

James David Benish
9069 Lake Rd.
Otisville, Michigan 48463-9781
619-591-8801

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Chief Judge United States District of Hawaii
300 Ala Moana Blvd C-338
Honolulu, HI 96850
(808) 541-1300

1

2	United States of America)	Motion to Convene a Federal Grand Jury
3	James D Benish-Petitioner/Affiant/Victim)	Case Number _____
4	_____)	
5	VS)	
6	Abraham, K. Honolulu PD)	
7	Adric, KPD Detective)	
8	Apeles, Eunice KPD Records)	
9	Asher, Roy KPD Asst: Police Chief)	
10	Asida , Hawaii Counsel)	
11	Asuncion, Gilbert V. KPD)	
12	Bello, Hilo PD)	
13	Budd, Nancy Kauai Attorney HCF -Stahley)	
14	Burgess, John Kauai Prosecutor Inv. (Ruff))	
15	Care, Philip L.(Lawyer Sulla).)	
16	Carrol, John S. Lawyer-Horowitz)	

- 17 Carvalho, Bernard Kauai Mayor)
- 18 Castillo, Alfred Jr. Kauai Prosecutor)
- 19 Courson, Nick (Kauai County Counsel))
- 20 Damerville, Rick- Prosecutor)
- 21 Daubert, Mary Kauai FOI Office)
- 22 Dubin, Gary-Lawyer Horowitz)
- 23 Elliot, W. Augustuz (Sulla Colleague))
- 24 Emery, Gloria- Sulla Colleague)
- 25 Esteban, Greg Hilo PD Lt.(Uyetakes supervisor))
- 26 Fujita, Calvin 1993 KPD Chief of Police)
- 27 **Enterprise:** Hale Opio Inc.)
- 28 **Enterprise:** Kauai FOI Office)
- 29 Blane, Sara)
- 30 **Enterprise:** County of Hawaii)
- 31 **Enterprise:** County of Kauai)
- 32 **Enterprise:** Hawaii Community Foundation)
- 33 **Enterprise:** Hawaii United Way)
- 34 **Enterprise:** Heahea Heights LLC.)
- 35 Paul Sulla Jr. Lawyer)
- 36 **Enterprise:** First Hawaiian Bank and Affl;)
- 37 **Enterprise:** Puueo Limited Partnership)
- 38 Agent Big Island Land Co. Ltd)
- 39 Gregory Gadd)
- 40 Nani April Gadd)

41 **Enterprise:** The Office of Overseer, A)

42 Corporate Sole and its successor)

43 Over and or the Popular Assembly)

44 Of revitalize, A Gospel of Believers)

45 **Enterprise:** G. Investment Group.)

46 Agent: An Enterprise Big Island Co.)

47 Ltd.)

48 Gregory Gadd)

49 Nani Gadd)

50 **Enterprise:** Bil One LLC:)

51 Paul J Sull Jr.)

52 Gregory Gadd)

53 **Enterprise:** Rainha Lemania Casa Holdings)

54 Agent: Paul J. Sulla Jr.)

55 Jamie Wallace- (trustee))

56 **Enterprise:** Jaxa Holdings LLC.)

57 Agent: Jerry Ruthruff)

58 Paul J. Sulla Jr.)

59 Paul J. Sulla III (Paul Suila Jr's son))

60 **Enterprise:** Kachimaunu Ventures LLC)

61 Paul. J. Sulla Jr.)

62 Jamie Wallace – (Sulla's son))

63 Paul Joseph Sulla III (Sulla's son))

64 Carol L. Silva)

65 W. Augustuz Elliot)
66 Robert L. Powers)
67 **Enterprise:** Faithful Ventures Trust. (No doc))
68 Paul J. Sulla Jr.)
69 Jamie Wallace-Sulla (Sulla Jr's Wife))
70 Gary Zamber)
71 Mgr. Menashe Jasun Sulla)
72 **Enterprise:** Ekele Pud Ass. Trust (No doc))
73 Gary Zamber)
74 Paul J. Sulla Jr.)
75 Jamie Wallace-Sulla)
76 **Enterprise:** BZ Development LLC)
77 Agent: Gary Zamber (Sulla Colleague)))
78 Jamie Wallace-Sulla)
79 **Enterprise:** Sky of Hawaii Church (No doc))
80 Paul JI. Sulla Jr.)
81 Paul J. Sulla III)
82 W. Augustuz Elliot)
83 Robert L. Powers)
84 Michael Sakell)
85 Gary Zamber)
86 Jason Hester)
87 Roxanne Joan Hampton)
88 Boston Kane)

- 89 Sheryl Sulttan)
- 90 **Enterprise:** Kaunamaro Farm LLC.)
- 91 Dr. Stanley Kripner)
- 92 Terrance McKenna)
- 93 **Enterprise:** Frana Services LLC (No Doc))
- 94 Edna Franco)
- 95 Paul J. Sulla Jr.)
- 96 Keone Agard)
- 97 **Enterprise:** Pyramid Process (No Doc))
- 98 Agent: RFD Asso. LLC. (Foreign))
- 99 Robert Dukat (Sulla process server))
- 100 Kelly Tmakiung (Dukat's partner))
- 101 **Enterprise:** Gospel of Believers Corp.)
- 102 Herbert M. Ritke)
- 103 Ronn Ritke)
- 104 G. Loran Lee (deceased))
- 105 Paul J. Sulla Jr.)
- 106 **Enterprise:** The Electic Center of Universal)
- 107 Flowing Light)
- 108 Roberto Silva)
- 109 E. Souza aka Ayahuasca Church)
- 110 Aka Ceudo Hawaii Spiritual Community))
- 111 Paul J. Sulla Jr.)
- 112 **Enterprise:** Territorial Savings Bank)

- 113 Vemon H. Hirata)
- 114 Collins Tomel (Horowitz case))
- 115 Allan Kitagawa)
- 116 Francis Tanaka)
- 117 Howard Ikeda)
- 118 Kirk W. Caldwell)
- 119 Melvin M. Miyamoto)
- 120 Ralph Y. Nakatsuka)
- 121 Richard Murakami)
- 122 **Enterprise:** Big Island Land Co. Ltd.)
- 123 Gregory Gadd)
- 124 Nani April Gadd)
- 125 **Enterprise:** Stewart Title Co. (no doc))
- 126 **Enterprise:** The Hawaiian Sanctuary)
- 127 **Enterprise:** Island Title Co. aka First)
- 128 American Title Co. (Horowitz property))
- 129 **Enterprise:** Hilo Police Department)
- 130 **Enterprise:** Kauai Police Department)
- 131 **Enterprise:** American Savings Bank)
- 132 **Enterprise:** Kauai Prosecutors Office)
- 133 Hara, Glenn . Attorney-Judge (Zedalis))
- 134 Hampton R.J. (Sulla colleague))
- 135 Hester, Jason. (Sulla Colleague))
- 136 Hold, Norman KPD)

- 137 Hurley, KPD Lt.)
- 138 Ibarra, Ronald HI Judge/lawyer (Horowitz))
- 139 Isoda, Gordon KPD)
- 140 Jolin, Taylor (Zedalis))
- 141 Jolin, Mary Ann (Zedalis))
- 142 Kimura. 1993 Kauai Prosecutor)
- 143 Kimura, Jay T. HI Prosecutor)
- 144 Jones, Hugh R. Deputy HI Atty Gen.)
- 145 Kane, Boston (Sulla Colleague))
- 146 Kagami, Michael S. Deputy HI Atty. Gen.)
- 147 Kollar, Justin 2015 Kauai Prosecutor)
- 148 Lavuosa, Patrick KPD Lt.)
- 149 Louie, David HI Deputy AG)
- 150 Lee, Loran HI Dept. Crim. Inv.)
- 151 Lowery, Chester)
- 152 Lewis, Diane- Ex KPD Office)
- 153 Lloyd, Katherine P. HCF Gen. Counsel)
- 154 Lund, Steve Hawaii Sanctuary)
- 155 Martine, Hanzs KPD)
- 156 Milks, Maria 1993 Circuit Judge)
- 157 Moss, Joe. Attorney for Silverman)
- 158 Kauai United Way)
- 159 Nakumura, Greg Judge (Zedalis))
- 160 O'Phelan, Daniel Hawaii Lawyer)

- 161 Parries, Bradley (J. Stahley's step-son))
- 162 Perry, Darryl KPD Chief)
- 163 Poi, Tom Hilo PD)
- 164 Ramson, Paddy KPD)
- 165 Rapozo, Mel KPD)
- 166 Ritke, Ronn= Horowitz case)
- 167 Ritke, Herbert- Horowitz case)
- 168 Rosa, Richard 1993 KPD Capt.)
- 169 Sulla, Paul J. Jr. Atty. Horowitz-Zedalis case)
- 170 Roth, Mitch HI County Prosecutor((Zadelis))
- 171 Schonlau, Todd- (Aaron Schonlau's Bro))
- 172 Silva, Carol- Sulla Colleague)
- 173 Silverman, Robert- J. Stahley Trust Admin.)
- 174 Sakell, Michael (Sulla Colleague))
- 175 Stein, Lynette M. Medrano)
- 176 Joe Moss Colleague- Kauaii)
- 177 United Way Foundation)
- 178 Takekawa, Ray KPD Lieutenant (Arrested)
- 179 Mr. Woolsey (father of Lacey Ruff))
- 180 White, Likey- Sulla Colleague)
- 181 Whittaker, Steven (Sulla Lawyer))
- 182 Yoshido, Alvin #19 KPD)
- 183 Yu, Carolyn M. HI AG Securities)
- 184 Yukimura, Jo Ann 1993 Mayor)
- 185 Zedales, Llian (Zedalis Trust))

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208 [REDACTED]

209 **MOTION TO CONVENE A GRAND JURY**

210 COMES NOW, A citizen of these United States of America, James David Benish hereinafter

211 referred to as Affiant who moves the Federal Court to Convene a Federal Grand Jury pursuant to: The

212 Federal Rules of Criminal Procedure, Title III, Rule 6 (1), and that the court forgive any legal procedural

213 improprieties, mistakes, omissions etc; in consideration that this request has not been prepared, by an

214 attorney, nor has there been any legal representation, assistance or other participation by a lawyer on

215 behalf of your Affiant other than legal and constitutional information available to all via the internet.

216 This request is made in the belief that a United States Citizen has the right, granted by the US

217 Constitution, to ask and require the court to act on this request , that an investigation is necessary and

218 that this request is in the best interest of all Citizens of the United States.

219

220

BRIEF SUMMARY.

221 Your Affiant alleges that during the 1993 investigation into the Murder of Lacey Woolsey Ruff
222 the Kauai Police in concert with the Kauai Prosecutors office conspired to and presented inaccurate,
223 incomplete and fraudulent prosecution documents for Murder against Aaron Schonlau before the 5th
224 Circuit Court Judge Marie Milks . Your Affiant alleges that these actions included filing case documents
225 that did not contain information about other culpable person(s), did not present the entire police
226 investigation file information that contained evidence of culpability of another person to the court, and
227 later ordered the destruction of evidence to cover up the improprieties of the police and prosecution
228 team. Your Affiant also alleges that during the time from 1993 until present there was a continuing and
229 ongoing effort by the Kauai Police and Prosecutors office to conceal and destroy evidence that
230 documented these improper activities of the prosecutors and police. Your Affiant states that additionally
231 there was later an effort by the Kauai Police and Prosecutors office to intimidate witnesses in an effort
232 to prevent these activities from becoming known to the public.

233 Your Affiant also alleges that during the months of January 2015 to present the Kauai Police
234 Department, the Kauai Freedom of Information office and the Kauai Mayors office participated and
235 conspired either by actions or inaction to prevent the release of incriminating documents to a journalist.
236 These documents, later obtained through the Courts, and information provided by Victims revealed
237 evidence of the concealment of information. Your Affiant states that as this search for information
238 progressed on a broader scale it appeared that the concealment of information included members of
239 the Hawaii Attorney General's office. The Hawaii Attorney General's office has not acted or investigated
240 certain colleagues of the Kauai Police Department, the Kauai Prosecutors office the office of the Kauai,
241 Hawaii Mayors and police departments, or influential professional legal colleagues. You Affiant makes
242 these allegations pursuant to the activities of at least four private lawyers who practice within the
243 Jurisdiction of the Federal Court District of Hawaii including respective police and prosecutors offices.

244 Your affiant also alleges that after the deaths of at least three persons who had substantial
245 financial portfolios, these four attorneys conspired to and gained access to the funds of the deceased by
246 utilizing their professional skills as attorneys, committing fraud and impersonation, and concealing their
247 associations with certain financial institutions to create a guise as impartial providers of legal investment
248 advisors to either the deceased when alive, and or grieving relatives. Your Affiant states that their
249 positions in the legal community was and is protected by law enforcement organizations in Hawaii. Your
250 Affiant states that the modus operandi in all of the cases was to transfer the money or assets of the
251 deceased into non and profit corporations that claim either religious or charitable social status and then
252 direct the funds either to themselves disguised as fees or to colleagues disguised as fees or to non or
253 profit organizations. This transference to Enterprises further concealed the location of the assets. Your
254 Affiant states that there is clear documentation, when following the path of the aforementioned assets,
255 that the organizations (Enterprises) were and are operated by or managed by the colleagues of these
256 aforementioned lawyers. To demonstrate the brazen, lawlessness and fearless demeanor exhibited by
257 these attorneys, in example your Affiant alleges that attorney, Paul J. Sulla Jr. committed fraud, perjury,
258 and criminal impersonation, in an effort to negate the sale of Hawaii property and divert funds to his
259 own use when acting on behalf of the property seller who died before the deed was transferred to the
260 new owners. The fearlessness of Sulla is enabled by negative response of law enforcement authorities
261 and disinterested courts.

262 Your Affiant alleges that it was discovered that Hugh Jones, the husband of one of the four
263 attorneys who allegedly siphoned client trust money to the Hawaii Community Foundation, is a Deputy
264 HI Attorney General who is assigned to the non-profit and charity division. Hugh Jones and his colleague
265 at the Hawaii Attorney Generals Office, David M Louie refused to investigate any and all allegations into
266 the activities of the aforementioned lawyers. Your Affiant states that all four criminal arenas of

267 fraudulent and illegal activities span numerous states to include but not limited to Hawaii, Oregon,
268 California , Arizona and New Mexico.

269 Your Affiant states that Nancy Budd, one of these attorneys, has denied any wrong doing,
270 Katherine Lloyd also one of these attorneys has denied any wrong doing and her husband, Hugh Jones
271 has attempted to protect her by sending emails of denial as a Deputy Attorney General. Katherine Lloyd
272 abruptly resigned as Counsel to the Hawaii Community Foundation that received in excess of
273 \$500,000.00 of the Stahley Estate. Nancy Budd is currently under investigation by the Disciplinary Board
274 of the Hawaii Supreme Court. And Judge Hara of the 3rd Circuit Court has ordered what is left of the
275 Zedalis Estate frozen in an attempt to keep the funds out of the hands of attorney Paul Sulla.

276 Your Affiant also alleges that local attorney Paul Sulla Jr. status as a lawyer who represents the
277 interest of his victims, enabled him to transport Trust and Estate funds and fraudulent documents from
278 State to State, culminating in Hawaii. He has personally benefited from the death of his client Loran Lee
279 who sold a valuable property with concealed property liens to the unwitting purchaser Mr. Horowitz. .
280 Your Affiant states that during the sale of this particular Hawaiian Property Sulla collected the entire
281 loan payment funds from the purchaser refused to issue clear title, concealed the existence of liens on
282 the property, and while his client Loran Lee was hospitalized and dying, committed forgery and criminal
283 impersonation to transfer the sold property into an Enterprise Trust Fund that was owned and
284 controlled by him (Paul Sulla Jr.) Your affiant alleges that Sulla was also acting as an attorney for the
285 aforementioned Enterprises controlled by him, and as such attempted to foreclose on the Horowitz
286 property for non-payment of the liens that existed when the property was sold to Horowitz. Your Affiant
287 alleges that Sulla's forgery was acknowledged by a Hawaiian court that ordered \$225,000 in damages to
288 Horowitz but later altered and softened the judgment at the request of Sulla. Your Affiant further
289 alleges that State and Local authorities enabled Sulla's illegal activities by failing to investigate and in

290 one case a member of a police agency assigned to investigate Sulla acknowledged Sulla's activities as
291 illegal but the investigation was squashed by his supervisor.

292 Your Affiant also alleges that Sulla has attempted to conceal his activities by diverting funds and
293 documents from the sale of this property to many profit corporations and unregistered religious
294 organizations owned or controlled by him and that all of these Enterprises were operated by his
295 complicit and culpable colleagues. Your Affiant alleges that in addition to numerous felonious violations
296 of law, Sulla's and his accomplices activities are violations of the Federal RICO Act and constitute money
297 laundering.

298 Your Affiant states that in both the Stahley, Zedalis and Horowitz incidents of fraud, the
299 proceeds were deposited in the First Hawaiian Bank (Katherine Lloyd Counsel) and the American
300 Savings Bank (Kelvin Taketa Director ASB and CEO HCF, Judge Maria Milks legal counsel). In the Case of
301 Sulla, after he manufactured a deed transferring the ownership of the property that had been sold to
302 Horowitz to his Enterprise "The Electric Center of Universal Flowing Light" he appointed his colleague
303 Jason Hester as the agent and then prepared a deed transferring ownership to Hester personally and
304 made a loan to Hester secured by the property sold to Horowitz for \$50,000.00.

305 Your Affiant states that it is very unlikely that Hester actually received payment of 50,000.00.
306 Your Affiant also states that Hester cannot be located. Your Affiant states that the loan was made by
307 Paul Sulla personally and now after all the aforementioned legal maneuvering has a personal stake in
308 property worth in excess of \$500,000.00.

309 Your Affiant was initially interested in Stahley death case because the Kauai PD di not provide
310 the autopsy report to Stahley's relatives and later delayed providing the report to your Affiant as
311 requested pursuant to the Hawaii Freedom Of Information Act. Your Affiant also states that in the case
312 of the Stahley death the Autopsy report was eventually provided by the Hauai County Counsel Nick
313 Courson. Mr. Jack L Stahley's death was determined by the Coroner as "Ruptured Aortic Aneurysm with

314 exsanguinations” Mr. Stahley was 75 and had health issues, but his death came soon after his trust was
315 created by Nancy Budd. Although Stahley’s personal doctor and friends were surprised by his death,
316 after your Affiant read the autopsy report there was no reason to suspect foul play until a review of the
317 Stanley M. Zedalis case. Stanley Zedalis was 89 and was en route to California from New Mexico to visit
318 relatives on January 3rd, 2013. His destination was changed at the New Mexico Airport, without the
319 knowledge of the Zedalis family by the now deceased’s daughter Mary Ann Jolin who is also a client of
320 Paul Sulla Jr.. Stanly M. Zedalis was re-directed to Hawaii at the New Mexico airport.. On June 6th, 2013
321 Mr. Zedalis died. The cause of death is unknown. There are death certificates that do not have
322 supporting autopsy reports. It is unknown how the cause of death was determined. The daughter of
323 Mr. Zedalis, Mary Ann Jolin had previously convinced the bank that held Stanley Zedalis’s money to
324 release the Zedalis trust funds using a fraudulent will and trust agreement. These funds were later
325 transferred to a Trust fund created by Paul Sulla Jr. and deposited in the First Hawaiian Bank. Your
326 affiant states that the actual Stahley trust administrator got wind of the removal of the funds and
327 petitioned a Hawaii court to seize the funds. This petition occurred too late to prevent the removal of
328 some of the funds from the First Hawaiian Bank.

329 Your Affiant further states that Paul Sulla Jr. challenged the relatives of deceased Stanley Zedalis in a
330 Hawaii court by demanding custody of the body of Mr. Zedalis so that the body could be cremated in
331 Hawaii. The Court refused the Sulla request and ordered custody of the body to the relatives and Mr.
332 Zedalis . He was later buried without cremation in a National Cemetery in North Carolina with his
333 deceased wife.

334 Your Affiant demonstrates the complexity and continuing aurora of legal associations that span
335 from the criminal branch of law to the civil branch of law and the “wash my back and I’ll wash yours”
336 philosophy that exists between the two facets within these legal arenas. Your Affiant states that the
337 Judge that presided over the conviction and incarceration of Aaron Schonlau for the murder of Lacey

338 Ruff in 1993 now works for the American Savings Bank in Kauai and is a colleague of the group of
339 lawyers who have allegedly participated in the funneling of money from private trusts and estates into
340 profit and non- profit Hawaii corporations. Your Affiant further states that the infiltration and or
341 penetration of the civil legal community by the criminal legal community is present at all levels of law
342 enforcement in Hawaii. For example your Affiant previously mentioned that Hugh Jones who is a deputy
343 Hawaii Attorney General and works in the non-profit enforcement division is the husband of Katherine
344 Lloyd who was an executive VP at the Hawaii Community Fund and resigned when her conflict of
345 interest surfaced. Jones' colleague and superior David Louie at the Hawaii Attorney General's office is
346 now in private practice and his office is located in the First Hawaiian Center in the same building as
347 Lloyd's office who is also the Counsel for the First Hawaiian Bank and the building is titled "First
348 Hawaiian Center" You Affiant states that Mr. Louie refused to investigate complaints by one of the
349 victims claiming it was a civil matter. Carolyn Yu who was Branch Chief With the Securities Enforcement
350 Branch State Of Hawaii and who also received complaints from some of the victims now works for
351 United States Commodity Funds LLC aka United States Oil Fund. She also refused to investigate. Your
352 Affiant states that it appears throughout this documentation, that the non-profit corporations, and the
353 Charitable Community have a profound presence within the Legal community. Your Affiant also states
354 that this presence is fueled by the illegal, improper, and cloaked actions of this community to provide
355 funding either directly to themselves or the community of corporations and financial institutions. Your
356 Affiant believes that funding almost always returns to the individual lawyers via salaries, or fees from
357 either unwitting victims, directly from the corporations or the expectation that some type of
358 remuneration, service, or employment will be provided in the future by these massive financial
359 institutions.

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#

361

ANCILLARY JURISDICTION

362 Your Affiant states that although the initial history of this case beginning with the murder of
363 Lacey Ruff is clearly within the jurisdiction of Hawaii 5th Circuit Court, an investigative review of the facts
364 and events of all of the cases described in this Affidavit become entangled in alleged violations within
365 three separate Circuit Court Jurisdictions to include violations of Federal Law by Lawyers, politicians,
366 and public servants, beginning with police officers, prosecutors, the Kauai Mayors Office, the 5th Circuit
367 Court, the 3rd Circuit Court, the 1st Circuit Court and culminating with private attorneys ,non-profit
368 corporations, religious organizations, Banks, and profit organizations in all jurisdictions.

369 Your Affiant states that scrutiny of all the participants within the Ruff, Stahley Horowitz and
370 Zedalis cases and their associates indicates, enlightens and educates us to the negative participation by
371 the State of Hawaii Attorney General’s office that enables influential local lawyers, Judges, the Kauai
372 and Hawaii County Mayors Offices the Mayors subordinates the Kauai and other local Police Chiefs. their
373 subordinates and numerous Hawaii corporations, banks and churches who at the very least are aware
374 of, and in the worst context, are participants in alleged fraud and probable money laundering activities.
375 Your Affiant further informs the court that in addition to the cold case murder of Lacy Woolsey Ruff, it is
376 thought that the deaths of Jack Lee Stahley, Stanley Zedalis and Loran Lee are curious and stand alone
377 as the modus operandi and facilitators for the alleged ‘white collar’ Federal crimes. Your Affiant further
378 states that the Stahley, Zedalis, and Horowitz cases involve actions that began in Kauai and Hawaii
379 counties and expanded into the civil courts and banks of Oregon, Arizona, Hawaii and California in an
380 attempt to direct assets located in these states to Kauai Banks and subsequently into the coffers of
381 Hawaii corporations and lawyers. Your Affiant states that in the Horowitz case C. Loren Lee (now
382 deceased) and Paul Sulla Jr. knowingly sold a substantial and valuable Kauai property with concealed
383 liens and Lee died before the deed was transferred to the purchaser. Motivated by Lee’s death his
384 advisor and lawyer Paul Sulla Jr. attempted to assume ownership of the property from its purchasers

385 and direct the paid mortgage funds to his own interests knowing that the original property owner was
386 not alive to protest or deny the authenticity of the fraudulent documents Sulla created. Your affiant
387 states that, in fact, fraudulent documents were provided to several courts, banks and government
388 agencies to accomplish this and that in one case the fraud was acknowledge by a court in Hawaii. Your
389 Affiant further states that this case is referred to as the Horowitz-Kane case and involves similar other
390 allegations of corruption within political divisions, prosecutorial divisions within the Federal 3rd District.
391 Courts.

392 Your Affiant states that it would be difficult, and impractical to investigate the alleged County
393 and State crimes and hold Federal Crimes as separate investigations because in a broad sense and in
394 particular the Lacy Ruff murder, alleged crimes are derived from the same unfortunate incident and the
395 same participants are apparent in later related and unrelated incidents. The Stahley and Zedalis cases
396 are similar scenarios involving the alleged white collar theft of family trusts and inheritances, either
397 covered up by the same police and prosecutorial agencies as the Ruff and Horowitz cases or enabled by
398 these agencies refusal to investigate or prosecute. Your Affiant further states that the improper
399 relationships between the local levels of government to include professional relationships with political
400 positions at County and State levels have not been limited to professional vs political relationships but
401 in one case is as closely linked as marital status or blood relative.

402 Your Affiant also states that although the alleged violations of Federal Law encompass a broad
403 array of legal and political participants, it is and was your Affiants initial objective to initiate a competent
404 aggressive investigation into the culpability of Todd Schonlau in the Murder of Lacey Woolsey Ruff in
405 1993. Your Affiant states that he believes that such an investigation would not be possible at the State
406 and County level without exposing and or acknowledging wholesale culpability in corruption within the
407 pertinent jurisdictions and that in fact, your Affiant has tried for years to re-initiate the investigation into
408 the Ruff murder and only when your Affiant began to make these efforts public did the Kauai

409 Prosecutors office begin to appear as if there was an ongoing investigation. Your Affiant informs the
410 court that there was a person convicted for the Lacey Ruff murder. This person is Aaron Schonlau. Aaron
411 Schonlau is in prison for this crime. Your Affiant states that there has since been an admission of guilt to
412 this murder by the brother of Aaron Schonlau, Todd Schonlau. Your affiant states that there is no intent
413 to absolve the responsibility or guilt of Aaron Schonlau who has confessed to your Affiant, but it is your
414 Affiants intent to ask for a completion of the investigation into the Murder of 4 yr old Lacey Woolsey
415 Ruff by holding all culpable persons accountable for this cold case murder.

416 Your Affiant further states that almost without exception, the witnesses in the Ruff murder
417 investigation are reluctant to formally testify for fear of physical and legal retribution from the Kauai
418 Police and Prosecutors Department. You affiant states that this fear is one reason for your Affiant's
419 participation in this affidavit. Your Affiant states that after extensive investigation into all the crimes
420 mentioned in this affidavit, there is a realization of profound seemingly unlimited wholesale coercion
421 within the criminal enforcement community that gives your Affiant pause.

422 Your Affiant informs the court that the time span of the connected events in this complaint is
423 from 1993 to present, and the Geographical jurisdictions encompass the Denver Colorado area, the
424 State of Oregon, the State of California, the State of Arizona as well as numerous Hawaiian jurisdictions..
425 However your Affiant advises the court that a Grand Jury investigation may possibly expand participants
426 and jurisdictions.

427

428

COMPLAINT

429 Your Affiant states that he is a retired police officer and author who has come upon information
430 that pre-empts some personal objectives and causes your Affiant to make this request for a Grand Jury.

431 Your Affiant states that the named defendants are alleged to be culpable or complicit in certain
432 Federal crimes and that the list of defendants is a compilation of three or more organized groups of
433 people and Enterprises who as groups conspired to and acted to violate Federal Law.

434 Your Affiant alleges that the named defendants do not represent all the persons involved in this
435 complaint. The list of alleged violations include Federal Law that prohibits the concealment of certain
436 information, by public servants, and your Affiant states that the names of additional persons (also
437 public servants) sought, have been withheld and denied by current local public servants. This
438 concealment has prevented these persons from being added to this complaint.

439 Your Affiant alleges that all of the above named persons, but not limited to, were either directly
440 or indirectly involved in violating the following laws and statutes. Your Affiant states that it is alleged
441 that Federal Laws were violated to include the RICO Act and 18 U.S.C. §§ 1956 or 1957. Money
442 Laundering Act and will be described in this Affidavit. The following is a list of the alleged Federal
443 crimes.

444 Violation of Title **18 U.S.C. Section 2248, 2251 Murder**

445 Violation of the **US Constitution 5th Amendment** .

446 *"No person shall be held to answer for a capital, or otherwise infamous crime, unless on a*
447 *presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or*
448 *in the militia, when in actual service in time of war or public danger; nor ...*

449 Violation of **US Constitution 4th Amendment**. and **18 US Code 242** Deprivation of Rights under
450 the Color of Law.

451 Violation of **US Constitution 6th Amendment** Right to Competent Counsel violated by 5th District
452 Circuit Court.

453 446 U.S. at 342-45. *But see* *Wainwright v. Torna*, 455 U.S. 586 (1982) (summarily holding that
454 defendant may not raise ineffective assistance claim in context of proceeding in which he had no
455 constitutional right to counsel). The trial judge must not only refrain from creating a situation of
456 ineffective assistance, but may well be obligated under certain circumstances to inquire whether
457 defendant's counsel, because of a possible conflict of interest or otherwise, is rendering or may
458 render ineffective assistance.²

459 Violation of Title **18 U.S Code 2071** Concealment, removal, or mutilation generally
460 committed by the Kauai Government in total.

461 *Whoever willfully and unlawfully conceals, removes, mutilates, obliterates, or destroys or*
462 *attempts to do so, or with intent to do so takes and carries away any record, proceeding,*
463 *map, book, paper, document, or other thing, filed, or deposited with any clerk or officer of any*
464 *court of the United States, or in an public office, or with any judicial or public officer of the*
465 *United States, shall be fined under this title or imprisoned not more than three years or both.*

466 *Whoever, having the custody of any such record, proceeding, map, book, document, paper,*
467 *or other thing, willfully and unlawfully conceals, removes, mutilates, obliterates, falsifies, or*
468 *destroys the same, shall be fined under this title or imprisoned not more than three years, or*
469 *both and shall forfeit his office and be disqualified from holding any office under the United*
470 *States. As used in this subsection, the term "office" does not include the office held by any*
471 *person as a retired officer of the Armed Forces of the United States.*

472 Violation of Title **18 US Code 241**-Conspiracy against rights.

473 *If two or more persons conspire to injure, oppress, threaten, or intimidate an person in any*
474 *State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of*
475 *any right or privilege secured to him by the Constitution or laws of the United States, or*
476 *because of his having so exercised the same; or*

477 *If two or more persons go in disguise on the highway, or on the premises of another, with*
478 *intent to prevent or hinder his free exercise or enjoyment of any right or privilege so*
479 *secured—*

480 *They shall be fined under this title or imprisoned not more than ten years, or both; and if*
481 *death results from the acts committed in violation of this section or if such acts include*
482 *kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit*
483 *aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or*
484 *imprisoned for any term of years or for life, or both, or may be sentenced to death.*

485
486 Violation of Title **18 US Code 242** Deprivation of Rights under the Color of Law.

487 *This statute makes it a crime for any person acting under color of law, statute, ordinance,*
488 *regulation, or custom to willfully deprive or cause to be deprived from any person those*
489 *rights, privileges, or immunities secured or protected by the Constitution and laws of the U.S.*

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This law further prohibits a person acting under color of law, statute, ordinance, regulation or custom to willfully subject or cause to be subjected any person to different punishments, pains, or penalties, than those prescribed for punishment of citizens on account of such person being an alien or by reason of his/her color or race.

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Acts under "color of any law" include acts not only done by federal, state, or local officials within the bounds or limits of their lawful authority, but also acts done without and beyond the bounds of their lawful authority; provided that, in order for unlawful acts of any official to be done under "color of any law," the unlawful acts must be done while such official is purporting or pretending to act in the performance of his/her official duties. This definition includes, in addition to law enforcement officials, individuals such as Mayors, Council persons, Judges, Nursing Home Proprietors, Security Guards, etc., persons who are bound by laws, statutes ordinances, or customs.

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Violation of **Federal Rules of Criminal Justice Rule 11**

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Violation **42-usc-14141**

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It shall be unlawful for any governmental authority, or any agent thereof, or any person acting on behalf of a governmental authority, to engage in a pattern or practice of conduct by law enforcement officers or by officials or employees of any governmental agency with responsibility for the administration of juvenile justice or the incarceration of juveniles that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

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Violation of Title **18 U.S. code Chapter 96 Racketeer Influenced and Corrupt. (RICO)**

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Violation of Title: **18 U.S.C. §§ 1956 or 1957. Money Laundering.**

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AFFIDAVIT,

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Events

517

RUFF MURDER BACKGROUND 1993

518

(With comparisons to information recently obtained.)

519

On or about August 1993 your Affiant was employed as a detective for the Thornton Colorado

520 Police Department and in that capacity was assigned to investigate the 1984 cold case murder of 7 year

521 old Tracy Neef. Tracey Neef was abducted one winter morning while walking to school. Her body was

522 later recovered in the foothills of the Rocky Mountains near Boulder Colorado. In 1993 during your

523 Affiants investigation into this cold case a police teletype was received with information that a resident

524 of Thornton had been arrested for murdering 4 year old Lacy Woolsey Ruff in Kauai. Ruff had been

525 abducted while camping with her parents at a popular camping site on the island of Kauai.

526 The teletype stated that Aaron Schonlau had been arrested for murdering Lacy Ruff and that his

527 older brother Todd was en-route back to Thornton Colorado. A record search of the name Aaron

528 Schonlau revealed that he had escaped from a Colorado juvenile detention facility months earlier and

529 that he previously lived in the City of Thornton a short distance from the murder victim 7 year old Tracy

530 Neef. Aaron Schonlau was adjudicated for sexual assault Your Affiant contacted the Schonlau family

531 and made arrangements to interview Todd Schonlau (Aaron's older brother who was with his brother in

532 Hawaii) upon his arrival in Thornton Colorado . The purpose of the interview was to inquire as to the

533 possibility of Aaron's involvement in the cold case abduction of Tracy Neef in 1984.

534 At this time Aaron Schonlau was not a significant person of interest in the Tracy Neef murder

535 because he would have been only 11 years old at the time of the abduction of Neef and there was no

536 viable explanation as to how he could have accomplished transporting the victim's body from Thornton

537 to the foot hills of Boulder Colorado 30 miles from the abduction scene without assistance.

538 Your Affiant states that a review of the 1989 police file of Aaron Schonlau that resulted in his
539 arrest indicates the following: On September 10th, 1989 Thornton Police officer Michael Morehouse
540 went to the Schonlau home to take a report on an alleged incestual relationship. This home was a few
541 blocks away from the spot where Tracy Neef was abducted in 1984. Officer Morehouse spoke with
542 Norrisa Schonlau, the mother of Sara Schonlau who told Officer Morehouse that her daughter had been
543 sexually assaulted by Aaron Schonlau. Your Affiant further states that the original complainant on this
544 crime was the Colorado Department of Social Services who forwarded their report to the police
545 department. Sara's was 15 years old at the time of the interview with social services and later with
546 detectives.

547 When detectives interviewed Sara in 1989 she told them that Aaron had crept into her room
548 and fondled her while she slept. She admitted to detectives that this assault was one of many previous
549 assaults that dated back to when she was eight or nine years old. She also told the Detectives that Aaron
550 had threatened to kill her if she ever told anyone about the assaults. Your Affiant calculates that if in fact
551 the assaults which included sexual penetration were commenced when she was age 8, Aaron Schonlau
552 would have been age 10 and Todd Schonlau was age 15. Your Affiant states that Aaron had previously
553 been diagnosed as having severe mental disorders and had been actually committed to the Denver
554 Children's Hospital for an unknown period of time prior to his arrest for sexual assault. He was also
555 perpetually prescribed lithium to control his disorders, like hearing voices dictating to him his actions.
556 The medication was an indefinite prescription. Your Affiant further states that the hearing of voices is
557 consistent with the Kauai PD interview with Aaron Schonlau in 1993. Your Affiant also states that Aaron
558 Schonlau's diagnosed mental condition in 1993 Colorado is not consistent with the Kauai Court ordered
559 mental evaluation after his arrest in Kauai also in 1993. Your Affiant also learned that Aaron Schonlau's
560 juvenile case had been adjudicated for sexually assaulting his younger sister and he was subsequently
561 sentenced to incarceration in a facility for juveniles. Your Affiant advises that Aaron Schonlau's behavior

562 while in incarceration was sufficiently satisfactory and he had been approved for a work release pending
563 his release from custody that was within two weeks of his escape. At the time of Affiant's interview with
564 Todd Schonlau in 1993 it was unknown why Aaron Schonlau walked away from his work release with a
565 short remaining custody time.

566 Your Affiant states that or about August 6th, 1993 upon Todd Schonlau arrival in Thornton
567 Colorado from Kauai an interview with him by your Affiant was conducted at the Thornton Police
568 Department by Affiant. The interview began with Todd's explanation to your Affiant about the incidents
569 in Hawaii that resulted in the arrest of his brother Aaron. Todd began by stating to your Affiant that he
570 assisted his brother in leaving the confines of his work release but insisted that it was Aarons's desire
571 that he escape Colorado custody not his.(Todd) This is contrary to Aaron's statement later to your
572 Affiant. Together they took the money that Aaron had saved in the bank from his work release job and
573 left the State of Colorado, first going to California, then to Oregon, then to Mexico and finally to Hawaii.
574 This travel took several months and after they had exhausted Aaron's saved money, they received
575 money from their grandmother in Colorado. .

576 Your Affiant further states that when Todd and Aaron Schonlau were in Kauai, they were living
577 on a beach in a tent purchased with money sent to them by their grandmother. Todd stated to your
578 Affiant that one night or afternoon Aaron came into their tent and told him that he had "done
579 something terrible". Todd said that his brother told him that he had abducted a little girl, or something
580 to that affect and that he thought the little girl was deceased. Todd said that he telephoned is
581 grandmother who was in Colorado and asked her what he should do. Todd Schonlau said that his
582 grandmother told him that he should call the police and turn in his brother Aaron. However your Affiant
583 states that after a review of Todd Schonlau's statement it is unclear whether or not Todd actually
584 communicated with his grandmother before or after turning his brother Aaron in to the Kauai police for
585 the Ruff Murder. Your Affiant states that later in 1993 he interviewed the now deceased grandmother of

586 Todd and Aaron. She did not verify that it was she who recommended to Todd that he turn in his
587 brother.

588 Your Affiant also states that Todd said that after speaking to his grandmother he told his brother
589 to get on a bus and go to the airport and he would meet him there. Todd said that he planned to call the
590 police and have his brother arrested after he (Aaron) boarded the bus and that he did not want his
591 brother Aaron to know that it was he, (Todd) that turned him in. Todd Schonlau also said that after he
592 spoke with his brother Aaron he called the police and informed them that his brother was the one who
593 abducted Lacey Ruff and that Aaron was on the bus leaving the beach area. Your Affiant states that
594 Kauai PD police documents verify this portion of Todd Schonlau's statement and Aaron Schonlau was
595 apparently arrested and removed from the bus.

596 Your Affiant further states that during the Todd Schonlau interview in Colorado Todd said that
597 when the police arrived at the beach he (Todd) took the police to where the victim's body was placed in
598 the ocean. Your Affiant states that when Todd Schonlau was asked how he knew the location of the
599 victim, he responded that he knew because his brother Aaron told him that he had put the victim into
600 the Pacific Ocean and described the beach area to him. Schonlau began to state that his brother Aarons
601 reference to a "gully" as a description of where the body was, was not continued and he abruptly
602 stopped further explanation of exactly how he knew the location of the body. Regretfully your Affiant
603 did not question him more about this.

604 Your Affiant suggests that based on the evidence and statements contained in both the Neef
605 and Ruff investigations, there is only one way that Todd Schonlau would know where the body was
606 located and that is if Todd Schonlau was present when the body was placed in the ocean.

607 Your Affiant further states that based on the documents provided by the Kauai Courts and the
608 KPD , there are only two indications that the police were shown the location of the Ruff body by anyone.
609 These are two separate evidence logs. There were no other police documents made available to your

610 Affiant, that an interview with Todd Schonlau ever took place during the Kauai Police investigation other
611 than the contact with Schonlau at the phone booth where he initially called the police.

612 The documents that indicate the Kauai Police were told or shown where the Ruff body was
613 located is KPD evidence sheet PDF page 27 signed by Lt. Patrick Layosa in December 1995 of Photo
614 Group C that notes that a picture was taken :

615 *“where Schonlau related that he placed the victim under the water and wedged her with a rock.”*

616 And a second document, evidence sheet 2, signed by Lt. Patrick Layosa, in December 1995
617 submitted as evidence of photograph Group C, (PDF document page 27) that states that the pictures are

618 *“Of the general area where Schonlau related that he placed the victim under the water and*
619 *wedged her with a rock.”*

620 Your Affiant advises the Court to note that the documents do not specify whether it was Todd or
621 Aaron who placed the body or who identified the location of the body. Only the word “*Schonlau*” is on
622 these aforementioned police documents that describe the person identifying the location of the body, ..

623 As redundant clarification, your Affiant states that during your Affiants 1993 interview with
624 Todd Schonlau, he states that it was in fact he (Todd Schonlau) that escorted the police to the place
625 where he (Todd Schonlau) thought the body of Lacy Ruff had been placed in the ocean.

626 Your Affiant also states that on page 25 of Affiants 1993 interview with Todd Schonlau he states,
627 *“ took em down, showed ‘ em where I thought he had left it and where at about on the water.”*

628 Todd meant that it was he {Todd} that showed the Kauai Police where the body was placed in the water.

629 Your Affiant further states that the evidence of a second culpable person, Aaron Schonlau’s
630 brother, was not included in the documents provided to the Kauai Circuit Court in 1993 to include the
631 evidence taken and the evidence documentation in this case. It is unknown whether or not Aaron
632 Schonlau’s attorney was provided with this information.

633 Your Affiant further states that Detective David Victorino's statement of "probable cause" for arrest
634 says only that

635 *"The facts and circumstances showing probable cause for the above-named persons arrest for*
636 *the above-listed offense(s) are found in the police reports attached hereto as Exhibit A,*
637 *consisting of a total of 33 pages."*

638 Your Affiant states that the term "the police reports" may have have lead the Court to believe
639 that the 33 pages were the entire police report and that there was no person other than Aaron Schonlau
640 who was culpable and that if information was not in the police reports it didn't exist Your Affiant
641 assumes that the Court relied on the police to include all relevant information. Your Affiant further
642 states that the Ruff Circuit court documents labeled "Exhibit A" do not include the above
643 aforementioned evidence log documents and the page count is 33 pages as indicated in Exhibit A. and
644 as numbered by Detective David Victorino.

645 Your Affiant further states that the date of the Ruff homicide was July, 1993. The date on the
646 top of each page of the aforementioned evidence sheets submitted by Lt. Patrick Layosa KPD is July
647 1993 and are all signed at the bottom of the evidence sheets by Lt. Patrick Layosa in December 1995.
648 Your Affiant states that it is possible that the evidence sheets containing exculpatable statements may not
649 have existed because they were not created until December 1995, and that a letter to the KPD from
650 Prosecutor Castillo authorizing the destruction of all evidence was in April, 1995. It is also possible that
651 not only did the District Court not receive the exculpatory evidence sheets, neither did Aaron Schonlau's
652 defense attorney or anyone else. Your Affiant states that it is possible that the evidence sheets
653 containing exculpatory evidence was not submitted by Lt. Patrick Layosa at all until December 1995 after
654 the authorization to destroy the evidence.

655 Your Affiant further states that the police reports provided to your Affiant via the Freedom Of
656 Information Act are not the same volume as provided to the Court for the Probable Cause or hearing
657 purposes and neither the Court's copy of the police reports or the reports provided to your Affiant

658 include any reference to an interview with Todd Schonlau or statements made by Todd Schonlau other
659 than his allegation that it was his brother who committed the murder when he was at the phone booth
660 scene.. Nor (with the exception of the evidence logs) is there any police report that indicates that it was
661 Todd Schonlau who provided the police with information as to the location of the Ruff body. Your
662 Affiant further states the references to "Schonlau" in the incriminating police evidence log reports are
663 deceiving and lend to inaccurate assumptions as to which Schonlau the reports refer to. Had these
664 reports been included in Detective Victorino's statement of probable cause the Court may not have
665 determined probable cause or may have inquired as to which brother the word "Schonlau" refers to.

666 Your Affiant states that there is also nothing in the Kauai Police Report or the court documents
667 that have been provided to your Affiant that indicates a description of the clothing that Todd Schonlau
668 was wearing during the initial investigation into the murder of Lacey Ruff. Your Affiant states that Todd
669 Schonlau described in the 1993 interview to your Affiant the shirt he was wearing when he was
670 interviewed. He also told your Affiant that the police questioned him about his brother Aaron's lack of
671 swimming ability and questioned him about the clothing he was wearing. Todd Schonlau further stated
672 that the police at the time of the interview suspected that he, (Todd Schonlau) was guilty of disposing of
673 the body of Lacey Ruff because there was a witness. Todd Schonlau stated to your Affiant in 1993,

674 *"What they say (the police) they think happened is that he (Aaron Schonlau) came back and he*
675 *told me, 'I did something terrible' and then took off andtried to figure out what he was gonna*
676 *do and they thought maybe that he came back and told me and I helped him do it."*

677 Your Affiant states that events of the possible culpability of Todd Schonlau, such as Schonlau's
678 knowledge of the location of the body, and the fact that Schonlau was wearing the same clothing as the
679 suspect seen by two witness, one being Merry Glass, and the other being KPD officer Keoho, and the
680 fact that the one and only witness that connects Aaron Schonlau to the murder of Lacey Ruff are the
681 statements made by another culpable person, (Todd Schonlau) and this fact was never brought to the
682 attention of the court by either the Kauai Police Department or the Kauai Prosecutors office. The

683 primary information that was provided to the Court was only the portion of the police reports that
684 indicated the culpability of Aaron Schonlau. Your Affiant suggests to the Court that according to Todd
685 Schonlau's own words, there was in fact an interview conducted by KPD police with Todd Schonlau in
686 1993 Your Affiant informs the Grand Jury that this interview, described in detail by Todd Schonlau, was
687 not a part of the Court Documents or the Police Documents provided to your Affiant..

688 In addition, the incriminating statement made to the police allegedly by Aaron Schonlau, was
689 presented to the Court within the aforementioned documents as an un-signed document. Your Affiant
690 also suggests that even though the document is unsigned, this document is an indication that Aaron
691 Schonlau requested the presence of an attorney numerous times including before, and during the time
692 all the questions were formally asked of him. Additionally, your Affiant states that a review of the
693 documents provided to your Affiant but not included in the court documents is KPD form 364
694 (acknowledgement of rights) signed by Aaron Schonlau in which the box stating, *Do you want to talk to*
695 *a lawyer at this time?* Is checked YES Also checked YES is the question, *Do you want a lawyer present*
696 *during this interview?* Your Affiant also states that the question; *Would you like to tell me what*
697 *happened or what you know?* is also checked yes. Your Affiant suggests that Aaron was indicating that
698 he would like to talk to the police but wanted legal representation while being interviewed. Your Affiant
699 states that if the alleged Aaron Schonlau statement transcription is a representation of fact, questioning
700 was continued and his desire for legal representation was ignored.

701 Your Affiant states that none of the above information was conveyed to the court during the
702 hearing process, the plea process or the sentencing process. Your Affiant states that it was Affiants
703 interview with Todd Schonlau in 1993 that lends information as to the clothing that Todd Schonlau was
704 wearing and that there was an actual interview of Todd Schonlau by KPD police at the Police Station as
705 described in Affiants interview;

706 *"and then they took me to the police station and grilled me, grilled me and grilled and they said,*
707 *we just want to eliminate you as a suspect..."*

708 Todd Schonlau also said: *"he kept asking me about the shirt I was wearing 'cause apparently the*
709 *shirt that I picked up out of the tent in the morning that I put on before I went to use the phone*
710 *was the one that he (Aaron) was wearing when he was taking the little girl out into the water."*
711 *"So that's why they were looking at me like, now where'd the shirt-why would you put on a dirty*
712 *shirt on- I said I don't know, you know, I said I just picked it up and put it on, you know. That's*
713 *that's all I know 'cause it was stuffed with mud and everything. An then ."*

714 Your Affiant further states that during your Affiants interview with Todd Schonlau in

715 1993, he describes the actual activity of his brother Aaron as if he were a participant: Todd Schonlau
716 stated,

717 *"Someone seen him, yeah. Someone at the house. See, I guess he didn't walk down the gully, he*
718 *walked down their driveway carrying something. And the lady yelled at him, but she didn't yell*
719 *at him 'oh he's got a body' or something, like that, she yelled at him, 'you, this is my property',*
720 *you know, 'what are you doing?' kind of thing and my brother just ignored her, they said, and*
721 *just kept walking down to the water and – did what- ever he did."*

722 Your Affiant further states that in 1993 following his interview with Todd Schonlau, your Affiant
723 telephoned the Kauai PD and told them about the interview with Todd Schonlau and that your Affiant
724 was suspicious about the truthfulness of Todd's statements about the reason for "turning in his brother"
725 for the murder of the Ruff child. Affiant states that the Kauai PD Detective Adric who Affiant was
726 speaking with, was not interested in the information that Affiant offered stating that there:

727 *"was enough evidence to arrest and convict Aaron Schonlau for the murder of the Ruff child."*

728 Your Affiant retired soon after the Ruff murder cold case investigation. Although there was a suspect
729 developed in the Neef murder, there were no charges filed in the Neef Colorado murder case.

730 Your Affiant states that years later, Affiant wrote a book, "Closed Eyes" that was about the
731 murder of Tracy Neef in Colorado 1984. Your Affiant further states that there was a chapter in this book
732 that was specifically about the Schonlau brothers, Todd and Aaron and their status as persons of interest
733 in the Neef murder. There was not enough evidence, other than Aaron's arrest history and their
734 proximity to Tracy Neef's abduction location to classify either brother as a suspect in the Neef murder.

735 The Neef case continued to be considered a cold case unsolved murder. The book was published on
736 April 21st, 2009

737 In reference to the initial 1993 Kauai PD investigation into the Ruff murder, and particularly the
738 portion of the investigation wherein Todd Schonlau directed the Police to the spot where he claimed the
739 body was left in the ocean. Your Affiant states that in 2015 a telephone interview was conducted with
740 Bill Yeron who actually recovered the body of Lacey Ruff from the bottom of a crevice in the Kauai reef.
741 Bill Yeron, who was with Lacey Ruffs father, at the time of the recovery stated that the victim's body was
742 found "down current" from the spot where Todd Schonlau had identified as the place where the body
743 had been submerged in about 40 feet of water. Your Affiant states that further communication with Mr.
744 Yeron and utilizing Google Earth Yeron was able to pinpoint the actual location where the body was
745 recovered.

746 Additionally the body location that was allegedly located by Todd Shonlau and as described to
747 Yeron before he began his search was on the reef about 25 yds off the shore in water no deeper than a
748 man's waist. According to the statement made by Todd Schonlau in 1993, your Affiant further states
749 that this is consistent with the autopsy report that confirms the cause of death to be drowning, and
750 drowning forensic descriptions of time vs body deterioration would mean that during the time span
751 between when the child was reported missing and her body was recovered, unless the body of a child is
752 weighted. it would have floated and been visible to police who were using a helicopter. Your Affiant also
753 states that whether the body was floating or not, since the water was clear and only a few feet deep the
754 body would have been visible from a helicopter. Your affiant further states that even today, via Satellite
755 photos, the Anini Beach Reef bottom is clearly visible through the ocean waters via satellite. Your
756 Affiant further states that according to Bill Yeron who recovered the body, there were no weights and
757 the body was lying on the bottom of a reef crevice about 40 ft deep. Drowning forensics indicate that

758 this scenario indicates the body did not float into the crevice because the lungs were filled with water
759 after death causing the body to sink.

760 Your Affiant further states that the accumulation of the above information is not consistent with
761 Todd Schonlau's statement in 1993 to your Affiant that the body was deposited in shallow water
762 because his brother Aaron cannot swim, but is consistent with a weighted body deposited in deep water
763 by a swimmer using snorkeling gear to assist moving the body in water or a live body left in deep water
764 until death caused by drowning and then the passing of sufficient time for the muscles in the neck and
765 throat to relax and allow water into the lungs. Your affiant further states that the final location of the
766 Ruff body is consistent with Todd Schonlau's statement to Ms. Kaneko in 2012 that he "*put the body in*
767 *deep water so the sharks would eat her.*" Your Affiant further states that in 1993 Todd Schonlau stated:
768 that he owned snorkeling gear and would frequently go diving for fish, clams etc:

769 Additionally, Bill Yeron who now resides in California stated to your Affiant the Kauai PD did not
770 interview him in 1993 before, during or after the recovery of the Lacy Ruff body, Mr. Yeron expressed
771 concern for his safety should the Kauai PD become aware that his statement about the recovery of the
772 body conflicts in any way the information in the police files.

773

2012

774 Your Affiant states that on or about December 2011 and or January, 2012 Affiant received an
775 email from a person who signed the email Valerie Soto. Affiant states that Ms. Soto had read the book
776 "Closed Eyes" and obtained Affiants email from information in the book. Affiant states that Ms. Soto
777 was inquiring about the Schonlau brothers and specifically Todd Schonlau. Ms. Soto further emailed
778 Affiant that she was interested in Todd Schonlau because he was the boyfriend of her friend Tiffany
779 Kaneko. Your Affiant states that Ms. Soto asked Affiant "*Is Todd dangerous?*"

780 Your Affiant states that his answer to Ms. Soto was. *"I have no information that would indicate*
781 *that Todd Schonlau was a dangerous person."* Affiant states that he questioned Ms. Soto as to why she
782 asked the question. You Affiant states that Ms. Soto informed Affiant that her friend, Ms. Kaneko, had a
783 romantic relationship with Todd Schonlau. After further communication with Ms. Soto Affiant became
784 aware of the following:

785 Both women reside in the Portland Oregon vicinity. Both Kaneko and Soto had read the book
786 "Closed Eyes". Kaneko had a juvenile male residing in her house or was frequently staying or visiting at
787 Kaneko's home .Kaneko had seen Todd Schonlau inappropriately touching this male juvenile. Caution
788 about Todd Schonlau was the reason both women were inquiring about him.

789 Your Affiant states that a short period of time passed and email communication was established
790 with Ms. Kaneko who related the same information as was relayed by Ms. Soto. Your Affiant states that
791 at some point in time after these emails, on or about 01-13-2012 .Affiant received a telephone call or
792 email from Ms. Soto who told him that Kaneko had telephoned her from jail and told her that she
793 (Kaneko) had confronted Todd Schonlau about the Ruff murder in Kauai. Ms. Soto said that both Ms.
794 Kaneko and Todd Schonlau had been "drinking alcoholic beverages" when Kaneko confronted Todd
795 Schonlau about the murder of Lacy Ruff.

796 Additionally your Affiant states that Ms. Soto relayed to your Affiant more about her
797 conversation with Kaneko. Soto told your Affiant that Todd Schonlau allegedly told Kaneko that he
798 found the body of Lacey Ruff near where he and his brother were camping. He allegedly told Kaneko
799 that he first attempted to weight the body with stones placed in her shorts before putting her in four or
800 five feet of water in the ocean but the body would not stay submerged because the child's shorts would
801 not stay on her torso. He allegedly said that to solve this problem he found what he called a "cinder
802 block" near a house on the beach. He allegedly said that he secured the block on her torso by placing
803 the "cinder block" inside of the victims shirt. He also allegedly told her that he then swam to deep water

804 while he dragged the body and submerged it. Your Affiant states that apparently Todd Schonlau
805 sometime later after the arrest of Aaron Schonlau realized that the victim Lacy Ruff was not deceased
806 when placed in the ocean and that she died from drowning.

807 Your Affiant states that Todd Schonlau's alleged statement is supported by your Affiants
808 interviews of both Aaron Schonlau and Todd Schonlau. Their statements to your Affiant indicated that
809 Aarons swimming ability was either that *Aaron cannot swim or Aaron can partially swim* and Aaron
810 Schonlau does not venture into water that would be over his head. In addition, in both interviews, it was
811 acknowledged that Todd was a regular swimmer, had the snorkeling equipment including fins, and
812 would snorkel the Kauai coast for food. Your Affiant also states that Todd Schonlau's alleged statement
813 is also consistent with the Lacey Ruff autopsy report, and the location of where the body was found as
814 described by Bill Yeron.

815 Soto further stated to your Affiant that when Ms. Kaneko had heard Schonlau's confession to
816 her, she became enraged and physically assaulted Schonlau. Schonlau called the police who responded
817 to Kaneko's residence and arrested her.(Kaneko) for assault. Your Affiant states that the above rendition
818 allegedly given to Ms. Soto is supported by Kaneko's subsequent arrest records and statements she
819 made when being arrested. Additionally Ms. Soto gave your Affiant a copy of a text Kaneko sent to Todd
820 Schonlau on January 23rd, 2012 in which she texts Todd Schonlau,

821 *"I wondered if you felt a little of what little Lacy felt? Probably not because I'm sure to hear you*
822 *tell it, she brought it on herself. Beings she was a whole 4years old and apparently was quite a*
823 *threat to you or she would still be here instead of where you left her. Do you ever wonder how*
824 *scared she was, oh , forgot, you were looking in her eyes, so you know how scared she was. So*
825 *what is it you tell yourself to make that acceptable within you?"*

826
827 Your Affiant states the above quoted text was provided by Ms. Soto who had physical control of
828 Ms. Kaneko's phone for a short period of time . She copied the texts from the cell phone.

829 Affiant states that the assault charges against Ms. Kaneko were dropped when Todd Schonlau
830 did not appear in court as the victim.

831 Affiant states that he telephoned the Kauai Police Department soon after he had spoken with
832 Kaneko and Soto and that he spoke with Sergeant Asher of the Kauai Police Department. Affiant states
833 that after listening to the information that your Affiant had about the murder of Lacey Ruff Asher said to
834 Affiant that he would check with the Chief of Police to see what action(s) should be taken.. Asher did not
835 return a phone call to your Affiant. After waiting a month or so your Affiant telephoned Asher who said
836 that the Kauai PD had no interest in Affiant's information about the Ruff murder and would not release
837 any Ruff investigation information to your Affiant. Asher advised Affiant that more information could be
838 obtained about the Ruff murder by contacting the local newspaper.

839 Your Affiant states that in 2012 your Affiant attempted to gain more information about the
840 history of Todd and Aaron Schonlau in their younger years. Your Affiant states that his investigative
841 experience has convinced him that the murder and sexual assault of children the ages of Tracy Neef and
842 Lacy Ruff was committed by a Pedophile. Your Affiant states that it was necessary to ascertain whether
843 or not either one of the Schonlaus had a history of pedophilia. In early 2012 your Affiant made
844 numerous phone calls to relatives of Aaron and Todd Schonlau.

845 Your Affiant states that contact was made with Sara and Shane Sullivan who also lived in the
846 Thornton Colorado area. Your Affiant states that Sara Sullivan is the younger sister of Todd and Aaron
847 Schonlau and grew up with them in the same household. Sara Sullivan/Schonlau is also the victim of
848 sexual assaults when she was living at home with her two brothers and these numerous assaults and the
849 intervention by the Colorado Department of Social Services resulted in her allegations against Aaron and
850 subsequently resulted in his incarceration.

851 These phone conversations were exclusively with Shane Sullivan, Sara's husband. Shane Sullivan
852 related to your Affiant that he had been acquainted with the Schonlau family for many years and dated
853 Sara when they both were in high-school. They were later married. Shane told your Affiant that he had
854 been aware of his wife's history with her two brothers when they attended high-school. Shane Sullivan

855 further stated that after consulting with his wife Sara, she had agreed to allow him to speak with your
856 Affiant about the sexual abuse she experienced as a child but she would not speak with your Affiant
857 directly. He also stated to your Affiant that Sara was extremely fearful of her brother Todd and that she
858 actually feared for her life should Todd Schonlau become aware that she had spoken to anyone about
859 the sexual assaults. Mr. Sullivan advised your Affiant that his wife Sara continues to have nightmares
860 about her childhood with her brother Todd who allegedly

861 *“killed her pet guinea pig in front of her and told her the same would happen to her if she told*
862 *anyone what he had done to her.” .*

863 Your Affiant questioned Shane Sullivan as to why she feared Todd Schonlau when it was Aaron
864 who she alleged assaulted her in the late 1980s and early 1990’s. Shane Sullivan said that the reason
865 for this was because Aaron Schonlau was not the person who sexually assaulted her, but that it was
866 Todd Schonlau who committed all of the assaults. Your Affiant further states that the other persons
867 who lived in the Schonlau household also had intense fear of Todd and that was the reason why no-one
868 protested or disagreed when Sara identified Aaron as the perpetrator.

869 Your Affiant states that Shane Sullivan said that his wife Sara has suffered since her sexual
870 assaults from her brother Todd and that it has taken a long period of time for her to recover and have a
871 reasonably normal life. However her fear of Todd Schonlau lingers and is always present with her. Mr.
872 Sullivan stated that his wife Sara found it difficult for her to speak to anyone about those experiences.

873 Your Affiant states that there were attempts to personally interview Aaron Schonlau in prison
874 but he refused, however he agreed to a written interview via mail. This interview was approved and
875 monitored by the prison authorities. Aaron Schonlau is serving a life sentence for murder with possible
876 parole. Your Affiant states that the hand written letters to Affiant by Aaron Schonlau are available for
877 review.

878 Your Affiant states that the 'letter to letter' interview with Aaron Schonlau commenced on
879 March 19, 2012 and ended on June 6, 2012.

880 Aaron said in his letters that in 1993 it was Todd who insisted that he withdraw all his saved
881 funds from working during his Colorado work release program and flee from incarceration and his
882 residence at a halfway house that culminated in their arrival in Hawaii.

883 Your Affiant questioned Aaron about his arrest for sexually assaulting his sister. Aaron's letter
884 does not support the charges made against him, but it does support the statements made by Shane
885 Sullivan. Your Affiant states that at no time did he make Aaron Schonlau aware of the interview with
886 Shane Sullivan. Aaron stated that he did not understand why he was arrested for assaulting his sister
887 although he did admit to some "horse play" with her, and thought it was the juvenile play that was the
888 cause of his arrest. You Affiant states that it appeared that Aaron Schonlau was confused about the
889 reason for his arrest for assaulting his sister. .

890 Your Affiant states that Aaron wrote that when he and his brother Todd arrived in Hawaii they
891 thought that they might be able to get a job however he said their time was spent drinking, smoking pot
892 and consuming mushrooms. He said that their entire travel from Colorado to Oregon, to California,
893 Mexico and finally Hawaii was financed by their grandmother. He said that his medication of lithium
894 was gone. He stated that lithium was how he "*controlled his mental condition.*" Your Affiant states that
895 Aaron's letter describing his condition when in Hawaii was one of a incapacitated mental awareness due
896 to drug and alcohol use and lack of lithium. Your Affiant states that Aaron Schonlau's memory of what
897 actually happened in Hawaii was not clear.

898 Your Affiant further states that Aaron admitted that it was he that abducted Lacey Ruff. He also
899 wrote that his attempt at sexual assault was unsuccessful and that he thought his weight on her during
900 this attempt had killed her. Aaron further wrote that he placed Lacy in 5-6 feet of water and that he
901 thought that she was deceased. He said that he attempted to weight her with a small piece of coral but

902 it was unsuccessful. Aaron wrote that her body would not sink. (This is consistent with Drowning
903 forensics and Todd Schonlau's statement as to what his brother Aaron told him except that Todd later
904 changed his rendition of weighting the body from using a piece of corral to using stones.)

905 Your Affiant states that Aarons letter describing the disposal of Lacey's body is consistent with
906 the statement made by his brother Todd when Todd told Ms. Kaneko about finding the body floating in
907 5-6 feet of water and then weighting and taking the deceased child's body too deeper water. It is also
908 consistent with the 2012 police interview with Aaron when he stated that he had tried to weight the
909 body but it would not sink. It is also consistent with where Lacy Ruff's panties were found as
910 documented in the Kauai PD property evidence report filed by Wesley Kauai on 07/28/1993. PDF page
911 17, Evidence reference G-2. That describes the evidence location as in about 7 ft of water.

912 Your Affiant further states that Aaron wrote that he cannot swim and therefore he rarely
913 ventured into water deeper than 4 feet. This is not consistent with the statement made to your Affiant
914 in the interview in Thornton Colorado on 08/06/1993. In this interview Todd Schonlau stated when
915 asked if his brother Aaron could swim, "*He can swim but not good.*"

916 Your Affiant further states that nowhere in the Kauai PD statement does Aaron state that he
917 told his brother that he placed the child's body in the ocean.

918 Additionally, your Affiant states that Aaron Schonlau told Affiant that his brother Todd had been
919 diving the day of the child's disappearance. This statement is also consistent with Aaron's statement to
920 Kauai Police in 1993 and is consistent with Affiants interview with Todd Schonlau in 1993.. Aaron
921 Schonlau also wrote to your Affiant that he did not tell his brother where the sexual assault occurred or
922 where he placed the body. This statement is not consistent with the Statement made Todd Schonlau
923 made to your Affiant in 1993 at the Thornton Police Department.

924 Your Affiant further states that Todd Schonlau provided more information in the 1993 Thornton
925 PD interview than was included in the documents provided to your Affiant by the Kauai Freedom of

926 Information office. Your Affiant states that this additional information may further incriminate Todd
927 Schonalu in the murder of Lacy Woolsey Ruff.

928 **EVENTS BEGINNING IN 2015**

929 Your Affiant states that during the process of assembling all this information, your Affiant made
930 a Hawaii Freedom of Information Request to the Kauai Police Department to gain access to the 1993
931 police reports on the Lacy Woolsey Ruff investigation. Your Affiant also states that much of the
932 information contained in Your Affiants affidavit about information collected by your Affiant was sent to
933 the Kauai Prosecutors office in response to a telephone call inquiry from a Kauai Prosecutors
934 investigator who identified himself as John Burgess. There was also a telephone interview. Present were
935 your Affiant, John Burgess and a representative from the Kauai Police Department.

936 Your Affiant states that after submitting the information outlined in the above affidavit to the
937 Kauai Prosecutors Office, and after receiving no further response from either the Police Department or
938 the Prosecutors office that their investigation had progressed, your Affiant states that there were two
939 additional separate Freedom of information requests were made to the Kauai Police Department via the
940 Kauai Freedom of Information office. Your affiant states that these requests were duplications of
941 information not provided as a result of the first request. Your affiant states that pursuant to the Hawaii
942 Freedom of Information statute a request was made for the reason that certain information was not
943 provided. Your Affiant states that no additional information was provided by the Freedom of
944 Information office and the answers to questions as to the reasons why there was no information on
945 specific document requests was not provide

946 Your Affiant further states that after and during the Freedom of information requests your
947 Affiant was contacted by the maternal father of deceased Lacy Woolsey Ruff, Timmy Woolsey. Your
948 Affiant states that Mr. Woolsey relayed that he had been contacted by John Burgess, with the Kauai
949 Prosecutor's office. Mr. Woolsey said that he

950 *“felt like Mr. Burgess was minimizing the need to look into the allegation that there was another*
951 *person who had admitted to killing his daughter and used phrases like, “He’s just trying to sell*
952 *books”.*

953 You Affiant states that a similar conversation was reported by Lacy Woolsey Ruff’s mother Tracy
954 Woolsey.

955 Your Affiant further states that later he received an additional telephone call from Timmy
956 Woolsey the maternal father of 4 yr old Lacey Woolsey Ruff who said that he (Mr. Woolsey) had been
957 arrested by KPD Lt. Ray Takekawa, and released without charges soon after your Affiant’s first
958 conversation with Mr. Burgess. Mr. Woolsey said that he felt that the arrest was a warning not to
959 communicate further with your Affiant.

960 Your Affiant also states that he interviewed Tracy Ruff, the mother of the victim Lacy Ruff. The
961 conversation was a recounting of the events surrounding the abduction of her daughter. Of significance
962 was a statement by Mrs. Ruff that on or after the initial investigation of the disappearance of her
963 daughter Lacey, she had never had contact with Todd Schonlau and did not know what he looked like.
964 She verified that she, Aaron Shonlau and one or two other persons were “partying” near their tents on
965 the beach at the time her daughter disappeared. She said that she never saw Todd Schonlau during this
966 time or after. In fact she says she had never met Todd Schonlau. This conflicts with Todd Schonlau’s
967 earlier statements that it was Aaron who left the “camp” and not him. (Todd) It also conflicts with other
968 statements made by Todd Schonlau about his (Todd’s) whereabouts during the time Lacy was abducted.
969 Your Affiant states that there is no information provided by the Kauai Police Department that would
970 shed light on the whereabouts of Todd Schonlau during the entire abduction of Lacy Ruff incident except
971 the statements made to Affiant that he had “gone diving” Your Affiant additionally states that Tracy
972 Ruff is a Caucasian blond female and her description would have been similar to the description of a
973 woman that Aaron Schonlau told police in 1993 he was “partying with” during the time frame Lacy Ruff
974 was abducted.

975 Your Affiant states that an interview with Timmy Woolsey the father of Lacy Woolsey, verifies
976 that the person who actually recovered the body of Lacy Woolsey from the sea was Bill Yeron. Yeron and
977 Timmy Woolsey were friends. Timmy Woolsey and Mr. Yeron were together when snorkeling and diving
978 in search of Lacy's body on the day Lacey Ruff disappeared. Yeron stated to your Affiant that based on
979 the location that Todd Schonlau pointed out as where the body was placed, the current would have
980 moved the body to another location. This is the location where he and Timmy Woolsey were searching.
981 Your Affiant further states that this established location is in front of the home of the witness Merry
982 Glass that saw a suspect carrying a child into the water.

983 Your Affiant states that it was Timmy Woolsey that provided the identity of Mr. Yeron. Your
984 Affiant states that on September 24th, 2015 a telephone call was made to Mr. Yeron to clarify previous
985 information that he had provided. This conversation and subsequent computer email contact
986 information resulted in the identification of the Inini Kauai beach area where the abduction occurred
987 using the Google Earth software. Using this software a pectoral image was created. This image identified
988 the Inini beach area, the shallow and deep waters of the reef area where Lacy Ruffs body was
989 recovered. Your Affiant further states that the image lends accuracy to Todd's statement to Ms. Kaneko
990 that it was he, Todd Schonlau, who placed the body in "deep water". However your Affiant states that
991 where the body was eventually found there was a witness. A witness who saw a person carrying what
992 appeared to be a body. The Witness Mrs. Merry Glass did not see the suspect's face (as stated by Todd
993 Schonlau in 1993) but described the clothing the suspect was wearing. This is consistent with the
994 statement made to your Affiant by Todd Schonlau in 1993 that the person seen by Glass ignored her and
995 just kept walking with the body. Todd Schonlau also stated in the 1993 statement to your Affiant that
996 he was wearing the T-shirt as described by the witness.

997 In conclusion to the Lacey Woolsey Ruff homicide investigation your Affiant alleges that there
998 was a concerted conspiracy to conceal and destroy the evidence and details of the Ruff investigation

999 from your Affiant to protect those who violated the numerous Federal Laws during and after the Ruff
1000 investigation to include the written order in 1975 by the Kauai Prosecutors office to destroy all evidence
1001 in this case.. Your Affiant states that this conspiracy was “self feeding” and the more effort exerted by
1002 those in the Kauai Government to keep this information from your Affiant, the more laws were violated
1003 and the more additional people became culpable.

1004 Your Affiant also alleges that in 1993 certain information was also intentionally withheld and or
1005 concealed from the Kauai Circuit Judge to justify the arrest and facilitate the charges against Aaron
1006 Schonlau. Your Affiant also alleges that this conspiracy had many culpable persons involved to include
1007 the Kauai District Attorney, the Kauai Police Chief, Police officers, investigators and several Kauai
1008 Mayors.

1009 Your Affiant further suggests to the Court that based on the totality of the information ie;
1010 witness statements, the autopsy report and the fact that in 1993 Colorado Aaron Schonlau was
1011 diagnosed as having some type of mental illness that resulted in the hearing of voices, the inability to
1012 function and make decisions as a normal human being would, and inability to determine what is real
1013 and what is not real without severe medication, its possible that the Kauai Police and Prosecutor
1014 arrested the wrong brother for the abduction of Lacey Ruff and that at the time of the murder Aaron
1015 Schonlau was not capable of discerning reality. Your Affiant further states that during the Kauai Police
1016 interview of Aaron Schonlau, he stated to the police that he had not been able to take his medication
1017 and had been consuming alcohol and mushrooms. Your Affiant states that after reading the transcript of
1018 the interview with Aaron Schonlau in 1993, it in fact appeared that the interrogator lead Aaron Schonlau
1019 down a path of fabricated reality designed to incriminate and that Aaron Schonlau accepted as being
1020 real. Your Affiant acknowledges, however, that Aaron Schonlau was cognizant sufficiently to request a
1021 lawyer during the interview.

1022 Additionally your Affiant states that in hind sight, your affiant has no evidence that Aaron
1023 Schonlau is a violent person, but that there is evidence that Todd Shonlau's whole known life has been
1024 violent and that he has had previous pedophilic actions.

1025 Your Affiant advises that there were many email comments made on your Affiants internet blog
1026 about the Ruff murder and references to the Corruption within the Kauai Government. Most of these
1027 comments were about the Kauai Police Department and in fact some comments are about the same
1028 people who are mentioned previously in this affidavit. .

1029 Your Affiant states that in support of the belief that it is necessary that a Grand Jury on the
1030 Federal level be convened it is important to reference any and all allegations that support your Affiants
1031 assertion that certain actions and non actions committed by the Kauai Government are violations of
1032 Federal laws and statutes and that these actions are either committed directly by individuals within the
1033 Government or facilitated by organized or informal groups of people who eventually benefit from these
1034 illegal actions or inactions.

1035 Your Affiant has previously outlined an alleged joint conspiracy between the Kauai Police
1036 Department, the Kauai Prosecutors office and the Kauai Mayors Office to violate Federal Laws during
1037 and after the Ruff murder investigation buy deceiving the Circuit Judge, destroying evidence, violating
1038 the 5th Amendment to the Constitution and preventing the scrutiny of documents by the public and that
1039 these actions have existed from 1993 to present in an effort to protect those involved from
1040 prosecution. However your Affiant advises the Court that other allegations have come to light involving
1041 the same public institutions, private institutions and may have expanded the degree of influence and
1042 corruption well beyond the Lacy Woolsey Ruff homicide investigation

1043 Your Affiant further states that it appears that there is a intertwining group of lawyers and
1044 others in Hawaii who have favorable connections within the County of Kauai, the County of Hawaii and
1045 the State of Hawaii Government that could facilitate organized criminal activities on an interstate level.

1046 These activities may include but are not limited to Theft, Fraud, Money Laundering, tampering with
1047 evidence, possibly murder, and tax evasion.

1048 Your Affiant is familiar with the Federal RICO Act and what this legislation was designed and
1049 implemented to do for the Citizens of the United States and believes that this act was implemented to
1050 stop and prevent not only the previously described alleged criminal activity but additional activity as
1051 described below.

1052 **ADDITIONAL INCIDENTS AND ALLEGATIONS**

1053 Your Affiant Alleges that the Kauai Freedom of Information office, the Kauai Police Department,
1054 and the Kauai Prosecutors office, as individuals (named above) or as an Enterprise conspired and acted
1055 to violate your Affiants rights as described by refusing to provide police records as requested pursuant
1056 to the Kauai Freedom of Information act. The specific US Code violations are: 1) **18 U.S Code 2071**

1057 **Concealment, removal, or mutilation generally** states:

1058 *Whoever willfully and unlawfully conceals, removes, mutilates, obliterates, or destroys or*
1059 *attempts to do so, or with intent to do so takes and carries away any record, proceeding,*
1060 *map, book, paper, document, or other thing, filed, or deposited with any clerk or officer of any*
1061 *court of the United States, or in an public office, or with any judicial or public officer of the*
1062 *United States, shall be fined under this title or imprisoned not more than three years or both.*

1063 *Whoever, I having the custody of any such record, proceeding, map, book, document, paper,*
1064 *or other thing, willfully and unlawfully conceals, removes, mutilates, obliterates, falsifies, or*
1065 *destroys the same, shall be finded under this title or imprisoned not more than three years, or*
1066 *both and shall forfeit his office and be disqualified from holding any office under the United*
1067 *States. As used in this subsection, the term "office" does not include the office held by any*
1068 *personas a retired officer of the Armed Forces of the United States.*

1069
1070 **2) US Code 241-Conspiracy against rights** that states:

1071 *If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any*
1072 *State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of*
1073 *any right or privilege secured to him by the Constitution or laws of the United States, or*
1074 *because of his having so exercised the same; or*
1075 *If two or more persons go in disguise on the highway, or on the premises of another, with*
1076 *intent to prevent or hinder his free exercise or enjoyment of any right or privilege so*
1077 *secured—*

1078

1079 *They shall be fined under this title or imprisoned not more than ten years, or both; and if*
1080 *death results from the acts committed in violation of this section or if such acts include*
1081 *kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit*
1082 *aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or*
1083 *imprisoned for any term of years or for life, or both, or may be sentenced to death..*

1084

1085 Your Affiant believes that the right to access public records is granted on the County level via

1086 the Uniform Information Practices Act (Modified), Chapter 92F, Hawaii Revised Statutes (“UIPA”) and

1087 thus is a “right” as described in **18 US Code 241-Conspiracy against rights**: Access to Government

1088 Records and thus the actions or inactions by the Kauai Police Department, the Kauai Freedom of

1089 Information office and the Kauai Mayor to negate this State Statute is a violation of the **Federal**

1090 **Conspiracy against rights** Code: And Your Affiant believes that the specific actions by the Kauai Police

1091 department of concealing, deleting, redacting, and not providing documents, is a violation of the :

1092 **3) US code 2071 Concealment Removal etc: Act.**

1093 Your Affiant also believes that the aforementioned acts of refusal by the Kauai Police

1094 Department was facilitated and supported by the Kauai Freedom of Information Office and that the

1095 Freedom of Information office individually and as a enterprise was aware of the KPD refusals and

1096 concealments of the Kauai Police Department. Your Affiant also believes that the Office of the Kauai

1097 Mayor individually and as an Enterprise, specifically the Kauai General Counsel Nick Courson was also

1098 aware of the aforementioned disregard for the law by the Kauai Police Department and directly assisted

1099 the Police Department by refusing to reveal the identity of the person(s) responsible for the alleged

1100 violations of law. Your Affiant believes that this is also a violation of:

1101 **4) US Code 2071, Concealment Removal or Mutilation generally**

1102 In support of the above allegations you’re Affiant states:

1103 Between the dates of September 4, 2014 and August 4 2015 there were three separate requests

1104 presented to the Kauai Police Department via the Kauai Freedom of Information office. Your Affiant

1105 alleges that there was a joint concerted effort to conceal information by redaction, elimination, deletion
1106 of complete pages and failure to acknowledge the requests and the names of the persons who
1107 facilitated this concealment in an effort to hide violations of US Federal law dating back to 1993. Your
1108 Affiant also alleges that the concealment, and refusal to provide the requested documents was
1109 facilitated and supported by the Kauai Mayor, the Kauai Freedom of Information office (individually or
1110 as a enterprise) and the County of Kauai General Counsel (as a enterprise or individually)

1111 Affiant states that in some cases whole pages were redacted, in other cases whole pages were
1112 missing, and in some cases entire records were not provided without explanation. In all but one request
1113 there were no reasons given for these individual refusals to provide documents as required by the
1114 Hawaii Freedom of Information statutes.. Affiant provides the following as examples.

1115 **1.** Provide the names of people responsible for providing the records and or redactions. Not
1116 provided. Reason? Information not considered a document.

1117 **2.** The first request included a Kauai PD form 364 (acknowledgement of rights) unsigned by
1118 the arrestee. The signed form was not provided until the third request and was provided by
1119 the Kauai County Attorney

1120 **3.** Provide all supplement reports by police personnel. (No detective investigative reports
1121 were provided.)

1122 **4.** Provide report that describes the recovery of the deceased body. (not provided)

1123 **5.** Provide reason or cause for arrest. (not provided)

1124 **6.** Provide all supplemental reports by officer 90 who sighted a suspect. (none provided)

1125 **7.** Provide any and all dispatch logs, recordings, etc; (none provided however your Affiant
1126 noted that on one of the evidence logs an entry was made then redacted. Affiant could see
1127 the words "dispatch recording")

1128 **12.** The last 4 paragraphs of Lt. Paul Hurley's report missing? (not acknowledged)

1129 **13.** Line and paragraph redactions in the interview transcription on pages 1,4,5,9,
1130 10,17,18,19.(Your Affiant asked why the redactions) (Questions not acknowledged)

1131 Affiant further states that all answers as to why the redactions exist were generic. In spite of the
1132 above list, on 03/05/2015 your Affiant received this message from Sara Blane of the FOI Office

1133 *“It is the Kauai Police Department’s belief that it has provided you with all requested*
1134 *documents from the police report concerning the murder of Lacey Ruff that is considered*
1135 *public record. The justification for redacting particular statements or information contained in*
1136 *those documents has already been provided to you on numerous occasions. Should you feel*
1137 *documents or information from the police report was withheld in error, you may submit an*
1138 *appeal to the State of Hawaii Office on information Practices”*

1139 Thank you

1140 Sarah Blane

1141 Your Affiant states that in particular, the request for the individual names of the public servants
1142 who work for the Kauai Mayor’s office and or the Prosecutors office and or the Kauai Police Department
1143 who were responsible for the eliminations, redactions and the refusal to provide any other
1144 documentations in the above instances were not provided upon request as Sara Blane states above.
1145 Your Affiant further states that a third request for these names was made directly to a Kauai County
1146 Attorney Nick Courson. Courson denied the request stating that the names requested are not public
1147 documents. Your Affiant states that he reminded Mr. Courson that there must be some type of
1148 document directing these individuals to perform redactions and that if this document(s) exists would it
1149 not be included in the term “documents”? Question not answered.

1150 Your Affiant further states that some of the missing information not provided by the Hawaii
1151 Freedom of Information office was obtained by accessing Kauai Court records. However, even the Court
1152 records were not complete.

1153 Other information has not been provided by either the Courts or the County to date. Your
1154 Affiant further states that the Kauai Mayor was contacted via email in reference to this issue and that
1155 the Mayor did not respond. Your Affiant states that a no response by the Kauai Mayor may make the
1156 Mayor complicit. The Mayor has been indicted for covering up illegal allegations in the past.

1157 Your Affiant further alleges that additional information about the murder of Lacy Woolsey Ruff
1158 in 1993 has been recently provided to your Affiant by the family of the victim. Your Affiant alleges that

1159 after supplying the Kauai Prosecuting Attorney's office with information regarding the murder of Lacey
1160 Ruff, and the emergence of Todd Schonlau as a suspect, an investigator from the Attorney's office, John
1161 Burgess contacted the father of the victim, Timmy Woolsey and tried to dissuade him from
1162 communicating with your Affiant. Your Affiant further states that soon after, Timmy Woolsey was
1163 arrested by KPD Lt. Ray Takekawa and then released without charges. Mr. Woolsey conveyed to your
1164 Affiant that he thought that the arrest was a "warning" not to communicate with your Affiant. Your
1165 Affiant further states that similar communications occurred between Mr. Burgess and the mother of the
1166 victim. Your Affiant advises the court that the Woolsey family members have criminal records. Your
1167 Affiant also reminds the court that if the above incidents occurred or were connected to a person who
1168 was politically affluent or had a history opposite of the Woolsey family history, the above incidents
1169 would not go un-noticed as they did with Mr. Woolsey. Possibly they would not have occurred.

1170 Your Affiant alleges that the actions by John Burgess on behalf of Justin Kollar the Kauai
1171 Prosecutor is also a violation of the:

1172 **US Code 241 Conspiracy against Rights Act.** *ie: two or more persons conspire to injure, oppress,*
1173 *threaten, or intimidate any person in any State,* and is also a violation of the **Conspiracy against**
1174 **Rights Code.**

1175 Your Affiant alleges that the interview and subsequent interrogation of the arrestee Aaron
1176 Schonlau was performed despite the fact that he requested the presence of an attorney, a violation of
1177 Schonlau's 5th amendment rights . Your Affiant also alleges that the affidavit for probable cause
1178 presented to the Court for the arrest of Aaron Schonlau was flawed and brings the question as to the
1179 legality of the actual arrest of Aaron Schonlau because the affidavit for probable cause did not contain
1180 exculpatory information such as the fact that it was Aaron Schonlau's brother Todd Schonlau who
1181 pointed out the location of the victim's body, and that it was Todd Schonlau who was wearing the same
1182 clothes seen by a witness possibly carrying a body, and that it was Todd Schonlau who was the only

1183 witness against his brother Aaron, and it was Todd Schonlau who voiced details about the commission
1184 of the Ruff Murder that are not contained in the Police or the Court records..

1185 Your Affiant states the police reports submitted to the Court were incomplete and deceptive
1186 and that all the reports were accepted without question by Circuit Judge Marie Milks. In addition,
1187 Aaron Schonlau's attorney, Arthur K. Trask Jr. with a professional file that included numerous Kauai Bar
1188 suspensions and ending with the termination of his license to practice law was appointed by the Court
1189 to provide legal advice and recommendations to Aaron Schonlau and that these recommendations
1190 were not consistent with the contents of the police file.

1191 Your Affiant states that it was Arthur K Trask Jr. who encouraged Aaron to plead "no contest" to
1192 murder knowing that there was at best a weak case against him. Your affiant further states that Aaron
1193 Schonlau requested that he be allowed to recant his admission because of incompetent legal
1194 representation. Your affiant further states that there is no indication that his request was even
1195 considered by the Court. Your Affiant alleges that this scenario is a violation of The **US Constitution**
1196 **Amendment 6**; ie;

1197 **446 U.S. at 342-45. But see** *Wainwright v. Torna*, [455 U.S. 586](#) (1982) (*summarily holding that*
1198 *defendant may not raise ineffective assistance claim in context of proceeding in which he had*
1199 *no constitutional right to counsel*).*The trial judge must not only refrain from creating a*
1200 *situation of ineffective assistance, but may well be obligated under certain circumstances to*
1201 *inquire whether defendant's counsel, because of a possible conflict of interest or otherwise, is*
1202 *rendering or may render ineffective assistance.*²

1203
1204 Your Affiant states that the entire investigation against Aaron Schonlau was assembled,
1205 processed, and presented to the Judge without exculpatory information and with evidence obtained
1206 contrary to the 5th Amendment of the United States by the Kauai Police Department and the Kauai
1207 Prosecutors Office.

1208 Your Affiant further states that this alleged concerted joint effort of deception, lawlessness,
1209 coercion, corruption and a disregard for evidence has undermined notion that the American Justice

1210 System is not corrupt and it is Affiant's hope that should the time come that any citizen of this country
1211 be required to appear before a criminal court of law that it would not be in a jurisdiction who's regard
1212 for the US Constitution is similar as exists in Kauai. Your Affiant also states that this feeling is resonated
1213 with many of the witnesses and contacts that your Affiant has had communication with in regards to the
1214 Ruff murder.. If it pleases the Court your Affiant's and the Citizens of the United States last resort for
1215 justice is a Federal Grand Jury investigation into the above allegations..

1216 Your Affiant further alleges that upon learning that the Ruff case was a topic of interest in 2012
1217 because there was another person who allegedly admitted to the crime, there was an organized effort
1218 by the Kauai government to impede the flow of information about the arrest and prosecution of Aaron
1219 Schonlau. Your Affiant states that this attempt includes recent concealing, removing, oppressing public
1220 records, and threatening a witness. Your Affiant further advises the Court that the cover-up of the
1221 details of the Ruff case began in 1977 when lead prosecutor Alfred Castillo Jr. sent a letter to the Kauai
1222 Police Department authorizing the spoliation of all evidence recovered during the investigation into the
1223 Ruff murder and thus attempting to insure that the case would not be re-opened in the future. Your
1224 Affiant further states that this is a violation of the **Federal Rules of Evidence** and is a malicious act in
1225 that Alfred Castillo as an assistant Kauai Prosecuting Attorney had to have known there was a second
1226 culpable person involved in the Lacey Woolsey Ruff murder.

1227 Additionally your Affiant states that there have been numerous other Federal investigations into
1228 the Kauai Police Department as well as the Kauai County Government. Your Affiant states that both the
1229 Kauai Prosecutors office, the Police Department and the Kauai Government have been riddled with civil
1230 law suits alleging corruption to include previous Grand Jury and Federal Justice Department
1231 investigations that include the gambling and racketeering guilty plea of one of the Kauai Police
1232 Commission members and extortion, sexual harassment committed by a KPD police officers..

1233 Your Affiant states that a respected Kauai journalist Anthony Sommer wrote an entire book
1234 about the corruption in the Kauai Police Department and the County of Kauai. He wrote,

1235 *“The overall culture in Kauai County government and at the KPD is racist and sexist and*
1236 *corrupt. And the local politicians keep it that way.”*

1237
1238 Additionally, your Affiant advises the Court that due to recent public internet scrutiny by
1239 multiple internet sources of the Ruff Murder investigation additional allegations of “Kauai corruption is
1240 addressed in this affidavit.

1241 Your Affiant advises that during the Months of August and September 2015 there was a
1242 communication about the possible involvement of the Kauai Police Department and the State of Hawaii
1243 Attorney General’s Office in the Death of an elderly man and the subsequent theft of valuables from the
1244 deceased’s home. Your Affiant advises that included in this information was the allegation of Fraud that
1245 involved the confiscation of over a million dollars from the deceased estate by an entanglement of
1246 lawyers, nonprofit organizations and the Kauai Police Department..

1247 Your Affiant brings this to the attention of the Jury because after learning the totality of the
1248 details of this incident and those who are involved, it appears that violations of offences against the
1249 United States as described in the RICO Act. involves some of same persons identified previously in this
1250 affidavit and during the same time frame.

1251 Your Affiant also advises the Court and the Jury that the following allegations will exemplify the
1252 complexity and depth of alleged corruption in Kauai and provide insight into the integration and
1253 degradation of public institutions with private institutions and the participation of public servants and
1254 lawyers who have attained a level of influence with the Kauai and Hawaii Governments.

1255 Your Affiant alleges that this level of influence is facilitated by social, political, personal and
1256 monetary associations that self serve. Your Affiant further alleges that extensive pre-cautions have been
1257 taken by these elite persons, their colleagues and their respective Enterprises to negate the appearance

1258 of fraud and other crimes using legal absolution, concealment and exercising influence on those
1259 agencies that would, under other situations, investigate criminal impropriety. These precautions include
1260 but are not limited to transferring funds to and from numerous tax free and taxable corporations,
1261 charities and religious organizations. Your Affiant states that in this request for Grand Jury action it
1262 begins with the Enterprise known as the Hawaii Community Foundation.

1263 Your Affiant states that on or about January 27th 2012 a resident of Kauai, Jack Stahley died.
1264 Kauai Police entered the home on a welfare check by crawling into an unlocked window because the
1265 doors were locked. The body of Jack Lee Stahley was discovered and items were removed from the
1266 house by the Kauai Police without a search warrant. Your Affiant states that police records reported that
1267 items taken (for safe keeping) were legal documents, however the family is alleging that money and
1268 jewelry was also missing from the Jack Stahley house. Your Affiant states that the family is also alleging
1269 that some of the items taken were Will and Trust agreements. Your Affiant states that this is confirmed
1270 by a partial copy of the Kauai PD Evidence log that was given to the Stahley family after the entry into
1271 the Jack Stahley home...

1272 Your Affiant states that the will and trust agreement was created, witnessed and implemented
1273 by local attorney Nancy Jo Budd who is private attorney specializing in Will and Trust agreements. She is
1274 also a member of the Hawaii Board of Education, General Advisor to the Hawaii Community Foundation
1275 Inc (a nonprofit corporation), Community Advisory Committee for Hale Opio Kauai Inc. and while in
1276 those capacities Ms. Budd represented Jack Stahley in Will and Trust matters. Your Affiant alleges that it
1277 was Nancy Jo Budd who implemented the designation of the Hawaii Community Foundation as a
1278 recipient of 50% of the Jack Stahley Trust Fund.

1279 Your Affiant continues that the Jack Stahley items taken from the deceased home were booked
1280 into the KPD evidence by KPD officer Gilbert V. Asuncion and KPD Paddy Ramson and when the items
1281 were returned to the family, the Stahley family noted that one of the items returned to the Stahley

1282 family was Jack Stahley's Will and Trust agreement. The Stahley family told your Affiant that their
1283 fathers Will and Trust had been altered to reflect changes and the addition of the Hawaii Community
1284 Foundation as recipient of 50% of the Trust had been added to the Trust . .

1285 Your Affiant continues that the Stahley family specifically Joy Stahley and her brother Jeff
1286 Stahley allege that the Will and Trust documents returned to them, by the KPD after the death of Jack
1287 Stahley, was notarized by Nancy J Budd but was not witnessed.

1288 Your Affiant also states that Joy Stahley said that Robert Silverman and his wife Lolly are Kauai
1289 residents and were friends of Jack Stahley. Ms. Stahley said that Robert Silverman was present and
1290 witnessed the entry into the home of Jack Stahley by the Kauai Police Department. Joy Stahley stated to
1291 your Affiant that she and her brother live in Oregon and initially relied on information about their
1292 father's death provided by Robert Silverman and his wife.

1293 Joy Stahley told your Affiant that Lolly Silverman emailed her and said that when her husband
1294 Robert entered the home at the time the police were present on the day Jack Stahley's body was found
1295 he (Robert Silverman) looked at the Will and Trust documents laying on a table and noted that it was
1296 not the same document that he was familiar with.

1297 Your Affiant states that Joy Stahley was told by Lolly Silverman that on the day her husband
1298 Robert entered the home of Jack Stahley with the Kauai Police that he saw the body of Jack Stahley and
1299 that it was bruised, battered and bloody and that there were Will and Trust documents lying on a table
1300 in the home. Jeff Stahley stated to your Affiant that when he arrived at his father's home 4 days later
1301 the interior of the home had apparently been searched, the home was in disarray and that there was a
1302 substance that resembled a black powder that might be used to lift fingerprints, throughout the home
1303 as well as the presence of yellow evidence tape.

1304 Your Affiant further states that the reason the Stahley family believes that Nancy Jo Budd
1305 orchestrated the changes to the Will and Trust document of Jack Stahley is that she (Nancy Jo Budd) was

1306 the legal advisor, and trustee/treasurer to the Hawaii Community Foundation under the direction of
1307 another local Kauai attorney Katherine Lloyd. Your Affiant further states that Katherine Lloyd was, at the
1308 time of the death of Jack Stahley, the General Counsel and Vice President of the Hawaii Community
1309 Foundation and is and was employed as General Counsel to the First Hawaiian Bank. Your Affiant advises
1310 that the CEO of the Hawaii Community Foundation is Kelvin H Taketa who is also associated with the
1311 American Savings Bank wherein \$336,900.00 of the Stahley foundation was deposited at the direction of
1312 the Stahley Trust administrator Robert Silverman who was appointed to the position by the Oregon
1313 Courts at the suggestion of Nancy Lloyd who was representing the Hawaii Community Foundation and
1314 who also arranged the employment of her Colleague Joe Moss as advisor to Robert Silverman and the
1315 Stahley Trust Fund.

1316 Your Affiant further states that in addition to the fact that Nancy Jo Budd and Katherine Lloyd
1317 were colleagues at the Hawaii Community Foundation, Your Affiant states that Katherine Lloyd whose
1318 husband is Hugh R. Jones is an attorney for the Hawaii Attorney General's office. Tax and Charity Div and
1319 has formally denied any professional association between his wife Katherine and Nancy Jo Budd.. Your
1320 Affiant further states that Katherine Lloyd, has since abruptly terminated her employment with the
1321 Hawaii Community Foundation.

1322 Your Affiant advises the Court that the Stahley family has stated that before Lloyds departure
1323 from the Hawaii Community Foundation and representing the Hawaii Community Foundations interest
1324 as a 50% recipient of the Jack Stahley Trust fund the Stahley family instigated a civil action in the State of
1325 Oregon wherein the Stahley family resides. This action contested the change in their father's will. Your
1326 Affiant states that Joy Stahley said stated to your Affiant that the results of this action resulted in the
1327 Hawaii Community Foundation assuming control of the Jack Stahley Trust fund and that Robert
1328 Silverman was appointed the Trust administrator, replacing Jeff Stahley at the insistence of Nancy Lloyd
1329 who inferred to the Oregon Court that Jeff Stahley had a "*conflict of interest*" as a family member and

1330 therefore his actions and decisions as administrator would be tainted. Your Affiant states that the
1331 signatures on the alleged altered Stahley will and trust agreement could not be verified as fraudulent
1332 because Jack Stahley was deceased.

1333 Your Affiant states that copies of certified checks indicate that the new administrator,
1334 (Silverman) immediately received \$25,000 from the Stahley trust fund. Your Affiant also advises that
1335 copies of certified checks indicate that after Robert Silverman assumed the position of administrator of
1336 the Jack Stahley trust, a \$227,000 deposit was made into the American Savings Bank (Board of Director
1337 is Kelvin Takata who is also the CEO of the Hawaii Community Foundation) and since an additional
1338 \$269,000 has been transferred to the Hawaii Community Foundation.. Your Affiant states that this legal
1339 maneuvering removed all control of the Jack Stahley inheritance from the deceased family to the Hawaii
1340 Community Foundation.

1341 Your Affiant advises that the Stahley family filed a complaint with the Hawaii Attorney General's
1342 Office and that Hugh Jones responded"

1343 Tuesday July 1, 2014. Hugh.R.Jones@hawaii.gov

1344 *"Mr.Stahley: I am sorry missed your references to Mrs. Lloyd in your prior email because it*
1345 *was read on anl phone after normal working hours."*

1346 *"You are correct that Ms.Lloyd is my spouse. For that reason, your july 2013 complaint was*
1347 *assigned to a different attorney in our Department with expertise in charitable oversight*
1348 *matters. I was not involved whatsoever thereafter. I do need to correct a couple of your*
1349 *statements. First, Ms. Lloyd was not terminated by HCF but left to take a new position with*
1350 *Hawaii Pacific University and she left HCF before the date of your complaint. Nor is Ms. Lloyd*
1351 *related in any way to Ms. Budd."*

1352
1353 Your Affiant states the Stahley family has received no further communication from the Hawaii
1354 Attorney General's Office, or the Kauai Police Department nor does the Stahley family have any
1355 information as to the status of their complaints.

1356 Your Affiant further states that as the legal advisor to Mr. Silverman and the Stahley Trust Fund,
1357 Joe Moss also serves as Bylaws Chair of The Kauai United Way . Your Affiant further advises that the Jack
1358 Stahley will and trust documents created by Nancy Jo Budd and dated 6/28/11 is witnessed by Lynette
1359 M. Medrano-Stine who is allegedly on the staff of Joe Moss at the Kauai United Way and was a witness
1360 on the Stahley Will and Trust agreement created by Nancy Budd. Your Affiant advises that the Hawaii
1361 Community Foundation is listed as a contributor to the Kauai United Way. Your Affiant further states
1362 that the addition of Joe Moss as an attorney to representative of Robert Silverman and or the Stahley
1363 Trust Fund may have been orchestrated by Budd or Lloyd. because they are all colleagues via the above
1364 mentioned Enterprises.

1365 Your Affiant further advises that Joy Stahley stated that her father did not have any known life
1366 threatening health issues and that her father's personal doctor was surprised by his death and was not
1367 notified of Mr. Stahley's death. In addition Joy Stahley stated that she feared that her fathers death was
1368 not a natural death.

1369 Your Affiant states that no Kauai Police investigation files had been released to the Stahley
1370 family, nor has any information as to the cause of her father's death released to them. However your
1371 Affiant recently received a response to a Freedom of Information request for the Stahley Death
1372 Investigation . The report was received as well as the autopsy report. Your Affiant advises that the
1373 Autopsy report states that Jack Stahley's death was due to a "Ruptured aortic aneurysm with
1374 exsanguinations". Your Affiant states that the Stahley family was provided with a partial evidence log
1375 list that indicated that a will and trust agreement was removed from the Stahley home but was not
1376 informed of her father's cause of death nor provided with any other police investigation reports. .

1377 Your Affiant further states that in an effort to validate the beliefs and allegations of Jeff and Joy
1378 Stahley, your affiant inquired as to the possibility of accessing past email or text communications their
1379 father Jack Stahley may have had with culpable persons such as Lloyd, Budd, or other persons associated

1380 with these two lawyers. Your Affiant states that the Stahley's provided your affiant with the Yahoo
1381 email address of Jack Stahley and the password to his email and or Yahoo account. Your Affiant states
1382 that after gaining access into the Jack Stahley email account it was discovered that the account had been
1383 tampered with. It appeared as if the email account had been terminated and then initiated again using
1384 the exact same email address of Mr. Jack Stahely as there was a "Welcome" email sent to the Jack
1385 Stahley email account after his death.. The termination date of the old email account was approximately
1386 5 months after Jack Stahley's death. Your Affiant states that Joy and Jeff Stahley were asked about this
1387 email termination. Your Affiant states that he was told by Jeff Stahley that he nor any member of the
1388 Stahley family had changed their fathers email account with Yahoo other than changing the password
1389 and did not instigate the forming of a new account that resulted in the email history to become
1390 unavailable. Jeff Stahley stated that he has possession of the cell phone and the computer that
1391 belonged to his father Jack Stahley. Your affiant states that Jack Stahley died on January 27th 2012 and
1392 the interruption and replacement of his email account was accomplished on June 26, 2013. Your Affiant
1393 was unable to access the original older Jack Stahley email account. Your Affiant states that an email was
1394 sent to the Yahoo security division inquiring as to why the Jack Stahley email did not contain any
1395 account history dated prior to the date of his death. No response has been received.

1396 Your Affiant redundantly reminds the Court and Jury of the following: Nancy Jo Budd and
1397 Katherine Lloyd allegedly were former colleagues at the Hawaii Community Foundation. Your Affiant
1398 advises the Court that Nancy Jo Budd was listed on an internet publication as an advisor,
1399 trustee/treasurer to the Hawaii Community Foundation under the direction of Katherine Lloyd and that
1400 Kelvin Takata is the CEO of the Hawaii Community Foundation. Takata is also is on the Board of
1401 Directors of the American Savings Bank that received substantial funds from the Stayley Trust fund. .

1402 Nancy Budd is and was on the Community Advisory Committee for Hale Opio Kauai that receives
1403 donations from the Kauai United Way as well as the Hawaii Community Foundation. In addition other

1404 colleagues of Lloyd and Budd at the Kauai United Way are Joe Moss Director of the Kauai United Way
1405 and is the Jack Stahley Administrator Robert Silverman's attorney on matters concerning the Stahley
1406 Trust.. As such Robert Silverman is in a position of influence as to the Trust investments etc:

1407 Associates of Budd at the Hale Opio Kauai Inc , Daryl Perry (Kauai Chief of Police, Shayleen
1408 Carvalho (previous Prosecuting Attorney) Justin Kollar (Present Prosecuting Attorney) are all who would
1409 be involved in the investigation into the death of Jack Lee Stahley. Your Affiant advises the Court that to
1410 date these entities or their respective County divisions have not contacted the Stahley family in
1411 response to their inquiry's except to return the Will and Trust agreements retrieved from the home of
1412 Jack Stahley.

1413 Your Affiant further advises that Katherine Lloyd is currently and was employed by the First
1414 Hawaiian Bank at the time of the death of Jack Stahley and that her past associate there is Benjamin
1415 Benzaken who was an investment advisor for Jack Lee Stahley. Your Affiant advises that additional
1416 Trusts known to be controlled with or associated with the First Hawaiian Bank are the Bishop St. Capitol
1417 Management, the First Hawaii Foundation and the Bank West Services Inc. Your Affiant further advises
1418 that Benjamin Benzaken was described by Joy Stahley as a "good friend" of Jack Stahley. Your Affiant
1419 states that he conducted a telephone interview with Mr. Benzaken. Benzaken would not provide your
1420 Affiant with any information and did not want to be quoted. He stated to your Affiant that he was a
1421 friend to Jack L Stahley and was surprised that he had died.

1422 Your Affiant further states that Katherine Lloyd, has denied any professional association with
1423 Ms. Budd except to infer that Ms. Budd was a volunteer for the Hawaii Community Foundation. Your
1424 Affiant further states that in an email from Nancy Budd to your Affiant she contradicts Ms. Lloyd and
1425 describes her "professional" position with the Hawaii Community Foundation as:

1426 *"My association with the Hawaii Community Foundation has been purely a professional one*
1427 *over many years-- most professional advisors in Hawaii have such an association. I served on*

1428 *a HCF community leadership council (NOT on a board of directors or board of governors or*
1429 *any other entity related to HCF that would require acting as a fiduciary). I may possibly have*
1430 *caused some confusion by including my participation as a member of the leadership council*
1431 *on a disclosure related to my volunteer service on the Board of Education for the State of*
1432 *Hawaii. HCF has set up a "leadership council" on each island to discuss overall trends and*
1433 *needs in the community".*

1434 Your Affiant states that although initially Budd seemed to infer that she was more than just a
1435 volunteer at the Hawaii Community Foundation and Lloyd denied this, your Affiant states that she and
1436 Lloyd had a close professional relationship in the implementation of the Jack Lee Stahley Will and Trust
1437 agreements because Lloyd was Counsel for the Hawaii Community Foundation and as such was the
1438 Hawaii Community Foundation representative during the Stahley's legal contest of the Stahley Trust and
1439 Budd created the Trust and Will documents that granted a 50% in the Stahley Trust Fund. Budd did not
1440 mention this relationship with Lloyd to your Affiant. .

1441 Your Affiant furthers states that this statement acknowledges internet records that indicate that
1442 Nancy Jo Budd has been on an Advisory Board for the Hale Opio Kauai Inc. non- profit corporation and
1443 that the Hawaii Community Foundation , and the United Way (Joe Moss previous United Way board of
1444 directors) are listed as donors to the Hale Opio Kauai Inc. Also on the advisory board of the Hale Opio
1445 Kauai Inc. are Kauai Mayor Bernard Carvalho (Also Board Director United way), Daryl Perry, Shayleen
1446 Iseri Carvalho, Lucy Douthitt (Hawaii Board of Education who serves with Budd) and Justin Kollar (Kauai
1447 Prosecutor).

1448 Your Affiant advises the court that it is alleged that Nancy Jo. Budd ,Katherine Lloyd, and Joe
1449 Moss all attorneys, have personally benefited financially from the death of Jack Stahley and his
1450 subsequent Estate and accordingly the Hawaii Community Foundation and the other nonprofit
1451 organizations that receive and distribute donations to and from each other have benefited or will
1452 benefit as a result of hundreds of thousands of dollars that become available for distribution via the Jack
1453 Stahley Triust fund. These funds are to be transferred (Pursuant to the Jack Stahley Will and Trust) to

1454 the Hawaii Community Foundation and in fact there has been immediate transfers of the Stahley Trust
1455 funds that averted the Hawaii Community Foundation and went directly into the American Savings Bank
1456 that is directed by the same person who Chairs the Hawaii Community Foundation,.... Kelvin Takata..

1457 Your Affiant states that all of the above named persons have in some way benefited from their
1458 involvement with the proceeds of the Jack Lee Stahley estate.

1459 Your Affiant advises the court that Nancy Jo Budd's position with the Hale Opio Kauai Inc non-
1460 profit corporation put her in a position to become associated with contributors such as Bernard
1461 Carvalho Kauai Mayor, Darryl Perry Kauai Chief of Police, Russell Goo Office of Hawaii Attorney General,
1462 Shayleen Iseri Cervalho, former Kauai Prosecutor, William Arakaki Hawaii Department of Education,
1463 Justin Kohar Kauai Prosecutor, Joe Moss who assisted in the implementation of the Jack Stahley Will and
1464 Trust and who is director of the Kauai United Way Fund..

1465 **List of the Jack Stahley Will and Trust participants**

1466 **Katherine Lloyd:** Hawaii Community Foundation General Counsel, First Hawaiian Bank. vice president
1467 and deputy manager, Trust and Investment ,Hawaii Pacific University. Lloyd had a direct involvement in
1468 the replacement of Jeff Stahley as Trust Administrator and stated in a letter to Jeff Stahley, "*It is clear the*
1469 *interests of Jeffrey L. Stahley as beneficiary conflicts with his duties as Trustee to deal impartially with all*
1470 *beneficiaries.*" Lloyd makes no mention of her conflict of interest.

1471 **Nancy Jo Budd is:**

1472 A colleague of Kathleen Lloyd at the Hawaii Community Foundation Inc. was the legal advisor to Jack Lee
1473 Stahley and created the deceased will and trust agreement and granted a 50% in the Jack Lee Stahley
1474 trust fund.

1475 A colleague of Bernard Carvalho Kauai Mayor, Darryl Perry Kauai Chief of Police, Russell Goo Office of
1476 Hawaii Attorney General, Shayleen Iseri Cervalho, former Kauai Prosecutor, William Arakaki Hawaii
1477 Department of Education, Justin Kohar Kauai Prosecutor all at the **Hale Opio Kauai Inc.**

1478 A colleague of Attorney Joe Moss who represents Robert Silverman and implemented the Will and Trust
1479 created by Lloyd. (Moss is allegedly paid by the Stahley Trust and is also affiliated with the Kauai United
1480 Way that has received funds from the Hawaii Community Foundation.)

1481 A colleague of Kathleen Lloyd Previous General Counsel for the Hawaii Community Foundation, (a non
1482 profit corporation), and First Hawaiian Bank,

1483 **Bradley G. Parries** Step son of Jack Stahley. Mr. Parries was not a recipient in the will and trust and
1484 allegedly threatened Jack Staley's life and the person who was found inside of Jack Stahleys residence
1485 after the body was removed. Joy Stahley stated that her father once told her *"If anything happens to*
1486 *me, Parries did it."*

1487 **Hugh R. Jones** Deputy Attorney General Hawaii (Hawaii Tax Division) Ms. Lloyds husband and past
1488 colleague of Nancy Budd at the Hawaii Bar Assn. a colleague of Chief Darrel Perry (Chief of Police),
1489 Bernard Carvalho (Mayor), Shayleen Iseri-Carvalho (Kauai Prosecutor) and secluded himself from
1490 investigating his wife Katherine Lloyd.

1491 **David M. Louie:** **Hawaii** Attorney Generals Office. Colleague of Hugh Jones. Refused to investigate
1492 allegations involving persons named in this affidavit. (Currently in private practice. His office is in the
1493 First Hawaiian Bank Building.

1494 **-Stein** (Colleague of Joe Moss- and signed as witness on Stahley Will drafted by Nancy Budd) Also
1495 colleague of Moss at United Way. Ms. Stein is also Campaign Development Manager and Community
1496 Liason for the Hawaii Community Foundation

1497 **Joe Moss** attorney, Bylaws Chairman for United Way, Per diem judge in the 5th District and Family
1498 courts, represents Robert Silverman the current trustee of the Stahley Trust and also past Director of
1499 the Kauai United Way Fund. A colleague of Nancy Budd (who provided Moss with the Stahley Will and
1500 Trust agreement) and Katherine Lloyd.

1501 **Benjamin (Ben) Benzaken** (Financial advisor for Jack Stahley. Joy Stahley alleges that Mr. Benzaken
1502 worked with Ms. Budd at the First Hawaiian Bank Mr. Benzaken admits he worked at the First Hawaiian
1503 Bank but denies that Ms. Budd worked with him.

1504 **Robert Silverman** Trustee of the Jack Stahley will after the removal of Jeff Stahley. Received a \$25,000
1505 gift from the estate. Liquidated funds from the Stahley estate and deposited them in the American
1506 Savings Bank in Kauai. Silverman's attorney is Joe Moss.

1507 Your Affiant states that although your Affiant has no indisputable evidence that the Will and
1508 Trust created by Nancy Budd on behalf of Jack Lee Stahley and administered with the recommendations
1509 of Joe Moss, and Katherine Lloyd is fraudulent the totality of circumstances and entwined relationships
1510 indicate profound conflicts of interests of the participants in this Will and Trust and it cannot be denied
1511 that Budd, Lloyd and Moss all had a direct if not a receiving interest in Jack Lee Stahley's estate.
1512 Additionally, Budd had direct contact with Jack Stahley and may have had the opportunity to access his
1513 home and his email prior or after his death. Unfortunately any documentation of the extent of a more
1514 personal relationship between Budd and Jack L. Stahley has been destroyed or is not available to your
1515 Affiant.

1516 Your Affiant further states that the relationship between Budd, Stahley and Moss had with
1517 Banks, and Non Profit Corporations and or the people who are closely associated with these
1518 corporations is evident and that their interest was facilitated and driven by access to large sums of the
1519 Jack Stalhley estate money and the possibility of these sums of money going to nonprofit corporations
1520 they are associated with. Your Affiant further states that the obvious and documented connections and
1521 associations between the people who were a part of these nonprofit corporations suggest the existence
1522 of at the very least, an informal group of directors and lawyers who pass money to each other via their
1523 individual nonprofit corporations and at some point in time the passing of this money from Trusts such

1524 as the as the Jack Lee Stahley Trust to other Trusts is difficult and at best impossible to follow or locate
1525 It is probable that some of these proceeds end up in the pockets of those who are attorneys.

1526 Your Affiant requests the Grand Jury to address these questions. Why were the Jack Stahley Will
1527 and Trust agreements removed from his residence by the Kauai Police Department after his death? Why
1528 when the Stahley family were returned their fathers Will and Trust agreement did the Stahley family
1529 allege that the will and trust had been changed in a way that granted 50% control of the Jack Stahley
1530 Trust to the Hawaii Community Foundation Inc and why was Katherine Lloyd insistent that Jeff Stahley
1531 be removed as the administrator of the Jack Stahley Trust ? Why did a deputy HI Attorney General Hugh
1532 Jones send a personal email to the Stahley family attempting to absolve his wife, Katherine Lloyd of any
1533 culpability or conflict of interest in the Stahley matter when its obvious to your Affiant that a conflict of
1534 interest did exist. In fact Katherine Lloyd also sent a personal email to the Stahley family defending the
1535 Stahley Trust 50% interest designation of Hawaii Community Funds by Nancy Budd. Why has not the HI
1536 Attorney General's office addressed the Stahley family's complaint? Why did Lloyd abruptly resign from
1537 the Hawaii Community Foundation? Why did the Kauai Police Department not provided your Affiant or
1538 the Stahley family any information surrounding the death of their father Jack Lee Stahley to include the
1539 cause of death? Why did the Kauai Coroner's office refuse to give the Stahley family their fathers
1540 autopsy report?

1541 Additionally, you affiant states to the Court and Jury that all of the participants in the Jack
1542 Stahley Will and Trust including the Kauai Police Chief and the Kauai Prosecutor, (except the family),
1543 have connections to Non Profit Enterprises who receive funds from the Hawaii Community Foundation
1544 either directly or indirectly and as such may be culpable in violations as described in the Congressional
1545 RICO act.

1546 Your Affiant alleges that the listed corporations are "Enterprises" as defined by CRM 109 and are
1547 utilized to receive money whether its origination is legal or not, processed and distributed to other

1548 Enterprises (Money laundering) or to individual recipients who would not ordinarily be entitled to the
1549 proceeds, disguised as fees, costs etc.:. Your Affiant further states that based on the statements of Joy
1550 and Jeff Stahley, the Jack Lee Staley will and trust agreements were more likely than not obtained by
1551 deception or are fraudulent. Your Affiant also states that the Stahley family senses that the death of
1552 their father is suspicious because although he was ill he had no known immediate life threatening
1553 illnesses. the fact that the Kauai Police Department, the Kauai County Counsel, and the Kauai Freedom
1554 of Information Office's refusal to provide any documents surrounding the death of Jack Staley leads to
1555 suspicion.

1556 Your Affiant further states to the Court that other cases and victims have come forth in the last
1557 two months with complaints and allegations of more corruption within the State of Hawaii. Your Affiant
1558 states that after reviewing some of these complaints your Affiant will present two more synopses of
1559 alleged corruption. This is presented because some of the same scenarios that exist in the alleged
1560 Stahley fraudulent Will and Trust documents that allow access to funds by organizations that claim to be
1561 charitable religious organizations, exist in this new scenario. Your affiant also states that some of the
1562 same alleged culpable persons may also be involved

1563 Your Affiant states that on or about November 2nd, 2015 an email was received from a woman,
1564 Sherri Kane who said that Joy Stahley had recommended that she contact your Affiant. Ms. Kane said
1565 that she had become aware that your Affiant was working on documents to request a Grand Jury
1566 investigate corruption in Hawaii. Your Affiant states that Ms Kane and her fiancé Dr. Leonard Horowitz
1567 had been victimized by an attorney named Paul Sulla Jr. and that they were on the verge of losing
1568 property that had been fully paid for. Your affiant states that Ms. Kane said to your Affiant that they had
1569 requested numerous times that local police agencies and the State of Hawaii Attorney General's Office
1570 investigate Mr. Sulla with no results and in some cases received no return communication. Your Affiant
1571 states that some of these allegations have supporting documentation

1572 Your Affiant states that numerous emails were sent back and forth between your Affiant, Ms.
1573 Kane and Mr. Horowitz containing questions, answers and copies of legal documents including court
1574 documents. Your Affiant states that Ms. Kane and Mr. Horowitz provided information to your Affiant
1575 that indicated there had been Fraud, and perjury committed by Mr Sulla and his colleagues in court, and
1576 that presumably as a result of said fraud and perjury there had been negative court decisions that could
1577 facilitate the seizure of the Kane Horowitz property by Third Circuit Court Judges. Kane and Horowitz's
1578 efforts to get relief from criminal policing agencies were not only ignored but in some cases enabled
1579 Sulla's fraudulent legal maneuvering. Mr. Horowitz and Ms. Kane felt that other than your Affiant's
1580 efforts to subdue some of the corruption in Hawaii, their options to gain control and ownership of their
1581 property were eroding. Mr Horowitz said that the property had survived several attempts by Sulla to
1582 assume full ownership in spite of the fact that the property has been paid for, and that in one case
1583 Sulla's purported "clients" fraud resulted in a \$200,000.00 judgment in favor of Horowitz. Sulla
1584 immediately appealed. (pending)

1585 As a brief summary and based on the information provided to your Affiant, the following
1586 incidents have occurred.

1587 **1).**Jan 15,2004 Horowitz's organization, Royal Blood Line of David purchased the subject
1588 property from Mr. Sulla's purported client, Cecil Loran Lee for \$550,000 escrowed by The Island
1589 Title Company aka First American Title Company, and title guarantee by Stewart Title Co. Later
1590 Horowitz learned that there were 3 liens against the property. The Title Insurance policy
1591 provided by Stewart Title did not reveal these liens on the property. The property is
1592 approximately, 17 Acres know as 13- 3775 Pahoehoe Kalapana Rd. HI 96778

1593 The aforementioned liens were placed by:

1594 A. The Federal Government \$ 85K

1595 B. Philip Maise's litigation encumbrance and pending liens totaling nearly \$225,000

1596 C. Bond Agent encumbrance of \$ 85K

1597 **2).**Feb 21st, 2008 a \$200,000 jury award to Royal Blood Line (Horowitz) because of Sulla fraud..

1598 **3).**Feb, 27, 2009 Royal Royal Blood pays off \$550,000 Mortgage to Lee, using the \$200,000 jury

1599 award as partial payment. (In addition the liens against the property were paid for by Horowitz)

1600 . Sulla and Lee then refused to release the Mortgage and provide clear title to the property.

1601 **4).**April 20,2009 Sulla conducted a non-judicial Foreclosure by Sulla using fraudulent

1602 documents.

1603 **5).** May 8th 20 09 Mr. Lee the seller is dying of cancer, with no money to pay Sulla.

1604 **6).**May 15th 2009 Mr. Sulla drafts Articles of Inc (The Office of Overseer, A Corp Sole and its

1605 Successor etc: Jason L Hester who has no known means of self support, and no known blood

1606 kinship to Lee, is appointed the responsible person

1607 **7).** May 15, 2009 Using manufactured and forged assignments of Horowitz's Mortgage and

1608 Notes, Sulla transfers interest in title by alleged criminal impersonation and fraud and later

1609 Sulla transfers the property title from Lee to a corporation that Sulla owns/controls...The Office

1610 of the Overseer.,

1611 **8).**May 26 & 28 2009 Sulla faxes date-altered and signature altered, fraudulent Incorporation

1612 Articles to Hawaii Department of Commerce and Consumer Affairs..

1613 **10).** June 27, 2009 Mr. Lee dies leaving the paid in full mortgage debt of 550,000 to Sulla's

1614 corporation the Office of Overseer. Sulla does not acknowledge that the mortgage has been

1615 paid in full after ignoring and evading notices to release the Mortgage.

1616 **11).**July 11th 2009 Horowitz Transfers property ownership from Royal Blood line to Kane and him

1617 self and absolves his religious corporation.

1618 **12).**June 9, 2011 Jason L Hester (responsible person for the Office of Overseer "Church")

1619 personally receives a Quitclaim Deed to Horowitz's property from Sulla. This deed was prepared

1620 by Sulla who also made a \$50,000.00 loan to Hester at the same time secured by a mortgage
1621 recorded on the Horowitz property. Sulla gave the loan to Hester to provide himself foreclosure
1622 rights. Your Affiant states that it is unknown whether or not Hester actually received \$50,000.00
1623 **13)**.. Sept 19, 2012 Royal Blood is dissolved by Officials Leonard G Horowitz and Sherii Kane.

1624 Your affiant states that although the above is a very brief account of Sulla's attempt to basically
1625 steal the property, Ms Kane and Mr. Horowitz have suffered through a fraudulent attempt by Sully to
1626 auction off the property for Falsely claimed nonpayment of the Mortgage, endured a successful criminal
1627 impersonation of Cecil Lee by Sulla who allegedly impersonated Lee to file property transfer documents
1628 with the State that gave the property to Sulla's Office of Overseer and then claimed that his colleague
1629 Jason Hester was Lee's nephew who therefore was the last survivor and entitled to Lee's estate.
1630 Investigation later discovered that Hester has a closer relationship to Sulla than he did to Mr Lee.

1631 Your Affiant states that through the years of trying to take possession of property that Horowitz
1632 paid for, their attempts to seek relief through the civil courts fell on the deaf ears of Judges ,local police
1633 and prosecutors and the State of Hawaii Attorney General's office. Your Affiant states that alleged fraud
1634 is not a new or unknown scenario to Paul Sulla Jr.

1635 Your Affiant states that between January 2013 to present Paul J Sulla Jr. directed and conspired,
1636 with two daughters of deceased Stanley M. Zedalis to redirect approximately \$200,000 from the Zedalis
1637 Trust and or Estate from California to the First Hawaiian Bank in Hawaii. It is alleged by the Zedalis
1638 family (actual trust administrators) that Sulla and the two sisters Mary Ann Jolin and Llian Zedalis
1639 committed forgery, fraud and kidnapping to accomplish obtaining a certified check for \$200,000 issued
1640 by the San Diego Credit Union. The check was in the name of an old dead trust established in 2009 but
1641 cancelled. The Trust was the Stanley M. Martha B. Zedalis Living Trust. Your Affiant states that its
1642 alleged by Macia Zedales Maire that her two sisters then conspired to kidnap 89 year old Stanly Zedalis
1643 telling him he was flying from New Mexico where he had been visiting his son to Mary Ann Jolin's home

1644 in San Diego. Instead when he arrived at the New Mexico airport Taylor Jolin, the son of Mary Ann Jolin,
1645 put him on a plane to Hawaii where he soon after died in the home of Llian Zedalis who resides in
1646 Hawaii. It is alleged that Mary Ann Jolin belongs to one of Sulla's religious organizations and as a
1647 member was recruited by Sulla as a client. . After Stanley Zedalis died, the family desired to transport
1648 his body to the National Cemetery in North Caroling where his wife was buried, but Paul Sulla Jr.
1649 petitioned the court to stop the transportation of body of the deceased, and demanded the court allow
1650 the body to be cremated in Hawaii. The court Judge, Hara, did not grant Sulla's request.. Mean while,
1651 Sulla was trying to take control of the \$200,000 brought to Hawaii by Mary Ann Jolin. The actual trust
1652 administrator, William Patrick Zedalis, provided documents validating and defending his position as
1653 administrator in an action filed by Sulla before the 1st Circuit Court, Judge Chang. The Judge seized the
1654 funds until August 19th, 2015 when Judge Hara 3rd Circuit Court validated the trust administrator as
1655 William Patrick Zedalis. However your affiant states that at this point in time, the family does not know
1656 what happened to the funds seized by the court.

1657 Your Affiant states that although the Horowitz, Kane, and Zedalis scenarios are within numerous
1658 Hawaii Circuit court jurisdictions they are similar to the incident in Kauai experienced by Jeff and Joy
1659 Stahley. The similarity is the alleged conspiracy by private lawyers to steal assets from person's by legal
1660 maneuvering of the system utilizing shell Enterprises, corporations and committing fraud. These named
1661 lawyers needed co-operation of financial institutions to relocate money and these institutional
1662 Enterprises are the same in each incident. Ordinarily your Affiant states that this maneuvering does not
1663 necessarily violate criminal law, however when there may be violations of Federal law and the
1664 protection of the US Constitution is disregarded by those who are sworn to uphold and protect the
1665 rights of US citizens, these public officials, their respective organizations and private lawyers constitute
1666 Enterprises of individuals and organizations who are complicit in crimes against the United States , Mr.
1667 Horowitz. Ms. Kane, the Stahley and Zedalis families should be included as victims of these crimes.

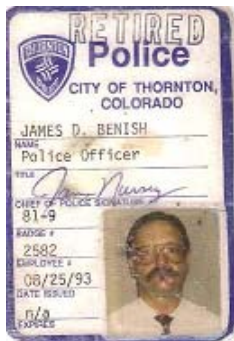
1668 Your Affiant states that it is unlikely that the above described incidents and scenarios could not
1669 have succeeded without being enabled by Hawaii authorities who either looked the other way, or
1670 participated in the alleged actions. These actions or inactions are not only actions that suffer these
1671 individual citizens but suffer the nation as a whole.

1672 The murder of 4 year old Lacey Woolsey Ruff demonstrates police work that was less than
1673 accurate, less than correct and when presented to the Court was deceiving. The following cover up was
1674 participated in by public servants at the top all the way to the level of a records clerk.

1675 The actions of Judges, the Prosecutors, the Attorney General's Office and the Police
1676 Department as is alleged in the Stahley and Horowitz case demonstrate the close knit relationship
1677 between corrupt private attorneys who skirt the law, violate conflict of interest guidelines, and prevent
1678 the access of public documents that reveal their respective actions.

1679 Your Affiant respectfully requests that Pursuant to Title III Rule 6, of the Federal Rules of
1680 Criminal Procedure the Court convene the Federal Grand Jury to investigate all of the above
1681 aforementioned infractions of Federal Law to include Hawaii Murder laws in the deaths of Lacey
1682 Woolsey Ruff, Jack Lee Stahley, Sherri Kane and Leonard Horowitz and issue appropriate indictments.

1683
1684 _____
1685 James D. Benish Date:
1686



1687

1688 **WITNESSES & VICTIMS**
1689
1690 James D Benish-Petitioner/Affiant/Victim
1691 9069 Lake Rd.
1692 Otisville, Michigan 48463-9781
1693 619-591-8801
1694 codefore@aol.com
1695 Alicia Woolsey Ruff (Deceased Victim)
1696 Jack L Stahley (Deceased Victim)
1697 Stanley M. Zedalis (Deceased Victim)
1698 Martha E. Zedalis (Deceased Victim)
1699 Lacey Woolsey Ruff (deceased victim)
1700 Glass ,Merry (saw Ruff suspect)
1701 3968 A Aninie Rd
1702 Kauai, HI
1703 Hu, Margaret (Zedalis cert of death)
1704 1292 Waianuenu
1705 Hilo Hawaii 96720
1706 Horowitz ,Leonard
1707 13-3375 Kalapana Rd
1708 Pahoia, HI 96778
1709 808-965-2112
1710 Kane ,Sherri
1711 PO Box 75104
1712 Honolulu HI 96836
1713 310-877-3002
1714 Kaneko, Tiffany (Todd Schonlau confessed to her)
1715 541-499-4779
1716 541-326-8037
1717 541-331-5799 (son) nicknamed "Bear"
1718 Lewis, Diane- Ex KPD Office
1719 Luana ,Lori Ann
1720 808-443-3445
1721 Luanacreation@yahoo.com.

1722 Martin ,Katherine AKA "Trink Martin" (Recommended Nancy Budd to Stahley)
1723 Rylander ,Jill (Jack Lee Stahley daughter)
1724 428 Clara Court
1725 Salem, OR 97301
1726 Schonlau, Aaron (convicted of murdering Lacey Woolsey Ruf)
1727 #A0261315
1728 CCA/Saguaro CorrectionCenter LC-23u
1729 1252 E. Arica Rd.
1730 Eloy, AZ 85131
1731 Stahley Joy (Jack Lee Stahley daughter)
1732 Joystahley@msn.com
1733 5707 SE Tranquil Court
1734 Milwaukie, OR 97267
1735 Stahley ,Jeffrey (Jack Lee Stahley son)
1736 JeffStahley@yahoo.com
1737 2050 Tumwater St.
1738 Westlinn, OR 97068
1739 503-657-0975
1740 Soto ,Valerie
1741 541-535-8174
1742 Valsoto@charter.net
1743 Sullivan ,Shane
1744 Shanesullivan109@comcast.net
1745 303-451-6551
1746 Woolsey ,Timmy (Father of Lacy Ruff)
1747 4829 Apoapo Rd.
1748 Kapaa, HI 96746
1749 808-821-0572
1750 808-482-0780
1751 Woolsey Tracy Ruff
1752 808-875-8128
1753 715 S Kinei Rd 256
1754 Lihei HI 96753
1755 Zedalis William Patrick -Trustee
1756 2420 E. Pennyslvania
1757 Naapa, Idaho 83686
1758 503-657-0975

1759 Zedalis, Macia Marie
1760 865 Rojo Way.
1761 Gardnerville NV 99460

1762 Zedalis, Stanley
1763 224 Factory Town Rd.
1764 Mouth of Wilson VA 24363

1765 Yeron, Bill (Located Ruff's Body)
1766 916 W. 85th St.
1767 Westchester, CA 90045
1768 310-612-9348

1769 Vidinhe, Joyce (First Hawaiiina Bank)
1770 Jvidinha@@FHB.com
1771 999 Bishop St.
1772 Honolulu, HI 96813
1773 808-525-7000

1774

1775

1776

LIST OF DEFENDANTS AND ADDRESS

1777 Adric, KPD Detective

1778 jadric@kauai.gov

1779 3990 Kaana St. Suite 200

1780 Lihuye, HI 96766

1781 808 274-1711

1782 808-241-1868

1783 Apeles, Eunice KPD Records

1784 3990 Kaana St. Suite 200

1785 Lihuye, HI 96766

1786 808 274-1711

1787 Asher, Roy KPD Asst: Police Chief

1788 808-241-1677

1789 3990 Kaana St. Suite 200

1790 Lihuye, HI 96766

1791 808 274-1711

1792 Ashida , Hawaii Corporate Counsel-Deputy Prosecutor

1793 120 Pauahi St. #312

1794 Hilo, Hawaii 96720

1795 808-961-0406

1796 Asuncion, Gilbert V. KPD (evidence)

1797 3990 Kaana St. Suite 200

1798 Lihuye, HI 96766

1799 808 274-1711

1800 Bello, Hilo PD

1801 349 Kapiolani St.

1802 Hilo, HI 76720

1803 808-961-8300

1804 Budd, Nancy Kauai Attorney HCF –Stahley

1805 437 Kukui Grove St. #103

1806 Lihue, HI 96766

1807 Burgess, John Kauai Prosecutor Inv. (Ruff)

1808 3990 Kaana Street, Suite 210.

1809 Lihu'e, HI 96766.

1810 Phone: (808) 241-1888

1811 Email: prosecutor@kauai.gov.

1812 Carey, Philip L.(Lawyer Sulla).

1813 688 Kinoole St. St105

1814 Hilo, HI 96720

1815 808-934-9711

1816

1817 Carrol, John S. Lawyer-Horowitz
 1818 810 Richards St Ste. 810
 1819 Honolulu, HI 96813
 1820 8085269111
 1821 Johncarro001@hawaii.rr.com

1822 Carvalho, Bernard Kauai Mayor
 1823 4444 Rice St. Suite 150
 1824 Lihue, HI 96766
 1825 808-241-5127

1826 Castillo, Alfred Jr. Kauai Prosecutor
 1827 3990 Kaana Street, Suite 210.
 1828 Lihue, HI 96766.
 1829 Phone: (808) 241-1888
 1830 Email: **prosecutor@kauai.gov**.

1831 Courson, Nick (Kauai County Counsel)
 1832 4444 Rice St. Suite 150
 1833 Lihue, HI 96766
 1834 808-241-5127

1835 Damerville, Rick- Prosecutor (No Bar Assn #)

1836 Daubert, Mary Kauai FOI Office
 1837 4444 Rice St. Suite 150
 1838 Lihue, HI 96766
 1839 808-241-5127

1840 Dubin, Gary-Lawyer Horowitz (No Bar Assn #)

1841 Elliot, W. Augustuz (Sulla Colleague)
 1842 45-3625 A Mamane St.
 1843 PO 910
 1844 Honokaa, HI 96727
 1845 808-518-2315

1846 Emery, Gloria- Sulla Colleague

1847 Esteban, Greg Hilo PD Lt.(Uyetakes supervisor)
 1848 349 Kapiolani St.
 1849 Hilo, HI 76720
 1850 808-961-8300

1851 Fujita, Calvin 1993 KPD Chief of Police
 1852 195 Lulo Rd.
 1853 Kapaa HI 1082-1243
 1854 808-822-5367

1855 **Enterprise:** Bishop St. Capitol Management aka
 1856 Bishop St. Funds div of First Hawaiian Bank
 1857 (STahley- Katherine Lloyd- David Louie)
 1858 999 Bishop St.

1859 Honolulu, HI 96813
 1860 808-526-7747
 1861 **Enterprise:** Hale Opio Inc.
 1862 **Enterprise:** Kauai FOI Office
 1863 Blane, Sara
 1864 4444 Rice St. Suite 150
 1865 Lihue, HI 96766
 1866 808-241-5127
 1867 **Enterprise:** Hawaii Prosecutors office
 1868 655 Kilauea Ave
 1869 Hilo, Hawaii 96720
 1870 808-961-0466
 1871 **Enterprise:** County of Kauai
 1872 4444 Rice St. Suite 235
 1873 Lihue, HI. 96766
 1874 808-241-4909
 1875 **Enterprise:** Hawaii Community Foundation
 1876 65-1279 Kawaihae Rd. Parker Square #203
 1877 Kamuela, Hawaii 96743
 1878 808-885-2174
 1879 **Enterprise:** Hawaii United Way
 1880 142 kinoole St. #A
 1881 Hilo, HI 96720
 1882 808-935-6393
 1883 **Enterprise:** Heahea Heights LLC.
 1884 Paul Sulla Jr. Lawyer
 1885 **Enterprise:** First Hawaiian Bank and Affl.
 1886 Robert S Harrison CEO
 1887 999 Bishop St.
 1888 Honolulu, HI 96813
 1889 808-525-7000
 1890 **Enterprise:** Territorial Savings Bank
 1891 1132 Bishop St. Ste 2200
 1892 Honolulu HI 96813
 1893 Vemon H. Hirata (agent)
 1894 Collins Tomel (Horowitz case)
 1895 Allan Kitagawa
 1896 Francis Tanaka
 1897 Howard Ikeda
 1898 Kirk W. Caldwell
 1899 Melvin M. Miyamoto
 1900 Ralph Y. Nakatsuka
 1901 Richard Murakami

1902 **Enterprise:** Pyramid Process
1903 RR3 1229
1904 Pahoa, Hawaii 96778
1905 Agent: RF Dukat
1906 16-2111 Coral Dr.
1907 Pahoa, Hawaii 96778

1908 **Enterprise:** Puueo Limited Partnership
1909 519 Manono St.
1910 Hilo, Hawaii 96720
1911 Agent Big Island Land Co. Ltd (Enterprise)
1912 591 Manono St
1913 Hilo, Hawaii 96720
1914 Gregory Gadd
1915 Nani April Gadd

1916 **Enterprise:** The Office of Overseer, A
1917 Corporate Sole and its successor
1918 Over and or the Popular Assembly
1919 Of revitalize, A Gospel of Believers

1920 **Enterprise:** G. Investment Group.
1921 519 Manono St.
1922 Hilo, Hawaii 96720
1923 Agent: An Enterprise Big Island Co.
1924 Ltd.
1925 Gregory Gadd
1926 Nani Gadd

1927 **Enterprise:** Bil One LLC:
1928 Paul J Sull Jr.
1929 Gregory Gadd

1930 **Enterprise:** Rainha Lemania Casa Holdings
1931 PO Box 425
1932 Laupahoehoe, HI 96764
1933 Agent: Paul J. Sulla Jr.
1934 35-2084
1935 Old mamalahoa Hwy
1936 Laupahoehoe, HI 96764
1937 Jamie Wallace- (trustee)

1938 **Enterprise:** Jaxa Holdings LLC.
1939 700 Richards St. #2709
1940 Honolulu HI 96813
1941 Agent: Jerry Ruthruff
1942 Paul J. Sulla Jr.
1943 Paul J. Sulla III (Paul Suila Jr's son)

1944 **Enterprise:** Kachimaunu Ventures LLC
1945 PO Box 5258

1946 Hilo, Hawaii 96720
 1947 Paul. J. Sulla (Agent)
 1948 106 Kamehameha Ave
 1949 Hilo HI 96720
 1950 Jamie Wallace – (Sulla’s son)
 1951 Paul Joseph Sulla III (Sulla’s son)
 1952 Carol L. Silva
 1953 W. Augustuz Elliot
 1954 Robert L. Powers

 1955 **Enterprise:** Faithful Ventures Trust. (No doc)
 1956 Paul J. Sulla Jr.
 1957 Jamie Wallace-Sulla (Sulla Jr’s Wife)
 1958 Gary Zamber
 1959 Mgr. Menashe Jasun Sulla

 1960 **Enterprise:** Ekele Pud Ass. Trust (No doc)
 1961 Gary Zamber
 1962 Paul J. Sulla Jr.
 1963 Jamie Wallace-Sulla

 1964 **Enterprise:** BZ Development LLC
 1965 PO Box 5258
 1966 Hilo, HI 96720
 1967 Agent: Gary Zamber (Sulla Colleague)
 1968 206 Kamehama Ave
 1969 Hilo, Hawaii 96720
 1970 Jamie Wallace-Sulla

 1971 **Enterprise:** Sky of Hawaii Church (No doc)
 1972 Paul JI. Sulla Jr.
 1973 Paul J. Sulla III
 1974 W. Augustuz Elliot
 1975 Robert L. Powers
 1976 Michael Sakell
 1977 Gary Zamber
 1978 Jason Hester
 1979 Roxanne Joan Hampton
 1980 Boston Kane
 1981 Sheryl Sulttan
 1982 **Enterprise:** Kaunamaro Farm LLC.
 1983 Dr. Stanley Kripner
 1984 Terrance McKenna

 1985 **Enterprise:** Frana Services LLC (No Doc)
 1986 Edna Franco
 1987 Paul J. Sulla Jr.
 1988 Keone Agard

 1989 **Enterprise:** Pyramid Process (No Doc)

1990 RR3 Box 1229
 1991 Pahoia, HI 96778
 1992 Agent: RFD Asso. LLC. (Foreign)
 1993 16-2111 Coral Dr.
 1994 Pahoia, Hawaii 96778
 1995 Robert Dukat (Sulla process server)
 1996 Kelly Tmakiung (Dukat's partner)
 1997 **Enterprise:** RFD Associates LLC
 1998 1800 Cooper Pt. Rd. SW Bldg 11
 1999 Olympia, Washington 98502
 2000 Agent: RF Dukat
 2001 16-2111 Coral Dr.
 2002 Pahoia, Hawaii 96778
 2003 **Enterprise:** Gospel of Believers Corp.
 2004 Herbert M. Ritke
 2005 Ronn Ritke
 2006 G. Loran Lee (deceased)
 2007 Paul J. Sulla Jr.
 2008 **Enterprise:** The Electic Center of Universal
 2009 Flowing Light
 2010 Roberto Silva
 2011 E. Souza aka Ayahuasca Church
 2012 Aka Ceudo Hawaii Spiritual Community)
 2013 Paul J. Sulla Jr.
 2014 **Enterprise:** Big Island Land Co. Ltd.
 2015 Gregory Gadd
 2016 Nani April Gadd
 2017 **Enterprise:** Stewart Title Co. (no doc)
 2018 **Enterprise:** Island Title Co. aka First
 2019 American Title Co. (Horowitz property)
 2020 **Enterprise:** Hilo Police Department
 2021 349 Kapiolani St.
 2022 Hilo, HI 76720
 2023 808-961-8300
 2024 **Enterprise:** Kauai Police Department
 2025 3990 Kaana St. Suite 200
 2026 Lihuye, HI 96766
 2027 808 274-1711
 2028 **Enterprise:** Kauai Prosecutors Office
 2029 3990 Kaana Street, Suite 210.
 2030 Līhu'e, HI 96766.
 2031 Phone: (808) 241-1888

2032 Email: prosecutor@kauai.gov.

2033 **Enterprise:** American Savings Bank
2034 Waimea Center
2035 65-1158 Hawaii Belt Rd.
2036 808-885-6016

2037 **Enterprise:** Department of the Attorney General
2038 425 Queen St.
2039 Honolulu, HI 96813
2040 808-586-1500

2041

2042 Hara, Glenn S . Attorney-Judge (Zedalis) 3rd Circuit
2043 777 Kilauea Ave
2044 Hilo, HI 96720
2045 808-961-7454

2046 Hester, Jason. (Sulla Colleague)
2047 Address unknown.

2048 Hold, Norman KPD
2049 3990 Kaana St. Suite 200
2050 Lihuye, HI 96766
2051 808 274-1711

2052 Hurley, KPD Lt.
2053 3990 Kaana St. Suite 200
2054 Lihuye, HI 96766
2055 808 274-1711

2056 Ibarra, Ronald HI Judge/lawyer (Horowitz) 3rd Circuit Court
2057 Big Island Drug Court-Kona
2058 81-940 Halekii St.
2059 Kealakekua, HI 96750
2060 808-433-2210
2061 Ronald.Ibarra@courts.state.hi.us

2062 Isoda, Gordon KPD
2063 3990 Kaana St. Suite 200
2064 Lihuye, HI 96766
2065 808 274-1711

2066 Jolin, Taylor (Zedalis) (Mary Ann Zedalis's son)
2067 PO Box 235740
2068 Encinitas, CA 92023

2069 Jolin, Mary Ann (Zedalis)
2070 PO box 235740
2071 Encinitas, CA 92023

2072 Burgess, John Lee. (Kauai Prosecutor investigator)
2073 1980 Ala Mahamoe Pl

2074 Honolulu HI 96819
 2075 808 839 5981
 2076 3990 Kaana St. Suite 210
 2077 Lihu'e HI 96766
 2078 808-241-1888
 2079
 2080 Kimura. 1993 Kauai Prosecutor
 2081 3990 Kaana Street, Suite 210.
 2082 Lihu'e, HI 96766.
 2083 Phone: (808) 241-1888
 2084 Email: prosecutor@kauai.gov.
 2085
 2086 Kimura, Jay T. HI Prosecutor
 2087 1159 Lei Hinahina Pl
 2088 Hilo, HI 96720-1528
 2089 808-895-0936
 2090 jaytkhi@yahoo.com
 2091 . Lee, Anson K (Hawaii County Deputy Prosecutor)
 2092 655 Kilauea Ave
 2093 Hilo, HI 96720
 2094 808-961-0466
 2095 Leea813@hawaii.rr.com
 2096 Jones, Hugh R. Deputy HI Atty Gen (Married to K. Lloyd) Worked
 2097 with AG David Louie who now has an office in the First Hawaiian
 2098 Center and Bishop St. Funds aka Bishop St Management Inc.
 2099 Department of the Attorney General
 2100 425 Queen St.
 2101 Honolulu, HI 96813
 2102 808-586-1500
 2103 Kagami, Michael S. Deputy HI Atty. Gen.
 2104 Department of the Attorney General
 2105 425 Queen St.
 2106 Honolulu, HI 96813
 2107 808-586-1500
 2108 Kollar, Justin 2015 Kauai Prosecutor
 2109 3990 Kaana Street, Suite 210.
 2110 Lihu'e, HI 96766.
 2111 Phone: (808) 241-1888
 2112 Email: prosecutor@kauai.gov.
 2113 Lavuosa, Patrick KPD Lt.
 2114 3990 Kaana St. Suite 200
 2115 Lihuye, HI 96766
 2116 808 274-1711
 2117 Louie, David former HI Deputy AG (Stahley case)

2118 999 Bishop St. Ste. 2600 (Same address as Bishop St
 2119 Capitol Mgmt Inc. First Hawaiian Bank)
 2120 Honolulu, HI 96813
 2121 808-535-5700
 2122 808-535-5799
 2123 dml@ksglaw.com

 2124 Lloyd, Katherine P. HCF General Counsel VP of Operations
 2125 900 Fort St. 1300 Mal
 2126 Honolulu, Hi
 2127 808-261-8027

 2128 Martine, Hanzs KPD
 2129 3990 Kaana St. Suite 200
 2130 Lihuye, HI 96766
 2131 808 274-1711

 2132 Medrano-Stein, Lynette M. (Joe Moss secretary-Campaign Development Manager and Community
 2133 Liason for the Hawaii Community Foundation)
 2134 5-4280 Kuhio Highway G-200
 2135 Princevill, Hawaii 96722

 2136 Milks, Maria N. 1993 Circuit Judge Ruff Case (Currently American Savings Bank)
 2137 MNMilks@hawaii.edu
 2138 1001 Bishop St. Ste. 977
 2139 Honolulu, Hi 96813
 2140 808-226-5633

 2141 Moss, Joe. (Attorney for Silverman and
 2142 Kauai United Way)
 2143 4303 Rice St. C-4
 2144 Lihue, HI 96766
 2145 808-246-8884
 2146 Joemoss4938@gmail.com

 2147 Nakamura, Greg Judge (Zedalis)
 2148 1st Div. Circuit Court
 2149 808-961-7464
 2150 777 Kilauea Ave
 2151 Hilo, HI 96720

 2152 O'Phelan, Dan Hawaii Lawyer (no reg-Hawaii Bar Assn)
 2153 319 Haili St.
 2154 Hilo, HI 96720
 2155 866-529-2340

 2156 Parries, Bradley (J. Stahley's step-son –threatened him)
 2157 2959 Umi St.
 2158 Lihue, HI 96766

 2159 Perry, Darryl KPD Chief
 2160 3990 Kaana St. Suite 200

2161 Lihue, HI 96766
 2162 808 274-1711

 2163 Poi, Tom Hilo PD
 2164 349 Kapiolani St.
 2165 Hilo, HI 76720
 2166 808-961-8300

 2167 Ramson, Paddy KPD
 2168 3990 Kaana St. Suite 200
 2169 Lihuye, HI 96766
 2170 808 274-1711

 2171 Rapozo, Mel KPD
 2172 3990 Kaana St. Suite 200
 2173 Lihuye, HI 96766
 2174 808 274-1711

 2175 Ritke, Ronn and Ritke, Herbert (Horowitz case)
 2176 13-811 Malama St.
 2177 Pahoa, HI 96778
 2178 808-313-2798

 2179 Rosa, Richard 1993 KPD Capt.
 2180 3990 Kaana St. Suite 200
 2181 Lihuye, HI 96766
 2182 808 274-1711

 2183 Roth, Mitch HI County Prosecutor((Zadelis)
 2184 655 KILAUEA Ave.
 2185 Hilo, Hawaii 96720
 2186 808-961-0466

 2187 Schonlau, Todd- (Aaron Schonlau's Bro)
 2188 Address unknown.

 2189 Silva, Carol- Sulla Colleague
 2190 Big Island Land Co.
 2191 255 Alpuni St.
 2192 Hilo, HI 96720
 2193 808=935-6874

 2194 Silverman, Robert- J. Stahley Trust Admin.
 2195 389 Likeke Pl.
 2196 Kapaa, HI 96746

 2197 Sulla, Paul J. Jr.
 2198 PO Box 5258
 2199 Hilo HI 96720
 2200 Stein, Lynette M. Medrano Campaign
 2201 Development Manager
 2202 and Community Liason for the

2203 Kauai United Way.
2204 5-4280 Kuhio Highway G-200
2205 Princeville, Hawaii 96722
2206
2207 Takekawa, Ray KPD Lieutenant (Arrested
2208 Mr. Woolsey father of Lacey Ruff)
2209 3990 Kaana St. Suite 200
2210 Lihuye, HI 96766
2211 808 274-1711

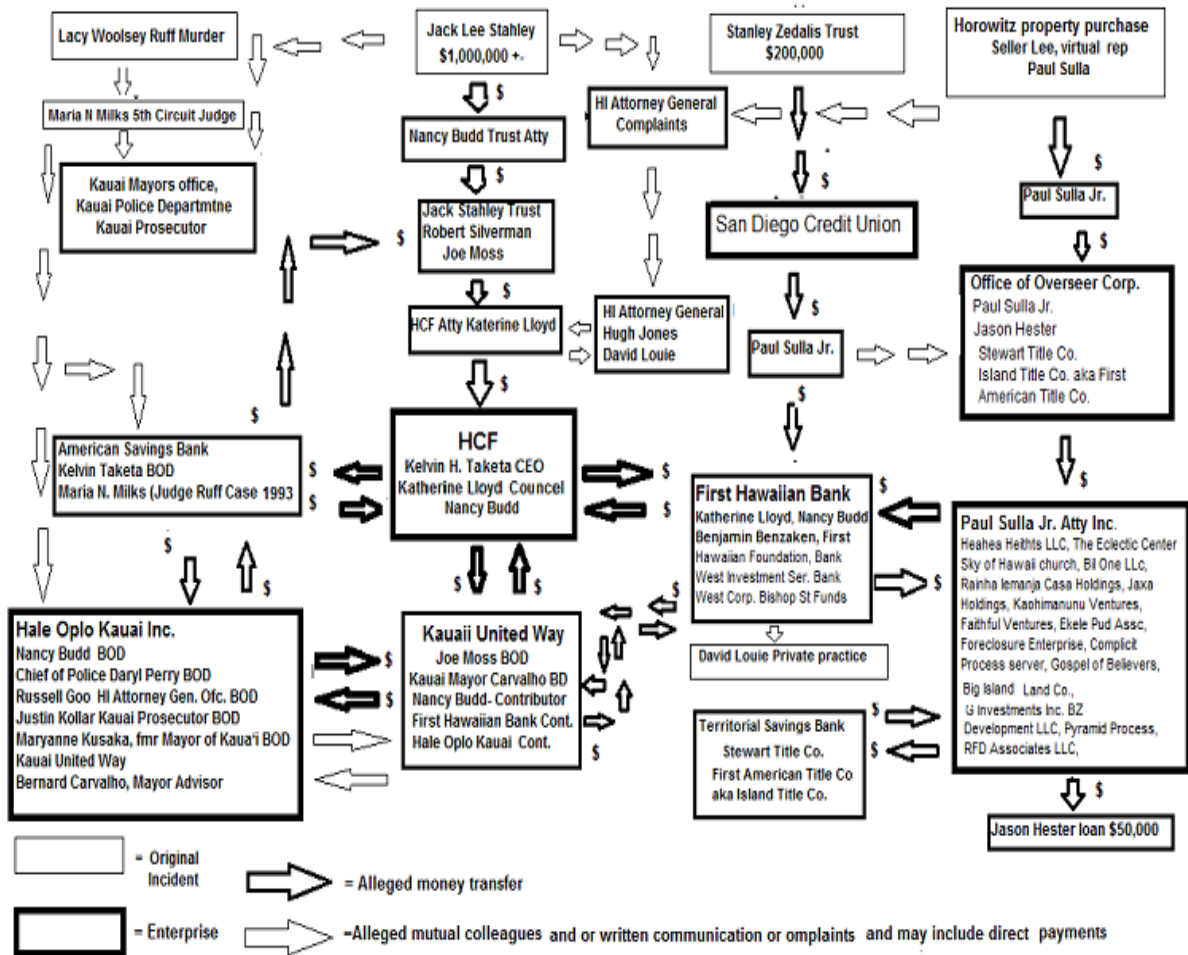
2212 Whittaker, Stephen (Sulla Lawyer)
2213 PO Box 964
2214 Kailua-Kona HI 96745
2215 808-960-4536
2216 Stephen@whittakerlawkona.com

2217 Yoshido, Alvin #19 KPD
2218 Kaana St. Suite 200
2219 Lihuye, HI 96766
2220 808 274-1711

2221 *Yu, Carolyn M. (HI Branch Chief With the Securities Enforcement Branch*
2222 *State Of Hawaii) now with United States Commodity Funds LLC aka*
2223 *United States Oil Fund.*
2224 *1999 Harrison St. Ste: 1530*
2225 *Oakland, CA 94612*
2226 *510-522-9600*
2227 *Carolynyu@unitedstatesoilfund.com*

2228 Yukimura, Jo Ann 1993 Mayor
2229 4396 Rice St. Suite 209
2230 Lihue, HI 96766
2231 808-241-4188
2232 C-808-652-3988
2233 JYMF@joannyukimura.com
2234 Zamiska, Allison (Brad Parries girl friend)
2235 2959 Umi St.
2236 Lihue, HI 96766
2237
2238 Zedales, Llian (Zedalis Trust)
2239 16-2119 Pukalani Dr.
2240 Paho, HI 96778
2241 Mail: RR3 Box 1348
2242 Paho, HI 96778

2243
2244



* There are other agency or personal connections, such as individual local police departments, FBI, Circuit Court allegations and communications not included in this spread sheet.

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