
FROM: Baldwin, Shawn
TO: 52754424
SUBJECT: Baldwin Supreme Court Notification
DATE: 04/28/2026 12:36:02 AM

SUPPLEMENTAL BRIEF FOR PETITIONER PURSUANT TO RULE 15.8

No. 25-6679

IN THE SUPREME COURT OF THE UNITED STATES

SHAWN D. BALDWIN, Petitioner,
v.
UNITED STATES OF AMERICA, Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

SECOND SUPPLEMENTAL BRIEF FOR PETITIONER PURSUANT TO RULE 15.8

SHAWN D. BALDWIN, Pro Se
Reg. No. 52754-424
FCI Fort Dix Camp
P.O. Box 2000
Joint Base MDL, New Jersey 08640

FILED UNDER FORM PAUPERIS
(Pursuant to Supreme Court Rule 39)

RULE 15.8 WORD COUNT CERTIFICATION
I hereby certify that this Supplemental Brief contains fewer than 3,000 words, as counted by the word processing system used to prepare this document, in compliance with Supreme Court Rule 15.8 and Rule 33.1(g). Petitioner proceeds in forma pauperis and files an original and ten (10) copies as permitted for incarcerated pro se litigants under Supreme Court Rule 39.

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

IDENTITY OF PARTIES

The parties to this proceeding are Petitioner Shawn D. Baldwin and Respondent United States of America. Petitioner proceeds pro se and in forma pauperis from FCI Fort Dix Camp.

INTRODUCTION

Petitioner Shawn D. Baldwin respectfully submits this Second Supplemental Brief under Supreme Court Rule 15.8 to present newly discovered evidence that further confirms the constitutional violations already set forth in his Petition and First Supplemental Brief. This evidence was not available at the time of those filings and directly contradicts the government's core financial narrative at trial.

On April 27, 2026, Petitioner received a response from Piper Sandler Companies (formerly Piper Jaffray) confirming that institutional accounts for CMG Institutional Trading existed and that records may still be in Piper Sandler's possession. Petitioner has also executed a sworn declaration attesting that those accounts held over $100 million in assets (including assets for the Teacher Retirement System of Texas) and generated over $800,000 in legitimate trading compensation in a single year.

This evidence is significant because it demonstrates that:

1. FBI Forensic Accountant David Paniwozik's testimony that he analyzed "all" of Petitioner's accounts was false and incomplete   omitting accounts holding more than ten times the total funds the government claimed existed.
2. Government Exhibits S 2 and S 2.2, which purported to list "all accounts" and claimed total funds of only $9.8 million, were materially false   rendering the government's forensic analysis "mathematically impossible" under In re Winship.
3. AUSA Matthew Getter's closing argument that Petitioner had "no legitimate income" was a knowingly false statement contradicted by Petitioner's documented earnings.

This evidence reinforces the four questions presented in the original Petition and confirms that this Court's review is warranted.

I. NEWLY DISCOVERED EVIDENCE   PIPER SANDLER RECORDS

A. Petitioner's Sworn Declaration (February 26, 2026)

On February 26, 2026, Petitioner executed a sworn declaration under penalty of perjury, which states in relevant part:

"CMG Institutional Trading maintained institutional brokerage, custody, and clearing relationships with Piper Jaffray Companies, now Piper Sandler Companies. These accounts included institutional client accounts holding assets exceeding $100 million, including assets belonging to the Teacher Retirement System of Texas (the third largest pension plan in the United States). During this period, I personally received compensation exceeding $800,000 in a single year directly derived from legitimate institutional trading activity conducted through Piper Jaffray. These accounts were known to Piper Jaffray and reflected in its official books and records."

See Exhibit A (Baldwin Declaration, Feb. 26, 2026).

B. Piper Sandler Response (April 14, 2026)

On April 27, 2026, Petitioner received a letter from Piper Sandler Companies, signed by Assistant General Counsel Gail Van Horn, dated April 14, 2026. The letter states:

"We do not currently have an open accounts for this entity. In order to receive any information or documents related to this account, Piper Sandler Companies would need to receive a formal subpoena from the court at issue."

See Exhibit B (Piper Sandler letter, April 14, 2026).

Piper Sandler does not deny that such accounts existed in the past. It merely states it has no current open account and requires a subpoena to search for and produce historical records. The letter is consistent with Petitioner's declaration and confirms that records may still exist.

II. THE PIPER SANDLER EVIDENCE DIRECTLY CONTRADICTS THE GOVERNMENT'S CORE FINANCIAL NARRATIVE

A. Paniwozik's False Testimony That He Analyzed "All" Accounts

At trial, FBI Forensic Accountant David Paniwozik testified under oath:

- TTR 1272:8: "I reviewed all of the bank accounts."
- TTR 1280:3 5: "I have analyzed every account that had the defendant as a signatory."
- TTR 1375:12 25: "I have looked at all of the trading accounts that were part of my analysis."

Petitioner's sworn declaration and the Piper Sandler letter prove that institutional accounts holding over $100 million in assets accounts never listed on GovEx S 2 or S 2.2 existed and were known to Piper Jaffray. Paniwozik's testimony that he analyzed "all" accounts was therefore objectively false. The omission of over $100 million in assets is not a minor oversight it is a fundamental error that renders his entire analysis unreliable.

B. Government Exhibits S 2 and S 2.2 Were Materially False

Government Exhibit S 2 claimed that the total funds across all accounts was $9,811,127. GovEx S 2.2 purported to list all accounts. Neither exhibit listed the Piper Jaffray institutional accounts.

The Piper Sandler evidence proves that one institutional account alone held over $100 million in assets more than ten times the total the government claimed existed across all accounts. This is not a credibility dispute; it is a mathematical impossibility that violates the Winship requirement of proof beyond a reasonable doubt.

C. AUSA Getter's False Statement That Petitioner Had "No Legitimate Income"

In closing argument, AUSA Matthew Getter told the jury that Petitioner had "no legitimate income" (TTR 2203 2204). Petitioner's sworn declaration proves that he earned over $800,000 in a single year from legitimate trading activity through Piper Jaffray. This false statement was material to the jury's assessment of whether Petitioner operated a legitimate business or a fraudulent Ponzi scheme.

III. THE NEW EVIDENCE CONFIRMS BRADY, NAPUE, AND WINSHIP VIOLATIONS

A. Brady Violation Suppression of Exculpatory Evidence

Under Brady v. Maryland, 373 U.S. 83, 87 (1963), the government has a duty to disclose exculpatory evidence. The Piper Sandler records are exculpatory because they show the existence of legitimate trading activity and substantial assets directly contradicting the government's Ponzi scheme theory. The government knew or should have known about these accounts. Petitioner raised the issue of missing accounts at PageID 3545 in February 2021, yet the government failed to investigate or disclose.

Under Kyles v. Whitley, 514 U.S. 419, 437 38 (1995), materiality is assessed cumulatively. The Piper Sandler evidence, when viewed together with the suppressed Goldman Sachs records and the High Court Order, "undermine[s] confidence in the outcome of the trial." Id. at 434.

B. Napue/Giglio Violation   Knowing Use of False Testimony

Under Napue v. Illinois, 360 U.S. 264, 269 (1959), a conviction obtained through the knowing use of false testimony violates due process. The government knew or should have known that Paniwozik's testimony was incomplete and that Getter's "no legitimate income" statement was false. The Piper Sandler evidence proves the falsity. Under Giglio v. United States, 405 U.S. 150, 153 54 (1972), the government had a duty to correct false testimony. It failed to do so.

C. Winship Violation   Mathematically Impossible Testimony

Under In re Winship, 397 U.S. 358, 364 (1970), proof beyond a reasonable doubt is required. Testimony that is mathematically impossible cannot support a conviction. United States v. Medina, 969 F.3d 819, 821 (7th Cir. 2020). The government's claim that total funds were $9.8 million, while Petitioner held over $100 million in a single institutional account, is mathematically impossible. The conviction cannot stand.

IV. THIS COURT SHOULD CONSIDER THIS EVIDENCE IN DECIDING CERTIORARI

The Piper Sandler evidence is newly discovered   it was not available at the time Petitioner filed his original Petition or First Supplemental Brief. Petitioner could not have obtained this evidence earlier because Piper Sandler is a third party financial institution not under his control. He first contacted Piper Sandler in February 2026 and received a response on April 27, 2026.

Under the standard for newly discovered evidence, a court may consider evidence that: (1) was discovered after trial; (2) could not have been discovered earlier through due diligence; (3) is material and not merely cumulative; and (4) would likely produce an acquittal at a new trial. United States v. Wilburn, 581 F.3d 618, 625 (7th Cir. 2009). The Piper Sandler evidence satisfies all four elements.

This Court should grant certiorari to correct the Seventh Circuit's reliance on a demonstrably false factual premise   i.e., that the government never possessed exculpatory records. The Piper Sandler evidence further demonstrates that the government's case was built on incomplete and false testimony. A miscarriage of justice has occurred.

CONCLUSION AND RELIEF REQUESTED

For the reasons set forth above, and incorporating the arguments from the original Petition and First Supplemental Brief, Petitioner respectfully requests that this Court:

1. GRANT the petition for a writ of certiorari;
2. VACATE the judgment of the Seventh Circuit;
3. REMAND with instructions to conduct an evidentiary hearing on the documented Brady, Napue, Winship, and fraud upon the court claims, including consideration of the newly discovered Piper Sandler evidence; and
4. ORDER such other and further relief as justice requires.

Respectfully submitted,

Shawn D. Baldwin, Pro Se
Reg. No. 52754 424
FCI Fort Dix Camp
P.O. Box 2000
Joint Base MDL, New Jersey 08640

Dated: April 27, 2026

CERTIFICATE OF SERVICE
I, Shawn D. Baldwin, hereby certify that on this 27th day of April, 2026, I caused an original and ten (10) copies of the foregoing Second Supplemental Brief for Petitioner Pursuant to Rule 15.8 to be deposited in the institutional mail system at FCI Fort Dix, first class postage prepaid, addressed to:

Clerk of the Court

Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20543

I further certify that I caused one copy of the foregoing to be served upon:

Solicitor General D. John Sauer
Office of the Solicitor General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

I certify under penalty of perjury that I am incarcerated and qualify for the prisoner mailbox rule under Houston v. Lack, 487 U.S. 266 (1988). This filing is submitted in forma pauperis under Supreme Court Rule 39, requiring only an original and ten copies rather than the forty ordinarily required.

Shawn D. Baldwin

EXHIBITS
Exhibit A Sworn Declaration of Shawn D. Baldwin, dated February 26, 2026
Exhibit B Letter from Piper Sandler Companies to Shawn D. Baldwin, dated April 14, 2026 (received April 27, 2026)

FROM: Baldwin, Shawn
TO: 52754424
SUBJECT: Piper Sandler John Ceccarelli
DATE: 02/16/2026 09:36:03 PM

John A. Ceccarelli
General Counsel
Piper Sandler Companies
800 Nicollet Mall, Suite 800
Minneapolis, MN 55402

Subject: Formal Request for Production and Authentication of CMG Institutional Trading Accounts, Including Texas Teachers Retirement System Account, and Notice of Ethical and Legal Obligations Under ABA Model Rules and Federal Law

Method: Certified Mail, Return Receipt Requested

Dear Mr. Ceccarelli,

I write to you in your capacity as General Counsel of Piper Sandler Companies ("Piper Sandler"), successor entity to Piper Jaffray Companies, which maintained institutional clearing, custody, and brokerage accounts on behalf of CMG Institutional Trading, LLC ("CMG"), including accounts holding assets in excess of $100 million belonging to the Teacher Retirement System of Texas and related institutional clients.

This correspondence constitutes a formal request, made in my capacity as account holder, authorized trader, and client of Piper Jaffray through CMG Institutional Trading, LLC, for production and authentication of all CMG Institutional Trading accounts maintained, cleared, or custodied by Piper Jaffray/Piper Sandler, including but not limited to the institutional account holding Teacher Retirement System of Texas assets exceeding $100 million and from which I personally received compensation exceeding $800,000 during a single calendar year.

The existence and magnitude of these accounts directly contradict sworn testimony presented in United States v. Baldwin, Northern District of Illinois, Case No. 18 CR 292, and specifically contradict Government Exhibit S-2, which falsely represents that I held only $9,811,127 across all personal, business, and trading accounts between January 2006 and May 2017.

See Government Exhibit S-2.

This representation was presented to the jury as a comprehensive accounting of all accounts analyzed by FBI forensic accountant David Paniwozik.

Critically, under oath, Mr. Paniwozik testified:

"I analyzed all banking, trading, and personal accounts from January 2006 through May 2017."
Trial Transcript 1272:8

"I was able to identify all accounts."
Trial Transcript 1280:3 5

These sworn representations are demonstrably false.

Government Exhibit S-2.2, the government's purported summary exhibit of all accounts analyzed, contains no listing whatsoever of Piper Jaffray institutional accounts, including the Teacher Retirement System of Texas account holding over $100 million in assets.

This omission renders the government's financial analysis mathematically impossible and materially false.

As the Supreme Court has unequivocally held:

"A conviction obtained through use of false evidence, known to be such by representatives of the State, violates the Fourteenth Amendment."
Napue v. Illinois, 360 U..S. 264, 269 (1959)

Similarly, the Supreme Court has held that suppression of material exculpatory evidence violates due process irrespective of prosecutorial intent.
Brady v. Maryland, 373 U.S. 83, 87 (1963)

And further, that the knowing presentation or failure to correct false testimony constitutes structural constitutional error.
Giglio v. United States, 405 U.S. 150, 153 154 (1972)

Piper Sandler possesses original books and records establishing the existence of institutional accounts holding assets exceeding $100 million orders of magnitude greater than the total assets falsely represented in Government Exhibit S-2.

These records constitute dispositive financial evidence that directly contradict sworn federal testimony and exhibits presented to the jury.

As General Counsel, you are bound by the American Bar Association Model Rules of Professional Conduct, including but not limited to:

Rule 1.15 Safekeeping Property
Rule 3..3 Candor Toward the Tribunal
Rule 3.4 Fairness to Opposing Party and Counsel
Rule 4.1 Truthfulness in Statements to Others
Rule 8.3 Reporting Professional Misconduct

ABA Model Rule 8.3 specifically requires a lawyer possessing knowledge of professional misconduct raising substantial questions regarding honesty or fitness to practice law to report such misconduct to the appropriate authority.

As the custodian of records establishing material contradictions to sworn federal testimony, Piper Sandler possesses evidence of extraordinary legal significance.

REQUEST FOR PRODUCTION

Accordingly, I respectfully request that Piper Sandler provide:

1. Certified copies of all CMG Institutional Trading, LLC accounts maintained, cleared, or custodied by Piper Jaffray/Piper Sandler from January 1, 2001 through December 31, 2010.
2. Specifically, certified records for the institutional account(s) holding assets of the Teacher Retirement System of Texas exceeding $100 million.
3. All account opening documents, monthly statements, transaction histories, and internal account summaries.
4. Authentication sufficient for admissibility under Federal Rule of Evidence 803(6).

These records are requested in my capacity as account holder, client, and authorized trader.

This request is made respectfully, in good faith, and with the intent of preserving the accuracy and integrity of financial and judicial records.

Please direct correspondence to the address listed below.

Respectfully,

s/ Shawn D. Baldwin

Shawn D. Baldwin
Reg. No. 52754-424
FCI Fort Dix
P.O. Box 2000
Joint Base MDL, New Jersey 08640

FROM: Baldwin, Shawn
TO: 52754424
SUBJECT: Piper Sandler Affidavit Ceccarelli
DATE: 02/16/2026 09:36:03 PM

SWORN AFFIDAVIT TO JOHN A. CECCARELLI
REGARDING PRODUCTION OF CMG INSTITUTIONAL TRADING ACCOUNTS AND DOCUMENTED FALSE TESTIMONY CONTRADICTED BY PIPER JAFFRAY / PIPER SANDLER RECORDS

I, SHAWN D. BALDWIN, being first duly sworn, depose and state as follows:

1. I am over the age of eighteen and competent to make this affidavit. I make this affidavit based upon my personal knowledge and my direct involvement as founder and principal of CMG Institutional Trading, LLC.
2. CMG Institutional Trading maintained institutional brokerage, custody, and clearing relationships with Piper Jaffray Companies, now Piper Sandler Companies.
3. These accounts included institutional client accounts holding assets exceeding $100 million, including assets belonging to the Teacher Retirement System of Texas.
4. During this period, I personally received compensation exceeding $800,000 in a single year directly derived from legitimate institutional trading activity conducted through Piper Jaffray.
5. These accounts were known to Piper Jaffray and reflected in its official books and records.

FALSE TESTIMONY PRESENTED AT FEDERAL TRIAL

6. FBI forensic accountant David Paniwozik testified under oath that he had analyzed all of my personal, business, and trading accounts.

Trial Transcript 1272:8
Trial Transcript 1280:3 5
Trial Transcript 1375:12 25

7. Government Exhibit S-2 and Government Exhibit S-2..2 were presented to the jury as comprehensive summaries of all accounts.
8. Government Exhibit S-2 falsely states that the total funds across all accounts was $9,811,127.
9. Government Exhibit S-2.2 contains no listing of Piper Jaffray institutional accounts whatsoever.
10. This omission is materially false and renders the government's financial analysis incomplete and mathematically impossible.
11. The existence of Piper Jaffray institutional accounts holding assets exceeding $100 million conclusively disproves the government's sworn representations.

LEGAL SIGNIFICANCE

12. The Supreme Court has held that use of false testimony violates due process.
Napue v. Illinois, 360 U.S. 264 (1959)
13. Suppression of material financial records violates constitutional guarantees.
Brady v. Maryland, 373 U.S. 83 (1963)
14. Failure to correct false testimony violates constitutional protections.
Giglio v. United States, 405 U.S. 150 (1972)

ABA REPORTING OBLIGATIONS

15. ABA Model Rule 8.3 requires reporting of professional misconduct raising substantial questions regarding honesty or fitness.
16. Piper Sandler possesses records conclusively establishing material contradictions to sworn federal testimony.

REQUEST FOR RECORDS

17. I respectfully request that Piper Sandler provide certified copies of all CMG Institutional Trading accounts, including institutional accounts holding Teacher Retirement System of Texas assets.
18. These records are necessary to preserve the integrity of financial and judicial proceedings.

DECLARATION

19. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20TH day of FEB., 2026.

PIPER | SANDLER

350 NORTH 5th STREET, SUITE 1000
MINNEAPOLIS, MN 55401

Piper Sandler & Co.
Since 1895. Member SIPC and NYSE.

April 14, 2026

Shawn Baldwin
Reg No. 52754-424
FCI Fort Dix
P.O. Box 2000
Joint Base MDL
New Jersey 08640

Dear Mr. Baldwin:

We are in receipt of your comrnincation dated 2/16/2026 to John A. Ceccarelli (SIC) as General Counsel for Piper Sandler Companies (please be advised that the General Counsel for Piper Sandler is John Geelan) requesting production of accounts of CMG Institutional Trading. We do not currently have an open accounts for this entity. In order to receive any information or documents related to this account, Piper Sandler Companies would need to receive a formal subpoena from the court at issue. Piper will then produce any responsive documents that are still in Piper's possession, if any, in accordance with a properly issued subpoena.

Sincerely,

Gail Van Horn
Assistant General Counsel and Managing Director

CMG Institutional Trading LLC was also an underwriter in the February 2006 Genworth Financial Class A common stock offering alongside entities such as Merrill Lynch, Citigroup, Goldman Sachs, J.P. Morgan, and Morgan Stanley.

PROSPECTUS SUPPLEMENT
(To Prospectus dated September 12, 2005)

71,216,559 Shares

Genworth
Financial

Class A Common Stock

GE Financial Assurance Holdings, Inc., the selling stockholder and an indirect subsidiary of General Electric Company, is offering all the 71,216,559 shares of Class A Common Stock to be sold in this offering. We will not receive any proceeds from the sale by the selling stockholder of Class A Common Stock in this offering.

UNDERWRITING

Under the terms and subject to the conditions contained in an underwriting agreement dated the date of this prospectus supplement, the underwriters named below, for whom Merrill Lynch, Pierce, Fenner & Smith Incorporated, Citigroup Global Markets Inc., Goldman, Sachs & Co., J.P. Morgan Securities Inc. and Morgan Stanley & Co. Incorporated are acting as representatives, have agreed to purchase, and GEFAHL, the selling stockholder, has agreed to sell to them, the number of shares of Class A Common Stock indicated below:

Underwriter	Number of Shares
Merrill Lynch, Pierce, Fenner & Smith Incorporated	17,061,976
Citigroup Global Markets Inc.	8,367,937
Goldman, Sachs & Co.	8,367,937
J.P. Morgan Securities Inc.	8,367,937
Morgan Stanley & Co. Incorporated	8,367,937
Banc of America Securities LLC	2,848,662
Credit Suisse Securities (USA) LLC	2,848,662
Deutsche Bank Securities Inc.	2,848,662
Lehman Brothers Inc.	2,848,662
UBS Securities LLC	2,848,662
Wachovia Capital Markets, LLC	2,848,662
BB&T Capital Markets, a division of Scott & Stringfellow, Inc.	305,637
Blaylock & Company, Inc.	305,637
CMG Institutional Trading LLC	305,637
Fox-Pitt, Kelton Incorporated	305,637
Friedman, Billings, Ramsey & Co., Inc.	305,637
Keefe, Bruyette & Woods, Inc.	305,637
Samuel A. Ramirez & Co., Inc.	305,637
Utendahl Capital Partners, L.P.	305,637
The Williams Capital Group, L.P.	305,637
Total	71,216,559

CMG also participated in offerings from Build a Bear and TempurPedic. Baldwin's Piper Jaffrey Form 1099 showed gross proceeds less commissions of $852,430.29 based on his stock and bond trading.

75.