



**Oklahoma High School  
Mock Trial Program  
2020-2021**

**State of Oklahoma  
v.  
Sidney Goode**

**Written by**

Todd Murray, Andrea Medley, Gessica Sewell, Orion Strand, Brittany Hayes, and Kevin Cunningham

*OBA Mock Trial Case Development Committee*

The Mock Trial Committee thanks our dedicated Case Development Committee for this exciting original case. We hope you find these materials interesting and educational. Best of luck during the competition!



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BAR FOUNDATION**  
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Oklahoma Bar Foundation, IOLTA Grant

### **WITNESS AND EXHIBIT LIST**

<b>PROSECUTION WITNESSES</b>	<b>DEFENSE WITNESSES</b>
Officer Kris Griffin	Defendant Sidney Goode
Sloan Barnes	Elon Gud
Shiloh Shelby, Ph.D.	Dylan Declan, Ph.D.

<b>EXHIBIT*</b>	<b>EXHIBIT NAME</b>
Exhibit 1	Wheatville Police Call Report
Exhibit 2	Wheatville Investigation Report
Exhibit 3	Photographs from Scene
Exhibit 4	Diagram of Rodeo Grounds
Exhibit 5	Medical Examiner's Report on Frank Griffin
Exhibit 6	1933 The Wheatville News article on the Execution of Ezra Goode
Exhibit 7	2018 The Wheatville News article on the Goode-Griffin Feud
Exhibit 8	1960 Goode Family Trust Document
Exhibit 9	State Expert Report
Exhibit 10	Defense Expert Report
*The preceding exhibits may be used by teams in competition. They are pre-marked and are to be referred to by number.	

## **STIPULATIONS**

The State and Defense stipulate to the following facts:

1. There is no issue of jurisdiction or venue.
2. The applicable law is contained in the jury instructions. These may not be read into the record. Pleadings and jury instructions may not be objected to at the trial.
3. The exhibits are true and authentic copies. Their authenticity may not be challenged. Unless stated otherwise, admissibility of exhibits may be challenged on other grounds.
4. The witnesses gave their statements on the dates indicated in the case. Each witness was given the opportunity to review the statement prior to and in preparation for trial.
5. The trial is only addressing the guilt or innocence of the Defendant. The sentencing phase shall take place only if the verdict is guilty. Any reference to possible sentencing, including the range of potential punishment is immaterial and inadmissible.
6. Whenever a rule of evidence requires that reasonable notice be given, it has been given.
7. Miranda rights were administered properly to the Defendant. Defense counsel was present for Defendant's statement.
8. The Federal Kidnapping Act ("Lindbergh Law") is not involved in the criminal trial at issue and is identified only for background information. No aspect of that law is applicable to the facts of this case.
9. The Medical Examiner performed the autopsy as described in the enclosed exhibit. The M.E. is not a witness in this trial and no comments, inferences, or other remarks shall be made by either side of the case on the absence of the Medical Examiner as a trial witness. The respective experts incorporate the M.E. Report into their reports, opinions, and testimony.

## STATEMENT OF THE CASE

(This is intended as a summary only and not to be used as evidence in the trial)

### **“13 Steps”**

There are thirteen steps from the ground to where justice is carried out. Thirteen steps from being part of the community, to becoming an example for the community. Thirteen steps between the idea of civility and the brutal action required to preserve civility, at least, according to some.

**You don't have to worry, I'll be there. There's oil on the noose, to make sure it doesn't catch. We'll march out five minutes before, I'll be right there with you. There will be a crowd. Thirteen steps up to the platform. I tie your hands, then your feet, the noose comes next and the hood is last. Don't worry, I'll be with you.**

If these words were ever spoken to you, then your time on this Earth was about to end. Regardless of one's persuasion on an afterlife, the listener had better make peace with their Creator if they are so inclined. These words were spoken to Ezra Goode by Cullen Griffin on June 19, 1933 near Wheatville, Oklahoma.

Ezra Goode was found guilty of kidnapping and became the only person ever executed under the Federal Kidnapping Act, popularly known as the Lindbergh Law. Prior to this law, criminals could take a person hostage and cross a state line and exploit the respective state's inability of law enforcement to coordinate with one another. The Lindbergh Law elevated interstate kidnapping to a federal felony and put manhunts into the hands of the FBI, whose jurisdiction was the entire United States. Interestingly, the Charles Lindbergh baby who was kidnapped out of a New Jersey nursery, was found deceased a few miles away and likely never crossed a state line. Even though the Lindbergh kidnapping was not covered by the law bearing the family's name, there were a series of high-profile kidnappings and related crimes across the country in the late-1920s and early-1930s that provided the impetus for passage of the Federal Kidnapping Act in 1932. Under this law, kidnapping that crossed state lines was a capital crime, regardless of whether the victim was harmed. This federal law became very important to the town of Wheatville, Oklahoma one early-summer day in 1933.

The original townsite for Wheatville Oklahoma included a small courtyard at the center of the downtown square. That small courtyard was the site of several public executions as the territory settlers and first citizens of the early town sought to establish law and order in an otherwise lawless area of the country. Even after statehood, the area around Wheatville was not a place to be caught unarmed or alone unless you were seeking trouble. Eventually, Wheatville prospered as industry established a foothold and the town even supported a factory that constructed parts for bombers used in World War II. However, Wheatville in the 1920s and 1930s was a different place and no one present to observe the execution on June 19, 1933 could have known how significant of an event they witnessed.

On June 19, 1933, Ezra Goode was executed in the last public hanging to occur in Oklahoma. Usually, that final punishment is carried out swiftly when the convicted is dropped

from enough height, with enough speed, to cause a traumatic and fatal snap. Often, the neck vertebrae are separated, and the spinal cord is severed. However, Goode's final moments of life took far too long, were far too barbaric, turned public sentiment against public executions and ignited a feud between the Goode and Griffin families that lasted for generations.

After Ezra's death, the Goode family moved to California to escape the community that had, in their eyes, turned against them and the ever-present sham facing the family because of that single horrific event. Ezra's child was forgotten by the Wheatville citizens after several years. Not until a string of tragic deaths in the Griffin family during the 1950s and 1960s did the rumors of a returned vengeance began to spread.

During the 1950s and 60s, four members of the Griffin family died, most likely killed by human hands. Individually, these deaths were odd and questionable in nature: an accidental drowning, two suicides by hanging, and an accidental firearm discharge while the gun was being cleaned. Not until all four deaths are viewed together do the connections to Ezra's death become apparent. First, all four Griffins died on or about the 19<sup>th</sup> of the month. Second, the Griffin that drowned was an avid swimmer, was found on the edge of a slow-moving stream, and had thirteen bruises along their back that looked like the heel of a boot. At the time, the authorities said those marks were from the body bouncing along rocks in the stream. Third, the firearm discharge involved a rifle that could not have been fired in a direction for self-infliction. The fatal shot was to the decedent's neck and there was never a clear explanation of how it happened without a second set of hands present. Finally, both hanging victims showed signs of struggle and neither neck was broken-which would result from a drop from an elevated position. Rather, it appears the victims were strangled. Just like the drowning victim, there was a series of thirteen or so bruises on the bodies. Both hanging victims also had unexplained marks on their wrists and ankles-which some speculate were the result of their hands and feet having been tied together around the time of their deaths. Also, the "suicide notes" simply said "Don't worry. I'll be with you". These Griffin deaths occurred over almost a twenty (20) year period and were spaced out enough that no one at the time made any connection between them.

The 1970s and 1980s involved a series of acts of retribution against the Goode family by the Griffins. While only two members of the Goode family died under unusual circumstances during this time, the Goode family suffered a series of unfortunate, but potentially directed by human hands, events. Bank foreclosures against family property with resulting sheriff sales to several associates of the Griffin family occurred and raised few questions in the community. The main community bank in Wheatville was founded by Cullen Griffin several years after he retired as an executioner for the State of Oklahoma. While the descendants of Cullen worked in many positions at the bank over the years, the majority ownership, and therefore the decision-making authority, was not held by the Griffin family since Cullen sold most of his interest before retiring from private business. Yet, no one seriously disputes that the Griffin family benefitted at the expense of the Goode family during this time.

Those two Goode deaths during this time, resulted from "self-defense" actions by Griffins in response to the "aggressions of the Goodes". However, it becomes quite difficult to understand and accept that shooting people a dozen or so times could be in self-defense, especially when the gun had to be reloaded. Apparently, the respective prosecutors decided there was justification for

such defensive action and no charges or trials ever resulted. The Goode family became more self-sufficient, independent and self-reliant with regard to crime and punishment, in response to the clear lack of fairness from the system of justice in place at the time.

The Goode-Griffin feud was just as violent as the more famous multi-generational family conflict during the late-1800s on the border between West Virginia and Kentucky, the Hatfield's and McCoy's. However, the Oklahoma version was never romanticized or given the "pop-culture treatment" and thus, the story is not nearly as well known. While no single source can provide the full details, the generational story can be pieced together to show two families that have apparently taken turns attacking the other because of a single event, the execution of Ezra Goode, that garnered national attention at that time, but was quickly forgotten by the rest of the nation. Now, it seems the pendulum of fate has swung back to place the Goode family over the Griffins- at least in terms of justice for past wrongs.

This is a criminal trial focused on the death of Frank Griffin on December 19/20, 2019. The Defendant Sidney Goode is accused of committing the crime of First-Degree Murder under Oklahoma law. The charges have been brought by the Travis County District Attorney on behalf of the State of Oklahoma. Sidney Goode is a descendent of Ezra Goode by way of Ezra's returned child around 1949.

**IN THE DISTRICT COURT OF TRAVIS COUNTY  
STATE OF OKLAHOMA**

STATE OF OKLAHOMA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CF-2020-247
	)	
SIDNEY GOODE,	)	
	)	
Defendant.	)	

**INFORMATION**

**STATE OF OKLAHOMA, COUNTY OF TRAVIS:**

I, Harvey Dyke, the undersigned District Attorney of Travis County, State of Oklahoma, in the name and by the authority, and on behalf of the State of Oklahoma, give information that on or about the 19<sup>th</sup> day of December 2019, in said County of Travis in the State of Oklahoma, Sidney Goode, did then and there unlawfully, willfully, knowingly and wrongfully commit the crime of:

**COUNT 1:**     **MURDER IN THE FIRST DEGREE**, a felony, in violation of Oklahoma State Statute Title 21, Section 701.7(A), by deliberately and intentionally taking the life of Frank Griffin when the Defendant, Sidney Goode, did then and there with malice aforethought cause the death of Frank Griffin, by tying a rope around the neck of Frank Griffin with such force, thereby inflicting mortal wounds which caused death, contrary to the provisions of section 701.7(A) of title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

By:     Harvey Dyke  
Harvey Dyke, OBA #100  
District Attorney in and for  
Travis County, State of Oklahoma

## **LEGAL AUTHORITY**

### **Oklahoma Statutes:**

#### **Title 21, Chapter 24, Section 701.7 – Murder in the First Degree**

- A. A person commits murder in the first degree when that person unlawfully and with malice aforethought causes the death of another human being. Malice is that deliberate intention unlawfully to take away the life of a human being, which is manifested by external circumstances capable of proof.
- B. A person also commits the crime of murder in the first degree, regardless of malice, when that person or any other person takes the life of a human being during, or if the death of a human being results from, the commission or attempted commission of murder of another person, shooting or discharge of a firearm or crossbow with intent to kill, intentional discharge of a firearm or other deadly weapon into any dwelling or building as provided in Section 1289.17A of this title, forcible rape, robbery with a dangerous weapon, kidnapping, escape from lawful custody, eluding an officer, first degree burglary, first degree arson, unlawful distributing or dispensing of controlled dangerous substances or synthetic controlled substances, trafficking in illegal drugs, or manufacturing or attempting to manufacture a controlled dangerous substance.
- C. A person commits murder in the first degree when the death of a child results from the willful or malicious injuring, torturing, maiming or using of unreasonable force by said person or who shall willfully cause, procure or permit any of said acts to be done upon the child pursuant to Section 843.5 of this title. It is sufficient for the crime of murder in the first degree that the person either willfully tortured or used unreasonable force upon the child or maliciously injured or maimed the child.
- D. A person commits murder in the first degree when that person unlawfully and with malice aforethought solicits another person or persons to cause the death of a human being in furtherance of unlawfully manufacturing, distributing or dispensing controlled dangerous substances, as defined in the Uniform Controlled Dangerous Substances Act, unlawfully possessing with intent to distribute or dispense controlled dangerous substances, or trafficking in illegal drugs.
- E. A person commits murder in the first degree when that person intentionally causes the death of a law enforcement officer, correctional officer, or corrections employee while the officer or employee is in the performance of official duties.

#### **Title 21, Chapter 24, Section 701.9 – Punishment for First Degree Murder**

- A. A person who is convicted of or pleads guilty or nolo contendere to murder in the first degree shall be punished by death, by imprisonment for life without parole or by imprisonment for life. A person who is convicted of or pleads guilty or nolo contendere to murder in the first degree, as described in subsection E of Section 701.7 of this title, shall be punished by death or by life without parole and absent an overwhelming amount of mitigating evidence shall

not be entitled to or afforded the benefit of receiving imprisonment for life or deferment of the sentence.

### **JURY INSTRUCTIONS**

#### **Oklahoma Uniform Jury Instructions (OUJI):**

##### **OUJI-CR 1-8: Opening Instruction:**

You have been selected and sworn as the jury to try the case of the State of Oklahoma versus Sidney Goode. The defendant is charged with the Crime of Murder in the First Degree by an Information filed by the State.

The Information in this case is the formal method of accusing the defendant of a crime. The Information is not evidence and the law is that you should not allow yourselves to be influenced against the defendant by reason of the Information.

The defendant has pled not guilty. A plea of not guilty puts in issue each element of the crime with which the defendant is charged. A plea of not guilty requires the State to prove each element of the crime beyond a reasonable doubt.

The defendant is presumed innocent of the crime and the presumption continues unless after consideration of all the evidence you are convinced of guilt beyond a reasonable doubt. The defendant must be found not guilty unless the State produces evidence which convinces you beyond a reasonable doubt of each element of the crime.

Evidence is the testimony received from witnesses under oath, agreements as to fact made by the attorneys, and the exhibits admitted into evidence during the trial.

It is your responsibility as jurors to determine the facts from the evidence, to follow the law as stated in the instructions from the judge, and to reach a verdict of not guilty or guilty based upon the evidence.

##### **OUJI-CR 4-60: Homicide – Causation**

No person may be convicted of homicide unless his/her conduct caused the death of the person allegedly killed. A death is caused by the conduct if the conduct is a substantial factor in bringing about the death and the conduct is dangerous and threatens or destroys life.

##### **OUJI-CR 4-61: Murder in the First Degree - Elements:**

No person may be convicted of murder in the first degree unless the State has proved beyond a reasonable doubt each element of the crime. These elements are:

First, the death of a human;

Second, the death was unlawful;

Third, the death was caused by the defendant;

Fourth, the death was caused with malice aforethought.

#### **OUJI-CR 4-62: Murder in the First Degree – Definition of Malice Aforethought**

"Malice aforethought" means a deliberate intention to take away the life of a human being. As used in these instructions, "malice aforethought" does not mean hatred, spite or ill-will. The deliberate intent to take a human life must be formed before the act and must exist at the time a homicidal act is committed. No particular length of time is required for formation of this deliberate intent. The intent may have been formed instantly before commission of the act.

#### **OUJI-CR-4-63: Murder in the First Degree – Proof of Malice Aforethought**

The external circumstances surrounding the commission of a homicidal act may be considered in finding whether or not deliberate intent existed in the mind of the defendant to take a human life. External circumstances include words, conduct, demeanor, motive, and all other circumstances connected with a homicidal act.

#### **OUJI-CR-4-95A: Murder in the First Degree – Defense of Heat of Passion**

A person who kills another person in the heat of passion cannot have the deliberate intent required for murder in the first degree. Thus, malice aforethought and heat of passion cannot coexist.

#### **OUJI-CR 8-46: Defense of Self-Defense - Justifiable use of Deadly Force**

A person is justified in using deadly force in self-defense if that person reasonably believed that use of deadly force was necessary to prevent death or great bodily harm to himself/herself or to terminate or prevent the commission of a forcible felony against himself/herself. Self-defense is a defense although the danger to life or personal security may not have been real, if a reasonable person, in the circumstances and from the viewpoint of the defendant, would reasonably have believed that he/she was in imminent danger of death or great bodily harm.

#### **OUJI-CR-8-49: Defense of Self-Defense - Burden of Proof**

It is the burden of the State to prove beyond a reasonable doubt that the defendant was not acting in self-defense. If you find that the State has failed to sustain that burden, then the defendant must be found not guilty.

#### **OUJI-CR 8-50: Defense of Self-Defense - When Defense not Available**

Self-defense is permitted a person solely because of necessity. Self-defense is not available to a person who was the aggressor, provoked another with the intent to cause the altercation, or voluntarily entered into mutual combat, no matter how great the danger to personal security became during the altercation unless the right of self-defense is reestablished.

#### **OUJI-CR-8-51: Defense of Self-Defense - Defense Reestablished**

A person who was the original aggressor, provoked another with intent to cause the altercation, or voluntarily entered into mutual combat may regain the right to self-defense if that person withdrew or attempted to withdraw from the altercation and communicated his/her desire to withdraw to the other participant in the altercation. If, thereafter, the other participant continued the altercation, the other participant became the aggressor and the person who was the original aggressor, provoked another with the intent to cause the altercation, or voluntarily entered into mutual combat) is entitled to the defense of self-defense.

### **OUI-CR-8-52 Defense of Self-defense - No Duty to Retreat**

A person who was not the aggressor, did not provoke another with intent to cause an altercation, or did not voluntarily enter into mutual combat has no duty to retreat, but may stand firm and use the right of self-defense.

### **OUI-CR 9-1: Evidence – Inferences**

You should consider only the evidence introduced while the court is in session. You are permitted to draw such reasonable inferences from the testimony and exhibits as you feel are justified when considered with the aid of the knowledge which you each possess in common with other persons. You may make deductions and reach conclusions which reason and common sense lead you to draw from the fact which you find to have been established by the testimony and evidence in the case.

### **OUI-CR 9-2: Direct Evidence Defined**

"Direct evidence" is the testimony of a person who asserts actual, personal knowledge of a fact, such as the testimony of an eyewitness. "Direct evidence" may also be an exhibit such as a photograph which demonstrates the existence of a fact. It is proof which points immediately to a question at issue and which proves the existence of a fact without inference or presumption.

### **OUI-CR 9-3: Circumstantial Evidence Defined**

"Circumstantial evidence" is the proof of facts or circumstances which gives rise to a reasonable inference of other connected facts that tend to show the guilt or innocence of a defendant. It is proof of a chain of facts and circumstances that indicates either guilt or innocence.

### **OUI-CR 9-4: Direct and Circumstantial Evidence – Weight**

The law makes no distinction between the weight to be given to either direct or circumstantial evidence. You should consider circumstantial evidence together with all the other evidence in the case in arriving at your verdict.

## **STATEMENT OF OFFICER KRIS GRIFFIN**

1           My name is Kris Griffin and I descend from a long line of law enforcement who've  
2   shouldered the burden of protecting the citizenry of this area, even to the point of sacrificing their  
3   lives in that duty. My great-great-great grandfather was United States Marshall John Bethlehem  
4   Griffin who died during the capture of Crawford Goldsby, otherwise known as "Cherokee Bill"  
5   one of the most dangerous men in Indian Territory during the nineteenth century. "Hanging Judge"  
6   Isaac Charles Parker sentenced Cherokee Bill to death for his crimes, including the death of J.B  
7   Griffin.

8           My family unselfishly protects and serves the public, unlike other families in this area who  
9   have a well-deserved reputation for being up to no good, if you know what I mean. I am a lineal  
10   descendant of Cullen Griffin, but am only distantly related to Frank Griffin, even though Frank is  
11   also a descendant of J.B. Griffin. You couldn't tell that Frank was a member of the Griffin family,  
12   however, since he never worked in law enforcement. Frank rejected the family's heritage and  
13   generally fell out of favor with the family. The Griffin women and men have always worn our  
14   uniforms and badges with great pride realizing that they are symbols of public trust, a trust which  
15   this family upholds every day. The Griffin family has a lot of "try".

16          I have an associate's degree in law enforcement from Wheatville Community College and  
17   am a CLEET certified peace officer. My training included fourteen and a half weeks of intensive  
18   on-site training at the Clayburn Training Center. This included more than five hundred hours of  
19   classroom training and practicums in all areas of being a police officer, such as criminal law,  
20   firearm training, emergency vehicle tactics, accident investigation, and drug/alcohol recognition.  
21   Additionally, I am a certified CLEET instructor and for the past nine years have taught the criminal

1 investigation portion of the annual academies. This will be my twentieth year with the Wheatville  
2 Police Department, where I began my law enforcement career.

3 I was the officer in charge of the investigation. I conducted a full and fair investigation into  
4 this crime, utilizing all my skill, knowledge, education, experience, and training. I was covering a  
5 patrol in a squad car overnight on the day in question. See my reports for information about the  
6 investigation.

7 Of course, Sidney Goode's behavior in not calling 911 "immediately" and confessing to  
8 involuntary manslaughter shows that they were guilty of murder, notwithstanding the explanation  
9 of the events that morning. If you're a big enough person to kill someone, then be mature enough  
10 to confess and own up to your wrongs. Sid's explanation seemed to be too pat, tying up lots of  
11 loose ends, in an attempt to try and avoid responsibility for actions, much like other members of  
12 that family have done throughout the history of this area. My instincts told me that Sid was lying  
13 about the incident. Why on earth did Sid wait so long to call 911 after Frank "accidentally" died?  
14 If it was really an accident, you would call 911 immediately.

15 The Medical Examiner's report was inconclusive on homicide, so I began looking for an  
16 alternate theory of how Frank Griffin died. I remembered the EMTs telling me that Frank may  
17 have been hung and that seemed a much more likely possibility than the spooked horse story. I  
18 sought out a forensic expert, Shiloh Shelby, who investigated Frank's death and concluded that the  
19 death was by hanging as I thought, not unlike Sidney's ancestor Ezra Goode was hung for  
20 kidnapping in the 1930s. After Sidney killed Frank by hanging, Sidney then tried to cover up the  
21 real mechanism of death by dragging Frank's body around the arena and making up the story about  
22 a spooked horse. Sidney may have been aided by Elon Gud. After speaking with Shiloh Shelby  
23 who had not finished the report, I arrested Sidney Goode for the murder of Frank Griffin. There

1 was no need to wait for the final written report since verbal confirmation was made. Sidney was  
2 there at the rodeo the night before and the morning of the 911 call. Would you have preferred that  
3 we let a murderer keep walking free on our streets??? I don't think so. Too much blood from my  
4 heritage has been spilled because of delayed action in taking down the bad people in this world.  
5 There was not enough evidence to arrest Elon Gud.

6 As for motive, everyone knows about the Goode Family Trust and that family members  
7 must commit an act of "true and permanent loyalty to the family" to inherit a share of the fortune.  
8 Such past acts have included killing a rival or threat to the Goode family. While there is no open  
9 "feud" other than the mystique that news article created trying to sell newspapers, there definitely  
10 is ill will between the families. The Trust Fund encourages Goodes' lawlessness for financial gain,  
11 usually at the expense of the lawfully acting Griffin family who remain blameless. Ezra Goode's  
12 hanging was well-deserved, but we can all agree that capital punishment is not pretty. No hanging  
13 is ever perfect, especially those that occurred a century ago.

14 Cullen Griffin did not do anything wrong when he metered out the judicial remedy; he was  
15 just doing his job, and, just so the record is clear, the hanging worked right? The condemned died  
16 right? Then what's the real problem? Yeah, the hanging should have been a quick snap and the end  
17 of the rope, but sometimes things don't go as planned and someone ends up kicking, fighting and  
18 swinging for a while. Whatever Cullen's private personal feelings were about Ezra, those feelings  
19 did not creep into how the execution occurred. The Griffins want nothing more than for the Goodes  
20 to move past whatever grudge they carry against the Griffins for performing their civic duties. I  
21 did what I had to do in this situation, and I will not hesitate to do the same again. What would you  
22 expect of your law enforcement officials if that victim was a member of your family?

1           As my family has said from time to time, sometimes this bright badge must work in the  
2   dark to catch the criminals of this world. Too often around here good people can be really bad.  
3   Sidney Goode is a bad one. The whole professional rising rodeo star line is trash. The chance of  
4   carving out a living in the rodeo circuit is slim, but there is a real clear line to inheriting from that  
5   family trust: an act of true and permanent loyalty; what's more permanent than ending the life of  
6   another?

I have given this affidavit of my own free will on February 20, 2020, and certify that my  
statements are the truth and I have nothing more to say.

*Kris Griffin*  
Kris Griffin

## STATEMENT OF SIDNEY GOODE

1           My name is Sidney Goode, pronounced “Good”, and I just want to start off by saying I did  
2   not murder Frank Griffin. It was an accident, a tragic accident. If you are in the rodeo circles, I’m  
3   sure you have heard about me, I’m kind of a big deal, an up and coming star as a tie-down roper.  
4   It’s the hardest event in the rodeo and requires significant skill with the rope. The rope is about 25  
5   foot in length with a 4-ply polyester cord to limit stretching once you get your target roped. Then  
6   it’s just two wraps and a hooley with the piggin’ string - and it’s done. Make sure your tie down  
7   holds, you don’t want the target to get loose, the calf I mean. You don’t want the calf to get loose.  
8   You also must be spot on with your aim - throwing to a specific spot on the head so that you don’t  
9   get trash in the loop, a leg or something, which will hurt your overall time. Most times you need  
10   to lead your target too, enough lead to get a good solid wrap around his neck and to pull it tight  
11   and the exact right second. The calf’s neck, sorry, the target is a calf most times.

12           There is a lot of speed with the horse which makes it even more difficult. It takes years to  
13   train a roping horse and it’s a close relationship - the horse trusts you and you trust the horse so  
14   that neither of you get hurt. Ez and I - well his full name is Ez’s Revenge - I’m not sure where he  
15   got that name. Well Ez and I are really close, I’ve spent hours upon hours training him. We are a  
16   good team and we get the job done. I’ve been called the rope whisperer - nothing yet that I haven’t  
17   been able to rope. You also must be in really good shape so I take real good care of myself,  
18   working out a lot - which I’m sure you can tell.

19           The night before the accident I was going to get in a practice session at the round up club  
20   and Frank was kind enough to offer to help me out. I had just happened to run into Frank that day  
21   and invited him to the practice session. Frank agreed and we made plans to meet up that evening  
22   at the round up club. Elon set up the practice session later in the evening when everyone else was  
23   gone. That’s what I wanted because it’s easier to practice without a crowd of people watching

1 you. I don't really know Elon well, we run in the same circles so I would call them an acquaintance.  
2 Elon and that family worked a lot with the Goode family through the years, I mean I come from a  
3 long line of "professionals", so our families have definitely crossed paths through the years. Some  
4 were outlaws, but if you earn money doing something that makes you a professional right?

5 Frank and I practiced that night at the round up club until about 10:00 p.m. and had plans  
6 to come back in the morning to get some more practice in before anyone else got to the round up  
7 club. By the time I got the horse watered, hosed off, brushed, put up and took a last walk-around  
8 the arena, it was about 11:00 p.m. when I left. I do a late-night walk around because the arena is  
9 usually quiet and no one is around. I walked up on the stage and around the stands. I thought I  
10 was alone. I didn't see Frank anywhere, so I just figured he had already left to go home. I packed  
11 up and hauled my equipment to my vehicle. I think I just had my gloves, several ropes, some  
12 riding equipment and I left everything else there at the arena. I do use a fairly large bag, but there  
13 wasn't anything there that night or the next morning that was worth much.

14 On the morning of the accident, it was just Frank and I there as far as I knew. I got to the  
15 arena around 6:30 a.m. and Frank was already hanging there, excuse me, out there; Frank was  
16 already hanging out there. Elon may have also been there too, since the arena gate was open.  
17 Anyway, I was using the dummy head to rope, and I was on Ez. Frank was there then also. Did I  
18 forget to mention that? Frank was there that morning. He was hanging out with me by then.  
19 Anyway, there wasn't much said between us that morning, you know how it is with rodeo, it's an  
20 intense time for sure. All was going as planned by that point.

21 I usually do thirteen passes in practice - it's just my ritual. Well, on the thirteenth pass I  
22 was coming around the arena on Ez. I had him in fifth gear - completely focused on the dummy  
23 head. I guess Frank was too close to the dummy when I threw the rope, I don't even remember

1    seeing him- because I was that focused on hitting my target. My horse spooked as I threw and it  
2    took off uncontrolled around the arena. My first thought was to get control of Ez and get him  
3    calmed down, so he didn't hurt himself or me. I did not realize that the rope had wrapped around  
4    Frank, I did not see what the rope had caught until it was too late. It was just a freak accident.  
5    Sometimes you just can't control everything. When the horse took off the rope was wrapped  
6    around the horn and pulled tight. It snapped Frank away from the dummy area and dragged him  
7    around the area until I could get Ez stopped. Once I finally got Ez settled and stopped, I ran over  
8    to Frank and he wasn't breathing. I guess the rope pull broke his neck and he was already dead  
9    when I got to him. Actually, I know he was dead by then. It was a terrible accident, but absolutely  
10   not murder. I went to look for help and 911 was called at some point.

11            I am aware of the "family feud", a.k.a. that crap work of fiction created by that newspaper  
12   reporter to sell papers. The Barnes reporter fancies themselves a modern-day Sherlock Holmes  
13   looking for some big scoop - well it's all just rumors and speculation. I'll admit there is history  
14   between my family and Frank's family, but I'm not a part of that fight and neither was Frank.  
15   Frank was different from the other Griffins, he didn't strut around thinking he was better than  
16   everyone else. Besides, it was like 100 years ago, I mean let it go people!

17            After my family moved to California, things seemed to die down - I guess absence does  
18   make the heart grow fonder, well not really. I was glad my family got away from Wheatville, it's  
19   a place where it seems no one talks about anything else other than the Goodes and the Griffins.  
20   Me and Frank both thought there has just been too much death in both our families. Frank and I  
21   were even joking about it and giving each other a hard time at practice about the so-called "family  
22   feud." I will tell you there have been some crazy coincidences with those Griffins for sure, guess

1 they must be really accident prone. Serves the rest of those Griffins right, they had taken too much  
2 from my family through the years.

3 I have no idea how those thirteen bruises got on Frank's back. I never saw them and don't  
4 know what they were from. Maybe they are from Frank's body being bounced around the arena  
5 grounds, maybe there were there before that day, but I certainly didn't put them there. I do wear a  
6 size 10 boot, but I have no idea why those bruises would match the size of the heel of a size 10  
7 boot. I think Elon wears a size 10 boot too. Seems really odd to me. Anyway, I also did not put a  
8 note into Frank's pocket. Yeah, I know what "Don't worry. I'll be with you" is referencing, but I  
9 bet that cop put it there to frame me.

10 Yes, there is a Goode family trust and I have seen the document. We each have a meeting  
11 with the current family lawyer, in an office to learn about the trust when we turn 18 years old. I  
12 remember my meeting, it's something that we all look forward to, a rite of passage in the Goode  
13 family. I remember my parents driving me to that office, but I went in alone to meet with the  
14 attorney. Something about attorney-client privilege or some legal terms like that. We are not  
15 supposed to talk about it, being family business and all. I will say there is a requirement of  
16 "permanent loyalty to the family" but killing someone is not what that means. It just means being  
17 committed to the family, that's it. I can't disclose any more information that what I've already  
18 told you, I am bound by family oath and the attorney talked to me about privileged communications  
19 and how serious it is to stay silent. Family is everything to me, but somebody must have spilled  
20 some beans because that crazy reporter somehow got the trust details right in that 2018 news article  
21 I mentioned earlier.

22 Of course, Kris Griffin would be the police officer to respond to the accident, and I am sure  
23 the Officer's mind was made up before they even got there. Griffin didn't bother to look at the

1 evidence, just assumed I was a murderer! That tells you how the rest of the Griffins are. I tell  
2 you, I always try to keep a wide berth from them whenever I can because you just can't turn your  
3 back on them for a second. They've shot down in cold blood members of our family. Then they  
4 claimed self-defense and the system bought it! What a joke! I tried to explain to Griffin what  
5 happened in the police car on the way to the station. Griffin even let me ride in the front of the  
6 police car, not in the backseat like some criminal, so I thought they might actually listen to me but  
7 of course Griffin didn't and once I realized this I asked for my attorney.

8 I cannot believe this is all happening to me. I mean there is absolutely no reason for me to  
9 kill Frank, especially not to get a part of the family fortune. How am I supposed to spend money  
10 from jail? Does that make any sense at all?? I'm at the beginning of my real life and I have a great  
11 rodeo career ahead of me that I've worked so hard to make happen. Why would I throw away the  
12 chance at a successful career of hard work and too little pay too often, for some guaranteed share  
13 of a fortune? There's no glory in the latter, at least not outside of the family.

I have given this affidavit on March 10, 2020, of my own free will and certify that my  
statements are the truth and I have nothing more to say.

Sidney Goode  
Sidney Goode

## **STATEMENT OF SLOAN BARNES**

1           My name is Sloan Barnes, I am a reporter for the Wheatville News, but I haven't only  
2       worked in Wheatville. My dream of being the first Wheatvillian to win a Pulitzer took me from  
3       Oklahoma State University all the way to *The Pennsylvania Inquirer*. With the bust of the  
4       newspaper business, I authored the 2018 article that shone a light into the underbelly of this place  
5       and I'm working on a podcast now. This is going to be quite the tale to tell.

6           Us locals know that there has been a generational family feud resulting in multiple deaths  
7       where no justice has been provided for either side; it's still the Wild West out here in what was  
8       once Indian Territory. Honestly, it still seems pretty wild and lawless, despite the "good-natured"  
9       efforts of law enforcement. Instead of waiting on the courts, people just wait a few years and take  
10      justice into their own hands. Yes, I know of the Hatfield and McCoy "Drama", but this story is as  
11      real as the wheat this town was named for. This tale should be a movie and best-selling book. Can  
12      Scorsese just shoot two movies in a row here? Anyway, I'm getting ahead of myself.

13          When I wrote the article on the Goode-Griffin disputes, I never imagined that the feud  
14      would be revived by me! Feud is probably an understatement though. These shenanigans go back  
15      nearly 100 years. You see, in the early 1930s, a young father name Ezra Goode violated the Federal  
16      Kidnapping Act, you know that "Lindbergh Law" after that pilot's baby and all. Anyway, Ezra  
17      was executed in Oklahoma's last public hanging. Hangings are usually swift, but Ezra's was  
18      horrific. Not only did it turn the public against public executions, it also started the feud we are  
19      here talking about today. The feeling from that time was that the Goodes weren't so good, and the  
20      Griffin's were law-abiding, law enforcing citizens.

1 Normally, the gallows floor drops quickly, and the person falls with a sharp crack as the  
2 rope pulls tight and the neck is broken. Ezra's hanging took forever, and the citizens watched as  
3 Ezra choked to death, fighting, kicking, moaning, and suffering the entire time. Apparently, the  
4 gallows trap door caught and ended up slowly lowering Ezra down until the noose pulled tight.  
5 There was no snap or quick injury, there was no mercy. It was barbaric and should not have  
6 happened like that. Also, it is very important to know that those gallows, built at the direction of  
7 Cullen Griffin, had thirteen steps from the dirt street to the platform where the hanging took place.  
8 Everyone knew Ezra had committed the crime and should have been punished, but not like that.  
9 People, mostly the Goode family, blamed Cullen Griffin, the executioner. The Goode family high-  
10 tailed it to California in order to put Ezra's death and botched execution behind them. Obviously,  
11 I wasn't there to witness all of that, I had to rely on trusty investigative journalists before me.

12 Nearly 20 years later, when nearly everyone had forgotten about Ezra Goode and the old  
13 execution matter, several suspicious and tragic deaths transpired in the Griffin family. During the  
14 50s and 60s, four Griffins were killed and each around the 19<sup>th</sup> of the month. One Griffin, an avid  
15 swimmer, drowned in a slow-moving stream and had noticeable bruising on their back. In fact,  
16 some records note thirteen distinct marks.

17 Another Griffin died when their firearm discharged while being cleaned, but at an angle  
18 that wasn't possible to be an accidental discharge. Also, everyone knows the Griffins are long-  
19 established law enforcement officials who were always familiar with firearms. Two more Griffin's  
20 died by "suicide" hanging, but there were clearly signs of a struggle, neither had a broken neck,  
21 and both had unexplained marks on the wrists and ankles as if they'd been bound. Also, both  
22 victims may have had thirteen bruises or marks along their spines. Both victims were found with  
23 notes on or near the scene with the phrase: "Don't worry. I'll be with you." Coincidences, right?

1           If it were only one or two deaths, few would have batted an eye. But, four deaths, all  
2   suspicious, all within the same family and over the course of twenty years, it all seems to be related  
3   to me. Word began to spread among some in the area that revenge might be on someone's mind.  
4   Most didn't seem notice and went about their sleepy existence.

5           The 70s and 80s were ripe with suspected retribution against the Goode family by the  
6   Griffin clan. Although only two Goodes died suspiciously, the family suffered several unfortunate  
7   events. Foreclosure after foreclosure hit the Goode family, and the Griffins were there to scoop up  
8   their remaining property at sheriff sales. Here's the kicker: the community bank of Wheatville was  
9   founded by old Cullen Griffin after he retired as executioner for Oklahoma. Now that sounds  
10   dramatic, but when I was doing research for my article I found out that although many Griffins  
11   worked at the bank at one time or another, the decision-making power was not retained by any of  
12   the Griffins after Cullen sold his interest before retiring from being a banker. It would have been  
13   more dramatic if the Griffin family controlled the bank, but that lead was a dud. I needed to find  
14   something to catch a reader's attention.

15          Oh, one more thing on those two Goode deaths, both were shot down with six-shooter  
16   revolvers. Who still used revolvers at that time? Apparently, some of the Griffins did and they  
17   allegedly acted in self-defense. Now, I am not a legal expert, but self-defense surely does not  
18   include firing nearly a dozen shots, having to reload half-way through, hitting your "attacker"  
19   across both the front and back of the body and then having only family members as witnesses to  
20   corroborate that the twice-over dead person was the attacker and started the fight. On top of this,  
21   neither Goode victim had a gun or weapon of any sort. I wasn't around then, but I am still  
22   embarrassed by the complete lack of prosecution or real investigation into these events. Anyway,  
23   back to my story, I needed to find something worthy of a headline for the Goode-Griffin feud.

1 Not to toot my own horn, but I did find something. I mean, I really found something,  
2 hopefully those Pulitzer Prize people are still listening. Hello, Pulitzer? I mean, one thing the  
3 Hatfield and McCoy feud didn't even have going for it as an old family trust. You know those  
4 things rich people create to protect their property. This trust, which I found when researching my  
5 article, held money and land and mineral interests and was worth more than enough to make any  
6 Wheatvillian's head spin. There was one odd requirement of an "act of permanent loyalty to the  
7 family" in order to inherit. Now, I'll let you decide what that means but I have my own feelings  
8 on the matter, and I might just save those feelings for that podcast I mentioned earlier. I think the  
9 title will be something like "Goode kills Griffin for share of Great Trust".

10 On to the matter at hand, yeah, Sidney Goode had motive for killing Frank Griffin-about a  
11 million reasons of motive. You see that Goode family trust was started generations ago and,  
12 regardless of your take on the family's decisions on "right and wrong", someone in that line made  
13 a bunch of right financial and investment decisions. I never found a full and complete copy of the  
14 document and there may not be an actual document, but I did see the excerpts in this case and there  
15 is enough smoke in the air for there to be some fire of truth to this part of the story.

16 Oh, and did I mention the royalties? Maybe the trust was started in California or somewhere  
17 between there and here, but I know it includes royalties being paid on mineral rights here in  
18 Oklahoma. I think the Goode family was even getting paid off of some of those Quadstone wells  
19 a few years back.

20 At the beginning I promised you a tale taller than the Hatfield and McCoy feud, and this  
21 Goode-Griffin history should speak to generations of readers. People like me have been reporting  
22 on these families for as long as there has been a feud to report on. This is why newspapers are  
23 important, even around here in Wheatville. Maybe we can finally get past the Quadstone and

- 1 Heisenburg fiascos, and on to more entertaining stories. That is a pretty good piece of literature
- 2 isn't it? Non-fiction of course. Where do you want my autograph? On the line? Got it.

I have given this affidavit on March 15, 2020 of my own free will and certify that my statements are the truth and I have nothing more to say.

*Sloan Barnes*  
Sloan Barnes

## **STATEMENT OF ELON GUD**

1 I am Elon Gud, pronounced “Good”. Yes, like the Defendant’s name, only not. Its “Good”,  
2 not “Goode”. My ancestors dropped the “lazy E” at the end of the original name many years ago.  
3 I do not know when, but I believe it was for a fresh start. My family reversed the Grapes of Wrath  
4 and moved to Oklahoma from California decades ago. I’ve known the Goode family for years,  
5 they’re like family. Of course, that includes Sidney Goode, and I know that Sidney did not murder  
6 that poor Griffin fellow. Sidney is a good person who cares for others and would not hurt a fly.

7 Like I said, my extended family moved to Oklahoma decades ago. My grandpa wanted to  
8 stay in California though, so I grew up in the Golden State. I learned to love the rodeo life from  
9 my gramps, he taught me how to rope and ride by the time I was seven years old. He taught me the  
10 trade and we worked the rodeos together until he died. So, when my core family eventually moved  
11 to Wheatville, and the “powers that be” heard about my skills, they offered me the job of manager  
12 at the Round Up club. Seeing me running things here really would have made Gramps proud.

13 I oversee the setup of all meetings, activities, and shows, including equipment. I coordinate  
14 staff and outside vendors, and I assist with ongoing building and maintenance projects. I know the  
15 place like the back of my hand. All the ins and outs, even the more hidden spots, where you might  
16 find teenagers making interesting life choices or some bad apples doing who knows what. I  
17 practically live at the Round Up club. I did say I was all about the rodeo life, didn’t I?

18 Anyway, part of the job is setting up practice sessions for our riders. Anytime, day or night,  
19 I’ll set up the practice arena for those who want it. I’ve set up practice session for Sidney too many  
20 times to count. That shows a really dedicated rider, and Sidney is a great rider, really becomes one  
21 with the horse. Sidney is also a real ace with that lasso. Doesn’t matter what it is, barrel, calf,  
22 dummy. Ironically to this situation, I’ve seen Sidney make a throw from a dead stop, start the

1 horse in the opposite direction of the target, and still catch the target at full stride. You should see  
2 how fast that dummy snaps over and gets a free ride down the full arena. Sidney never fails to  
3 rope the target. That's what Sidney was doing that night, practicing in the arena. I believe Frank  
4 Griffin had offered to help Sidney practice. I saw them both heading into the arena the night  
5 before...well, the night before the body was found.

6 I had set up the arena that night at the scheduled time and left it open, I knew Sidney would  
7 be along shortly. Then I headed back to my office to work on some paperwork, we had an  
8 upcoming event I was preparing for. Right as I was about to step into my office, I saw Sidney and  
9 Frank walking towards the arena. They were pretty far away so I couldn't see or hear perfectly,  
10 but they seemed to be getting along, I think one was even chuckling. That's when I heard one of  
11 them say, I'm not sure which, "I hope one day I find out if vengeance really is sweet."

12 I didn't see or hear anymore after that. Like I said, I had work to do. I went into my office  
13 and put my nose to the grindstone, and I didn't finish up until late that night. As I was locking up  
14 my office, I saw Sidney hurrying out to the parking lot. Given the time, I was sure Sid was heading  
15 home. Sid did have a large bag slung over their shoulders and it sure looked heavy. I assume it  
16 was just riding equipment. Frank wasn't around as far as I could tell, and I guess I assumed he had  
17 already headed out or maybe he was hanging out near the practice arena somewhere out of sight.  
18 It was late, and I was tired, so I didn't give it a second thought.

19 I got back to the arena and into my office before daybreak, I like to be the first one there.  
20 At some point, I saw Sidney return for the typical morning routine. Sid was dragging that bag of  
21 equipment again, must have had a tough night because Sid seemed off. I could tell, even from a  
22 distance, that Sid was struggling to get that equipment to the arena. I thought about helping, but  
23 figured Sidney was an experienced roper and was handling whatever needed to be taken care of.

1           The next thing I remember is hearing some commotion a little while later. Maybe it was  
2 an hour or so, but there was a real storm of activity around the arena. They had found Frank's body,  
3 and everyone was in a tizzy. Everyone saw the rope and their minds immediately went to a noose,  
4 but it was plain to me it was a lasso and some terrible accident had occurred. There is no other  
5 explanation.

6           Look, I know people are going to say this is about the "feud", but it isn't. People want to  
7 make Sidney a villain, but the truth is Sidney didn't give a darn about all that stuff. Yes, there has  
8 been bad blood between the Goodes and the Griffins in the past, but that's exactly what it is, in the  
9 past. I wouldn't even call it a feud, more a mistrust of each other. I mean can you honestly tell me  
10 if one of your ancestors was murdered by a family, you wouldn't be a little wary of the  
11 descendants? Even if Sidney's ancestors couldn't let their feelings go, the recent family members  
12 were trying to put it all behind them, at least I thought so. Frank offered to help Sidney in the arena  
13 and Sidney accepted, right? Where's the problem? Where's the feud? Its not like Sidney needed  
14 a reason to get close to a Griffin or something. Everything was good.

15           Don't even get me started on all of this family trust business. That trust was formed decades  
16 ago, back when tensions were still high. If the wording is a little strange, you'll have to blame it  
17 on the times. None of us beneficiaries put any stock in the so-call oath or pledge.

18           Sidney says the horse spooked and I believe it. You don't get to be a great roper without  
19 being a great rider, and any great rider will tell you sometimes horses just spook. There is no rhyme  
20 or reason to it. You just have to hold on tight and get the horse under control. Sidney was at the  
21 arena with Frank the night before, but I did not see Frank there in the morning; not until there was  
22 a body in the arena. Sidney did not kill Frank Griffin. It was a bad mistake. Besides, if I was going  
23 to kill someone just to get some inheritance for the rest of my life, why on earth do it out in the

1 open? That doesn't make any sense. I'd try to make it look like an accident, but I didn't do  
2 anything, and Sidney didn't do anything. This is a ridiculous mess, probably drummed up by that  
3 news reporter to try and generate more interest in some piece of fiction.

I have given this affidavit of my own free will on April 1, 2020 and certify that my statements are the truth and I have nothing more to say.

Elon Gud "Good"

Elon Gud

### **STATEMENT SHILOH SHELBY**

1 I am Shiloh Shelby, Dr. Shelby actually. I have been retained by the State of Oklahoma to  
2 review certain evidence in this case and render an opinion as to the manner and cause of death of  
3 Frank Griffin, decedent. I have included a list of my professional positions and education history  
4 in my report and I would direct any questions on such subjects to that document. Let me just say  
5 that I have been doing this type of work for quite a while and my conclusions should be beyond  
6 question or reproach. Regardless, I offer the following conclusions with medical certainty.

7 For my work in this matter, I reviewed several documents that have been identified as  
8 possible exhibits in this case. Specifically, the Wheatville Police call and investigation reports; I  
9 have seen photographs from the scene and diagrams of the rodeo arena and surrounding grounds;  
10 I have reviewed the Medical Examiner's report and I have reviewed a copy of the "report" offered  
11 by Dylan Declan for this case. I must say at this point, that I disagree with Declan's opinions and  
12 am surprised that a fellow product of Canyon Ridge University would sign such a report, but I  
13 guess you can pay enough to get any opinion you want sometimes.

14 To be concise, Frank Griffin was hanged and died from intentional strangulation. The  
15 medical facts support only intentional conduct by human hands, this was no accident. The neck  
16 structures were damaged in a manner consistent with strangulation by rope. In fact, there was so  
17 much damage to the soft neck structures, that I believe there were two (2) instances of "hanging".  
18 I do not believe that the damage to the neck structures observed by the Medical Examiner could  
19 have resulted from a single, quick snap and drag event. Even factoring in the fact that a horse was  
20 running away from the decedent at the time of the accidental roping, the blunt force completely  
21 crushed and moved the internal neck structures to the point of indistinguishable identification and  
22 impossible assessment.

1           The lack of broken bones in the neck shows that the decedent was submitted to a prolonged  
2   trauma and not a quick snap as would be the case if the spooked horse story were the true sole  
3   source of damage. I do believe the decedent was roped and dragged around the arena the morning  
4   of discovery, but I disagree that the decedent was alive and standing upright when the second  
5   roping occurred. If the accidental roping story was true, I would expect to find broken bones and  
6   such separation of the cervical vertebrae that it could be established the neck was static at the time  
7   of strangulation. In other words, if the decedent was standing, kneeling or in a position where the  
8   neck would provide some degree of initial resistance to the force of the noose at the time of the  
9   roping, then there would be broken bones and or significant separation of the cervical bones. In  
10   my opinion, the observed damage is consistent with the body being re-roped or hung a second time  
11   and pulled around the arena the morning of discovery.

12           Also, there was no dirt in the interior structures and tissues of the nose and lungs. The  
13   decedent was not breathing the morning the body was found and Frank was certainly not breathing  
14   right before he was “accidentally” roped. In my opinion, the decedent had already died before the  
15   rodeo events occurred. There was a little dirt found under the decedent’s fingernails and this would  
16   be consistent with a dead body being dragged around the arena. Had the hands been pulling against  
17   the rope, as would be the reaction of a conscious person, then there would not have been any dirt  
18   observed under the fingernails. The lack of dirt under the eyelids also shows that the eyes were  
19   not open at the time of the dragging-even more evidence to support that the decedent was dead  
20   when the body was crudely re-hung and dragged around the area in a pathetic attempt to cover up  
21   the crime that had already occurred.

22           Declan’s concussion theory is interesting, in the same way that a toddler denying having  
23   had a cookie with crumbs on their mouth is interesting. One must refrain from laughing at such a

1 ridiculous claim. Declan's "theory" is clearly not supported by the evidence. Nowhere is there a  
2 single piece of medical evidence that the decedent sustained a concussion and was knocked out.  
3 The Medical Examiner's report makes no mention of any observed evidence to support concussion  
4 or loss of consciousness, other than the person having died at some point. I do not offer opinions  
5 based entirely on speculation and I would caution my younger fellow CRU graduate to never offer  
6 such a baseless conclusion again. No professional witness will make a career out of speculation.

7 Furthermore, the absence of concussion evidence actually supports my conclusion that the  
8 decedent was already dead at the time of the accidental roping. There was no blood flow to the  
9 brain such that bruising would result from an impact between the brain and the interior surface of  
10 the skull. The only explanation offered by Declan for the lack of concussion evidence is that the  
11 Medical Examiner did not look enough. That's it! That is not a basis for sound medical opinion.

12 Also, the defense does not offer any explanation for that note: "Don't worry. I'll be with  
13 you." Why would that be on the body of the decedent? Everyone knows exactly what that is  
14 referencing! It's some sick fascination the Goodes have with giving final words to their victims.  
15 I also read the Wheatville News article about the Goode-Griffin family feud as part of my analysis  
16 and this incident really seems to fall in line with that story. I believe Frank Griffin was killed as  
17 part of that dispute. He did have thirteen bruises on his back right? Has the defense side addressed  
18 that fact or explained that away to any plausible degree? Yes, I did talk to Officer Griffin about  
19 my opinion before issuing my final report- that is typical. I wanted to make sure I had the facts  
20 correct. The M.E.'s report supports homicide and is incorporated into my opinion and report.

I have given this affidavit on May 5, 2020 of my own free will and certify that my  
statements are the truth and I have nothing more to say.

Shiloh Shelby  
Shiloh Shelby

### **STATEMENT OF DYLAN E. DECLAN**

1           Good morning, I am Dylan Declan. I have been conducting forensic pathology  
2 investigations since about 2004. I teach classes on this type of work also. I will ask to note here  
3 my educational, training and professional work as set forth in my report. The evidence in this case  
4 supports accidental death. I reviewed the ME's report and disagree with the conclusions reached  
5 by Shelby, the State's witness.

6           Mr. Griffin died tragically, but accidentally. There was no intention to kill in this matter.  
7 At least, I did not find any medical evidence to support an intent to kill. While I would respectfully  
8 ask that my report and the conclusions contained therein provide the substance of this statement, I  
9 do want to offer several points.

10          First, no dirt was found in the lungs because the throat was closed due to the impinged neck  
11 structures. I agree there was no breathing at the time of injury, because death was quick and the  
12 neck's structural integrity had been compromised. Such is the result of strangulation. By nature,  
13 no air makes it to the lungs and thus, the absence of dirt in the lungs does not support preceding  
14 death as is suggested by the prosecution's hired witness.

15          Second, the damage to the neck structures is certainly significant, although I disagree that  
16 there were two (2) independent events. The quick snapping motion of decedent being accidentally  
17 roped, the rope snapping closed and the momentum of the spooked horse all resulted in significant  
18 force being applied to decedent's neck by the rope. The absence of broken bones or separated  
19 cervical bones is not dispositive and does not conclusively support the State's opinion. More  
20 analysis is needed.

21          This decedent was literally jerked off their feet by a rope, which effectively acted as a  
22 noose. The medical evidence clearly shows the neck structures were crush beyond identification-

1 consistent with a significant external traumatic force having been sharply and quickly applied to  
2 the area. Such force coming from the application of a rope and the momentum of a running horse  
3 at the other end of the rope pulling in the opposite direction. I believe the crushing damage supports  
4 the conclusion that the decedent's neck was static or stationary at the time of and just before the  
5 roping occurred. There would have been a moment of tensing by the body in the second that force  
6 begins to be applied, it is an involuntary reaction of the human body to try and stay balanced, but  
7 this split-second reaction would provide sufficient "resistance" to the force of the rope. Therefore,  
8 the significant damage was the result of a single roping/hanging as the body did resist the force.

9       Next, there is no dirt under the fingernails because the fatal damage had been done already  
10 and decedent was not fighting against the rope or against being pulled across the arena floor. I  
11 believe the decedent was rendered unconscious or was in such a state of shock that the "normal"  
12 reactions of fighting against the rope would not be present. I doubt the decedent had much time  
13 to react or realize what was happening-which is a small mercy.

14       As for the absence of dirt under the eyelids, I do not believe the Medical Examiner made  
15 that observation. Certain observations of the eyes were made, but I could not reach a determination  
16 on this specific point and the State's opinion seems to lack any medical evidence in support. There  
17 is evidence of scrape marks on the neck consistent with rope pulling toward the head or being  
18 dragged around, as observed by the investigating officer. That same individual noted scrape marks  
19 on the hands and the state's witness does not even address this medical evidence.

20       Also, the "minimal" bruising is not due to dying before the roping, but due to the quickness  
21 of death in the seconds after the horse spooked and the complete closure of the circulatory system  
22 at the neck. If you pinch a water hose completely closed, the water stops flowing and backs up to  
23 a static and still position. In this case, the hose was closed and never reopened before death. The

1 heart stopped beating before the impingement was removed and the lack of blood circulation is not  
2 supportive of intentional action, as suggested by Shelby.

3 I do agree, to an extent, that the overall wounds are consistent with hanging. However,  
4 there is no evidence of that cause of death having occurred before the decedent was effectively  
5 “hanged” by the accidental roping. This was an accident and there was no intent to kill. The  
6 evidence does not support death prior to the accidental roping. I believe someone was arrested  
7 before I even finished my report, which seems very odd and calls into question the validity of an  
8 objective investigation, but such matters are beyond my experience. I would ask that my report be  
9 included at this point in my statement to provide any additional details, opinions, and support for  
10 my testimony. Thank you.

I have given this affidavit on May 10, 2020 of my own free will and certify that my  
statements are the truth and I have nothing more to say.

Dylan E. Declan  
Dylan E. Declan

**EXHIBIT 1**  
**Call Report**



# WHEATVILLE POLICE DEPARTMENT

2 Main St.  
Wheatville, Oklahoma 73333  
Phone: (405) 555-9111

## **OFFICIAL CALL REPORT**

Date Reported: December 20, 2019  
Time Reported: 07:30 a.m.

OKCPD Complaint No.: 22117

### **CALL DATA**

**Incident type:** Unresponsive Person – Possibly Deceased

**Location of Occurrence:** Wheatville Round-Up Club (Rodeo Arena)

**Type of Premise:** Public City Property

**Responding Officer:** Officer K. Griffin

**Reporting Party:** Elon Gud, likely of the Goode family

### **Initial Investigation Data**

**Identification of Unresponsive Person:** Frank Griffin

**Method of Identification:** Driver's license found on body; also confirmed by persons present

**Apparent Injury and Method:** "Accidental" roping- noose was wrapped around the body at the neck and there are signs of intentional killing

**Time of Injury:** Exact time- Unknown; Estimated time - between 23:00 night before to 7:00 this morning

### **Persons Present at Scene**

Name: Sidney Goode  
Contact Information: Refused to Provide

Name: Elon Gud  
Contact Information: Manager of Round-Up Club/Rodeo Grounds

### **Suspect(s)**

Name: Sidney Goode- last person seen with unresponsive person and claims to have accidentally roped decedent. Not arrested yet, no other suspects at the scene.

## **Narrative**

At approximately 7:30 a.m. on December 20, 2019, I received a dispatch call for an unresponsive person found at the rodeo arena. This call was generated from a 911 call by Elon Gud reportedly fifteen minutes or so after Frank Griffin died, but that seems unlikely. An ambulance was also called. I arrived within a few minutes of the call and entered the arena. I made contact with Elon Gud outside the arena, the manager. I was led into the arena.

Once inside, I observed an unresponsive person laying supine on the ground with a loosened lasso around his neck. I recognized the body being Frank Griffin. Frank's body appeared to have been dragged around the arena as the clothing was covered in dust and there were small scrapes on the head and hands. There was no blood on the scrapes. I approached and checked for vital signs but did not feel a pulse or see any signs of breathing. I decided against performing CPR based on the lack of vital signs and the suspicious circumstances of the scene. There was no way for me to ascertain with any certainty the time of the death, but it looked like it had been a few hours. There were several other people at the arena, but only one of note; see above. The ambulance arrived but left after the medics confirmed there were no signs of life present. The lasso was not removed from the body. The medics suggested it was possible that Frank's neck was broken but an autopsy would be needed to discern the cause of death. I radioed dispatch to update on the call. I requested back up, that the Medical Examiner's office be sent to the scene, and I began an investigation- See separate report.

I, Officer Kris Griffin, prepared this Call Report on December 20, 2019.

Reporting Officer: Officer Kris Griffin  
Supervising Officer: Sergeant Tywin

**EXHIBIT 2**  
**Investigation Report**



## WHEATVILLE POLICE DEPARTMENT

2 Main St.  
Wheatville, Oklahoma 73333  
Phone: (405) 555-9111

### **OFFICIAL INVESTIGATION REPORT** **Homicide Division**

Case Number: 2019-09-01-1457H  
Date of Call/Event: December 20, 2019  
Reporting Officer: Officer K. Griffin  
Investigating Officer: Officer K. Griffin  
Investigation Division: Homicide  
Address of Scene: Wheatville Rodeo Grounds, 450 W. Main Street, Wheatville, Oklahoma 73333

#### **Information from Call Report- General Description of Scene:**

The rodeo arena has been in use for nearly a century and is owned by the city of Wheatville. A 911 call about the discovery of an unresponsive person in the arena on December 20, 2019. Other than the body, a roping target was in the arena. Nothing else appeared out of place. I made contact with Elon Gud outside the arena, the manager, I was led into the arena.

#### **Scene:**

Once inside, I observed an unresponsive person laying supine on the ground with a loosened lasso around his neck. I recognized the body being Frank Griffin. Frank's body appeared to have been dragged around the arena as the clothing was covered in dust and there were small scrapes on the head and hands. There was no blood on the scrapes. I approached and checked for vital signs but did not feel a pulse or see any signs of breathing. I decided against performing CPR based on the lack of vital signs and the suspicious circumstances of the scene. There was no way for me to ascertain with any certainty the time of the death, but it looked like it had been a few hours. There were several other people at the arena, but only one of note; see above. The ambulance arrived but left after the medics confirmed there were no signs of life present. The lasso was not removed from the body. The medics suggested it was possible that Frank's neck was broken but an autopsy would be needed to discern the cause of death. I radioed dispatch to update on the call. I requested back up, that the Medical Examiner's office be sent to the scene, and I began an investigation.

I then worked to secure the area and instructed Elon Gud to shut down the arena but not let anyone leave without speaking to me first. I began taking notes on the scene as part of the investigation. I observed a roping target at the north eastern end of the arena near the chutes. The body was at the southwestern end of the arena. I obtained identification and contact information for the person

who was involved. I inspected the arena where the victim was found. Through a thorough inspection, I identified the following evidence of note:

- a drag line from the north-east area of the arena to the south-west end where the decedent's body was found;
- the arena floor north of where the drag line began was disturbed differently than the rest of the grounds;
- the patterns in that area were different and looked to be inconsistent with the run patterns described;
- that area looked to be swept over, but did cover from the north chutes to the exact point where the drag line began;
- body was found near the south-west end of the arena;
- the decedent had dirty fingernails and observable injuries consistent with having been hanged;
- the decedent was not wearing gloves, nor were any found on his body or in the arena that might have been in his possession.

I talked to a few people who were present at the arena, but none appeared to know anything first-hand nor have any motive to kill the victim.

Elon Gud told me that both Frank Griffin and Sid Goode had been practicing calf-roping the evening before. They were using a target and practicing both on foot and on horseback. The two appeared to be getting along, although there was a fair amount of yelling that Elon attributed to the roping practice. Even so, at one-point Elon overheard what Elon now believes could have been some argument between the two. Elon was not close enough to hear exactly what was said but believed to have heard something about "revenge" and the family feud. Elon saw Sid leave the arena around midnight or so and assumed Frank had also left. Elon did observe Sidney this morning dragging what appeared to be roping equipment. Not until the commotion this morning did Elon claim to be alerted to the discovery of Frank's body. For some unknown reason, Elon does not believe that Sid could have intentionally caused Frank's death.

At 8:45 a.m. that same morning, I made contact with Sidney Goode. Sidney admitted having been at the arena with Frank Griffin practicing calf-roping. Sidney said there were no arguments between them and Sidney claims to have left around 11:00 p.m. Sidney admitted that during the practice there was cursing and loud voices, but it was all to do with the success or failure of the practice and not directed at each other. Sidney eventually admitted that the two had discussed the family feud and how the citizens of Wheatville seemed to revel in its mythology to the point that the Wheatvillians were more invested in the feud than were the Goodes or the Griffins. I asked if Sidney would come down to the station to make a statement and Sid agreed. We both got into the patrol car. I permitted Sidney to be in the passenger front seat. I turned on the dash cam, but there was a malfunction and it did not record the ride to the station.

During the ride, Sidney Goode told me the "tale" of accidentally killing Frank Griffin. For some reason, Sidney claimed the horse spooked right as the lasso was tossed and it ended up wrapping around Frank. Yeah, you're reading this right, it was an "accidental" roping that turned fatal when the horse ran across the arena and Sidney was unable to control the animal. The horse got spooked, the lasso landed on Frank instead of the target, and the horse bolted, dragging Frank. Sidney tried

just letting the lasso go, but the lasso was hung up since it was still tied to the saddle horn. By the time that Sidney got the horse stopped and the lasso unhooked from the saddle, Sidney claims that Frank was dead. I don't see how that is possible since the whole sequence of events could not have taken more than a minute. The only part of this tale that I believe was Sid telling me Frank did not seem to be fighting the rope. Sidney did not attempt CPR.

By the time we got to the police station, Sidney suddenly wanted to see a lawyer. We got out, Sid made a call from a cell phone and a lawyer soon contacted the station. That was my last interaction with Sidney until the arrest.

Diagram of Crime Scene and photographs taken personally are separately marked and incorporated here by reference.

**Witnesses:**

Sidney Goode- present at alleged time of death

Elon Gud- present near area, but claims to have not seen anything directly

**Victim:** Frank Griffin, identification confirmed by documentation and witness.

**INVESTIGATION AND CONCLUSION**

**Weapon:** Lasso/Noose/Rope

**Fingerprints on Weapon:**

No fingerprints on rope as Goode was wearing gloves. I did not test any other items in the area.

**Injuries to Victim:**

There were scrapes to the head and hands of the victim. There was also a mark around the victim's neck that likely came from the rope. There appeared to be markings on the outside sides of the victim's wrists and ankles (I've seen similar marks after people are arrested and handcuffed). I believe the victim was bound at the hands and feet before death.

**Blood Testing:**

None performed as no blood at scene.

**Conclusion:**

Sidney Goode killed Frank Griffin. Goode (and perhaps Gud) covered up the crime by concocting a crazy "accidental roping" theory. Sidney Goode is the prime suspect and should be arrested immediately.

**Photos from Investigation:**

1. Lasso
2. Rodeo arena diagram with marked items as indicated.

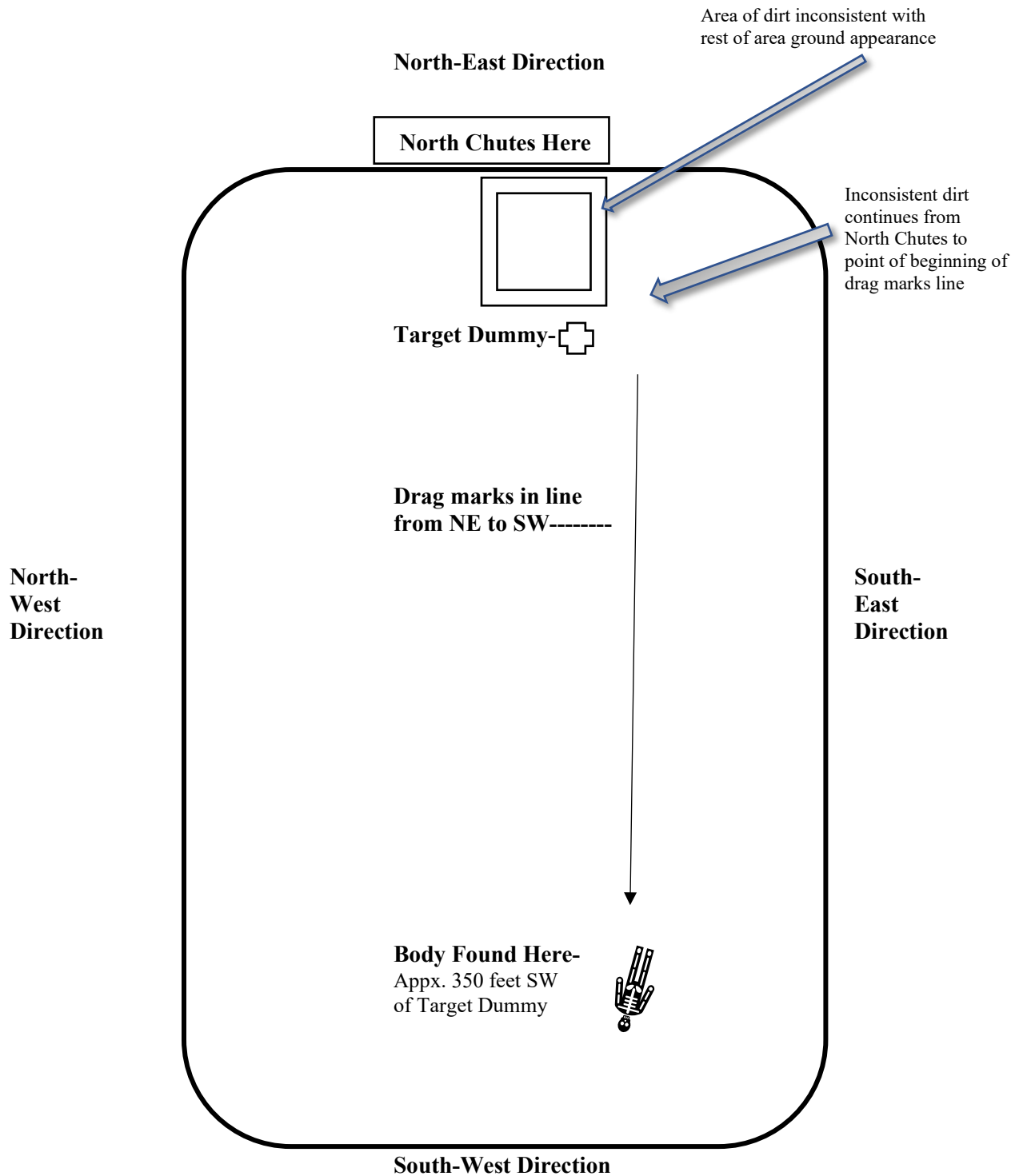
I, Officer Kris Griffin, prepared this Investigation Report on January 3, 2020.

Reporting Officer: Officer Kris Griffin

Supervising Officer: Sergeant Tywin G.

**EXHIBIT 3**  
**Diagram and Photos from Scene**

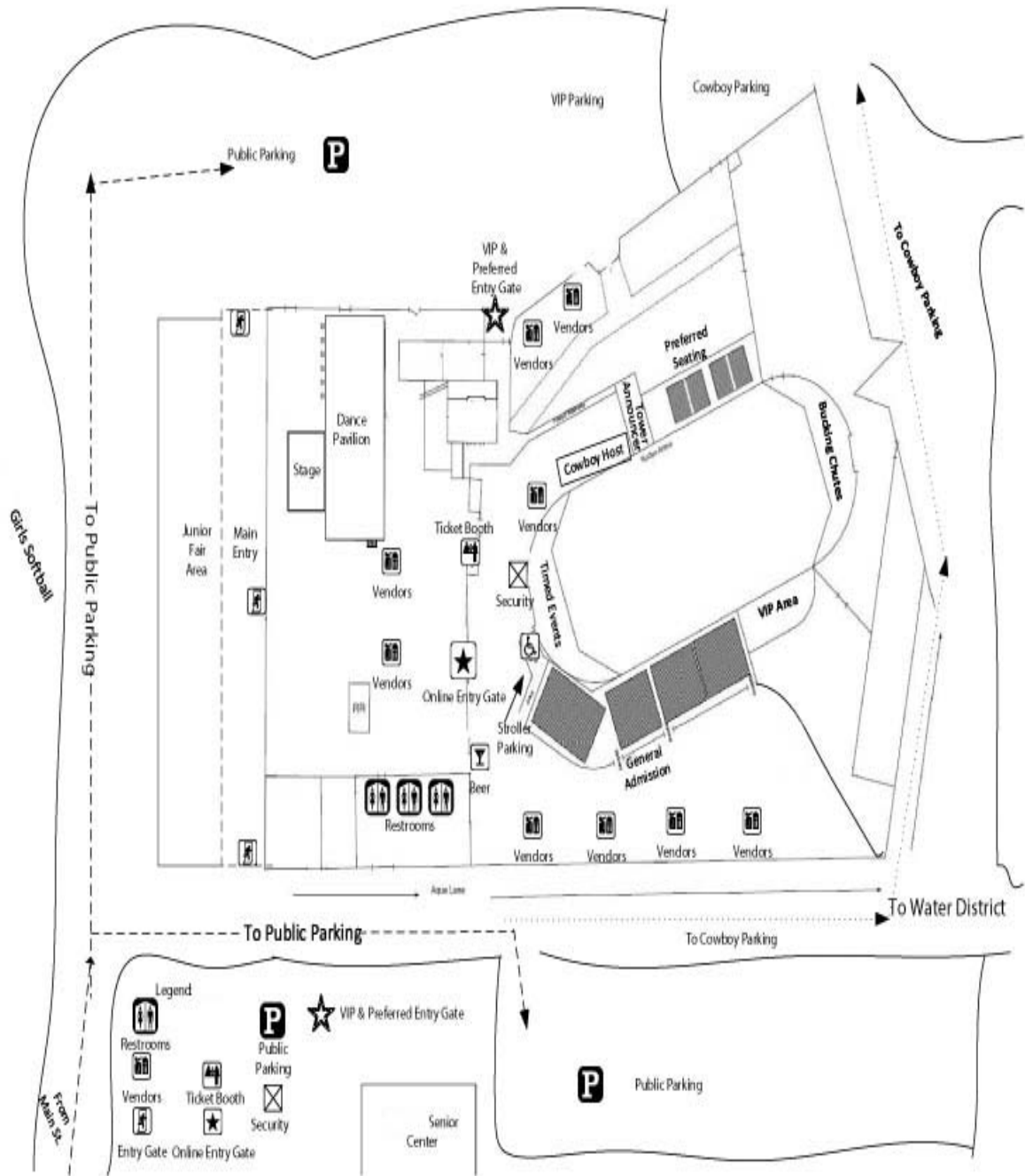
**Rodeo Arena**



**Rope**



# **EXHIBIT 4** **Diagram of Rodeo Grounds**



**EXHIBIT 5**  
**Medical Examiner**

**AUTOPSY AND CONCLUSION REPORT**



Board of Medicolegal Investigations  
Office of the Chief Medical Examiner  
1115 West 17<sup>th</sup> Street  
Tulsa, Oklahoma 74107  
(981) 555-5890 Phone  
(981) 555-9451 Fax

**CERTIFICATION**

I hereby certify that this document is a true and correct copy of the original document.  
By: Sawyer Edgar  
Date: December 30, 2019

**REPORT OF AUTOPSY**

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Decedent: Frank Griffin      Birth Date: June 16, 1972      Case: #1501530

Type of Death: Violent, Unusual or Unnatural      ID By: Visual Recognition and Driver's License

Autopsy Performed by: Sawyer Edgar, M.D.

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**PATHOLOGIC DIAGNOSES**

- I. Strangulation- Fatal
  - a. Compressed throat/neck structures
  - b. Complete impingement of trachea and air pathways
  
- II. Blunt Force Injury to Spine- Non-Fatal
  - a. Contusions and abrasions of posterior spine/back
  - b. Consistent impact source

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**CAUSE OF DEATH:** STRANGULATION

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**MANNER OF DEATH:** POSSIBLE ACCIDENTAL STRANGULATION

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The facts herein are true and correct to the best of my knowledge and belief.

<u>Sawyer Edgar, MD</u>	<u>OCME, Central Division</u>	<u>December 23, 2019 10:00 AM</u>
Sawyer Edgar, M.D.-Forensic Pathologist	Location of Autopsy	Date and Time of Autopsy

## MEDICOLEGAL INVESTIGATION

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### I. CIRCUMSTANCES OF DEATH:

This forty-seven (47) year old person reportedly died from strangulation.

### II. AUTHORIZATION:

The postmortem examination is performed under the authorization of the Office of the Chief Medical Examiner, Central Division, Oklahoma

### III. IDENTIFICATION:

Body identified by family, by visual recognition, and by Driver's License located on the body

## POSTMORTEM EXAMINATION

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### I. CIRCUMSTANCES OF THE EXAMINATION:

The postmortem examination of Frank Griffin is performed at the Office of the Chief Medical Examiner, Central Division, OKC, Oklahoma on December 23, 2019 at 10:00 hours.

### II. CLOTHING AND PERSONAL EFFECTS:

- a. Brown boots on left and right foot
- b. Dark blue jeans- note in pocket with phrase: "Don't worry. I'll be with you."
- c. Brown wallet in right-rear jean pocket
- d. White undershirt
- e. Plaid red-white button up long-sleeve shirt
- f. No jewelry

### III. EXTERNAL EVIDENCE OF RECENT MEDICAL THERAPY:

None- CPR not performed at scene due to suspicious nature of death and delay in call for emergency services

### IV. COLLECTIONS:

Scalp-hair sample, oral swab, nasal swab, finger-nail swabs left and right hands, and a tissue sample from the interior lung surface were procured and analyzed.

## EXTERNAL EXAMINATION

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The body is sealed in a white body bag with a lock tag #10042016 intact. The body is that of an unembalmed, well-developed, well-nourished person appearing consistent with the recorded age of 47 years. The body weight is measured at 145 pounds. The body length is measured at 68 inches. Rigor mortis is moderately advanced in the extremities. Lividity is purple and is noted in the posterior arms, legs, and back and is fixed. The chest and back are symmetrical with normal conformation. There is a series of bruises/markings in a lineal fashion along the spine. There appear to be thirteen (13) distinct marks of similar shape and size. The head, neck, and shoulders are not congested. There is no peripheral edema

present. Personal hygiene is good. No unusual odor is detected as the body is examined. Anisocoria is identified; the right pupil measures 7 mm, the left pupil measures 6 mm. The hair is brown and worn to approximately 10 cm in length. The sclera is streaked with blood lines/broken vessels, but otherwise normal in color. The conjunctival surfaces are not remarkable. The irides are hazel in color. The teeth are in a typical condition. The nose is symmetrical and the initial air passages are open. Dirt/dust is observed on the open nostrils, but nothing is found further into the nasal cavities. Similarly, there is dirt noted on the lips, but internal structures and tissues, as noted below, do not present dirt of any measurable amount. The external ears are normal in appearance and without injury. Examination of the skin shows multiple scars of the hands, arms, legs and multiple contusions or similar shape and size along the spine as noted.

## **INJURIES**

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Blunt force injuries on the back; non-fatal. There are thirteen bruises/markings extending from the lumbar spine up to the cervical neck progressing in a linear manner. The bruises are symmetrical in shape and size and could be from a similar impact source. The bruises appear semi-circular, somewhat regular in color, and measure consistent with impact from something several inches in diameter. There is associated discoloration surrounding the primary bruises. However, additional examination or testing is impossible given the decayed nature of the body surface.

The neck structures are completely compromised, and full impingement of the airways and circulatory vessels is observed-these are fatal injuries. There is too much damage to determine the exact sequence of traumatic impact/movement, or to identify the distinct internal structures, but the observed damaged is consistent with a rope having been situated around the neck and then pulled away from the body to the rear of the head with great force. The damages are consistent with traumatic strangulation by rope.

## **BODY CAVITIES**

The body is opened through the customary "Y" shaped incision. Subcutaneous fat is normally distributed, moist, and bright yellow. The musculature through the chest and abdomen is rubbery, maroon and shows no gross abnormality. The sternum is removed in the customary fashion. The organs of the chest and abdomen are in normal position and relationship. The diaphragms are intact bilaterally. There is approximately 40 ml of liquid blood in the right and left pleural spaces.

### **PERICARDIUM**

The pericardium is a smooth, glistening, intact membrane, and the pericardial cavity, itself, contains the normal amount of clear, straw-colored fluid.

### **HEART**

The heart weight is normal and has unremarkable configuration and location. No adhesions are noted. Coronary arteries arise and distribute normally with no significant atherosclerosis. Chambers and atrial appendages are unremarkable. Myocardium is intact, rubbery, and red-tan. Papillary muscles and chordae tendineae are intact and unremarkable. The vena cava and major tributaries are widely patent.

### **NECK ORGANS**

Subject to the damages noted above, the observable musculature is normal, rubbery and maroon and the organs are crushed and not in a midline position. The tongue is intact, but there is evidence of hemorrhage. Hyoid bone is intact but moved toward the top of the skull. Cartilaginous structures forming the larynx are

crushed from the front to the back and complete closure of the areas where the pharynx, larynx, and related air pathways should be is noted. Thyroid gland is slightly enlarged, rubbery, light tan to maroon and in its normal position. The pharynx and larynx are completely crushed and damaged beyond distinct assessment. Overall, there is significant and fatal damages to the entire neck structures, external and internal.

### **LUNGS**

Lungs appear symmetrical and in proper positioning. Visceral pleurae are smooth, glistening and intact with minimal anthracosis and no bleb formation. Overall configuration is normal. Pulmonary arterial tree is free of emboli or thrombi. There is no evidence of consolidation, granulomatous, or neoplastic disease. However, there is little to no dirt found in the internal lung surfaces and tissues.

### **BRAIN AND MENINGES**

Injuries to posterior skull base/neck are described above. Brief review shows evidence of stroke due to deprivation of oxygen to brain. Attribute this condition to strangulation.

### **VERTEBRAE**

Movement in cervical structures consistent with strangulation by rope; but no broken bones are noted.

### **BONE MARROW**

Moist and dark red. Unremarkable.

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### **TOXICOLOGY**

Screens unremarkable. All other lab work, tests, and screens were negative and within normal range.

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### **OPINION**

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**Cause of death is strangulation. Absence of fracture of cervical bones, but complete impingement of spinal cord and air pathways resulting in deprivation of oxygen to brain through damage to neck structures. Duration of time between injury and death- estimated 3-5 minutes. Manner of death is ruled strangulation inconsistent with quick blunt force trauma.**

**Sawyer Edgar, MD**

**Sawyer Edgar, M.D.**

**EXHIBIT 6**

**1933 Article from The Wheatville News on Execution of Ezra Goode**

# **THE WHEATVILLE NEWS**

## **GOODE'S NECK UNBROKEN, DIES BY STRANGULATION**

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### **HANGMAN BLAMED FOR ERROR; DEATH OCCURRED AFTER SEVERAL MINUTES**

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By WALTER BISCUITT  
Wheatville World Staff

WHEATVILLE, 1933 JUNE 19— Slowly strangled to death by hanging was the revolting end meted out just after dawn today of Ezra Goode, local citizen and convicted kidnapper. An executioner's inexperience with hanging caused the "temporary" error, according to Warden Roy Ricks.

The first person in the United States to be executed for violation of the Lindbergh kidnaping law, Ezra Goode was excruciatingly slowly lowered through the trap in the gallows as 150 witnesses stared intently wondering what was wrong and why it was taking so long as Goode fought to stay alive, gasping and kicking at the trap door.

It didn't make much difference exactly how Goode died. United States Marshal Sam Samuels of Muskogee was ordered to oversee the hanging of the convicted by the neck until dead. The warrant did not specify whether the prisoner was to die from a broken neck or be choked, he said. Quite callously, Samuels defended the result since the convict was dead, no matter the path to get there— "he's dead, the job is done. Cullen is very good and this one event won't stick on him."

The preferred manner of execution by hanging is the broken neck route because it is more expedient and certain. This method requires a bit more attention to weight, height, length of rope and other factors that should be considered to achieve the quick execution.

Cullen Griffin, the state prison's executioner who has electrocuted nine prisoners since 1912 was at the gallows at 4 o'clock this morning. Two electric lights had been strung to the top beam of the structure as Griffin supposedly prepared the moving parts of the gallows and tightened the thirteen-wrap knot of the noose. Griffin checked all thirteen steps from the spectator's area up to the platform multiple times, but apparently didn't care to check much else or even test the hanging mechanism prior to placing the noose around Goode's neck.

The gallows had been erected in an outside courtyard in the center of town by Griffin the night before. That Monday morning, the local factory refrained from blowing the 6 o'clock shift-change whistle so as to not impact the proceedings or startle those present.

Executioner Griffin completed the final arrangements at 5:30 o'clock just before dawn began to break. Warden Roy Ricks removed a canvas screen which was placed around the gallows platform.

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## Too Gruesome

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*While the Wheatville World obtained photographic coverage of the Goode execution, the pictures were of such a gruesome nature that it was deemed contrary to public policy and good taste to publish them.*

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Something of a carnival atmosphere had developed around the immediate area. As the witnesses began arriving in the yard for the 6:30 o'clock hanging, they were told that newspaper reporters would be allowed to stand near the gallows, but lay witnesses would have to remain 30 feet back. At least 15 lay witnesses pulled out paper and pencils and claimed to be reporters to get better positioning.

No last-minute stay of execution was received, and everything moved forward as planned. Griffin escorted Goode from a hidden holding area, up the 13 steps, and onto the platform. In the only interview allowed by Griffin after the execution, he told me that the last words heard by Goode were his. Griffin provided the following quote:

*“You don't have to worry, I'll be there. There's oil on the noose, to make sure it doesn't catch. We'll march out five minutes before, I'll be right there with you. There will be a crowd. Thirteen steps up to the platform. I tie your hands, then your feet, the noose comes next and the hood is last. Don't worry, I'll be with you.”*

It took several minutes for Goode to die, a delay that many thought was the fault of the executioner who had never hanged anyone before. The public in attendance expected a quick execution but were noticeably shaken and visibly upset at the event. Some in the crowd seemed to believe it was an intentional effort designed to “make an example for the nation” of how our state would treat kidnappers. The Goode hanging was the first legal hanging in Oklahoma since 1911 when Frank Henson was convicted of the murder of Deputy Sheriff Charles Stamper at Dawson five months earlier.

Having never seen something like this before, this reporter must say that I pray this unfortunate event is quickly left in the past, but I fear this is not the end of this story.

**EXHIBIT 7**

**2018 Article from The Wheatville News on Goode-Griffin Feud**

# **THE WHEATVILLE NEWS**

## **AN OKLAHOMA FAMILY FEUD SPILLS BLOOD**

By Sloan Barnes

WHEATVILLE, Sep. 6, 2018—The 1933 botched public hanging of Ezra Goode at the hands of Cullen Griffin left an indelible mark on the history of our community, and of the state of Oklahoma as a whole, being the last public execution by hanging in our state. Many remember hearing about the horrific event through history textbooks and the stories our grandparents told us, but few people know about the long history of death and blood that followed.

Ezra Goode had been charged and convicted with violation of the then-new Federal Kidnapping Act of 1932 passed by Congress after the Lindbergh kidnapping. Goode was sentenced to death by hanging, which was carried out by the state prison's executioner, Cullen Griffin on June 19, 1933. "Don't worry, I'll be with you" were Griffin's last words to Goode as he led him up the thirteen steps to the gallows according Wheatville News' own Walter Biscuitt, who reported at the scene. In what was not to be the only botched execution in Oklahoma's spotty history of capital punishment, Griffin neglected to ensure that the gallows floor functioned properly, resulting in a slower fall which prevented Goode's neck from breaking. Goode strangled and appeared to fight against the inevitable for several extremely painful minutes before finally falling still, being declared dead, and "justice" being served before a shocked crowd.

For most Wheatvillians, that is where the story ends, however, a succession of cowardly and grisly murders was carried out against the Griffin family which were likely the result of a family allied and cemented by a common desire to avenge the gruesome and inhumane death of their patriarch, which they presumably imagined to be intentional. From 1950 through the 1960s, four Griffin family members were killed under suspicious circumstances. While authorities have ruled all of these deaths to be accidental or self-inflicted, intrepid reporting and extensive historical investigation has revealed that these were not isolated incidents, but were in fact a connected string of assassinations carried out by a cruel and vindictive family bent on fulfilling their intergenerational vendetta against the Griffin family.

On June 21st, 1953, the body of Ronald Griffin was discovered by a fisherman near a stream running along the west side of town. While the body was in a state of decomposition, authorities noticed that there were 13 distinct bruises across the back, which were consistent with a person's boot heels, according to an independent investigation conducted at the family's request. However, the official cause of death was ruled an accidental drowning, and the bruising was attributed to the body hitting rocks as it floated down the stream. While

many in the community found it odd that Ronald was supposed to have accidentally drowned in such a slow-moving body of water—being an avid swimmer, the authorities refused to investigate further. The death was found to have been approximately two days prior to discovery, or June 19, 1953, exactly 20 years to the day following Ezra Goode's execution. Authorities at the time presumably thought this was a coincidence.

On August 19th, 1957, 22-year-old Sam Griffin was found hanging in their closet in what was later ruled a suicide. Again, the family disagreed with the county coroner's stated cause of death. Slight bruising on the wrists and ankles was thought to be consistent with the decedent being bound by their hands and feet, but the coroner's office did not make any such finding. Although this Griffin was also found with exactly 13 bruises along the spine, the official cause of death was listed as self-inflicted asphyxiation by hanging. The only note left by the late Griffin was simply a small piece of paper found in a pocket which read "Don't worry. I'll be with you." Officials interpreted this as a suicide note, further bolstering their conclusion of self-inflicted hanging. However, the room was in a state of disarray where the body was found, which the Griffin family found curious due to the extremely neat and orderly disposition of the decedent. Again, the death happened on the 19th day of the month, and again, the authorities failed to follow up on any leads.

On February 19th, 1962, neighbors of one P. Griffin reported hearing a single gunshot from a home nearby. This Griffin was found dead at a work bench, slumped over a hunting rifle with a bullet wound to the neck. The official investigation into the death determined that the gunshot was likely self-inflicted; however, P. Griffin was a well-known and outspoken member of the local hunter's community and was engaged to be married the following month. This led private investigators to conclude that the discharge was accidental, as P. Griffin had been an enthusiastic hunter and was known to clean guns at the workbench for long periods of time. However, questions remained about the exact circumstances of the death, which were compounded by a note in the coroner's report that they were not able to determine how the decedent was able to bring the 24-inch rifle barrel 17 inches away from their body and still be able to pull the trigger. The official report was also unable to explain how the angle of bullet's path matched with how the decedent was supposedly holding the gun in the position the body was found. Further complicating matters was the fact that P. Griffin was also a former sheriff's deputy with a long history of familiarity with firearms, lending more support to the growing consensus within the Griffin family that they were being targeted.

Finally, on July 19, 1968, another member of the Griffin family died under suspicious circumstances. 47-year-old Warren Griffin was found hanging from a tree on the family's 15-acre property some 10 minutes west of Wheatville city limits. The newly funded Office of the Chief Medical Examiner for the state of Oklahoma ruled the death a suicide, and that supposedly, several unidentified factors led them to rule out other possibilities. This outraged the Griffin family, whose independent physician found bruising on the wrists and ankles very similar to those found on Sam Griffin's body almost 10 years prior. There were lingering questions about the manner of death as well—the branch where the noose was tied was approximately 15 feet off the ground, but no ladder was found in the area, which would indicate that Warren had to climb the tree and then dropped down off of the branch, at which

point he would fall approximately 6 feet down to the end of the noose. However, ligature marks and internal injuries on the neck were inconsistent with a long drop. This led many to conclude that someone let him down slowly and left him to asphyxiate in much the same manner as old Ezra Goode. In what was interpreted by the Griffin family as an explicit message from the Goodes, the body was again found with a note in the pocket with the words “Don’t worry. I’ll be with you.” This was the last killing carried out against the Griffins, but the feud did not end there.

What followed is a series of events in which the Griffin family, who had supported law officials for decades, having become outraged at the lack of official response to the string of apparent killings, took matters into their own hands and started serving justice against the Goodes. The Griffins, who were self-described upholders and enforcers of the law, were shrewder than their rival counterparts and likely used their connections with the Community Bank of Wheatville—founded by Cullen Griffin in 1943—to force foreclosures on Goode family properties throughout the 1970s, which the Griffins then bought up at sheriff sales. In response to this inquiry, the Community Bank denied that the Griffin family had any effect or control over company decisions as no member of that family had been on the board of directors for several decades. However, questions remain as to the extent of the Griffins’ influence over board members, as they seemed to have enriched themselves greatly at the expense of the Goodes. Over a fifteen-year period, the Griffins came into possession of nearly 75 percent of the real estate holdings that had been initially purchased by various Goode family members trying to re-establish their lineage in the Wheatville area.

Following the 1985 foreclosure and sale of a 40-acre tract of land purchased by the Griffins, two members of the Goode family, siblings Clarence and Therra, visited the home of 58-year-old Donna Griffin, who was known to carry a single action Colt Peacemaker on her person. Shortly after their arrival, Mrs. Griffin shot and killed the two Goode siblings. Reports are conflicting as to the facts of this event—the Goodes alleged that they sent two family members over to try to buy back their 40-acre tract which served as the oldest Goode family homestead in Oklahoma. Donna Griffin and three other members of the Griffin family alleged that the Goodes came to her home to threaten and scare the Griffins into giving the property back. In any event, a struggle ensued which claimed the lives of the two Goode siblings by gunshot wounds. While no weapons of any kind were found on the bodies, Donna Griffin and the three witnesses to the killing said that the Goodes lunged at the woman shouting “I’ll kill you” after a heated exchange where she refused to sell them the property back. Mrs. Griffin reportedly fired twelve shots, hitting both Goodes in the chest and across the back. On the basis of the witness accounts—all members of the Griffin family—the Travis County District Attorney’s Office declined to prosecute on the basis of a finding of “self-defense” which was warranted in response to the “aggressions of the Goodes.” No charges were ever brought, and no trial ever took place, in spite of the obvious fact that Donna Griffin had to reload her weapon in order to fire as many shots as she had.

While readers may be aware of the ongoing strife between what is essentially the Hatfield’s and McCoy’s of rural Oklahoma, few are aware of the more sinister plot underlying these events. Through extensive research, reports have surfaced regarding the contents of a document known as the “Goode Family Trust.” Sources who spoke on the

condition of anonymity have reported that the Goode Family Trust owns thousands of acres of mineral royalty interests and real estate holdings throughout Oklahoma, Kansas, and Missouri and that, in order to inherit a share of the vast fortune, a member of the Goode family must commit an act of “true and permanent loyalty to the family.”

Such acts have typically taken the form of extrajudicial killings of business and family rivals, including the four Griffin killings occurring in the 50s and 60s. Members of the Goode family have called these allegations “baseless and untrue”, however, such facts would go a long way toward explaining the enduring feud that has wound its way through the history of our town. While the whereabouts of the original document itself are unknown—possibly in a vault somewhere on one of the Goode properties in California—excerpts of the trust document have surfaced which support the conclusion that members of the Goode family are killing for profit. In fact, based on the terms of the trust, those that inherit do so without any risk of losing that inheritance, even if they are convicted of a crime for the conduct that entitled them to inherit. There is clear motivation for Goode family members to kill Griffins and several members seem to have secured their life-long inheritance by doing so.

I invite any and all readers to come explore this area of the wild west. Bring your doubt and let me convince you of the truth to this story. After all, we are in the middle of what was once a lawless Territory where people fought to stay alive. Sometimes that fight was against the weather. Sometimes that fight was against the government trying to take what is ours. A few times, there have been fights against the rope of “justice”. Many times, the fight is against each other as we all look to put food on our tables and add our piece to this incredible story.

Whether this is true or not is a conclusion that the reader will have to ponder. What is clear, as Walter Biscuitt said in his 1933 article, is that “this is not the end of the story.”

**EXHIBIT 8**

Goode Family Trust Excerpts

*In order to affirm any beneficiary's standing to inherit and take from and under this document, said individual, having been verified by three family members of roll shall*

*and must commit an act of permanent loyalty to the family, in a manner that forever affirms loyalty to the cause above all others, including self, with full sacrifice*

*such taking of an inheritance shall be afforded and granted for the duration of the taker's life, regardless of the type, action, or consequence of any entitling action or conduct, acquittal or convic*

**EXHIBIT 9**  
**Shelby Report- State's Expert**

I, Shiloh Shelby, have been designated as an expert witness by the State of Oklahoma regarding the pending charges in the case filed in Travis County, State of Oklahoma v. Sidney Goode, CF-2020-247. The following statement is a true and accurate recording of my qualifications and my involvement in this matter:

**QUALIFICATIONS:**

1987	<b>B.S. in Forensic Pathology from Canyon Ridge University</b>
1988	<b>M.S. in Criminal Forensic Investigations with Specialization in Homicide Pathology from Canyon Ridge University</b>
1990	<b>Ph.D. in Forensic Pathology from Canyon Ridge University's specialization in Crime Scene Investigation</b>
1990-1997	<b>Assistant Medical Examiner for Oklahoma Attorney General's Office</b>
1998-2000	<b>Medical Examiner for Oklahoma State Department of Health</b>
2000-Present	<b>Private Medical Examiner, Forensic Examiner</b>

**DOCUMENTS REVIEWED:** I have reviewed completely and wholly the following exhibits:

Ex. 1: Wheatville Police Department Call Report.

Ex. 2: Wheatville Police Department Investigation Report.

Ex. 3: Photographs of Scene

Ex. 4: Diagram of Rodeo Grounds

Ex. 5: Medical Examiner's Report on Frank Griffin

Ex. 7: 2018 Article from The Wheatville News

Ex. 10: Report from Dylan Declan, M.D.

**PUBLICATIONS AND MEMBERSHIP ORGANIZATIONS**

15 papers in forensic investigation journals and magazines. Five (5) time guest author for annual publication issued by Pathology Societies in 20 States. Author of weekly blog on advancements in pathology science. Former member of peer-review committee that publishes, approves and authors a bi-annual hardback update with articles on varying forensic pathology topics- often used in continuing medical education programs for State's Boards of Medicine.

## **CERTIFICATION**

American Board of Forensic Pathologists, June 1991

The following professional assessment is my opinion on this matter after reviewing my research, publications, various other authorities, review of the documents identified above, and through conversation with attorneys for the State. This opinion is entirely my work, and while I rely on other science, research, the opinions to this case are mine and mine alone, free from any undue influence.

## **PROFESSIONAL ASSESSMENT**

Frank Griffin's death was a homicide. As the evidence and findings from my review of the autopsy show- the only theory of death is homicide by hanging/intentional strangulation. The accidental roping theory is not plausible and is contrary to the medical evidence. There is sufficient damage to the throat structures, both internal and external, that I believe the decedent was subjected to two (2) separate hangings. In my opinion, the decedent was killed prior to being roped at the rodeo arena. The autopsy findings are consistent with this conclusion and the police investigation offers further support.

I've seen this type of injury before and the medical evidence in this case is similar enough to lead me to conclude this was a homicide. The evidence simply does not support a single "accidental" roping. The distance that the decedent's body was supposedly dragged would not involve enough time to result in death. The neck was not broken in a manner consistent with a quick "snapping" trauma- as would be required under the accidental roping claim. Depriving the brain of oxygen for less than a minute, the time I believe it would take to rope and drag a body a few hundred feet by a "startled" horse, would not necessarily result in death. Certainly, there would be traumatic injuries and the victim would be in a critical condition, but not necessarily dead at that time. The police investigator noted marks on the decedent's hands consistent with having been bound at the time of death-even more evidence of an intentional action.

No dirt was found in any internal surface or tissue-see Medical Examiner's report. The nasal cavities had dirt on the external areas, but nothing on the internal surfaces. This is consistent with the person having died before the time of the accidental roping. In fact, I believe the decedent was dead before that morning. Had decedent been alive before the roping, he would have been breathing while in and around that arena. The body would not have had time to expel any dirt particles that had been inhaled if breathing was occurring immediately prior to the complete compromise/crushing of the throat as a result of the accidental roping. The analysis of both the internal nasal and lung surfaces supports this conclusion and I reference the M.E. report here for additional support.

The concussion element offered by Declan is preposterous. True medical professionals should not offer opinions that involve speculation. The Medical Examiner's report included an analysis of the brain. Although it appears to have been brief and I concede concussion damage was not ruled out, such damage was not observed. There certainly is medical evidence out there to support concussion resulting from whiplash injuries, but there is no such evidence in this case. That part of the opinion is pure speculation and should therefore be dismissed completely and summarily.

**CONCLUSION:**

Frank Griffin was intentionally killed. The medical evidence supports no other conclusion. My contemporary's opinion is not based in sound medical science and analysis. This case clearly shows why some medical professionals make certain employment designations and others do not progress passed the "Deputy Associate" level. It is unfortunate that the defense has offered the opinion created by Dylan, but my conclusion is actually based on the evidence established by the great law enforcement work performed in this case. Also, what an amazing story this is-a family feud here in Oklahoma to rival, no, that exceeds, the Hatfield's and McCoy's? Anyway, as set forth above, the decedent was killed intentionally prior to the timing of the accidental roping. Frank Griffin, of the legendary Griffin family, was killed by human hands, someone was at the other end of the rope that ended Frank's story.

***Shiloh Shelby***

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**Shiloh E. Shelby**

**EXHIBIT 10**  
**Declan Report- Defense's Expert**

I, Dylan E. Declan, have been designated as an expert witness by the Defendant with regard to the case filed in Travis County, State of Oklahoma v. Sidney Goode, CF-2020-247. This statement, as drafted, revised and authorized personally, is a true and accurate recording of my qualifications and my involvement in this matter:

**QUALIFICATIONS:**

1990	<b>B.S. in Forensic Pathology from Canyon Ridge University</b>
1992	<b>M.S. in Criminal Forensic Investigations with Specialization in Homicide Pathology from Canyon Ridge University</b>
1994	<b>Ph.D. in Forensic Pathology from Canyon Ridge University's specialization in Crime Scene Investigation</b>
1994-2000	<b>Deputy Assistant Medical Examiner for Oklahoma Attorney General's Office</b>
2000-2004	<b>Assistant Medical Examiner for Oklahoma Attorney General's Office</b>
2004- Present	<b>Instructor of medical examiners undergrad and graduate programs with practicum classes/residency internship coordinator</b>

**Books and Publications:**

5 published papers in peer-reviewed forensic investigation journals. Reviewing editor for quarterly Forensic Pathology publication issued by United Forensic Pathology Societies in many States. Author and contributor for the Society of Criminal Investigators-Forensic Pathology, which publishes weekly updates on research and new advances in investigative techniques.

**CERTIFICATION**

Board Certified, American Board of Forensic Pathologists, January 1995

**DOCUMENTS REVIEWED:** I have reviewed completely and wholly the following exhibits:

Ex. 1: Wheatville Police Department Call Report.

Ex. 2: Wheatville Police Department Investigation Report.

Ex. 3: Photographs of Scene

Ex. 4: Diagram of Rodeo Grounds

Ex. 5: Medical Examiner's Report on Frank Griffin

Ex. 9: Report from Shiloh Shelby, M.D.

The following professional assessment is my opinion on this matter after reviewing my research, publications, various other authorities, review of the documents identified above, and through conversation with counsel for Defendant. This opinion is entirely my work, and while I rely on other science and research, the opinions to this case are mine and mine alone, free from any undue influence.

### **PROFESSIONAL ASSESSMENT**

First, Frank Griffin died from strangulation-that conclusion is not subject to dispute. I do not dispute that strangulation was caused by a rope being closed around decedent's neck resulting in fatal injuries. However, where I differ from the opposing witness is in concluding that the death was accidental and not intentional. I believe the accidental roping explanation, and, in my opinion, the evidence supports only this conclusion. Once again, the State is twisting the facts to support a conclusion that supports conviction.

I did not perform an autopsy and I do not need to perform one to reach my conclusions. I am relying on the autopsy performed by Dr. Edgar, the documents and information gathered as part of this case and my professional training and experience. Clearly, the fact that my counterpart attended the same school and our training history is very similar, did not result in similar opinions. As shown in the counter report, mistakes and errors can result when careful attention is not given to this matter.

Second, the absence of dirt particles in the internal breathing surfaces and tissues, see nasal and lung assessments, does not necessarily support the intentional action theory. The medical evidence shows complete impingement of the neck structures and organs. This person was deprived of oxygen through a crushed neck and by direct result, no air was entering the surfaces below the crush point. This explains the absence of dirt on the internal lung tissues. The absence of dirt inside the nose is explained by the limited exposure to the arena grounds the morning of the accident. The decedent was not in the arena for very long and any dirt or dust that had been disturbed from the previous activities would have settled overnight. Also, the arena is fairly large and is an open space. The State fails to provide any explanation or detailed analysis of how there could have been enough disturbed dirt suspended in the air to have entered the lungs in a measurable amount prior to death.

Further, the spinal bruises/marks observed by Dr. Edgar were not fatal injuries, but are consistent with the body being dragged and possibly bounced along the arena floor. The drag line is linear, and the spinal bruises are consistently aligned with a linear progression of impacts. Also, had the decedent died before that morning, then there would not have been blood circulation such that bruising would result from impacts to the body. So, the theory that the decedent was killed before the morning in question fails. Those bruises were either made before death or very near to the time of death. Either way, this evidence is consistent with an accidental roping with immediate dragging and resulting impacts to the spine from the arena floor.

The absence of evidence of fighting the rope by decedent is explained by the swift and traumatic nature of the mechanism of death. Subjecting the body to such a swift tightening around the neck and the resulting jerking motion of the body being pulled by rope by a running horse would result in a level of shock to the body. I suspect the decedent may have even been knocked unconscious by the traumatic force being applied to the neck. As the neck was the first body part to be pulled in the direction of the horse, the head would be subject to a whiplash effect. This whiplash effect has been confirmed by numerous medical studies to result in severe concussion and or loss of consciousness. While the decedent's brain was not examined in detail for concussion, I believe the decedent could have been knocked out by the whiplash and would therefore not have been conscious and fighting the rope.

Only if one ignores the evidence of an accidental death, can the theory from the State be accepted. My experience requires me to look for the theory of death that is most complete. In this investigation, the theory that is more established by the evidence is an accidental cause of death.

### **CONCLUSION**

I submit this conclusion based on a reasonable degree of medical and investigational certainty and, while subject to change as discovery continues, affirm that Frank Griffin died of accidental strangulation, depriving the brain of oxygen and causing death. The decedent was accidentally roped around the neck and the swift pull action of the spooked horse resulted in the closing of the rope and strangulation of the decedent. The bruising along the back could have been made by the body bouncing while being pulled after the accidental roping. It appears that the path was fairly linear and therefore the direction of the bruising, being in a straight line, is plausible. I disagree that the bruises are exactly the same size and disagree that each mark must have been made by the same source.

While the absence of broken bones in the neck does support the contrary conclusion, and I do concede there are other facts that support the State's conclusion, overall, the evidence must be seen to support the accidental death conclusion. In my professional opinion, Frank Griffin died from accidental strangulation and the medical evidence available does not support the intentional action theory set forth by the opposing witness. Frank Griffin died accidentally and was not intentionally killed.

**s/ Dylan E. Declan**

**Dylan E. Declan**