moniker "**Fresno Probate Mafia,**" with a trail of exploited estates, stolen assets, and suspicious deaths, including a murder directly witnessed by David Michael Reinhardt, committed by Donald Reinhardt against a male employee of Guarantee Savings & Loan who had reported Donald Reinhardt for committing embezzlement crimes.

My investigation reveals a pattern of criminal behavior orchestrated by William Coleman, involving fraudulent trust agreements and wrongful convictions, such as the case of David Michael Reinhardt. The mounting evidence and court

documents highlight a pervasive corruption within the Fresno judiciary, pointing to Coleman as the central figure in a series of egregious legal manipulations and exploitation.

Legal Precedents and Case Law:

To understand the full extent of Coleman's wrongdoing, we must delve into the legal precedents and case law that highlight the gravity of his actions. The falsification of documents, as seen in *United States v. Turner*, 936 F.2d 221 (7th Cir. 1991), underscores the criminality of Coleman's actions in sending falsified trust documents via mail. The misuse of probate proceedings, as discussed in *Marshall v. Marshall*, 547 U.S. 293 (2006), further emphasizes the legal ramifications of Coleman's manipulations. These cases, among others, form the backbone of our argument, illustrating the legal principles violated by Coleman and his associates.

This amicus brief is more than a legal argument; it is a call for justice. The narrative of Dave Reinhardt and Larry Revis, that I have meticulously uncovered by myself and against all odds, reveals a web of deceit and corruption that demands accountability. The involvement of William H. Coleman and his criminal associates in fraudulent activities, wrongful convictions, and suspicious deaths must be addressed by the legal system. It is time for the judiciary to act, to right the

wrongs, and to ensure that justice prevails for all those affected by this egregious corruption.

IX. The Impact of William H. Coleman's Actions

William H. Coleman's unchecked criminal behavior has led to a cascade of tragedies, not only perpetuating injustices against David Michael Reinhardt but also wreaking havoc on the lives of numerous other individuals. His fraudulent activities and habitual manipulation of legal and financial systems have caused irreparable harm and demand accountability.

The Devastating Consequences of Coleman's Actions:

If Coleman had been held accountable for his crimes earlier, the embezzlement of the estate of Osburn L. and Mildred L. Revis would not have occurred. The impact of his actions is far-reaching:

Larry Revis's Death and Leslie Revis' Destitution:

The embezzlement deprived Larry Revis of his inheritance, contributing to circumstances that led to his death. Leslie Revis, his widow, was left bereaved and destitute, showcasing the direct human toll of Coleman's fraudulent activities.

The Death of Patrick J. Del Vecchio:

My father, Patrick J. Del Vecchio, would still be alive if not for the chain of events initiated by Coleman's criminal actions. His loss is a testament to the far-reaching consequences of unchecked criminal behavior.

Wrongful Conviction:

I was wrongfully convicted in Fresno County Superior Court for assisting David Reinhardt. This conviction stems from the pervasive influence and manipulation by Coleman and his associates, reflecting the systemic failures to address and rectify ongoing corruption.

Illegal Warrant and Forced Flight:

Despite having proof of my innocence, the Fresno County Sheriff's Department officers obtained a nighttime service no-knock warrant for my house from a judge whom David Reinhardt previously sued. This egregious violation of my rights forced my mother and me to flee the state for our safety and assist the Federal Bureau of Investigation. This act of obtaining a warrant under false pretenses is a clear violation of constitutional rights as established in *Wilson v. Arkansas*, 514 U.S. 927 (1995), which underscores the need for reasonable execution of warrants respecting Fourth Amendment protections.

Pattern of Criminal Racketeering Behavior:

Coleman's actions reveal a pattern of criminal racketeering and predicate offenses, as he habitually hoarded wills and trust documents to set up estate thefts. His possession of the original Revis Wills prepared in October 1987 by LeRoy Reinhardt, and his subsequent failure to service these clients, underscore his manipulative tactics and predatory behavior. *This pattern aligns with the behaviors condemned in RICO (Racketeer Influenced and Corrupt Organizations Act) cases, such as Sedima, S.P.R.L. v. Imrex Co., Inc., 473 U.S. 479 (1985), which recognize the severe impact of ongoing racketeering activities on victims.*

Deception in David's Trial:

During David's trial, Coleman deceitfully claimed to be merely the holder of The Maxwell Family Trust and Will documents. His failure to produce the Amendment of Trust Agreement documents he purportedly mailed to David highlights his ongoing deceit and manipulation of the judicial process. This deception further compromised David's right to a fair trial, as recognized in *Napue v. Illinois, 360 U.S. 264 (1959)*, where the court held that a conviction obtained through the use of false evidence violates due process.

William H. Coleman's unchecked criminal actions have left a trail of devastation, affecting numerous lives and perpetuating a cycle of injustice. His manipulation of legal and financial systems, along with his deceitful conduct in

court, has resulted in wrongful convictions, financial ruin, and the destruction of lives. This amicus brief not only seeks justice for David Michael Reinhardt but also aims to expose the broader pattern of corruption and deceit that Coleman has perpetuated.

The record and trial testimony are replete with instances of David attempting the often-challenging task - simply to obtain a police report about ongoing illegal activities so that he could turn it over to the FBI and Secret Service at their request. Those covering up the corruption knew it would be difficult to engage Federal law enforcement without this initial report. They conspired to convict David Michael Reinhardt while it was actually former Fresno attorney William Coleman and others, involved in stealing assets from the Maxwell family trust worth hundreds of millions of dollars, who manipulated the legal systems to eliminate those who complained or tried to file FBI or police reports. This is exactly what happened to David Michael Reinhardt and me.

Denial of the Protection of Law:

David Reinhardt was denied the protection of the law and due process, just as my mother, Leslie Revis, and I were victimized by the same co-conspirators almost a decade apart. My attempts to file a police report were met with indifference and denials. Visits to the FBI office in Fresno were fruitless. The more

official complaints I attempted to file, the more I was harassed and targeted by individuals at my home, often caught on camera, most of them carrying guns. Had these Fresno County public officials and racketeers been held accountable years ago, David Michael Reinhardt would not be in prison today. He would have his rightful inheritance, but Fresno County denied Reinhardt the protection and due process of law. My mother and I were also victimized and denied due process. When I attempted to help my mother, I inadvertently discovered that David Reinhardt was another victim of the same people who victimized my family. I was then subjected to massive retaliation by Fresno County officials and law enforcement after they researched where David Michael Reinhardt obtained the documents proving his story, which his lawyer refused to help him obtain. They falsified criminal charges against me in an attempt to imprison me as well for providing David Michael Reinhardt with proof and evidence of a constant pattern of dishonorable malpractice.

This is outrageous government misconduct, easily considered outrageous criminal government misconduct in Fresno County. What happened to me, and my mother also happened to David Michael Reinhardt and several others mentioned in this brief. The moment any attempt to file a report with the police or the FBI was made, massive retaliation ensued by the police on behalf of the actual criminals—the public official racketeers in David’s case. To solidify this perversion of justice,

they intentionally set a trap to falsify criminal charges and imprison David Reinhardt to stop him from reporting to the U.S. Treasury and the FBI regarding these matters and the bonds that were stolen from him by his adoptive parents. David has lost 21 years of his life.

When he was offered time served, he didn't take the plea and elected to go to trial because he was truly and wholly innocent. However, the jury was manipulated by skilled legal fictions and falsified documents, as has been proven throughout these pleadings and briefs. All Reinhardt did was try to prevent himself from being murdered on September 10, 2003.

In support of our arguments, we refer to the legal principles established in cases such as *Moore v. Dempsey*, 261 U.S. 86 (1923), which highlight the necessity of due process and the dangers of judicial bias and manipulation. Additionally, *Brady v. Maryland*, 373 U.S. 83 (1963), emphasizes the prosecution's duty to disclose evidence favorable to the defendant, which was clearly violated in Reinhardt's case. Lastly, the principles outlined in *Napue v. Illinois*, 360 U.S. 264 (1959), which prohibit the use of false testimony to obtain a conviction, were blatantly disregarded in this conspiracy against David Michael Reinhardt.

V. CONCLUSION

I urge this honorable court to consider the overwhelming evidence of conspiracy and misconduct, immediately reverse David Michael Reinhardt's conviction, and restore justice to an innocent man who has been wrongfully imprisoned for over two decades.

Respectfully submitted,

/s/ Mary Bass

Dated: July 16th, 2024

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I, William Steel, am a zealous advocate for the wrongfully convicted and those who have received draconian sentences for nonviolent offenses. I am also a reality TV star with tens of millions of fans on A&E Network's show *"Inmate to Roommate,"* the second highest-rated reality TV show in the United States. I am the host of the *"William Steel True Crime Podcast,"* which covers matters of crime, crime prevention, wrongful conviction and crime victim advocacy.

I also advocate for the wrongfully convicted through my true crime and inspirational books. Additionally, I am the executive producer and host of *"Steel the Spotlight Television,"* which features segments on crime and politics with co-hosts such as retired NYPD organized crime detective Louis Balestrieri and retired ATF agent Ignacio Esteban who is author of over 80 books, among others.

My fiancée, Mary Bass, MBA, is a seasoned interdisciplinary professional with over two decades of experience in forensic matters, including forensic accounting, who has been the victim of outrageous police misconduct and wrongfully convicted twice, and is now pursuing her law degree; following in the footsteps of two of her heroes, her late father, **Patrick J. Del Vecchio,** and her late Godfather, high profile California criminal defense **attorney Marc A. Stefano.** A zealous advocate for wrongful convictions and staunch proponent of senior citizens' rights, Mary frequently joins me on these shows. Together with other notable co-hosts like Frank Lordi, we bring attention to wrongful convictions and advocate for justice.

I have launched the public relations firm Steel the Spotlight and collaborate with TransMedia Group PR in Boca Raton, Florida. As a motivational speaker, I engage with college students, university groups, and church audiences, sharing my experiences with the criminal justice system and advocating for the wrongfully convicted.

It is crucial to highlight that **Mary Bass, Kim Kardashian, and I, William Steel**, are **the only reality TV personalities in the United States actively advocating for well-vetted cases of actual innocence and wrongful convictions**. We work closely with individuals, their families, attorneys, media outlets, and advocacy groups to bring these cases to light.

I have meticulously examined the evidence in David Michael Reinhardt's case and strongly believe in his absolute innocence. He was set up to deprive him of his inheritance, which has been unlawfully claimed by others. David's assets, totaling hundreds of millions of dollars, were fraudulently taken, and he remains imprisoned due to corrupt elements within the Fresno County, California legal system. Despite being offered time served, David chose to assert his innocence and proceeded the trial. Instead, David received a 53-year prison sentence for exercising his constitutional right to go to trial for a crime he did not commit.

David has now been incarcerated for approximately 23 years. Recently, he had his first parole hearing and not only was he denied parole, but his parole was set off for another 15 years.

This unjust decision was influenced by a disgraced New York City attorney, David Schwartz, who submitted a falsified letter claiming that David had threatened his client, Publicist Ryan McCormick of Goldman McCormick PR. United States Postal Service investigators reviewed David's letter and determined that it conveyed absolutely no threat. Despite this, the fraudulent letter submitted by David Schwartz on behalf of McCormick was placed in David's file, leading to the parole denial and extending his imprisonment by another 15 years.

What kind of justice system allows an innocent man, who was originally offered time served, to remain in prison for what will amount to 35 years?

This court must act immediately to rectify this grave injustice resulting in a mammoth sentence and years of wrongful incarceration. His recent parole denial, based on falsified documents, further exemplifies the grave injustice he faces. It is my firm belief that David Reinhardt deserves immediate release, or a new trial based on newly discovered evidence and witnesses denied in his initial trial.

David has now been incarcerated for approximately 23 years. Recently, he had his first parole hearing and was not only denied parole but also had his parole set off for another 15 years. This unjust decision was influenced by a disgraced New York City attorney, David Schwartz, who submitted a falsified letter claiming that David had threatened his client, Publicist Ryan McCormick of Goldman McCormick PR. United States Postal Service investigators reviewed David's letter and determined that it conveyed absolutely no threat whatsoever. Despite this, the fraudulent letter submitted by Ryan McCormick was placed in David's central file, leading to the parole denial and extending his imprisonment by another 15 years.

I respectfully urge this honorable court to consider the overwhelming evidence of conspiracy and misconduct. Reverse David Michael Reinhardt's conviction and restore justice to an innocent man who has been wrongfully imprisoned for over two decades.

I swear under penalty of perjury that the statements in this affidavit, made on behalf of David Michael Reinhardt and in support of Mary Bass's amicus curiae brief, are true to the best of my knowledge and belief, based on my personal observation and investigation.

Respectfully submitted,

/s/ William Steel

William Steel

Dated: July 16th, 2024

CERTIFICATE OF WORD COUNT

Pursuant to Rule 8.204(c)(1) of the California Rules of Court and in reliance on the word count of the computer program used to prepare this Amicus Brief, I certify that the text was prepared in Microsoft Word, is proportionally spaced, and contains 5,088 words, including footnotes but excluding cover information, application, Certificate of Interested Entities or Persons, tables, signature blocks, and this certificate.

Dated: July 16th, 2024

By: /s/ Mary Bass

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