

1
2
3
4
5
6 **BEFORE THE VICTIM COMPENSATION BOARD**
7 **OF THE STATE OF CALIFORNIA**
8

9 In the Matter of:

10 **William Woods**

11 Claim No. 24-ECO-59

Proposed Decision

(Penal Code §§ 1485.55, 4900 et seq.)

12 **I. Introduction**

13 On September 16, 2024, William Woods (Woods) submitted a claim for compensation to the
14 California Victim Compensation Board (CalVCB) as an erroneously convicted person pursuant to
15 Penal Code section 4900, which was supplemented multiple times before filing on February 18, 2025.
16 The claim is based upon Woods' incarceration for two convictions for identity theft and false
17 impersonation, both of which were vacated with a finding of factual innocence. Woods, who initially
18 submitted the claim pro se, is represented by the law firm of Keker, Van Nest & Peters LLP. The claim,
19 as supplemented and revised, requests compensation in the amount of \$80,640 for 576 days of
20 incarceration, which includes an unspecified period of confinement in a state hospital.

21 The Attorney General, represented by Deputy Attorney General Jessica Leal, responded to the
22 claim on February 24, 2025. The Attorney General agreed that Woods is entitled to compensation in
23 the requested amount.
24
25
26
27
28

II. Procedural Background

On August 20, 2019, Woods was arrested and subsequently charged with one count of identity theft and one count of false impersonation in Los Angeles County Superior Court case number BA480543.¹ After prompting by defense counsel, the superior court declared Woods mentally incompetent to stand trial on February 10, 2020, thereby suspending the criminal proceedings pursuant to Penal Code section 1368.² Woods was eventually transferred to a state hospital for treatment.³

On March 17, 2021, Woods returned to court. The court found Woods mentally competent, and Woods entered a negotiated plea of no contest to both felony counts for a stipulated term of two years imprisonment. Immediately thereafter, the court sentenced Woods to time served and ordered him released.⁴ By then, Woods had spent a total of 576 days in custody from the date of his arrest on August 20, 2019, to and including the date of his release on March 17, 2021.⁵ This period of time included approximately 147 days during which Woods was confined in a state hospital, and all of those days were credited by the court towards satisfaction of Woods' prison sentence.⁶

On July 27, 2023, a detective from Iowa submitted a request to the Conviction Integrity Unit of the Los Angeles County District Attorney (LADA) to review Woods' case.⁷ The request noted, inter alia, that the supposed victim in Woods' case had been criminally charged in Iowa with fraudulently using Woods' identity. On April 11, 2024, upon LADA's recommendation, the superior court vacated Woods' convictions in case number BA480543 pursuant to Penal Code section 1473.7 and issued a finding of

¹ Pen. Code, §§ 529 (false impersonation); 530.5 (identity theft); Woods Application (App.) at p. 1; Woods Memorandum (Memo), submitted via email on Feb. 13, 2025, at pp. 3, 8, 12.

² Memo at p. 3.

³ Woods Supplemental Documents, sent via email on Dec. 1, 2024 (Dec. Supp.), at p.13.

⁴ Dec. Supp. at pp. 11-14 (minute order for Mar. 17, 2021, hearing).

⁵ The number of days was determined using the online calculator located at <https://www.timeanddate.com/date/duration.html>.

⁶ Dec. Supp. at p. 13.

⁷ App. at pp. 11-13.

1 factual innocence pursuant to Penal Code section 1485.55.⁸ On May 16, 2024, the court ordered
2 Woods' criminal records sealed and destroyed pursuant to Penal Code section 851.8.⁹

3 On September 16, 2024, Woods submitted a claim to CalVCB seeking compensation as an
4 erroneously convicted person under Penal Code section 4900. The claim originally requested \$80,360
5 for 574 days incarceration, which included time spent in a state hospital. The claim was sent via
6 regular mail by Woods, who represented himself at that time. By letter dated September 23, 2024,
7 CalVCB acknowledged receipt of Woods' claim but determined that it was incomplete.¹⁰ CalVCB
8 requested additional information, including an Abstract of Judgment (AOJ) from the original sentencing
9 hearing, the minute order from the hearing at which the finding of factual innocence was issued, and a
10 statement of injury. The letter was sent to Woods, as well as the Attorney General.

11 Woods eventually obtained representation from the law firm of Kecker, Van Nest & Peters LLP
12 on December 10, 2024.¹¹ Meanwhile, Woods and/or his representatives submitted additional
13 documents on November 28, 2024, December 1, 2024, February 10, 2025, and February 13, 2025. As
14 supplemented, Woods requested compensation for an additional day of incarceration amounting to
15 \$80,500 for 575 days. However, as explained in his counsel's declaration, Woods was ultimately
16 unable to obtain a copy of the AOJ, despite diligent efforts.¹² Instead, Woods provided a minute order
17 from the sentencing hearing.¹³ Under the circumstances, the Attorney General expressly declined to
18 object to the missing AOJ, and CalVCB agreed that the AOJ was not necessary to complete Woods'
19 claim.¹⁴

21 ⁸ App. at pp. 8-9; Dec. Supp. at pp. 15-16.

22 ⁹ Woods Supplemental Documents, sent via email on Nov. 28, 2024 (Nov. Supp.), at p. 7; Dec. Supp.
at p. 17.

23 ¹⁰ The letter was sent by CalVCB Senior Attorney Caitlin Christian, who was initially assigned to review
24 this claim. Following her unavailability, the claim was reassigned on February 11, 2025, to CalVCB
Senior Attorney Laura Simpton. (Cal. Code Regs., tit. 2, § 615.10 (Assignment of Hearing Officer).)

25 ¹¹ Counsel Declaration (Decl.) at p. 2, submitted via email on Feb. 10, 2025.

26 ¹² Counsel Decl. at pp. 3-4.

27 ¹³ Dec. Supp. at pp. 11-14.

28 ¹⁴ Email sent by Deputy Attorney General Jessica Leal on Feb. 11, 2025; CalVCB email to parties sent
on Feb. 11, 2025.

1 On February 18, 2025, after reviewing all supplemental information and documents to confirm
2 compliance with Penal Code sections 4900 and 4901, CalVCB deemed the claim filed. CalVCB further
3 determined that the expediated approval provisions in Penal Code section 1485.55 applied as a result
4 of Woods' finding of factual innocence. CalVCB therefore requested a response from the Attorney
5 General on the issue of injury pursuant to Penal Code section 4904.¹⁵

6 On February 24, 2025, the Attorney General agreed that Woods was entitled to compensation
7 for the entire duration of his custodial confinement, including his time at the state hospital, because
8 those days had been credited by the court to satisfy Woods' prison sentence for the challenged
9 convictions. But by the Attorney General's calculation, Woods was entitled to an extra day of
10 compensation amounting to \$80,640 for 576 days, which included the partial day of Woods' release.¹⁶

11 Woods replied on February 27, 2025. He agreed with the Attorney General's calculation and
12 revised the requested amount of compensation accordingly.¹⁷ The administrative record closed the
13 following day on February 28, 2025.

14 **III. Factual Background**

15 According to Woods, Matthew Keirans (Keirans) stole his personal identifying information and
16 used it to open a bank account in Los Angeles. After discovering the fraudulent account, Woods went
17 to the bank on August 20, 2019, and attempted to close it. Woods explained to the bank employee that
18 he had been the victim of identity theft and presented his identification. But after Woods was unable to
19 answer the security questions, which had been completed by Keirans when he initially opened the
20 account, Woods was arrested and charged with identity theft and false impersonation. Throughout the
21 criminal proceedings, Woods insisted his identity had been stolen.¹⁸

22 After his release in 2021, Woods continued to insist that Keirans had stolen his identity. The
23 two had worked together over 30 years earlier at a hot dog cart. Since then, Keirans had allegedly

24
25 ¹⁵ CalVCB email to parties sent on Feb. 18, 2025.

26 ¹⁶ Email sent by Deputy Attorney General Jessica Leal on Feb. 24, 2025; see also *People v. King*
(1992) 3 Cal.App.4th 882, 886 (construing "days" for custody credit to include partial days).

27 ¹⁷ Email sent by Woods' counsel Lauren Jung on Feb. 27, 2025.

28 ¹⁸ Memo at p. 3.

1 used Woods' identity to obtain employment, insurance, a social security number, driver's license, and
2 various forms of credit. At the time of these events, Keirans was working in Iowa. Woods filed
3 complaints with Keirans' employer and local law enforcement in Iowa.¹⁹

4 On August 29, 2023, Keirans was charged in federal court with multiple counts of fraud for false
5 loan applications and false identification documents.²⁰ The incriminating evidence included a DNA
6 comparison with Woods' father, which confirmed Woods was his son and excluded Keirans.²¹ Keirans
7 pleaded guilty to two counts on April 1, 2024, and was sentenced on August 8, 2024.²² Keirans is
8 pursuing an appeal of his convictions.²³

9 Meanwhile, on April 11, 2024, the Los Angeles County Superior Court found that Woods was
10 factually innocent of identity theft and false impersonation in case number BA480543. In particular, the
11 superior court determined "that another man, Matthew Keirans, has plead guilty to falsely personating
12 William Woods, thereby causing Woods to be falsely prosecuted in this case."²⁴ The superior court
13 confirmed that "the petitioner's true name is William Woods" and "[h]e is not also known as Matthew
14 Keirans."²⁵

15 IV. Determination of Issues

16 Penal Code section 4900 allows a person, who has been erroneously convicted and
17 imprisoned for a felony offense that they did not commit, to submit a claim for compensation to
18

19 ¹⁹ Memo at p. 3.

20 ²⁰ 18 U.S.C. § 1014 (false loan application); 8 U.S.C. § 1028(a) (false identification documents);
21 Docket for *USA v. Matthew David Keirans*, U.S. District Court, Northern District of Iowa, case number
22 2:23-CR-01020 (noting Keirans was "Also Known As William Donald Woods" and "William D Woods");
see also Cal. Code Regs., tit. 2, § 617.8 (official notice).

23 ²¹ App. at pp. 12-13; see also Brittny Mejia, *Judge vacates conviction in identity theft case: William Woods spent nearly two years locked up for a crime he didn't commit*, L.A. Times, Apr. 13, 2024, available on Westlaw at 2024 WLNR 4264914.

24 ²² Memo at p. 4; Docket for *USA v. Keirans*, supra, at pp. 2-3. The docket does not disclose the sentence imposed.

25 ²³ Docket for *United States v. Matthew Keirans*, Court of Appeals for the Eighth Circuit, case number 25-1339; Cal. Code Regs., tit. 2, § 617.8 (official notice).

26 ²⁴ App. at p. 8; Dec. Supp. at p. 15.

27 ²⁵ App. at p. 9; Dec. Supp. at p. 15.

1 CalVCB. Typically, the claimant bears the burden to prove by a preponderance that (1) the crime with
2 which they were convicted either did not occur or was not committed by them and (2) they suffered
3 injury as a result of their erroneous conviction.²⁶ In this context, injury means that, but for the
4 erroneous conviction, the claimant would have been free from custody.²⁷ Once a properly submitted
5 claim is filed, Penal Code section 4902 requires the Attorney General to submit a written response,
6 after which an informal administrative hearing ensues pursuant to Penal Code section 4903. If the
7 claimant satisfies their burden at the hearing, then Penal Code section 4904 requires CalVCB to
8 approve payment for the purpose of indemnifying the claimant for the demonstrated injury, at the rate
9 of \$140 per day of their incarceration, if sufficient funds are available, upon appropriation by the
10 Legislature.²⁸ No compensation is authorized for any time spent on supervised released.²⁹

11 Significantly, a different and expediated process occurs for claimants with a court finding of
12 factual innocence. Under subdivision (b) of Penal Code section 1485.55, when a court has vacated a
13 judgment pursuant to Penal Code section 1473.7, “the person may move for a finding of factual
14 innocence by a preponderance of the evidence that the crime with which they were charged was either
15 not committed at all or, if committed, was not committed by the petitioner.”³⁰ If the court makes such a
16 finding, then under subdivision (c) of section 1485.55, “the [CalVCB] board shall, without a hearing,
17 recommend to the Legislature that an appropriation be made and any claim filed shall be paid pursuant
18 to Section 4904.”³¹ Even then, CalVCB is statutorily obligated by Penal Code section 4904 to
19 determine the extent of injury caused by the erroneous conviction and incarceration.³² To that end,

21 ²⁶ Pen. Code, §§ 4900, subd. (a); 4903, subd. (a).

22 ²⁷ Cal. Code of Regs., tit. 2, § 640, subd. (f).

23 ²⁸ Pen. Code, § 4904.

24 ²⁹ Pen. Code, § 4904; see also proposed Pen. Code, § 4904, subd. (d), conditionally operative July 1,
25 2024, subject to appropriation, as added by Stats.2022, c. 771 (A.B. 160), § 21; Governor’s May
26 Revision (2024-25), Introduction at pp. 9-10 (rejecting A.B. 160’s conditional expenditures due to “the
negative multiyear projections” to the General Fund), available at <https://ebudget.ca.gov/2024-25/pdf/Revised/BudgetSummary/FullBudgetSummary.pdf>.

27 ³⁰ Pen. Code, § 1485.55, subd. (b).

28 ³¹ Pen. Code, § 1485.55, subd. (c).

³² Pen. Code, § 4904.

CalVCB may “request from both parties additional documents or arguments as needed to calculate compensation.”³³ The burden to prove injury rests with the claimant by a preponderance of the evidence.³⁴

A. Innocence

Pursuant to the court’s finding under Penal Code section 1485.55, CalVCB unequivocally accepts that Woods is factually innocent of all charges in case number BA480543. As conclusively determined by the superior court, “a preponderance of the evidence” demonstrates that “the crimes alleged in this case were not committed by” Woods.³⁵ As confirmed by Keirans’ guilty plea to two counts of fraud, Woods was the victim, not the perpetrator, of the alleged identity theft and false identification that led to his convictions. Accordingly, the administrative record amply demonstrates Woods’ innocence for purposes of compensation under Penal Code section 4900 as an erroneously convicted offender.³⁶

B. Injury

As both parties agree,³⁷ the record further demonstrates injury in the amount of \$80,640 for 576 days of Woods’ incarceration for his erroneous convictions. Penal Code section 4904 specifies that the amount of compensation to be approved for the claimant’s injury “shall be a sum equivalent to one hundred forty dollars (\$140) per day of incarceration served, and shall include any time spent in custody, including a county jail, that is considered to be part of the term of incarceration.”³⁸ This compensation is “for the purpose of indemnifying the claimant for the injury” sustained “through their erroneous conviction and imprisonment....”³⁹ In this context, the term “injury” refers to “the unique harm

³³ Pen. Code, § 4904, as amended by Stats. 2023, c. 702 (S.B. 78), § 5, eff. Jan. 1, 2024.

³⁴ Pen. Code, § 4904; see also Evid. Code, § 115.

³⁵ App. at p. 9.

³⁶ Pen. Code, §§ 1485.55, 4902, subd. (a).

³⁷ Email sent by counsel Lauren Jung on Feb. 27, 2025; email sent by Deputy Attorney General Jessica Leal on Feb. 24, 2025.

³⁸ Pen. Code, § 4904.

³⁹ Pen. Code, § 4904.

1 suffered when factually innocent persons are imprisoned.”⁴⁰ Stated differently, the requisite injury
2 contemplated by section 4904 is “each day ... spent illegally behind bars, away from society ... and
3 their loved ones” solely as a result of the erroneous conviction.⁴¹ To that end, injury “may be
4 established by showing that, but for the erroneous conviction, the claimant would not have been in
5 custody.”⁴²

6 Penal Code section 4904 does not expressly address whether or not compensation is available
7 for time spent in a state hospital. Instead, section 4904 authorizes compensation for “time spent in
8 custody, including county jail, that is considered to be part of the term of incarceration.”⁴³ Nonetheless,
9 Penal Code section 2900.5 confirms that time spent in a state hospital may be credited towards the
10 defendant’s prison sentence. Specifically, “when the defendant has been in custody, including, but not
11 limited to, any time spent in a ... hospital..., all days of custody of the defendant ... shall be credited
12 upon [their] term of imprisonment....”⁴⁴ Thus, as both parties agree, Woods is entitled to compensation
13 for any portion of his incarceration that was served in the custodial setting of a state hospital. This
14 result best promotes the purpose of section 4904 to compensate an erroneously convicted person for
15 each day they spent “away from society ... and their loved ones.”⁴⁵

16 Here, the record demonstrates that Woods’ injury consists of 576 days incarceration,
17 amounting to \$80,640 in compensation for his erroneous convictions in case number BA480543. For
18 these convictions, Woods received a prison sentence of two years, for which he spent a total of 576
19 days in custody from his arrest on August 20, 2019, to and including his release on March 17, 2021.⁴⁶
20 This period includes approximately 147 days in a state hospital that the court expressly credited

21
22
23 ⁴⁰ Senate Floor Analysis of Sen. Bill No. 635 (Reg. Sess. 2015-2016), as amended Sep. 3, 2015, at
pp. 4-5.

24 ⁴¹ *Holmes v. Calif. Victim Comp. & Gov’t Claims Board* (2015) 239 Cal.App.4th 1400, 1405.

25 ⁴² Cal. Code of Regs., tit. 2, § 640, subd. (f).

26 ⁴³ Pen. Code, § 4904, subd. (a).

27 ⁴⁴ Pen. Code, § 2900.5, subd. (b).

28 ⁴⁵ *Holmes, supra*, 239 Cal.App.4th at p. 1405.


⁴⁶ *King, supra*, 3 Cal.App.4th at p. 886 (construing “days” for custody credit to include partial days).

1 towards satisfaction of Woods' prison sentence.⁴⁷ Accordingly, as both parties agree, Woods' injury
2 includes the entire duration of his custodial confinement, including time spent in a state hospital.

3 **V. Conclusion**

4 As mandated by Penal Code section 1485.55, the undersigned hearing officer recommends
5 CalVCB approve payment to Woods in the amount of \$80,640 for his claim as an erroneously
6 convicted offender under Penal Code section 4900 if sufficient funds are available,⁴⁸ upon
7 appropriation by the Legislature, as indemnification for the injury sustained by his 576 days of
8 imprisonment solely as a result of his vacated convictions.

9
10 Date: March 27, 2025



11 Laura Simpton
12 Hearing Officer
California Victim Compensation Board

13
14
15
16
17
18
19
20
21
22
23 ⁴⁷ Dec. Supp. at p. 13.

24 ⁴⁸ Of the initial \$8 million appropriated by Assembly Bill 107 (i.e., the Budget Act of 2024) for CalVCB's
25 payment of approved claims under Penal Code section 4900 for the 2024-2025 fiscal year,
26 approximately \$445,460 in funds currently remain. Nonetheless, as Assembly Bill 107 recognized,
27 "Upon order of the Department of Finance, [this] amount ... may be increased by an amount not in
28 excess of any total unpaid claim amounts pursuant to Sections 4900 and 4904 of the Penal Code."
(A.B. 107, Ch. 22 at pp. 777-778.) Accordingly, any additional appropriations will be applied to
outstanding claims, in the order approved, absent a contrary directive from the Legislature or
Department of Finance.