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October 6, 2000

**SUPREME COURT
FILED**

OCT 10 - 2000

Honorable Frederick Ohlrich, Clerk
California Supreme Court
350 McAllister Street
San Francisco, California 94102-3600

Frederick K. Ohlrich Clerk
[Signature]
DEPUTY

RE: *In re Curtis F. Price*
Court No. S069685

RECEIVED

OCT 10 2000

Dear Mr. Ohlrich:

CLERK SUPREME COURT

Respondent respectfully requests this Court file this letter brief, which concerns information addressed by this Court in its Order of September 13, 2000. In that order, the Court granted petitioner's application, and ruled that the Court would consider the materials submitted by the San Mateo Superior Court, which were the subject of the Court's previous Order of July 12, 2000, in ruling on the habeas corpus petition and the motion to disqualify the Attorney General's Office. Given that respondent has not had an opportunity to comment to this Court on the content of the sensationalized allegations in those newly unsealed materials, respondent requests that opportunity through this brief. Further, in evaluating and investigating those materials, respondent has uncovered information in the record which is useful in evaluating certain other claims that have been raised to the Court. We believe respondent's response to these issues will be helpful to the Court, and we request this Court to file this letter brief, and consider the materials herein.

Two former Department of Justice (DOJ) prosecution investigators have made allegations with regard to events at the *Price* trial in 1985-86. At their worst, the allegations accuse trial prosecutor, now Senior Assistant Attorney General Ronald A Bass, of the following: he knew another investigator, James Hahn, who worked for the Department of Corrections (CDC), lied to the court about an interview with an inmate; he suppressed a transcript of that interview to protect the CDC investigator from a charge of perjury; he concocted various cover stories; and, he only disclosed the transcript to the court when threatened with exposure by DOJ investigator Paul Tulleners.

We have examined the record, and it shows these allegations to be the result of Tulleners's misunderstanding of the facts. The record shows: There was no perjury while Bass

was on the case. While the investigator may have concealed the interview from *Tulleners*, the court early on knew the truth; *Tulleners*, who was not present at the hearing, *falsely* believed the investigator lied to the court; *Tulleners* became aware of the transcript of the interview only *after* Bass had already revealed it to the court; *Tulleners*'s self-important claim he forced disclosure of the transcript is laughably incorrect; and Bass's subsequent statement that Hahn perjured himself is probably exaggerated, but is unimportant given that Bass made the court aware of the entire situation before the *Price* trial, which caused the discovery hearing at which the investigator Hahn told the truth. In sum, *Tulleners*'s allegations are provably incorrect. Bass's integrity is vindicated by the transcripts.

The new materials appeared in the following manner. It appears that at a hearing in a trial completely unrelated to the *Price* case, now taking place in San Mateo County before Judge Carl W. Holm, the credibility of Senior Assistant Attorney General Bass became a tangential issue. In order to impeach Bass' credibility, attorneys there, apparently aware of the briefing in this case, attempted to produce Paul *Tulleners*, who, as this Court is aware, has alleged certain misdeeds by Bass in the pretrial portion of the *Price* trial. While *Tulleners* did not testify at that San Mateo County hearing, his presence apparently caused the defense to call former DOJ investigator Oscar Breiling, who allegedly had a "run-in" with Bass in a completely separate matter in 1988, long after the end of the *Price* trial. Apparently, Breiling testified at a pretrial hearing in the San Mateo County case that he did not remember the details of that 1988 incident. However, he stated he had sent certain memoranda and other materials relating to that incident to *Tulleners*, who kept them for safekeeping. These materials were received by Judge Holm under seal, and forwarded to this Court, and this Court stated in its Order of September 13, 2000, that it would consider them in regard to the pending habeas corpus petition and motion to disqualify the Attorney General's Office in this case.

The new materials contain memoranda and other materials prepared in 1988, long after the close of the *Price* trial, in which investigator Breiling writes that in 1988, in the course of his duties, he inquired of Ron Bass as to his opinion of James Hahn. Breiling, in a May 19, 1988 memo, wrote that:

"Bass stated Agent Hahn testified as a witness in the *Curtis Price* (AB) death penalty murder case . . . and in his opinion perjured himself. Bass said the *Curtis Price* case was almost lost as a result of Hahn's testimony and he feels there is still a strong possibility the case may yet be lost on appeal because of his testimony."

Breiling included Bass's comments in a memo, and the comments found their way to Senior Assistant Attorney General John Gordnier. Breiling's notes at the time state that Gordnier

requested a meeting with Bass and Breiling to explore Bass's comments about perjury. Breiling's notes state that a conference was held on May 27, 1988, a month after Bass's original statement. Bass denied making the statements that Hahn perjured himself, or that Hahn's testimony could cause the loss of the *Price* case. At the conference, Gordnier told Breiling to prepare another memo clarifying the issue now that Bass's statement had been received. Gordnier stated that Breiling, who obviously was upset by Bass's denial of the statement, could include in the new memo the fact that it had been ordered by Gordnier. Breiling quoted Gordnier as stating that Gordnier "could not and would not order the destruction of [Breiling's original] memorandum, however, he did want a clarification of what was told to me by Bass."

The materials also include other hearsay statements. In another memo to file, Breiling discusses a May 27, 1988, telephone conversation with Agent Paul Tulleners. In that memo, Tulleners is quoted as repeating the story of his conflicts with Agent Hahn and Bass at the discovery stage of the *Price* trial. We will discuss these allegations in more detail below. The materials also include a handwritten memo, apparently from Ron Bass to Oscar Breiling, stating that he had explored his memory of the incident from the previous month, and now believed that he must have actually made the statement about Hahn. However, Bass wrote, "My use of the term 'perjury' was unfortunate . . . ¶ I do not feel the case will be reversed because of this issue. I do, however, feel that the whole issue of discovery in all the in camera reviews and deletions I made to SSU reports and CDC records will be a major issue on appeal." Bass also stated that he believed that Hahn's memory may have been incorrect at the hearing at which he testified.

We also note a cover letter dated January 19, 2000, sent by Tulleners to Judge Holm. That cover letter lists the contents of the packet he sent to the judge. Also included in the cover letter was a statement that after Breiling's June 7, 1988, "clarification" memorandum, which is included in the packet and which does not change any of Breiling's previous statements, a meeting was held which was attended by Breiling, Bass, Gordnier and others. In his cover letter, Tulleners states that Breiling told Tulleners that at the conclusion of that meeting, "Gordnier ordered all persons at the meeting to destroy any all [sic] memorandums, notes, and documents regarding this incident."

In order to understand the Breiling allegations, it is necessary to return to the Tulleners allegations, which we discussed as part of our response to petitioner's argument 7 in our Brief in Opposition to the Petition for Writ of Habeas Corpus. It will be recalled that Tulleners, in lengthy interviews with both the defense and the prosecution, made the allegation relevant here, which was discussed at length by Tulleners in his interview with our investigator, and described by our investigator as follows:

"Paragraph 47. Tulleners explained he and his partner Gene [Dague], met

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with Oscar Pena, the head of SSU and the prison gang task force who told them about prison inmate informants, including Larry 'Turtle' Jones. Tulleners subsequently interviewed Jones, who stated Curtis Price sent Jones a message in prison slang indicating he (Price) had to kill a female in Eureka. Tulleners said it was his job to corroborate that statement which could have been learned by Jones through other informants within the prison system. Jones told Tulleners during their interview that he had told the same things about the *Price* case to SSU Special Agent James Hahn when previously interviewed by him in San Quentin. That made sense to Tulleners, who knew that SSU did interview prison gang 'roll outs.' Tulleners requested SSU provide him with the interview of Jones so that he could corroborate what Jones told him about the *Price* case. He was told Jones was never interviewed. The same issue later came up during the trial and *Hahn, Pena, and Allen testified Jones had never been interviewed.* Tulleners said he accepted that. Months later, Tulleners saw Bass reading a transcript in their courtroom office. Tulleners said he was intimately familiar with the case and asked Bass what he had. Bass responded that he did not have anything and threw the document into his briefcase. Tulleners told Bass he wanted to know what it was if it was something that dealt with the *Price* case. Bass responded that Tulleners could not see it because he (Bass) would get into trouble with [Gordnier]. Tulleners persisted and Bass eventually showed him the document, which Tulleners estimated was approximately 60 pages in length. The transcript was the interview of Larry 'Turtle' Jones by James Hahn which Tulleners said had 'numerous' references to the Eureka homicide. Bass told Tulleners they 'had a way around this'; they would say Jones was not interviewed but rather 'debriefed.' Tulleners said James Hahn and Oscar Pena had both perjured themselves in the *Price* case and he has retained evidence obtained after the case was adjudicated wherein Bass admits that. He stated that, in his opinion, the information contained in the CDC interview of Jones would not have changed the outcome of the trial but insisted it is up to the trier-of-fact of the habeas proceeding or the trial to make that determination.

"Once Tulleners discovered the transcript of the Jones interview existed, he gave Bass the option of going to Judge Buffington with that evidence or else he said he (Tulleners) would. Tulleners said he could not remember whether it was he or Bass who informed Judge Buffington of the existence of the transcript, however, when Tulleners went in-camera with Judge Buffington, he said Judge Buffington 'went through the ceiling' and ordered the relevant portions of the interview immediately discovered to the defense. Bass later told Tulleners he got his 'ass reamed by the judge.' Nothing came of the information disclosed to the defense because there was nothing that was exculpatory." (Italics added; Brief in

Opp., Exh. B, Report by Jeff Lierly Interview of January 20, 1999 with Paul Tulleners.)

In our brief in opposition, we believed the bottom-line of this issue was that the material did in fact find its way to the defense in a timely manner, that the material was not significant, and that the trial could not have been affected by any of these issues. As such, we did not attempt to recreate from the extremely old and complex record exactly what was true and not true about Tulleners's allegations. Given the new material, which so clearly and sensationally attacks the actions of the prosecutors at trial, we have elected to go back and assess these allegations in light of the record. What we have found is that the record is complete, and that the incidents underlying Tulleners's allegations are thoroughly recorded. After reading that thorough record, several things become evident, namely: Bass's actions were wholly proper and ethical at all times; Tulleners's impressions of the events were simply incorrect; and the motive for Tulleners to falsely impugn other members of the prosecution team is clear.

The subject of the Jones/Hahn interview was part of a massive discovery battle which involved several parties. James Hahn, the CDC investigator, was responsible for "debriefing" AB gang members as they "rolled out" of prison gangs. As a condition for being protected against their former gang members, CDC required "roll outs" to thoroughly disclose all their information about the gang, so as to "burn their bridges" and block any possibility that the member would be reaccepted by the gang.

Hahn, and his boss Oscar Pena, developed relationships with numerous ex-gang members, and as was developed at numerous discovery hearings, were somewhat reluctant to share that information with the prosecution in this case. In particular, Tulleners developed an extremely adversarial relationship with Pena and Hahn, with Pena and Hahn calling Tulleners a liar, and Tulleners returning the claims in various forums during the pretrial period. One particular issue which arose was whether Hahn or Pena had admitted or denied to Tulleners or to anyone else that they had interviewed the inmate Jones, and whether Jones had provided any information during that interview which could be useful in the *Price* case.

Bass was appointed to the case in November of 1984 (RT 1392), and soon became aware of this dispute between Tulleners and Hahn. Bass, in a timely manner, disclosed to the Court and the defense materials which raised the dispute, and the possible previous contacts by Hahn and Pena with Jones. A lengthy hearing was held in February and March of 1985, at which Tulleners, Pena, Hahn and others testified. (See RT 709 (testimony of Tulleners); RT 1173 (testimony of Hahn); RT 1268 (testimony of Pena).)

All of these witnesses disputed the testimony of the others, but, the primary points for our

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purposes are two: First, whatever Hahn had previously told Tulleners (and it is evident Tulleners believed that Hahn lied before), when he was actually on the witness stand under oath, Hahn specifically testified that he had interviewed Jones as many as five times starting in February of 1984. (RT 1176 et seq.) Hahn testified that some of the interviews were taped, although Hahn did not recall at that time which ones were or were not. The second main point is that Tulleners was not present at Hahn's testimony, and apparently persisted in believing that Hahn had told the same lie to the trial court as Tulleners believed Hahn had told to him. This misapprehension of reality by Tulleners was the seed of the later confusion.

Moving to July of 1985, Tulleners's log shows that on July 2, he discovered Bass reading a transcript of Hahn's March 13, 1984, interview with Jones. (See Tulleners's log, Exh. 43 to Pet. for Writ of Habeas Corpus.) This is the incident which Tulleners described at length in the interviews and in his discussion with Breiling. Tulleners goes into detail discussing how he was forced to twist Bass's arm in order to force Bass to disclose the existence of the interview. Tulleners believed he had proved that Hahn had committed perjury by claiming at the discovery hearing that he had not in fact interviewed Jones. Tulleners's log entry plainly shows his excitement at having found what he believed was proof that Hahn had perjured himself, thus vindicating Tulleners's in his feud against Hahn and Pena. (See Exh. 43, *supra*.) A previously sealed transcript of July 3, 1985, shows that the next day, after lengthy hearings on numerous topics, Bass and the judge *in camera* discussed the Hahn/Jones transcript which Tulleners claims he had discovered the previous day.

The first thing that is obvious, given our previous statement of Hahn's testimony at the discovery hearing months earlier, is that Tulleners was way off base in believing that Hahn had perjured himself. In fact, whatever Hahn had told the court or Tulleners previously, Hahn told the truth at the March 1985 hearing. Therefore, the transcript of a Hahn/Jones interview in March 1984 was not proof of perjury, and was entirely inconsequential with regard to Hahn's credibility.

However, the question still persists, if Bass had the transcript of the interview, why had Bass not given the interview in discovery. Tulleners claims that it was because Bass and Gordnier wished to protect Hahn from a charge of perjury, but we can now see that theory does not make any sense. Hahn did not perjure himself, the court knew that Hahn testified to the possibility that he had taped an interview with Jones, and Hahn had testified to the facts of that interview which related to the *Price* case. Thus, Bass had no reason to suppress the transcript. A full explanation for Bass's actions is suggested by a reference in the July 3 *in camera* hearing, wherein the trial court mentions to Bass a transcript of a Hahn/Jones interview. (RT 2989-8.)

Examination of prior *in camera* hearings shows that in fact, a month earlier, on June 4,

1985, in response to a subpoena duces tecum and a claim of privilege, the court and Bass adjourned to chambers. At that recorded hearing, Bass and the Court spoke as follows:

"THE COURT: Okay. The next thing is March 15th, 1984, report in regard to Mr. Jones. Have they been provided with this?

"MR. BASS: Huh-uh. This is his – this is by Jimmy Hahn. Can you tell who it is by?

"THE COURT: Yes. Well, I don't know. Number three is Mr. Hahn. Yes.

"MR. BASS: *I've got the whole tape recording of this and it has – it's in various stages now of being transcribed. And everything he says in here is on tape.* It's the initial statement they got from him when he reported as a drop-out. I see certain things – you know, he mentions Baby Curt back at the top of page two, killing witnesses. That's already been in reports that have been supplied with. I object to the whole – to them seeing the entire report as to everything that he said about the entire Aryan Brotherhood and the members on the grounds that it gives them, you know, the inside scoop on everything that he – that the department was told when Jones rolled out; *but I don't object to anything that has anything to do with the case being given.* (Italics added; RT (6/4/85) 1741-1743 et seq.)

Thus, Tulleners made the following major points: Hahn perjured himself at trial, thereby masking from the judge that he had interviewed Jones; Bass suppressed that transcript because he wished to protect Hahn from a charge of perjury, and, the transcript only was discovered to the judge and defense when Tulleners, on July 2, 1998, told Bass that Tulleners would tell the judge if Bass did not. Plainly, on all of these points, Tulleners was flatly mistaken. Whatever Hahn had stated previously to the Court or to Tulleners, he told the truth at the March 1985 hearing, and revealed the content and existence of possible taped statements by Jones. Next, Bass did not need to be prodded by Tulleners, given that, by the time Tulleners found out about the existence of the March 1984 transcript in July of 1985 Bass already had told the judge a month previously about the existence of the transcript. The Hahn/Jones interview is Court's exhibit 9, volume 5 of "corrected" clerk's transcript, at p. 1345.

It seems plain that, Tulleners's hostility towards Hahn and Pena clouded his judgment. Further, Tulleners also had a great deal of hostility at this point for Bass. Without getting deeply into the topic, the record is replete with references to the attempts by the CDC investigators to kick Tulleners off the case. Tulleners believed that Bass had not backed him up in this dispute, and a great deal of hostility arose when Bass began limiting Tulleners's contact with prison inmates. In the July 3 transcript, the trial court describes these disputes in great detail, and also

describes the troubles Bass had with Tulleners, given Tulleners's tendency to mingle nondiscoverable material in the materials he gave to the defense. Thus, Tulleners's motivation to attack both Bass and Hahn is plain. Unfortunately, Tulleners's accusations have caused a great deal of confusion, when their factual basis is completely mistaken. Tulleners has shown no misconduct whatsoever by Bass. The entire issue is an unfortunate side track in this already complicated case.

We next turn to the new allegations in the Breiling materials. Given the disputes that Tulleners, Bass, Hahn, and Pena had with each other, it becomes easier to understand why, when Breiling brought up this topic of Hahn three years later, Bass still had raw feelings on the subject. Plainly, Bass believed, along with Tulleners, that the CDC investigators, including Pena and Hahn, had been less than forthcoming, and in fact, had caused a great deal of difficulty in Bass's and Tulleners's efforts to investigate the *Price* case through the use of inmate informants. It will be recalled that the materials also showed that in 1988 Bass was deep in a complex prosecution at the time Breiling surprised him with the question about Hahn, and it is easy to understand that Bass's reaction was colloquial, emotional, and not intended for dissemination beyond the ears of Breiling. Whether Bass remembered a month later, when confronted by Gordnier, that he had used the word perjury with regard to Hahn is a topic of the greatest unimportance in this case. The only issue which remains is whether Bass, as implied by Tulleners and Breiling, knew about perjury at the *Price* trial and failed to properly act upon it. The record we have previously discussed shows conclusively that no such misconduct was present.

While it is quite likely that Bass believed in 1988 that Pena and perhaps Hahn had misled the prosecution at a time before Bass entered the *Price* case in 1984, it is plain that any such misbehavior by Hahn was corrected and ended at the March 1985 discovery hearing. As we have stated, at that hearing, any misstatements Hahn had made previously were purged and corrected by Hahn's truthful statement that he had interviewed Jones up to five times, that he had taped some of those interviews, and that Jones had indeed discussed specific facts, which Hahn enumerated, which were relevant to the prosecution in *Price*. In fact, rather than suppressing any possible perjury by Hahn, the record shows that it was Bass, with Tulleners's encouragement, who set in motion the events leading to this discovery hearing by revealing to the defense that he had become aware that the previous prosecutor in the case had not discovered to the defense numerous boxes of possibly discoverable material. (RT 773.) When the defense became aware through Bass and Tulleners of these materials, the March 1985 discovery hearing ensued, and all proper materials were revealed to the defense, and all possible prior negligence was corrected. In fact, at the end of the hearing, in a lengthy summary of the issues, the trial court specifically stated that both sides were guilty of negligence with regard to the discovery procedures. However, while the judge indicated he too had some doubts as to Hahn's probity at previous times, the trial court made plain that as of that date, all discovery issues had been properly

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resolved, and that there was no intentional misconduct by any prosecutor. (RT 1401, et seq.)
The judge made no aspersion whatsoever on Bass's handling of the issues.

In sum, once again far from a showing of hidden perjury, the facts are just the opposite. It was Bass who discovered the possible inconsistencies in Hahn's reports, and who alerted the defense and the Court to those inconsistencies. It was thus Bass and Tulleners who caused the convening of the massive March 1985 discovery hearing, at which all of Hahn's behavior was scrutinized. At the end of that hearing, all was revealed. Bass, in due course, informed the court that he had begun to prepare the transcript of the Hahn/Jones interview. Tulleners's subsequent discovery of that transcript and his wild and inaccurate conclusions drawn from his incomplete understanding of the events have caused all of these issues to arise.

Given that we are dealing with unsupported allegations of misconduct by prosecutors, we deal with one last issue before we close. We have previously discussed Tulleners's motive for being angry with Bass, and with Gordnier, during the *Price* trial. It will be recalled that Tulleners accused Gordnier of having told Bass that the Hahn/Jones transcript need not be discovered because it was cumulative. Given that, by the time Tulleners knew of the existence of that transcript, it had already been revealed to the trial court a month earlier, Tulleners's claim on this point is obviously nonsensical, and merely casts doubt on Tulleners's ability to properly evaluate the issues regarding this particular discovery matter.

We do not find it surprising that Tulleners appears once again in the year 2000 to have newly falsely accused Gordnier. It will be noted by anyone who reads Breiling's 1988 materials, or listens to his extremely thorough and vituperative tape recording, that Breiling protected no one and hid nothing in his memorialization of the incidents. Therefore, it is striking that Breiling nowhere claims that Gordnier ever made an order to destroy documents. In fact, Breiling's only mention of Gordnier's attitude towards dissemination of the incident is contained in Breiling's own memo of August 27, 1988, where Breiling quotes Gordnier as follows: "Gordnier stated he could not and would not order the destruction of this memorandum, however, did want a clarification of what was told to me by Bass." While we have been dealing with inadmissible hearsay in large quantities throughout this entire discussion, the hearsay statement by *Tulleners* that Gordnier ordered destruction of documents appears wholly unreliable. The idea that Gordnier believed that the highly independent Breiling, and the large list of individuals present at the various meetings, and "cc'd" in the various memos, could be forced to destroy all of their paperwork on the topic insults Gordnier's intelligence. Breiling never has claimed that Gordnier gave any such order. Given that Tulleners's claim that Breiling made such a statement has been hidden from the light of day for 12 years, to the extent that Breiling no longer even remembers the topics discussed, we regard Tulleners's allegation against Gordnier as a mere statement of personal animosity, and one entitled to absolutely no credence whatsoever.

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In sum, Tulleners, despite his strong efforts, has cast no doubt on the integrity and ethics of either Gordnier or Bass. Breiling's intra-office dispute with Bass, given the factual background we have discussed, also fails utterly to cast Bass in a negative light with regard to the *Price* prosecution. In fact, the record conclusively shows Tulleners to be wrong on each significant factual allegation he has made. The record conclusively shows that Bass acted ethically and proactively to ensure proper discovery in the *Price* pretrial. Tulleners, and the defense in this case, have taken this court on a wholly unnecessary excursion into innuendo and hearsay mudslinging. We would request this Court to clearly rule that no misconduct by Bass or Gordnier has been shown, and, in fact, Bass has been shown to have acted consistently with proper moral and ethical standards throughout the *Price* prosecution.

Sincerely,



DAVID H. ROSE
Deputy Attorney General

For BILL LOCKYER
Attorney General

DHR/gm

DECLARATION OF SERVICE

Case Name: **In re Curtis F. Price**

No.: **S069685**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the Bar of this Court at which member's direction this service is made. I am 18 years of age or older and not a party to the within entitled cause; I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On **October 6, 2000**, I placed the attached **LETTER BRIEF** in the internal mail collection system at the Office of the Attorney General, 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102, for deposit in the United States Postal Service that same day in the ordinary course of business, in a sealed envelope, postage thereon fully prepaid, addressed as follows:

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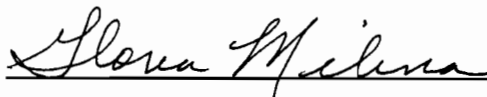
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I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **October 6, 2000**, at San Francisco, California.

GLORIA MILINA

Typed Name



Signature