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KING COUNTY SUPERIOR COURT No. 12-1-00453-1

(Former) (COA -NO. 69968-7-1

DANIEL T. SATTERBERG

PROSECUTING ATTORNEY

CRIMINAL DIVISION

MALENG REGIONAL JUSTICE CENTER SUPREME COURT NO. 932859

(Former Petition for Review) Supreme Court No. 91197-5

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

In Re: the Personal Restraint of

JASON EDWARD MARKLEY

Petitioner,

PERSONAL RESTRAINT PETITION Supplemental Amendment

Amended Exhibit No. 5[from AMENDED PRP] and additional related

Exhibit No. 28 related to BRADY ISSUES, and perjuries of:

Jenee Westberg, Aaron Wheatley, Chelsea Eykel, Hannah Mueller aka Evergreen
DVM, Heather Stewart DVM, Dave Morris, Judge Cheryl Casey, Dave Roberson,
Jenny Edwards, Bonnie Hammond, Jamie Taft, Denise Whitaker, Ben Dobin, Gera
Dobin, Judge Jim Rogers, et al and,

Elected King County Prosecutor Dan Satterberg, Kelli Williams of the King County
Office of Civil Rights & Open Government, Civil Rights/ Ethics, Public Records Act
Program/ Boards & Commissions and,

Norm Alberg, Director, Records and Licensing Services (RALS).

Jason Edward Markley, pro se

[REDACTED]
[REDACTED]
[REDACTED]

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MOTION

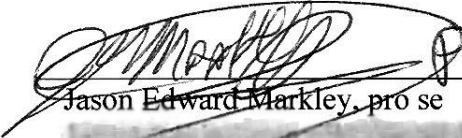

I do hereby motion to supplement the following to my Personal Restraint Petition [AMENDED].

It contains evidence that was withheld by King County Prosecutor Dan Satterberg, Admin Kelli Williams, Records and Licensing Services (RALS) Director Norm Alberg and King County Deputy Prosecutor Gretchen Holmgren, et al, that further strengthens this petition and in the name of justice cannot be ignored.

It was discovered and secured after the filing of this petition and could not be helped.

Please see the afore-referenced supplement to the Personal Restraint Petition - attached.

Respectfully submitted,


Jason Edward Markley, pro se
Pro se 01 sep 2016

thefallenfeather@outlook.com

CONTENT

- I. **UNDISCLOSED FURTHER EVIDENCE OF FRAUD since PRP filing – intentionally withheld by the King County Prosecutor’s Office and KCDPA Gretchen Holmgren.**
- II. **A more definitive picture of Westberg’s GPS movement conspired with KCDPA Gretchen Holmgren.**
- III. **A. Westberg’s “photo” evidence, Photoshop - and,
B. the “glamour” before and after shots of two completely different horses who are not “Alex.”**
- IV. **Follow the money, the invoices don’t lie... or do they?**
- V. **The head of Drug Court, trial judge Cheryl Carey and her numerous attempts to conspire phony bench warrants for Markley while he had a stay in place three times.**
 - A. **Conspiring with Judge Jim Rogers and SCRAP Defense counsel Dave Roberson, et al.**
 - B. **Then implementing a unlawful second and third attempt through Helping Hands Yoli Gerasimov, Alyce Green and KCDPA Laura Petregal (for Judge Carey and Gretchen Holmgren) to produce a second and third attempt at illegal bench warrants against Markley (during a stay) in an effort to disable him and leave his family vulnerable to predatory property loss – astonishingly, the first two failed phony motion to strike was included as “evidence” in the filings of the third attempt while no affidavit of mailing/service was implemented nor included in any of the motions.**

OVERVIEW

The following additional evidence of a fabricated were discovered *after* submission to Markley's Personal Restraint Petition but are clearly prudent additions for consideration in the consistent and ongoing bad behaviors of the King County Prosecutor's Office using their color of authority to maliciously prosecute innocent taxpayers, raid them of their assets, distress their properties and then through an [illegal land grab](#) - steal their properties.

There are several components:

- 1) Malicious prosecutions produce a distressed property. (This is rigged throughout the judicial system so that it is difficult to legally defend or to bring suit for wrongful prosecution.
- 2) Extraordinarily copious Brady violations.
- 3) Fabricated evidence.
- 4) Secreted exculpatory evidence.
- 5) Perjury en masse especially by embezzler used as "expert" witnesses.
- 6) Embezzlement of county funds using the phony prosecution as a vehicle – in this case under Markley and Thomas cases.
- 7) Falsified animal cruelty reports by people who have criminal histories – some with concealed animal cruelty violations themselves.

ADDITIONAL EVIDENCE OF FRAUD for supplement to the original PRP

I. UNDISCLOSED FURTHER EVIDENCE OF FRAUD, Brady violations since PRP filing. This is clearly intentionally withheld by the King County Prosecutor's Office through KCDPA Gretchen Holmgren.

In the Markley Amended Personal Restraint Petition (PRP-AMENDED):

- a) [Pg15- ¶3],
- b) [Pg23-¶1 item"6")],
- c) [Pg35- ¶6],
- d) [Pg36- ¶2],
- e) [Pg37- ¶1-¶2],
- f) [Pg38- Pg39],

a) – f) discusses the analysis of particular invoices and documents submitted to King County Records and Licensing Services (RALS) for payment by certain service providers (“actors”). The paperwork clearly was incomplete due to King County’s failure to produce it all in a period of 5 years of public records requests systematically affecting the failure to coincide after appeal deadlines. However, it does demonstrate clear perjury and the embezzlement on its face.

It has been recently learned through PRA depositions that payments in RALS happen through an “approval” process involving a step-by-step accounting method along with municipal driven software called ORACLE for record keeping.

ORACLE was implemented in 2012. Previously to ORACLE a software system called ARMES was employed.

RALS is headed by Director Norm Alberg and Deputy Director Sean Boufiou, RALS facilitates the accounts payable to service providers within various departments.

One of the departments RALS “services” is the accounts payable for Regional Animal Services of King County (RASKC).

RALS is responsible for the issuing of the final approved invoices for payment to RASKC service providers and/or “actors” who provide services to RASKC for the board and care of animals in their possession.

In a plethora of Public Document Requests (PDR) specifically designed to produce an auditable financial trail, RALS persistently produced inconsistent billing invoicing that were submitted to King County for payment on this case (et al).

RALS has continually, in an ongoing pattern of behavior failed to produce the requested corresponding and/or complete invoices as required by law under the [Public Records Act RCW 42.16](#).

RALS continued in this behavior even when given clear direction and examples of missing documents that were used at trial but never produced by RALS. One could easily conclude on its face that King County’s accounting system tracking some \$10 billion in taxpayer’s

monies (\$7.2 billion dedicated to the judicial system) was completely inept and in serious array.

This resistance to providing complete documentation precipitated several Public Records Act litigations that are currently still active.

King County's competency levels would ultimately be exposed in through the depositions of Mr. Boufiou (acting deputy RALS director) and Cheryl Schmit, (Senior Accountant lead in the Financial Business Operations Department in RALS) through the above mentioned Public Record Claims against King County.

In very detailed descriptions both Boufiou and Schmit adamantly claimed that the locations of any requested documents were well-known *exactly* within the accounting tracking system.

Despite this however, many of these requested documents continue to this day to be withheld by RALS director Norm Alberg through his direction to a series of his "confidential secretaries," Sean Cockbain, Ben Gannon and Kate Blyth - all who acted as RALS public information officers as part of their job descriptions.

Note - this part of the job description was never volunteered prior to the filing of the PRA action, although inquired about, and was only recently discovered through depositions.

Requested documentation was also withheld directly by Kelli Williams, (who was formerly the King County Prosecutor's Office's

public information officer for the elected King County Prosecutor, Dan Satterberg). Her failure to timely produce investigation files on several Brady officers (including Jenee Westberg) precipitated the filing of a second PRA case.

Ms. Williams is currently director of the Office of Civil Rights under the King County elected county executive Dow Constantine (Dept. of Executive Services “DES”).

Ms. Williams, in that capacity, has been directly responsible for withholding copious employee investigations that amount to exculpatory, full-out Brady violations to the Markley and Thomas cases (as well as other cases like it).

Williams has also been pivotal in stone-walling any investigation into missing GPS data that are part of the aforementioned bad faith PDR claims.

Additionally it was discovered from the information derived from these two depositions, that King County’s ORACLE system does not cross reference payment with King County’s “PCard” (VISA Purchase Card) located in the “Procurement” Department and directed by Roy Dodman. Thus the PCard expenditures are handled in a completely different accounting system.

This is a gaping accounting vulnerability that could be vicariously exploited (and it appears that it has been).

It was recently discovered that invoices produced by King County Deputy Prosecutor Gretchen Holmgren (WSBA#37862) during trial, and recorded within court records, were missing from the some 30,000 pages of a Public Records Act litigation discovery.

Many, if not all, of the corresponding paid invoices Ms. Holmgren held in trial were never produced by RALS upon repeated attempts in a Public Records Act document request under any of the above named RALS employees and RALS director Norm Alberg.

It was the failure of this PRA production that fueled the aforementioned unresolved Public Records Act claims, one in 2013 in which the county admitted complete guilt and over which the next three years would stimulate over 30,000 pages of production through interrogatory demand to King County. It was handled by King County Deputy Prosecutor, John Gerberding (under King County Chief Deputy Prosecutor, Kevin White, civil unit) then to Dan Satterberg (elected prosecutor of King County).

Those 30,000 documents were produced after the initial (former) King County Deputy Prosecutor handling the cases, Nancy Balin, was removed from the PRA cases after 18 months of failing to resolve them while producing very little – under 500 documents. Yet it was clear that even the later 30,000 pages still had key components missing.

Recently, after the AMENDED PRP were filed, several of those MIA invoices were discovered June 24, 2016 in a case file held in storage by the King County Prosecutor's Office located directly in the personal case files of King County Deputy Prosecutor Gretchen Holmgren for the Markley and Thomas cases.

Ms. Holmgren was the lead prosecutor in the Markley and Thomas cases as well as the primary prosecutor in most of the some 21 other cases like them. These documents were not discovered either through any of the other copious cross-referencing of no less than 20 additional ongoing PRA requests (in addition to the aforementioned PRA claims) from various King County departments.

These documents are directly related to the extraordinary BRADY issues that drove the profound fraud and RICO within these two cases and the other 21 cases just like it.

These concealed documents are also at the very core of the entire malicious prosecution of animal abuse that only existed through an organized network of conspiracy designed to usurp constitutional rights guaranteed to every US citizen and to fabricate "evidence" that did not exist in order to raid the innocent, in this case, Jason Markley and Cherish Thomas.

This "ring" of conspirators used their color of authority to relieve their victims of their animals, assets then attempt to create a

distressed property for a land grab – in this case – a parcel in a 10 parcel subsection of the City of Auburn that is nearly 90% consumed and prime for development.

That subsection is currently consumed through 40% foreclosures, 20% straw borrowers (some of the foreclosures are likely straw borrowers currently) and a concentration of an unusual amount (30%) (three) massive falsified animal cruelty cases that were all conspired by the same individuals present in the Markley and Thomas cases. They were either directly or through their shill “rescue” organizations “actors” of King County under the guise of the related municipality raids alleging fabricated animal cruelty in order to create a distressed property.

These actions explode beyond a simple malicious prosecution claim. They employ a system of violations of civil rights under the color of authority as a means to an end – to gain large swathes of property for future development into higher density housing making a higher tax revenue base for the municipality.

These newly discovered missing invoices and other related documents were apparently withheld from the Markley and Thomas defense during the simultaneous trial brought against them, directly by King County Deputy Prosecutor, Gretchen Holmgren while she

secreted this exculpatory evidences within her own prosecuting case files recently uncovered.

This recent discovery of the above-referenced storage banker box that held a profound and definitive amount of conceal exculpatory evidence as well as some of the missing “secreted” invoices (that are now over five-years-old) mentioned above in the initial PRP. It is apparent that they were collectively withheld, demonstrating that KCDPA Gretchen Holmgren knowingly and with malice, concealed documents in a case that she clearly knew was completely fraudulent. These missing documents fulfilled the missing pieces present in the AMENDED PRP that definitively demonstrated that the two horses “Alex” and “Hebo” were secreted and concealed at Ben and Gera Dobin’s farm for nearly three years under a phony case number and re-named “aliases” in order to deceive King County while veterinarian Hannah Mueller Evergreen, Heather Stewart, and Jamie Taft and Bonnie Hammond’s “rescue” Save a Forgotten Equine billed for the same animal at the same time.

In addition to the “actors” inappropriate embezzlements, KCDPA Gretchen Holmgren, herself, attempted to capitalize on a completely unrelated case by billing 8 months worth of restitution board for three full-sized horses - “Alex,” from this Markley/Thomas cases and “Bud,” and “Brandy” from the Diemond case. That case (Dunham)

was restitution to the defendant's two mini horses and a goat (Below - Shannon Dunham # 11-1-10721-0).

These documents demonstrated clearly that Animal Control Officer Jenee Westberg, as an undisclosed Brady cop, was still up to her criminal activities - that Gretchen Holmgren was deliberately hiding that fact - was only the proverbial tip of the iceberg. That is, virtually every single other "actor" was a participating member of an unimaginable criminal collective while the career criminals within it were working the fabrication in the background through the authority of the King County Prosecutor's Office and members of the judicial system.

Veterinarians Heather Stewart and Hannah Mueller Evergreen, RASKC ACO's Chelsea Eykel, Aaron Wheatley, Dave Morris, Director of Washington State Animal Response Team (WSART), Gretchen McCallum, Save a Forgotten Equine (SAFE)'s Bonnie Hammond/Jamie Taft, "foster home" Ben and Gera Dobin, all were acting in concert to defraud Markley and Thomas and others of their animals, assets and – in the end - their properties (as they were in every case they were involved in).

Note - An honorable mention- this land grab has been in action at least 10 years.

The Dean Solomon case (# 08-1-04267-3) was in that same Auburn parcel subsection where Markley and Thomas live.

In the Solomon case, together, Jenny Edwards, Director – Hope for Horses (predecessor to SAFE), Patricia Clark of Serenity Equine and Rescue, Gretchen Salstrom, Director of People Helping Horses and Susan Michaels of Pasado’s Safe Haven, et al, systematically, with malice, cannibalized Solomon. This was also discovered in the King County storage banker boxes recently reviewed.

In 2008, Jenny Edwards (Hope for Horses) was exposed for embezzlement in front of the Pierce County Council in the Donna Gale case. See video:

[Exhibit 1\) – Public Video Pierce County Council.](http://www.lifeinpiercecounty.com/jenny-edwards-hope-for-horses/Rose-Corey_Letter-to-Council/document_a_letter_from_rose_corey.htm)

http://www.lifeinpiercecounty.com/jenny-edwards-hope-for-horses/Rose-Corey_Letter-to-Council/document_a_letter_from_rose_corey.htm

Ms. Edwards was never held accountable by (then) auditor (now Pierce County Executive) Pat McCarthy and her protégé, (now auditor), Julie Anderson.

The Dean Solomon case (#08-1-04267-3) was already in motion at the time of Edward’s exposure but despite the Pierce County Public Access TV exposure, the newly elected Mark Lindquist filed no charges against Jenny Edwards. It would appear that Pierce County Prosecutor Mark Lindquist, Pat McCarthy and Julie Anderson in their political climb made a deal with King County Prosecutor Dan

Satterberg to keep it under wraps while King County finished up eating Solomon alive and went for the next properties (Markley, Thomas and Ramirez).

Jenny Edwards provided the KCDPA with beautifully packaged presentations of copious testimonials against Ms. Solomon that Edwards produced, who is not an attorney nor does she have any authority. This is blatant self-dealing.

There was no evidence that these “testimonials” were nothing more than Animal Rights Extremist (ARE) “trolls” (likely from Pasado’s Safe Haven) who had managed to infiltrate Solomon’s property and her life with the sole intent to steal her property and the horses she was successfully rehabbing from auction.

Solomon’s horse business had the help of three of the most tenured, respected equine veterinarians in the State of Washington. In fact having these very particular three veterinarians on site was one of the biggest eye-popping items found in Solomon’s case file banker box as these three veterinarians were successfully concealed from the Solomon court records.

When the three most respected equine veterinarians in the State of Washington told the King County Prosecutor that there was nothing wrong with Solomon’s horses and that the horses fresh in her possession were only there for a short time picked up at auction to

rehab, their concerns were completely ignored by Mr. Satterberg. His favorite “expert” was a young, inexperienced, well-known incompetent veterinarian Hannah Mueller Evergreen who had barely passed her courses to graduate as a veterinarian. In fact the school transcripts that she had submitted in her licensing package to the Washington State Board of Health were both incomplete and counterfeit (as well as barely carrying a passing GPA).

The three equine veterinarians in the Solomon case, Larry Pickering, Chuck Emig and Bob Clark had 150 years of experience between them. They adamantly told the King County prosecutor that Solomon was being framed and that Mueller Evergreen was incompetent but their voices were quelled and their presence were virtually erased from the court files for Satterberg’s favorite skill, Hannah Mueller Evergreen who we now has been shown to be an embezzler just like Jenny Edwards. There can be only one reason for this. They wanted to disable Solomon to acquire her property.

Dr. Emig would pay the ultimate price. Like virtually all the victim/defendants, he was vocal about the Solomon injustice and his own property began to be vandalized every night. That is until one night about three weeks in; he thought he had two of the vandals trapped in one of his containers. A woman suddenly came around the closing door and Emig’s .44 magnum went off. The male yelled an

explicative and jumped Emig who shot him in self defense. The male died on the spot. The woman was in the hospital for over a month. The police would find the vandals/drug addicts police monitors and their vehicle full of Emig's inventory.

Michael Perry (Case #08-1-02922-7)

Around the same time as Jenny Edwards was giving the King County Prosecutor's Office a profound amount of unsubstantiated (but prolific) testimonials against Dean Solomon that were nicely packaged in a premium clear front, 8 ½" X 11" metal prong fastened (accolated) premium presentation "pitch" folders while singing the praises of her "Hope for Horses" (full color promotional tri-fold pamphlet included) and her expertise in horse case "evidence" collection that she has no background in (that King County was paying her for to "train" their animal control officers) - Edwards was embezzling an extra \$50,000 for care in the Pierce County Donna Gale case and stealing two of the Gale horses who were recovering in a *real* foster care so she could re-starve them and drive donations to herself. While all this was going on, another well-known horseman was getting targeted to lose his acreage, Michael Perry. It was a land-grab feeding frenzy.

Perry was the guy who drove all those Wells Fargo Stage Coaches we have all seen in the bank's commercials. There is no doubt all the

aforementioned “rescues” were working Perry who cared for his mother on his property. That would include Susan Michaels founder of Pasado’s Safe Haven and Gretchen Salstrom of People Helping Horses. Perry’s ranch is now a housing development. (It was a completed developer’s land grab).

Like Susan Michaels, Salstrom was working the *bilking* donation circuit and the WA Attorney General also initiated an investigation against Salstrom (as they did a year earlier with Michaels) for deceptive business practices in the Consumer Protection Act and the charitable Solicitations Act. All the same people were present in the Perry case as well.

It is quite apparent that Westberg’s name was cleansed from both case files by the prosecution and animal control’s presence was represented by Westberg’s colleagues Steve Couvion along with her supervisor Dave Morris at the time due to the fact that Jenee Westberg was having troubles of her own - she was busy getting busted in a 19-count felony VUCSA (drugs) in Black Diamond on January 24, 2008.

It was Couvion who came to pick Westberg up after the K9 unit had alerted on the side panels of the car she was driving (with no license, no insurance, after consuming an entire bowl, transporting drugs, refusing a field sobriety test (something that should have

gotten her fired), with (what appeared to be stolen Oxycodone).

While Westberg was handcuffed and passed out in the back of Officer Huff's police vehicle, Steve Couvion had a long discussion with Huff about professional courtesy. At the same time the K9 unit was disassembling the side panels looking for the drugs their dogs alerted on.

Directly after the event there was a secret investigation that materialized which more resembled a "how to instruction sheet" to give Jenee Westberg a free pass if she entered into a plea bargain with Satterberg's "fixer" KCDPA Maggie Nave.

How King County helped things along for the "rescue" organizations.

All of the "rescue" service providers had help coming directly from King County then and continue to now.

Patricia Clark of Serenity was running out of money from the lucrative 2009 Solomon raid. She enjoyed guaranteed board and 8 free horses that once belonged to Dean Solomon. By 2013 her barn was deteriorating and the county building code inspectors were coming after her for her failing barn. The fines were mounting up with penalties on the fines.

In 2013 by the time King County Councilman Reagan Dunn was alerted by his legislative assistant (who was a "volunteer" for Serenity), Dunn got busy. He got the county to reduce her code

violation penalties and fees by half, he stimulated county resources for a prosecutorial search to find Solomon to get Solomon to pay restitution (four years after the fact after Solomon had lost her property, her herd and her entire business that Clark had already enriched herself with) in an attempt to collect restitution.

Additionally King County Councilman Regan Dunn got county grant funding to rebuild Clark's barn.

Patricia Clark was back in business. She had a barn party and – her next target – the Ramirez property in 2016 in the same subsection as Markley and Solomon. In fact Ramirez's property touches Markley/Thomas's property. She was poised and ready to go.

In 2006 the animal sex advocacy movie "ZOO" was produced (*that went to Sundance* – yes you too could have your movie go to "Sundance" if you paid the \$150 entry fee) in an apparent attempt to soften public recoil about animal sex known as bestiality.

Jenny Edwards was featured as co-narrator about the death of Kenneth Pinyan (who died having sex with a horse in a well-known brothel in Enumclaw). Edwards had apparently been chosen by King County Animal Control to "handle" the animals involved). Hannah Mueller Evergreen was the "veterinarian" on the set.

King County Deputy Prosecutor Maggie Nave was at her usual job as the "fixer" in that case for Dan Satterberg. It was Nave who

allowed James Tait (the “handler” (pimp) of the brothel to go free with only 3 months for criminal trespassing. (He was using the neighbor’s horses).

Maggie Nave drove the idea that there just weren’t any bestiality laws on the books so they couldn’t charge Tait with more. It appears she forgot about the manslaughter part – while Tait and his buddy (there were three of them) gave them a full confession to the event.

This would make the unapologetic Tait (see [Seattle Times, Mike Carter](#)) available to co-narrate the animal sex advocacy movie with Edwards and several years later available to be jailed in Tennessee for animal sex. (Interestingly in the movie, Tait claimed Edwards “didn’t know what the **** she was doing with horses”).

Then Jenny Edwards of Hope for Horses was given the lead as the “expert” trainer in numerous animal abuse “training” sessions for King County’s animal control officers to learn how to collect evidence in animal abuse cases (how to fabricate evidence). She got the taxpayer paid lucrative billing and many free horses along the way.

All of which is curious since Ms. Edwards has/had NO law enforcement background on evidence collection, little experience with horses and was exposed (in front of public access TV at the

Pierce County Counsel) bilking the extra \$50,000 in boarding from Pierce County in the Donna Gayle case in 2009.

The Ramirez case (#16-04984) located in the Markley, Thomas and Solomon subsection

On April 21, 2016 Patricia Clark (thanks to King County Councilman Regan Dunn) was back in her previous role participating in an attempted raid on the Ramirez property in the City of Auburn by new neighbor Kelsie Sherman, (who has gained title of the property next door to Markley and Thomas in 2012).

The Ramirez property is the third parcel (fourth prosecution) subject of phony animal abuse charges in the Markley Thomas subsection. The shill apparent and probable “straw borrower,” is Kelsie Sherman and her husband Paul, who have been in title since 2012 to the adjoining property to both Markley/Thomas and Ramirez. Sherman rents the house while she lives in a \$3.2 million residence in Clyde Hill where oddly she promotes boutique mini horses on site.

By April 21, 2016 Kelsie Sherman was making wild allegations that a mare having a normal birth on the Ramirez property was in trouble and the foal “*is going to die.*”

It seemed wildly coincidental that Kelsie Sherman just happened to be present at the time when the mare was giving birth – a process that takes about 45 minutes. The mare had just come in to Ramirez’s property the month before and did not appear to be pregnant rather

she appeared to be of normal weight. When the mare surprised everyone with a foal, it was clear, she had previously been in a situation where she was kept at a visual weight that would hide the pregnancy. And Kelsie Sherman was making herself present for the two months prior on the property of which she does not occupy as if she knew in advance about when the mare would foal.

Patricia Clark, without any papers, knew that the mare and foal were worth \$5,000 each while trying to extort possession from the Ramirez's. This horse was from a "boarder" who said he got the mare from "Woodinville" (where SAFE is located).

This suggests that between Kelsie Sherman, Patricia Clark and Bonnie Hammond at SAFE, they conspired to have animal cruelty charges initiated with City of Auburn animal control officer George Winner. Winner has been in contact with Pasado's and the rest through animal control "training" seminars sponsored by the rescue groups and paid for by taxpayer's dollars through the City of Auburn.

This case was shut down because of the quick actions of an attentive press that exposed the plot – a scheme directly related to the Markley and Thomas cases as Ramirez is their enjoined neighbor.

It is a further wild coincidence that Auburn's animal control officer Winner would be talking to a women in Ramirez's case who had a rescue in Woodinville – "Save Horse Rescue" – as he listed it in his

report, which turns out to be a meta tag for Save a Forgotten Equine. There is only one rescue in Woodinville and that is Save a Forgotten Equine who is notoriously touching virtually every case reviewed.

All of these aforementioned people have participated in a complicated convoluted system of producing phony repeated municipal billings under the guise of the same horse while introducing numerous other animals to the mix.

In most cases, including Markley and Thomas, Jenee Westberg and Dave Morris participated primarily as the facilitator of the initial fabricated “evidence.” Morris also illegally wrote police reports and probable causes in many cases. The production of a distressed property that ends up as a land grab and can be demonstrated by an aerial view on King County’s own parcel viewer:

[Exhibit 3\) – Arial map of subsection](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/160601AllCompromisedParcels.pdf)

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/160601AllCompromisedParcels.pdf>

Embezzlement to candy store till – no one’s watching the store.

In the case of the subject horse “Alex” in the Markley and Thomas prosecutions, during the next several years from the moment “Alex” was surrendered under the extortion of Jenee Westberg’s patting her gun for access, “Alex” was billed for on at least seven occasions on the same dates while in multiple locations at the same time. (There were apparently several different horses being paid for under this case number).

At the same time King County quietly paid for the care and board of “Heybro” (Markley’s “Hebo”) at the Dobin’s farm for almost three years never disclosing that is where both Markley and Thomas cases horses really were located. Hebo was rarely mentioned in the Markley and Thomas case as Hebo was healthy, fat and would *not* make a good poster horse to convince anyone of starvation.

The Shannon Dunham case (#11-1-10721-1)

Dunham’s raid took place April 11th, 2011 – *three days after* Markley and Thomas, Darryl and Gina Lindsey and *five weeks after* Diamond.

Further troubling, on September 18, 2012, just as she was preparing for the Markley and Thomas prosecutions, KCDPA Gretchen Holmgren was attempting to extort restitution from Shannon Dunham, (without Dunham’s court presence) for 8 months worth of care for three full-sized horses (in addition to Dunham’s two mini horses and a goat).

(Diamond’s trial was starting with Holmgren’s good friend KCDPA Maggie Nave (WSBA# 19004) and SCRAP (Society of Counsel Representing Accused Persons) defense counsel Dave Roberson (WSBA#19298) September 27, 2012.

The Dunham case was in front of Superior Court Judge Mariane Spearman (who – with Nave - oversaw animal Control Officer Jenee Westberg’s 19-

count VUCSA prosecution three years earlier). Just like most of these cases, Westberg was also a primary witness in Dunham's prosecution.

[Exhibit 4\) – Dunham Restitution Demand](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/DunhamRestitutionDemand.pdf)

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/DunhamRestitutionDemand.pdf>

The Dunham case was a completely unrelated case to Markley and Thomas and was also prosecuted by KCDPA Gretchen Holmgren. She was cannibalized by the same “actors.” In her case, one mini horse “Fresca” died suddenly in a half an hour while grazing peacefully out in the pasture.

Veterinarian Erin Kennedy of Northwest Equine (a group headed by Steve Latimer who appears to be training young veterinarians in this business model for the King County Prosecutor – usually women) diagnosed it as starvation.

Note - starvation does not create expiration in a half an hour but an injection of potassium chloride might.

Westberg under the color of RASKC then seized the two remaining family mini horses and a goat.

Westberg spent an hour (on her GPS) reviewing their separate location about a half a mile away from Dunham's then property.

It appears there was intent the gain possession of Dunham's herd of 22 valuable goats *and* cripple their property (property which Dunham did subsequently lose). However, before Westberg could get Heather Stewart, Hannah Mueller Evergreen et al, to Dunham's

herd, Dunham's own veterinarian wrote a statement (effectively quelling the idea) that the herd was the healthiest he had ever seen.

Holmgren's first Dunham restitution demand September 18, 2012 was for an additional \$12,000 for 8 months worth of care for three full-sized horses that never belonged to Dunham. This would be a date just prior to KCDPA Maggie Nave's start of the Diamond trial and four weeks prior to the scheduled Markley and Thomas trials.

Holmgren used eight Save a Forgotten Equine's (SAFE) invoices (That King County had failed to produce four of in the Public Records Act case). One of the three full-sized horses included was Markley's "Alex." The other two full-sized horses were Diamond's. (This was in addition to the care of Dunham's two seized mini-horses and a goat).

Because the restitution "investigator" sent an additional copy of the restitution demand directly to Dunham (perhaps unintentionally) in addition to her attorney Jeff Williams (WSBA#20338), there was no way for Jeff Williams and Holmgren to repair the breach.

Holmgren was caught cold in the act, and suddenly substitute counsel KCDPA Kelsey Schirman (WSBA#41684) appeared with no notice of appearance in Holmgren's place. Williams waited four months before replying to King County while the three trials of Markley, Thomas and Diamond were active and came to their conclusions.

When Jeff Williams did reply, he carried on a long diatribe with Schirman with the main topic (surprisingly) about whether or not King County was “a victim” and deserved restitution though King County is a statute-defined victim for restitution. They both had a fleeting moment buried in the middle of those exchanges where they addressed the “oh-by-the-way” you are charging Ms. Dunham for three horses that don’t belong to her. (One might think that would be the main topic).

[Exhibit updated invoice map 5](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/160724EmbezzlementGraph.pdf), *Heather Stewart invoicing*, *Hannah Mueller Evergreen (Cedarbrook invoicing, SAFE invoicing, Ben and Gera Dobin invoicing, WSART invoicing and Holmgren’s failed restitution bilking.*

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/160724EmbezzlementGraph.pdf>

During the pre-trial process for Dunham, virtually like all the others, Ms. Westberg’s criminal history was concealed by KCDPA Holmgren.

And in the Markley and Thomas cases, Holmgren secreted Westberg’s Brady issue *along with* Westberg’s “Activity Card.”

The “Activity Card was a screen print out outlining all the overlapping invoices and some of the critical invoices themselves of where “Alex” and “Hebo” were actually being kept.

The “Activity Card” is listed on both the pretrial and trial Exhibit lists held in the RJC exhibit room but the actual exhibit is not present.

When defense counsel Kevin Tarvin discovered the Westberg Brady violations in court records October 24th, 2012 the day before Markley and Thomas's scheduled trials, it caused a massive hemorrhaging of a Brady violation that continues to this day to bleed. Their email exchange with Holmgren was excoriating. Yet both Tavin and Piculell would both back off in impeaching Westberg while in trial 6 weeks later.

Exhibit 6) - Tarvin and Piculell emails

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/TarvinPiculellHolmgrenEmailThreadREWestberg.pdf>

Darryl and Gina Lindsey (Case #11-C-05776-0).

On April 8th, 2011, (earlier the same day as the initial contact with Markley), Morris and Westberg met at the Darryl and Gina Lindsey property (another case of phony animal abuse prosecution) in Enumclaw to serve an unlawfully gained search warrant signed by Superior Judge Mary Roberts.

Westberg and the uniformed KCS Sgt Ison had been there a week earlier April 3, 2011, without a search warrant, threatening access employing the "muscle" of King County Sheriff officer Ison's sidearm in a direct violation of constitutional due process under *State vs. Ferrier, 136.Wn.2md 103 (1998)*.

KCDPA Gretchen Holmgren was also the prosecutor in the 2011 Lindsey cases.

On May 15, 2012, Judge Mary Roberts ruled to suppress evidence collected by Jenee Westberg as “not lawful” suppressing the evidence and effecting a dismissal under [Cr 3.6](#) .

It appeared Judge Roberts had some concerns that Lindsey’s defense counsel might raise the issues to a 42 US § 1983 civil rights violation in federal court where it could become high profile but appeared to be most immediately concerned about the other active cases getting wind of it. Then Judge Mary Roberts failed to ever produce her own Cr 3.6 statute mandated Finding of facts and conclusions of law.

Judge Mary Roberts would be the same judge who failed to mention it five months later in the Markley and Thomas matter.

When that pivotal moment occurred in October of 2012 just as the Markley and Thomas trials were to begin, Markley counsel Kevin Tarvin found the 19-count felony VUSCA arrest and the shoplifting/bribery charges that Holmgren failed to disclose, Judge Mary Roberts failed to sanction KCDPA Gretchen Holmgren for Holmgren’s gargantuan Brady violation.

[Exhibit 7\) Lindsey 2011 case](#)

KCDPA Gretchen Holmgren filed an appeal against the Lindsey’s without Judge Mary Robert’s findings in hand - having the

appearance that she was zealously meeting the 30-day filing statute for appeal regardless if she had it in hand or not.

But what she was really doing is successfully keeping Mary Robert's order to suppress and Mary Robert's unproduced Findings of fact and conclusions of law in legal limbo.

This action (1) served to keep both Mary Robert's order to suppress the evidence Westberg collected AND the never produced (still) findings hidden from three active cases that were going to trial.

It took Mary Roberts a month to rule to suppress, and action that effectively ended the Lindsey Superior Court trial and (2) kept it from escalating to Federal Courts.

Roberts would continue in her failure to produce findings to this day. Though Mary Robert's failure of producing the findings at the COA eight months later also was allegedly the vehicle that resulted in Holmgren then withdrawing and dismissing Lindsey's COA case in December of 2012 (when the coast was clear) that just after the Markley, Thomas and Diamond cases were tried it (3) saved the active trials from additional dishonorable Brady exposure to the prosecution.

Who would know better *when* to dismiss the Lindsey COA so it would be released out of its concealed legal limbo but the same

prosecutor prosecuting the Markley and Thomas cases (Gretchen Holmgren).

Who better to know when to communicate with Jeff Williams in the Dunham case than Gretchen Holmgren?

In a wildly serendipitous coincidence, Jeff Williams had solicited Diemond for her case as he did Dunham. Diemond was suspicious from the get-go because she knew the King County Clerk's Office does not have a "Google News Alert." After Williams attempted to convince Diemond to plea and pay him \$25,000 for the privilege, Diemond asked him how he knew to reach out to Diemond, his face turned red, he abruptly ended the meeting and ran out of the Law Library like a tornado was chasing him.

Diemond (Case # 11-1-06177).

On October 24, 2012, while Holmgren was confronted by Kevin Tarvin and Gene Piculell with her gargantuan Brady violations – (concealing Westberg's felony arrests and Westberg's subsequent convictions) Holmgren never mentioned the additional problematic Brady issues in the Lindsey's, Dunham and the upcoming huge seizure of Laurie Hart (Case# 13-1-10914-6) cases that were also her cases.

Holmgren then alerted her massive exposure to Diemond's SCRAP defense counsel Dave Roberson who had just completed throwing

Diemond's case allowing KCDPA Maggie Nave to lie to the jury, present tampered evidence while he sat there and failed to present a defense and suppressed evidence of fraud Diemond had already found before trial.

When Holmgren called him, Roberson was truly in full tilt panic and for two weeks repeatedly told Diemond it was Holmgren who alerted him to Westberg's Brady issue while intentionally withholding the names on the cases. Within a few weeks, he suddenly recanted bellowing at Diemond the night before her sentencing hearing September 30, 2012, "*It wasn't Gretchen Holmgren. It was Maggie I told you! Forget Gretchen Holmgren! It was Maggie!*"

Roberson would then, the next day, November 30, 2013, at Diemond's first *continued* sentencing hearing, misrepresent to the court that it was KCDPA Maggie Nave who had timely disclosed Westberg's criminal felony arrests to him. Nave claimed she didn't know anything about Westberg either; it was just an innocent mistake that *deprived Diemond of her constitutional rights*.

Robersons' efforts were apparently an effort to protect both Nave and Holmgren. Except if this were the case it would mean that Nave was advised about it after Diemond's trial and she didn't do her due dilligance investigating Westberg's background either. Roberson

went so far in his fabrications he threw himself on the sword as this being a case of ineffective assistance of counsel on himself, as he himself should have checked.

At no time did anyone ever mention that it was KCDPA Maggie Nave who was the lead counsel in giving RASKC ACO Jenee Westberg a free pass for her guilty plea in 2008 nor that she knew Westberg had pled guilty the year before and withheld that information from the court in front of Judge Mariane Spearman (wife of COA Chief Justice Michael Spearman).

On all accounts, Judge Jim Rogers failed to act to protect Diamond's due process and instead acted to protect his colleagues Roberson (his law school classmate) and Nave (his former prosecutor colleague) and himself.

Although Roberson is most certainly guilty of ineffective assistance of counsel on other matters, he also lied to the tribunal (court) a true violation of his professional rules of conduct (PRC).

After a year of having massive evidence of fraud in front of him, the perjuries in mass, tampered photos, an expert photo expert report demonstrating that King County Sheriff Detective Robin Cleary could not have taken the photos the day she claimed and testified, the Cr 3.6 suppression of evidence Lindsey order, and both Robin Cleary and Jenee Westberg's pending termination investigations (also

undisclosed) that landed Westberg and Cleary on the King County Brady list, Judge Jim Rogers refused numerous motions for a new trial and/or vacation and convicted anyway stating that all the witnesses (including Hannah Mueller Evergreen who was embezzling at the time) cumulatively testified to the same thing the Brady officer and perjurer Jenee Westberg testified to therefore the jury's outcome would be the same (something no one could know). Rogers ruling also claimed testimony "*including a neighbor*" who didn't exist.

Only there were a few problems with the juror. One is that there was *no neighbor* who testified. It was cumulative *perjuries* just like that of the Markley and Thomas's cases (a land grab) it was the same in Dean Solomon's case (a land grab). It was the same in the Darryl and Gina Lindsey cases (a land grab). It was the same in the Dell Adams – Sue Jackson cases (a land grab). It was the same in the Laurie Hart case (a land grab). It was the same in the Michal Perry case (a land grab). It was the same in the Dean Solomon case (a land grab). It was the same in et al, (a land grab). There are 23 suspect malicious prosecutions in an attempt to capture land, steal animals and bilk the taxpayers with repeated billings for the same items.

Judge Mary Robert's continuation in failing to produce findings on the Lindsey cases at the time, Gretchen Holmgren's delay in dismissing the Lindsey's COA until after Markley, Thomas's and

Diemond trials, would serve to keep RASKC ACO Jenee Westberg in the mixes as the King County Prosecutor's primary witness, shielding her further from exposure of Brady violations in those live cases that refused to plea bargain - Markley, Thomas, Diemond, et al and other future like cases.

Dell Adams and Sue Jackson (Cases #12-1-02068-6 and #12-1-02069-4)

While the 2012 trials of the 2011 illegal seizures and attempted land grab of 2011 for Markley, Thomas and Diemond, Westberg was busy again with her veterinary buddy Erin Kennedy from Northwest Equine Veterinarian whom Westberg had worked with the year before in the Shannon Dunham case.

In Adams/Jackson the same thing happened as in the Dunham case. One of the horses died suddenly, Westberg came out based on a call from a "neighbor" and Erin Kennedy diagnosed all the animals (including the death of one) with starvation with not one lab test present.

KCDPA Gretchen Holmgren was the prosecutor on those two defendants also (husband and wife).

Laurie Hart (Case # 13-C-10914-6).

Shortly after the Markley and Thomas cases finished (and Lindsey's case dismissed), in December of 2012, just two months later, on February 7, 2013, RASKC, Westberg, Dave Morris,

Mueller, SAFE et al, made a major raid on Laurie Hart, a case that, like Solomon, was a large haul, over 30 horses. Hart's horses were primarily Paso Fino – a sought after breed and valuable.

Witnesses to the event – including RASKC Sgt. Tim Anderson (ACO who was formally with the aforementioned 2008 Donna Gale case in Pierce County), say it was a free-for-all those who attended.

In reviewing the records, it was very clear this, like all the rest of the phony cases, had been planned out years in advance (along with the Growth Management Act). Hart lost her horses and her very developable property in Enumclaw.

Within days of the Hart raid, Ms. Mueller Evergreen began to get payments for the care and board of the Hart case animals on a King County VISA “PCard” (Purchase Card). The charges were approved by and placed on RASKC supervisor Eric Swanson's PCard (Tim Anderson's predecessor). Remember aforementioned - the King County Procurement Department handles PCards. Records and Licensing handles accounts payable billing for RASKC. There is no cross reference.

Mueller's charges for Cedarbrook Veterinary Care amounted to approximately \$47,500 on an abundance of invoices over a period of approximately 6 weeks. They exceeded code mandated use caps in both State and King County PCard Procurement codes.

At the same time, King County was paying Evergreen Fairgrounds for the board and care on their property of the same Hart animals Mueller Evergreen was billing for on her privately leased property in Snohomish.

Within a few months, Ms. Mueller Evergreen submitted some of the same invoices Mr. Swanson had already paid with his PCard - with different print dates - to RALS for payment. These invoices were repeatedly presented for payment at RALS over the next months – embezzlement.

Like every single case, Holmgren was not forthcoming in her Brady disclosures in the Hart case until it became apparent there was active press scouting her.

The Hart case was dismissed 19 months after her raid in September 2015 by Holmgren’s substitute counsel (when press showed up), KCDPA Christian Brown, with approximately \$3.5 million in county expense (and a still to be determined liability tort). There are still five missing Hart horses remaining that King County has not returned from the herd that Ms. Mueller Evergreen killed 30% of. Hart lost her property in the spew.

On April 8, 2011, Markley and Thomas’s fateful day, it was Mary Robert’s search warrant that facilitated the after-the-fact exposure of the “not lawful” collection of evidence done on Lindsey’s case the

week before. But it did not stop the seizure of the three remaining horses of the four horses they had the week before.

Note - In virtually every case, animals are unnecessarily killed at the hands of members of RASKC and their co-conspirators like Hannah Mueller Evergreen – animal cruelty at the hands of those making the allegations.

The week before, Westberg forced Lindsey's to burden the euthanization of the fourth horse at the direction of veterinarian Chantel Rothschild from Northwest Equine (same clinic as the Dunham case above with Erin Kennedy). They did this so that they could unlawfully capture body parts from the renderer in order to have one of their other "skills" Dr. Rhett (who does not seem to exist) claim the animal was being starved to facilitate animal cruelty allegations. These are the same laws that King County Prosecutor Dan Satterberg spent years (since 1994) designing in partnership of the disreputable rescue Pasado's Safe Haven (who was charged with fraud by the state AG in 2010) and its founder Susan Michaels in order to falsely allege animal cruelty upon their victims using the muscle of the King County Prosecutor's Office.

Lindsey's property adjoined both Gretchen McCallum (director of WSART – Washington State Animal Response Team) and veterinarian Heather Stewart's properties (who both committed

perjury in Markley and Thomas cases (and other cases like it while bilking the county). Lindsay's property would make a nice addition to their own parcels.

This would be the second time Lindsey's were hit with cruelty allegations by the same individuals.

Lindsey's in 2007 (Case# 07-1-11067-1).

The first Lindsey case in 2007 was led then by ACO Diane Toledo with Westberg bringing up the rear. Westberg's name was cleansed from the court file but it was unmistakable she was there and later confirmed.

That case culminated with a plea under extraordinary pressure placed on Lindsey's from the prosecution while they were busy hiding Jenee Westberg's felony arrest January 24, 2008 in Black Diamond on a 19-count felony VUCSA charge.

Lindsey's would never see Westberg's arrest because their plea was filed exactly the same day, March 20, 2008 as was Jenee Westberg's notice of arraignment for her 19-count felony VUCSA arrest. Who designed that? KCDPA Maggie Nave.

In this way the primary witness (Westberg) for the prosecution was shielded from any soon after discovery in the Lindsey cases exactly like what was done later with the second Lindsey findings in December 2012 to hide the salami at the COA so the Markley,

Thomas and Diamond cases would not have any chance to find it (although Diamond did just after trial but no one would act).

Westberg's criminal history was then concealed in a similar manner in every single case of animal cruelty since by the King County Prosecutor's office and Dan Satterberg, including Markley, Thomas and Diamond, et al.

Lindsey's were never advised of Westberg's arrest in either their 2007 case or the one in 2011. It happened when one of the other victims contacted them in 2013, six years later. When asked if they would have entered into a plea if they had known, it was a resounding no.

The second Lindsey case in 2011 culminated in the above unlawful search warrant (a week late) and the raid of three horses April 8, 2011 that was earlier in the same day of Markley and Thomas's "first contact" raid by Westberg in the evening.

In the Markley and Thomas cases (October 24, 2012) when Superior Court Judge Mary Roberts failed to sanction Gretchen Holmgren for her massive Brady violation in failing to disclose Jenee Westberg's criminal history Roberts was participating with Holmgren in secreting her own exculpatory ruling five months earlier in the Lindsey case –to suppress the evidence as "not lawfully" collected by

Westberg in the Lindsey case on April 3 - 8, 2011– (the same case Mary Roberts failed to produce the Cr 3.6 findings in).

Nicole Pappas (Case# 09-1-04160-8).

On April, 28, 2009, Animal Control Officer Dave Morris wrote a probable cause on Pappas as code enforcement. This is illegal as Morris is a animal control “code enforcement” officer,” *he is not law enforcement.*

This was also a pattern of behavior. Dave Morris illegally wrote the probable cause (and the superform) on Markley and Thomas as well as Lindsey’s while Hannah Mueller diagnosed the animals and Westberg embellished the evidence, tampered with the camera and committed perjury upon Pappas.

At no time were Westberg’s felony arrests disclosed (Brady violations) to any of these defendants.

Karen Thomas (Case# 10-1-01026-0).

On February, 10, 2010, Animal Control Officer Dave Morris wrote a probable cause on Thomas as while a code enforcement officer. This is illegal as he is not law enforcement. It was also a pattern of behavior. Dave Morris illegally wrote the probable cause on Markley and Thomas as well as Darryl and Gina Lindsey, Pappas and Thomas. Hannah Mueller diagnosed the animals of starvation while Westberg preyed upon Pappas. Heather Stewart, Save a Forgotten Equine,

Hannah's apprentice Kelli Taylor was also on site as was Mueller's embezzling buddy, Daphne Jones (Barefoot aka the Bare horse ferrier) who was found double billing King County.

At no time were Westberg's felony arrests disclosed (Brady violations) to these defendants.

Troubling, on June 10, 2010 Dave Morris was sanctioned (through a Loudermill proceeding) five days (40 hours) for his lack of follow up on Thomas between November 13, 2009 and January 19, 2010.

Dave Morris wrote his illegal probable cause for Karen Thomas on February 10, 2010 after he was investigated for failing to oversee Karen Thomas's property. This would suggest his allegations were retaliatory towards Thomas to misdirect his own accountability.

Morris was very concerned about this sanction. In emails, Morris was adamant that this sanction on Thomas be removed from his personnel file. Human Resources were apparently not in agreement with his position.

Morris was sanctioned again (along with ACO Chelsea Eykel - Markley and Thomas cases) for starving three malamutes at the Crossroads center on April 24, 2012. He was *not* prosecuted for animal cruelty for starvations. This was his third sanction.

Morris wrote the probable cause for Markley and Thomas cases. He was in the background mentoring Jenee Westberg in the Diamond

case. He soon retired in 2012 after unsuccessfully removing evidence of his Loudermill sanctions (the third for adopting out before the waiting period was up).

ACO Sgt Chelsea Eykel was sanctioned six weeks (through a Loudermill proceeding) for the Malemute starvation event. She was *not* prosecuted for animal cruelty either. Instead she was used as a credible witness in the Markley and Thomas cases without any Brady disclosure from KCDPA Gretchen Holmgren.

None of these exculpatory events were disclosed to any of the defendants in the phony prosecutions at any time by the King County Prosecutor's office and Gretchen Holmgren.

II. A more definitive picture of Westberg's GPS movement conspired with KCDPA Gretchen Holmgren.

On April 8, 2011, RASKC ACO Jenee Westberg would initially testify in the Markley and Thomas cases that she was just driving by on her way home and just happened to stop by the Markley and Thomas property to check out a report of a skinny horse.

Westberg's GPS-enabled-computer would confirm that she could not have been "just driving by" since the property was within the "targeted for development" parcel subsection at least a mile off the main road through several easements totaling a mile long. She actually had a very big day.

Her GPS would serendipitously reveal that Ms. Westberg was quite busy that entire weekend with other future defendants (victims).

Westberg started her day Friday, April 8, 2011 meeting RASKC Dave Morris.

King County Sheriff Deputy (KCSO) Robin Cleary who was – like Westberg - also fired for dishonesty the day after Westberg’s termination and shortly after she disposed of the camera she attempted to manipulate in the Diamond case but was exposed by the photo expert (that Judge Jim Rogers ignored in that case). Like Morris, neither Westberg nor Cleary were prosecuted for breaking the law. (Cleary was involved with the Lindsey cases and the Diamond case).

Although terminated within a day of one another, Cleary became a Brady Cop in 2014 a year after Westberg donned the title.

On April 8, 2011, while at the Lindsey raid, both Westberg and Morris turned off their GPS-enabled-computers but were GPS pinged filing “activity reports” in the middle of Lindsey’s pasture while WSART Director Gretchen McCallum, brought an over-kill amount of personnel and vehicles (for all the neighbors to see) in order to steal the remaining three Lindsey horses right out in the open. WSART then billed King County for it tripling the actual mileage. KCS Det. Robin Cleary was the “muscle” on that case as she was the

evidence “tamperer” and the phony police reporter on the Diamond case.

Westberg would turn her GPS-enabled-computer back on after leaving Lindsey’s and GPS tracked every minute leaving the unattended fire station where she and Morris met before and after the Lindsey raid.

Westberg’s GPS-enabled-computer shows she headed back towards Auburn and is pinged going off road 750 feet for 3 minutes, then appears to route via Roberts Black Diamond road where she began to pull over the side of the road for five + minutes every few miles approximately five times on her way to the Markley and Thomas property.

She filed a phony “activity report” at 4PM while driving. This was prior to her task of checking a report of abuse near the King County Department of Transportation parking area.

There she lingered for 19 minutes not anywhere visually near the report address she already filed and was allegedly checking out I.E., the report she filed was fraudulent and appeared to be prepared in advance. Whatever-it-was that Westberg was doing, one thing Westberg was *not doing* was “animal control.”

As she approached Markley and Thomas’s property she again filed a phony activity report in the same manner point three (.3) miles prior

to arriving at the Markley and Thomas property while driving – suggesting again she had another phony report prepared in advance.

When arriving at Markley/Thomas property, Markley and his 6 member family claim she patted her side-arm to gain access to their locked gate on the property.

This is a claim which Westberg and Holmgren marginalized and denied during trial. In fact, Westberg claimed she did not even carry a taser. (But two years later victim defendant Rose Ridlon would make the same claim and the 2011 Lindsey case was dismissed because Westberg brought KCS Ison on her “not legal” collection of evidence with Ison’s fire arm for “muscle.”

Rose Ridlon (Case# 14-1-03235-4).

Three years later, Westberg was accused of patting her gun in the same manner to gain access to a gate in the Rose Ridlon phony animal abuse case which was mysteriously dismissed shortly after Ridlon’s attorney was alerted to Westberg’s undisclosed Brady issues. Ridlons, like most of the victims, had one of their favority family dogs poisoned a few hours after Westberg was seen sitting at their gate for 15 minutes stalking them. It was about 8:30PM and a Saturday night. At 11PM the dog started throwing up, convulsed and died at around 2AM.

On April 8, 2011 Westberg arrived at Markley/Thomas's property, patted her gun to gain access, then refused to examine the hay and feed located on site. She insisting instead to take Thomas to nearby Reber Ranch to purchase what would be a bale of moldy hay Westberg personally secured.

GPS data shows that at 5:41PM, ACO Aaron Wheatley was 23 minutes from Reber Ranch filing an activity report while his presence is completely obfuscated from the work roster portion of the GPS data. He was clearly in the field working but there is no other data to track his movement and locations save his filed "activity report."

The GPS data (though incomplete) was provided later through a Public Document Request by King County Civil Rights Director, ***Kelli Williams***. This is the same Kelli Williams that was denounced in the 9th District opinion in the Joshua Frost case in March of 2016 for exactly the same behavior.

Since, and after repeated requests, Kelli Williams has failed to produce Wheatley's and numerous other missing employee GPS rosters who appear filing activity reports but who are missing from the GPS minute by minute location roster.

Ms. Williams has also refused to produce the IT specialist who could search the server for missing GPS data. His name is Todger Koerker,

While Wheatley was filing his activity report 23 minutes from Reber at 5:41PM, Westberg was on the Markley/Thomas property (near Reber Ranch) at the time insisting they go buy hay at Reber Ranch.

23 minutes later, Westberg is at Reber while Thomas is inside purchasing hay. Westberg's GPS-enabled-computer is turned off at Reber Ranch at 6:02PM.

Both Westberg and Thomas return to the Markley/Thomas property in their respective vehicles where Westberg continues to terrorize the 6-member family until around 9:30PM refusing to even let Thomas go inside to get a coat where their four young terrified children are hiding in the house.

Magically, at exactly the same time Westberg is still located on the Markley/Thomas property, her GPS-enabled-computer turns itself on in her home residence at 8:25PM in Kent 20 minutes away.

Plainly Westberg had a co-conspirator – ACO Aaron Wheatley.

On April 9, 2011, the next day, another Westberg co-conspirator, veterinarian Heather Stewart arrived at the Markley/Thomas property to examine “Alex” the very elderly old gelding. Stewart testified in the morning of trial that Westberg was with her on site. Markley and Thomas also concurred that Westberg was with Stewart. Westberg's GPS-enabled-computer is conveniently turned off during this time.

At trial, Stewart first stated Westberg was with her on the Saturday April 9 farm call. She then recanted after lunch at trial after Ms. Holmgren was seen talking with Stewart in the hall. (Westberg had testified the day before in trial that she was not with Stewart on April 9, 2011).

On Saturday, April 9th, 2011, Westberg's GPS-enabled-computer was turned off at the Kent Shelter at 9:09AM and turned back on at 12:48PM during which time Heather Stewart was allegedly making her farm call at the Markley Thomas property (it was at around 11:30AM).

Westberg's GPS-enabled-computer was on by 12:48PM and is pinged with an "Activity Report" "*Chickens and a rooster left behind*" at 1:34PM and the location on the roster was consistent with that. It records that Westberg's GPS enabled computer is there for approximately 10 minutes then she leaves.

At 1:52PM, 18 minutes later, Westberg's GPS enabled computer arrives at the Mountain View Cemetery where she parks until 2:26PM for an hour and a half.

She then leaves traveling to south Seattle, coincidentally placing herself within 2,500 feet of where Aaron Wheatley is filing an activity report at 2:31PM at around the same time in South Seattle.

She appears to be wandering around and then her computer is turned off at 3:20PM in the same area.

Again Wheatley's roster minute by minute movement is obfuscated from the ACO roster portion of the GPS report April 9th while later, under a Public Document Request, **Kelli Williams** fails to have IT GPS expert Todger Koerker certify that he searched the server for that missing roster data.

At 5:57PM Saturday, April 9th, that same day, Westberg is pinged filing an activity report at the Markley road at about the same location as she did the day before, point three (.3) miles from the Markley/Thomas property while her minute to minute tracking is turned off. Westberg appears to be stalking the Markley Thomas property.

Westberg and Holmgren would claim at trial, the horses were taken this day (April 9th, 2011). Case in point, if the horses were no longer with Markley and Thomas (as Westberg testified at court) - taken on April 9th, why is Westberg stalking Markley's on the evening of April 9th and again the morning of April 10th?

In fact, on April 9th, 2011, there is no evidence whatsoever supporting that either Wheatley or Westberg walked Markley's "Alex" and "Hebo" back to Reber Ranch. Yet at trial, Gretchen Holmgren is establishing April 9, 2011 as *the day* "Alex" and "Hebo"

were allegedly walked from Markley and Thomas's property to Reber Ranch and specifically identified as the day Markley released them.

Neither horse left Markley/Thomas property on April 9th. Both horses left Markley and Thomas's property on the evening of April 10, 2011.

On April 10, 2011, Westberg's GPS-enabled-computer pings an activity report at 8:00AM at the same location as before by the Markley Thomas property while her minute by minute GPS roster was turned off. The tracker was turned on at 1:11PM at the Kent Shelter where it mysteriously seemed to grow legs and wander around in the trees and bushes behind the Kent shelter (west) for almost 4 hours in a radius of about 60 feet even going to the utility road as if it were waiting for someone to come pick it up until 5:00PM.

During this same period of time that Westberg's GPS-enabled-computer is walking around in the woods, Westberg is pinged filing an "activity report" at 1:35PM (Sunday, April 10th) again at the same location point three miles (.3) from the Markley Thomas property. *Westberg now appears to be in two places at once.* (There was a second computer with another warm body).

At 5:00PM Westberg's GPS-enabled-computer appears to go in route to Reber Ranch (from the woods behind the Kent Shelter)

arriving at Reber Ranch at 5:19PM and parking there until 6:44PM when the GPS-enabled-computer is turned off.

While both Westberg and Wheatley testify they were together on the 9th (really the 10th), Wheatley's GPS tracker is not there.

The GPS data on Sunday, April 10 supports *April 10, 2011* date as when Westberg and Wheatley walked "Alex" and "Hebo" to Reber Ranch. Saturday, April 9, 2011 does not.

GPS data *does* support that Westberg parked her GPS-enabled-computer at Reber on April 10, 2011 at 6:44PM the time she erroneously reports as occurring on the day before April 9th.

III. A. Westberg's "photo" evidence, Photoshop and,

B. the "glamour" before and after shots of two completely different horses who are not "Alex".

A. The metadata on Westberg's evidence photos *was meant* to document that Westberg took 15 photos, on a Canon PowerShot SD1400 IS as "evidence" of what the horses looked like at the time. This is what she would testify to.

Her first four images were:

- a) On the Markley/Thomas property.
- b) Labeled "Alex 001 – Alex 004 (four images).
- c) Dated April 8th, 2011.
- d) Time - between 6:22PM – 6:24PM.
- e) Her GPS-enabled-computer was turned off at 6:02PM.

Her next six images were:

- a) Allegedly taken at Reber Ranch Barn D.

- b) Labeled “ALEX AND HEBRO 001 – ALEX AND HEBRO 006” (six images).
- c) Dated April 9th, 2011.
- d) Time - between 7:37PM – 7:38PM.
- e) Her GPS-enabled-computer was turned off at 3:20PM.
- f) She files a GPS “pinged” activity report identifying that she is point three (.3) miles from the Markley property at 5:57PM on the easement road.

Her next five images were:

- a) Allegedly taken at Reber Ranch Barn D,
- b) Labeled “ALEX AND HEBRO 007 – ALEX AND HEBRO 011” (five images).
- c) Dated April 10th, 2011.
- d) Time - at 8:19AM – 8:20AM.
- e) Her GPS-enabled-computer was turned off.
- f) Westberg files a GPS “pinged” activity report at the same location as the night before point three (.3) miles on the easement road.

In that group of 15 images, all taken by Westberg, each one visited a photo graphics program such as Photoshop.

This is easily evidenced without a photo expert examination.

Digital cameras assign serial numbers. This is not user-defined.

Here those numbers have been replaced with labels that include the horse’s names. The custody of evidence has been compromised.

Labels such as what Westberg provided on her digital images have to be employed through the use of a graphics program. This label manipulation can conceal a good many things. It conceals any shots out of series order that Westberg may not want anyone to see. It also conceals any content manipulations. In short the

custody of evidence is broken. The photos have been tampered with. *This is evidence tampering.*

The content in the first four images appear to be “Alex” on Markley’s property. There is one photo showing Ms. Thomas.

Ms. Thomas claims she was not wearing those clothes on April 8, 2011 however. She did wear those clothes in court suggesting she was “Photoshopped” into the image. The shadow from the light source (the sun which is not movable) on her is at 3 o’clock while the shadow on the horse is at 4 o’clock.

The content of the next six images show the interior of a wood barn with stalls, a dirt floor with the interior of a dormer roof.

Westberg testifies that feed had to be purchased for the horses to keep at Reber Ranch, because Reber provided no food. There is a complete absence of invoices for board at Reber in RALS public records production which now is exceeding 30,000 documents. This would seem odd.

Westberg’s submitted one feed receipt to RALS. It was concealed at trial by KCDPA Gretchen Holmgren. That receipt shows she purchased Vita hard keeper, Timothy pellets and a bucket at 11:22AM on April 10th, 2011 which would seem to contradict Westberg, Wheatley and Eykel’s testimonies at trial. They all said that there was no other food at Reber.

In contrast, the content in photos “ALEX AND HEBO 005” and ALEX AND “HEBO 006” there is different food - a bag of Purina Senior Feed and a full bale of hay that appears to be alfalfa. These photos also appear to have a roof dormer which “Barn D” at Reber Ranch does not have.

Westberg did not purchase Purina Senior Feed or a bale of hay alfalfa from Reber Ranch. None of the items she purchased at Reber are displayed in the photos she took.

Westberg claimed RASKC ACO Chelsea Eykel made the purchase but it was Westberg who submitted the receipt on her own expense report for King County to pay.

The Reber receipt was dated on April 10, 2011 at 11:22AM and marked that Westberg submitted it for reimbursement - not Eykel. If Westberg and Wheatley walked the horses to Reber on April 9th, it would appear that she failed to feed them that night.

There is a “no-win” on this. Either they took the horses on Saturday April 9, 2011 and did not feed them – OR - they took the horses on Sunday April 10th, 2011, fed them and illegally used Heather Stewart’s invoice as evidence at trial without permission or a search warrant.

[Exhibit 8\) – WestbergNotesWithInvoice](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/WestbergStatementNotes.pdf)

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/WestbergStatementNotes.pdf>

In comparison, Reber ranch Barn D is a very large commercial post and metal building. It has a cement floor and is full to the brim with conveyor belts and hay moving equipment to service their in-house hay production operation. Westberg's shots show a dirt floor, interior view of a dormer and wood.

It is clear that the last 11 images were not taken at Reber Ranch. The horses in those last 11 images could not have been "Alex" and Hebo" because "Alex" and Hebo" were still located at the Markley and Thomas property at the time as they were not removed until the evening of April 10, 2011.

B. The two large posters that were "glamour shots" depicting both a before and after shot that Judge Cheryl Carey allowed into the court as poster sized exhibits under strong defense objection. Where the hard copy poster sized images are sequestered in the exhibit room, the corresponding CD with the digital images is no longer in the RJC exhibit room where it was once located two years ago.

They were downloaded from the websites of Hannah Mueller Evergreen and Save a Forgotten Equine Bonnie Hammond/Jamie Taft's websites. Those images showed that both shots were taken by the "rescues" employed by King County I.E., Hannah Mueller Evergreen and Bonnie Hammond/Jamie Taft of Save a Forgotten

Equine. This is a conflict of interest that is a break in the custody of evidence. The missing CD's are currently not listed on the exhibit list.

The poster photos are of two different horses (not "Alex"). Both of the digital versions of the poster-sized glamour versions of "Alex" had visited Photoshop CS3 for MAC.

This is easily seen in the basic metadata provided by most computer operating systems. Those same shots have been captured from the websites of Hannah Mueller and Save a Forgotten Equine, Bonnie Hammond and Jamie Taft who apparently produced them.

This also demonstrates a break in the custody of evidence allowed by Judge Cheryl Carey. These people have a conflict of interest that drives their personal revenue.

The skinny horse "before" shot was taken nine days after RASKC's possession. The image shows identifiable content of Hannah Mueller's place of business. It does not show any identifiable means of making sure it is the same horse. The horse is a "liver chestnut" a different color than "Alex" who is a "sorrel" (color of a bright copper penny).

The "after" shot appears to be from a series of images of an unidentifiable liver chestnut gelding that someone has replaced the

rear with a re-colored “sorrel” color rump using a graphics program attempting to confuse the viewer. There is no such thing as a DNA two colored horse.

IV. Follow the money, the invoices don’t lie... or do they?

Throughout trial, KCDPA Gretchen Holmgren would ask what Wheatley and Westberg did on *April 9th*. All State’s witnesses testified Westberg and Wheatley walked Alex and Hebo to Reber Ranch in the evening of April 9th. *This event actually never happened on April 9th.*

Representing that the event was April 9th would facilitate the acquisition of veterinarian Heather Stewart’s on-site farm call invoice April 9th (personal data that Markley paid for on site and never gave permission for Stewart to give to anyone).

Ms. Stewart then would illegally give the invoice to RASKC because Holmgren would establish that RASKC had possession of the horses on April 9th. Then the invoice could be used at trial as evidence without Markley or Thomas’s permission. (Similar method as getting body parts from the euthanized Lindsey horse from a third party (the renderer) without Lindsey’s permission or a court order).

It was never noted in King County PRA productions of Heather Stewart’s invoices that Markley paid this invoice on site as Stewart was presenting an embellished version for a duplicate payment.

Stewart testified at trial that Markley paid her on site. Markley paid her \$250.00. The invoice produced by King County was for \$458.44. The invoice was made out to Thomas who was not present at the time. (No one seems to know where they got Thomas's name).

After the Stewart invoice experienced embellishments that almost doubled the amount, it was then apparently walked over to KCDPA Gretchen Holmgren who hid it in her case file (the recently discovered banker box) for trial.

At the same time, veterinarian Heather Stewart also submitted this invoice to King County Records and Licensing Services (who handle RASKC accounts payable) for a *second payment* on the same farm call.

Later Stewart attempted to collect a *third* payment through a restitution demand with the help of Gretchen Holmgren.

In an undisclosed Westberg document that Ms. Holmgren also secreted in her personal banker box (found on June 24th) it shows that Westberg documented most of these overlapping invoices on an "Activity Card."

This "Activity Card" is listed on the List of Exhibits for both pretrial and trial in the exhibit room storage at the Regional Justice Center (RJC) in Kent, WA. However the corresponding document (the "Activity Card") is not there. It is, however present and

concealed in KCDPA Gretchen Holmgren's banker box along with what she claims as proof that Markley/Thomas's former neighbor Ryan Stover was the reporting party. That "Activity Card" documents the existence of billings that:

- 1) WSART *transported* two horses (and Shannon Dunham's two mini horses (stolen by Westberg on the RASKC April 11th Dunham raid) via Lake Moneysmith Road to Snohomish on April 12th. (Lake Moneysmith Road is the only route to Ben and Gera Dobin's farm.)

Lake Moneysmith Road is directly south of Reber Ranch.

Snohomish is north of Reber Ranch.

The invoice (like Lindsey's WSART invoice) also represents triple the round trip miles between Reber and Snohomish. (They could have gone to Portland and back).

That WSART invoice was disclosed by King County RALS 16-months into the first PRA action under interrogatory demand after the filing of a (still active unsettled) Public Records Act claim.

- 2) That "Hebo" (aka "Heybro") went to Ben and Gera Dobin foster farm. Dobins spontaneously started billing King County RALS for a completely undocumented horse not part of any RASKC

case files. They referenced him as “*Cooter*” (aka Alex) and gave him a non-existent RASKC case number.

At the same time, Ben and Gera Dobin also started billing King County RALS for “Heybro” (aka Hebo) April 12th, under Thomas’s RASKC case number.

The first year of Dobin’s invoicing through the Markley and Thomas’s trials were secreted from the defense. Those invoices were apparently walked over to the prosecution from RALS after being paid. The subsequent invoices for the rest of the three years appear to be for longer time periods as if someone advised Dobin’s to hold back their invoices so they would not be captured in public records request search.

Dobin’s invoices starting on April 12, 2011 and were part of what was recently discovered in Holmgren’s case file banker box that had been concealed from trial.

All of Dobin’s invoices listed dates but omitted the year. The King County RALS receipt date acknowledges when it was received (and that it was approved for payment).

Dobin’s withheld the last three billings from submission for 5 months, 10 months and 12 months in an apparent attempt to avoid detection in both the upcoming trials in the last quarter of

2012 and the aforementioned Public Records Act request and subsequent PRA litigation.

The first three invoices (prior to trial) covering 1 month, 1 month, 3 months, were completely missing while concealed in Ms. Holmgren's personal case file banker box until July 24, 2016 suggesting they were physically removed pending trial.

King County RALS continues to withhold those three early invoices in the expansive 30,000 page public records case reference above. This is most likely because the originals are still secured in Ms. Holmgren's personal banker box recently discovered.

It appears all the invoices were paid by RALS suggesting that someone within RALS secreted the earlier original invoices to Ms. Holmgren for safe keeping prior to trial to take them out of RALS AP system - suggesting there was an overt effort to avoid detection from a Public Document Request.

Within two months of "Alex" and "Hebo" release to RASKC, veterinarian Heather Stewart began to make farm calls treating "Cooter" and "Heybro." She used the same skewed RASKC case numbers as Dobins did. But she failed to note the location of the farm call. Her descriptions of "Cooter" matched that of "Alex" as Markley's old elderly sorrel gelding "Alex."

Exhibit 9)– Stewart Invoicing

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/StewartInvoices/AlexCooter.pdf>

- 3) Westberg’s newly discovered “Activity Card” still in the banker box (instead of in the RJC exhibit room where it is listed but not present) documents that in addition to Dobin’s billing, SAFE also started invoicing for “Alex.” Except SAFE started their billing on April 5th - *five days before Ms. Westberg’s first contact with Markley/Thomas while both horses were still on the Markley/Thomas property.*

In addition to Westberg’s “Activity Card” that documents the existence of the SAFE invoices, those invoices themselves were submitted to King County RALS for payment. These invoices were attained through both public records and court records. The same SAFE invoices were used as exhibits in the court files of Shannon Dunham when King County Deputy Prosecuting Attorney Holmgren attempted to collect eight months of care for three unrelated full-sized horses in Dunham’s first restitution demand. [Note - This is not the first questionable moment that Holmgren was involved with restitution monies. Holmgren attempted to give \$15, 000 of a \$22,000 restitution to a former board member of rescue “Care” in Burien for Care’s assistance in “re-homing” one hundred \$2,500/head purebred lap dogs

seized in the Hamilton case (#12-1-02188-7) in addition to apparently returning a dog “Diva” to Hamilton that is not Diva].

[Exhibit 11\) – SAFE Invoices](#)

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/SAFEInvoicesMarkleyEtc.pdf>

- 4) From April 14 to May 31, at the same time, veterinarian Hannah Mueller was invoicing for the care of Mr. Pibb (aka “Alex”) on a “*high mash rate*” over the same 8 weeks as Dobin and SAFE. Mueller claimed “Mr. Pibb” was “Alex” (and they had just changed his name) while and Bonnie Hammond/ Jamie Taft of Save a Forgotten Equine billed under “Alex” and Ben and Gera Dobin billed under “Cooter.” (Horses rarely come to another horse’s name).

[Exhibit 10\) – Hannah Mueller Evergreen invoices](#)

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/HannahInvoices.pdf>

Invoices demonstrate that King County was paying four different “actors” for the care of at least 3 different horses using the Markley and Thomas cases as window-dressing while these exact same “actors” defamed and cannibalized Markley and Thomas at trial.

The scheme also defrauded the county tax payers under the supervision of RALS Director, Norm Alberg and the concealment of exculpatory evidence by KCDPA Gretchen Holmgren, King County Prosecutor Dan Satterberg, KCDPA Nancy Balin and their

commiserate service provider “actors” all who were employed to pull off the scheme. This appears to be an end goal to disable the property owner in order to capture and steal property from honest, hard working property owners.

The newly discovered invoices found in Ms. Holmgren’s personal case file June 24, 2016 contained three missing invoices referenced by Westberg’s obfuscated “Activity Card” (also found there) of the foster “actors” Gera and Ben Dobin for the care of “Cooter” (Alex) and “Heybro” (Hebo), that completed the incomplete embezzlement paper trail mishandled by Kelli Williams and Dan Satterberg delivered through KCDPA counsel John Gerberding through a PRA claim two years after the trials.

Note - In the first year of the Public Document Request (PDR) initiation and the first year directly after the filing of the PRA case, KCDPA Nancy Balin represented both RASKC civilly and represented King County in the PRA case. She never disclosed she represented RASKC civilly while records were obviously being grossly obfuscated during the same time from the PDR.

Balin was removed by King County from the PRA case in September of 2015 and a year later (2016) quietly escorted out of King County after an extensive investigation and copious reprimands

and copious complaints from virtually everyone she came in contact with. She is currently working for the small city of Bothell.

Ben and Gera Dobin actively participated in this fraud. Ben and Gera Dobin skewed both horse's names and used erroneous case numbers (provided by WSART invoices) to identify the phony cases to RALS and to Norm Alberg's office for payment. The last two years were billed in nearly an annual invoice suggesting they knew there were active public records requests and there was an attempt to avoid exposing the evidence of where "Alex" and "Hebo" really were.

In addition to the lack of a designated year on each of the Dobin invoices, the totals – and other data - had to be restored due to the use of colored outliner pen (other than yellow) that would serve to obfuscate the content during any B&W copying attempts by any third party public information officers (PIO). It is a way of redacting illegally.

Along with the transportation invoice by WSART's Gretchen McCallum that states that they transported two horses and two mini's (Dunham) to Snohomish via Lake Moneysmith road in (the opposite direction of Snohomish) towards Dobin's property while tripling the actual miles, WSART invoices demonstrate that Markley's Alex and Hebo were secretly transported to Dobin's care where they remained

neatly under wraps for nearly three years (paid for by King County), while Hannah Mueller/Evergreen, Heather Stewart, Bonnie Hammond/Jamie Taft (SAFE), Gretchen McCullam (WSART), Aaron Wheatley, Dave Morris, Jenee Westberg, Chelsea Eykel, Gretchen Holmgren preyed upon Markley and Thomas. They had help by KOMO TV Denise Whitaker (who also did two hit pieces she edited to make it appear Markley said things he didn't) prior to trial tainting any jury pool.

Whitaker's hit pieces heralded Hannah Mueller Evergreen and Bonnie Hammond of Save a Forgotten Equine as heroes claiming to have nursed the old elderly Alex into a much younger (by 30 years) version while he magically changed to a completely different color and breed with the AKA "Mr. Pibb" for the phony court case prior to trial.

It is ironic that it was Ms. Whitaker's cameraman who documented the identification marker "whorl" (cowlick) on Mr. Pibb's face that would expose Mr. Pibb's dye-job attempt to match that of "Alex."

V. The head of Drug Court, trial judge Cheryl Carey and her numerous attempts to conspire phony bench warrants for Markley while he had a "stay" in place.

- A. Conspiring with Judge Jim Rogers and SCRAP Defense counsel Dave Roberson, et al to produce an illegal bench warrant.**
- B. Then implementing a unlawful second and third attempt through Helping Hands Yoli Gerasimov, Alyce Green and KCDPA Laura Petregal (for Judge Carey and Gretchen**

Holmgren) to produce a second and third attempt at illegal bench warrants against Markley (also during a stay) in an effort to disable Markley and leave Thomas and their children vulnerable to predatory property loss – astonishingly, the first failed phony motion to strike was included as “evidence” in the filings of the second and third attempt while no affidavit of mailing/service was implemented nor included in any of the motions. And the 2013 order to stay was signed by Carey was omitted.

A. *On August 9th, 2013*, Society of Counsel representing Accused Persons, (SCRAP) attorney, Dave Roberson submitted an order for a bench warrant against Markley who he claimed was his own client. Roberson is a defense attorney. He submitted it against his own client for failing to complete community service hours.

Amy Cox of SCRAP was provided the Helping Hands calendar list of out of compliance (OOC) individuals with Helping Hands the day before that somehow Markley had been added to during a stay pending COA signed by Judge Cheryl Carey.

Roberson claimed Markley as his own client which was untrue. The motion for a bench warrant for Jason Markley was to be heard in front of Roberson’s old law school classmate, Judge Jim Rogers during an in and out of custody bench warrant hearing call.

Roberson had never represented Mr. Markley nor did he ever put in a notice of appearance at this time. Roberson, in fact, did not know Markley at all.

Markley received the notice to appear three weeks after the fact so did not know to appear – so Markley was not present.

That day the blank forms normally provided to all attorneys in large hearing calls were mysteriously missing. Judge Rogers seemed to be unconcerned.

Judge Rogers was notably panicked in the audio that the representatives from the clerk's office (who he apparently understood were at an all day meeting that day) may show up much to the incredulous response of his assigned bailiff at the time. (Clerks are usually present to assist attorneys fill out those forms that were missing).

By the time Roberson entered the room, KCDPA Tina Marie Masters had found the “*Stay pending COA*” filed just four items up on Markley's docket and had crossed out the motion for a bench warrant to a *motion to strike*. (There were no blank forms to fix it).

From that moment things went askew. The bailiff reports that the motion to strike was signed in chambers, not in open court as the motion states. The audio supports this. Markley appeared on the calendar but not anywhere in the five hour audio of the calendar.

There were notably three different hand writings on the motion. Mr. Roberson signed it as Markley's defense counsel.

Judge Rogers signed the motion to strike at the downtown courthouse over the title of Judge Cheryl Carey (Carey was located at the RJC in Kent at the time) committing forgery on a recorded court document.

When Markley learned of the event he emailed Judge Carey with an inquiry. She was non-responsive as to whether that was her signature and abruptly advised Markley that there was no bench warrant and to be happy with that.

The obvious connection of Dave Roberson and Judge Jim Rogers to Markley is that Mr. Markley had been auditing another phony animal cruelty case (Diamond) where Roberson *was* defense counsel for in Roger's court. Roberson and Rogers were actively attempting to suppress the evidence tampering and perjury in that case and protect KCDPA Maggie Nave who was exposed in a massive Brady violation for not disclosing RASKC ACO Jenee Westberg's felony arrests just like her friend Gretchen Holmgren was doing in the Markley and Thomas cases. Only in Ms. Nave's case, SHE was the one who prosecuted Westberg. It was not an idle mistake.

- B. ***On July 17, 2015***, Markley reached out to Helping Hands, Yoli Gerasimov, to find out how to submit the community service hours he had completed prior to his perfection letter as ordered by Judge

Carey. Markley was also under a post COA stay of eight months at the time that was signed by Judge Carey two years earlier that included his earlier stay pending COA.

Instead of assisting Mr. Markley with this task, Ms. Gerasimov immediately advised Mr. Markley via email, that she had forwarded his email to the King County prosecutor for review with no other information. She had no trouble reaching Mr. Markley.

Unbeknownst to Mr. Markley, the Prosecuting attorney, Laura Petregal (who is involved in numerous phony animal abuse cases), apparently ignored the eight month stay and instead of contacting Markley to find out that he had completed - in triple - his community service hours prior to his perfection letter, she scheduled a motion for a bench warrant on August 17, 2015 in front of Judge Carey. Then she failed to notify Markley.

Ms. Petregal filed a "Notice to Appear" to Markley in the court record. She claims within it that she sent it to his two-and-a-half-year-old former contact address. It was not accompanied by an affidavit of mailing/service and no surprise; he did not receive any notice and did not appear. Ms. Petregal admitted in an email that no affidavit existed.

Apparently KCDPA Shayo Calvo (who was tasked by Petregal with presenting the motion in front of Carey) didn't show up on August 17, 2015 in Carey's courtroom.

Judge Carey emailed him immediately on August 17, 2016 when he failed to appear. She knows him well as he has the second highest case load in her prestigious position as "Drug Court" judge. "Drug Court" has been instituted since 1994. Calvo has been a prosecutor for the Drug Court only one year.

This email from Carey appears to be ex parte contact. After a flurry of activity, Mr. Calvo responded with a response 3 hours later with "*So what's up with this.*"

Exhibit 12) – Carey email thread

On August 26, 2015, nine days later, the hearing was re-scheduled for September 28, 2015 as if Markley had failed to appear when no hearing took place because Calvo failed to show up.

Colored outliner was used to obfuscate the "(For Change in Hearing Date.)" on the header of the Re-notice of post sentencing violation - it had to be restored to read it.

The "re-notice" to appear for September 28th did not have any affidavit of mailing/service to Mr. Markley so again he would not know to appear. On Sept. 28, 2015, the audio demonstrates that there was a three minute hearing with an unidentified male

prosecutor (who was later identified as Shayo Calvo) who was unusually personally familiar with Judge Carey.

Judge Cheryl Carey never mentioned the fact that Markley was two-months into an eight-month stay that she herself had signed two years earlier.

Carey vaguely established that there was a previous hearing as if it were held (when it wasn't). She also stated quite clearly that Markley failed to show up for the August 17th hearing when she knew personally that no August 17th hearing ever took place because Mr. Calvo, the prosecutor, had failed to show up. There was suggestion it took place with another court. KCDPA Calvo would have also known there was no hearing since he is the one who didn't show up. Calvo remained silent about it.

Exhibit 13) Audio of Carey's BW hearing.

<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/150928CareyBenchWarrantUpdated.wma>

Carey never asked for an affidavit of service as if she knew there wasn't one. She instead asked for the "notice to appear" as if that were proof of service that Markley was sent the notice.

It appeared Mr. Calvo and Judge Carey were alone in the court room save a bailiff and the audio. There was no defense counsel present.

Mr. Markley did not appear because he never received the notice that no one mailed to him nor did anyone contact him through his

current contact information on the email Yoli Gerasimov successfully sent to Markley when she claimed she forwarded his inquiry to the prosecutor (Laura Petregal).

Carey also acknowledged during the audio that the case had gone “*all the way to the Supreme Court apparently.*” who did not rule on it (so she would be familiar with the allegations of fraud in her courtroom that she failed to cure).

Judge Carey seemed desperate to cripple Mr. Markley and place him in jail. She signed the order during an eight month stay she herself had signed two years earlier, without his presence, without any service, without a defense counsel present, without knowing that Mr. Markley had completed his community service hours in triple. Judge Carey did this all in under 3 minutes.

In requesting clarification directly from Judge Carey on where the affidavit of service was, 20 minutes later KCDPA Laura Petregal’s paralegal responded for Judge Carey. She claimed they had mailed Markley’s “notice” to the last known address for Markley two and a half years earlier rather than to use the current contact information forwarded to them from Mr. Markley’s recent email to Helping Hands (Yoli Gerasimov who had successfully responded to Markley using his current contact info).

When an extensive public records request was made for all documentation relating to the bench warrants of Jason Markley by press, two days later, long-term Helping Hands supervisor, Alyce Green suddenly left her position but not before deleting 6,296 of her emails and leaving instructions for her subordinate Yoli Gerasimov to find everything she needed in the “BW drawer” when she is asked for it.

On August 22, 2016, a Cr60 (to vacate for error) hearing was held in Judge Carey’s court. Both KCDPA’s Laura Petregal and Shayo Calvo appeared. They did not object to vacating the erroneous bench warrant. Carey prepared her own order however. Instead of signing a Cr60 order admitting court error, she prepared an order to expunge. She hand wrote that Mr. Markley’s community service hours were complete as a representative of the nonprofit who provided Mr. Markley the community service hours was present to be sworn.

The erroneous bench warrant is now corrected as the trial should be (but isn’t) by Judge Cheryl Carey.

Note – this is not the first time Mr. Satterberg has been caught in disturbing prosecutorial misconduct and malfeasance. (See Frost v. Van Boining, 757 F. 3d910 – Court of Appeals, 9th Circuit 2014- Opinion filed March 21, 2016)

“The en banc court held that the King County Superior Court’s erroneous refusal to allow defense counsel to make alternative arguments during summation – that the state hadn’t met its burden of proof, and that Frost committed the crimes under duress – was harmless because the jury heard overwhelming evidence that Frost committed the charged offenses and any argument that the prosecution failed to meet its burden of proof would have fallen on deaf ears.”

In a scathing descent, Justice Alex Kozinski wrote that he and the four joining judges found the facts giving rise to the *Brady* and *Napue* claims most troubling. He wrote that:

*“there is cause to believe that the **King County Prosecuting Attorney’s Office violated Brady and Napue by willfully withholding evidence of Shaw’s domestic-violence plea deal and by permitting Shaw to lie on the stand, and that subsequent to the trial, the office stonewalled in providing Frost this information when he doggedly requested it.**”*

Further Justice Korinski added:

*“Finally, we are concerned by the actions of **Kelli Williams**, the public records officer for the King County Prosecuting Attorney’s office at the time Frost sought information about Shaw. Frost asked that office, in very way he knew how, for the information that would have supported the *Brady* and *Napue* claims. Yet Williams provided incorrect of misleading information in response to his request. Her failure to identify and disclose either plea agreement to Frost may be the result of incompetence of indolence, but it may also reflect a deliberate effort to prevent disclosure of the deception committed by her office.”*

What is disturbing about the Frost case in comparison to Markley and Thomas is that throughout their cases (and that of the other 21 individuals falsely charged with animal cruelty), there are the very same individuals

within King County doing exactly the same thing they did in the Frost case.

Where Korinski comments on the lack of accountability:

“So far as we are aware, the individuals involved have never been held to account for their conduct.”

Here we see that the lack of accountability has fortuitously allowed the same bad behavior to flourish within the prosecutor’s office to affect 23 other unrelated innocent people.

The Markley and Thomas cases were a facsimile of the Frost case including the exact and ultimate actions performed by the very same public information officer **Kelli Williams**. When it became known (through rumor) that both Jenee Westberg and Robin Cleary were terminated for cause in early 2015, the request for records was immediately implemented for the personal files of Brady officer Jenee Westberg and King County Sheriff Detective Robin Cleary.

In the case of Markley, King County Deputy Prosecutor Gretchen Holmgren defended her case with Markley completely through the Court of Appeals attributing her entire argument to ACO Jenee Westberg statements while Holmgren *knew* Westberg was under the very investigation that Westberg was terminated for a year later and designated a Brady Officer over.

Holmgren's father, notable local millionaire and former Seahawk's coach attended Markley's oral argument wearing his million dollar Super Bowl trophy ring which he in turn waved around his head the entire oral argument exercising due influence on the COA panel.

While prosecuting Markley, no one, including Gretchen Holmgren, ever disclosed Westberg's precarious position and current investigation as a liar and a thief in Markley's run at the COA, another continuing violation of Brady vs. Maryland and a ongoing series of non-disclosures.

In reviewing Gretchen Holmgren's oral arguments, she attributes her grounds primarily to Jenee Westberg statements, someone who was at that moment, not only under investigation for dishonesty and falsifying her animal cruelty reports, but also someone that King County had concealed as an invisible Brady Officer in 2008 because of a 19-count drug arrest, another felony arrest for shoplifting and attempted bribery. Ms. Holmgren concealed it all from the defense and was exposed at the October 24, 2012 Omnibus Hearing that was apparently only the tip of the iceberg.

Holmgren concealed it from all her prosecutions involving Westberg.

Ms. Westberg was not just allowed to testify in a majority of the 23 cases of phony animal abuse cases, she was given special authority while King County knew about her criminal career and failed to disclose her Brady background for impeachment. This allowed the King County Prosecutor Office to consistently prevail and/or extort plea deals from

their terrified victims criminally creating a distressed property slotted for development.

In Markley, Thomas et al, records were requested in order to defend the covert Brady violations in their cases (and that of the other some 21 cases of malicious prosecutions).

Kelli Williams promised directly to provide that information but she provided misleading information, then waited until after the Court of Appeals deadline was past for at least one of the cases to provide the “juicy” (her words) information that showed that Jenee Westberg had been an undisclosed Brady Office since 2008, there had been a “secret” investigation regarding the 19-count drug arrest that led to a “free pass” plea deal with King County Deputy Prosecutor Maggie Nave (who also never disclosed Westberg’s Brady information in the Diamond case throughout the entire phony prosecution.

Westberg’s arrests (there were two felony arrests and one misdemeanor that is still undisclosed) only became visible because of the Markley case. Nave denied knowing anything about it in the Diamond case while she had been the lead counsel in designing Westberg’s plea deal in the 2008 19-count felony arrest.

Ms. Nave was also the lead prosecutor in the James Tait case in the death of Kenneth Pinyan who died having sex with a horse in an animal sex brothel that James Tait was operating.

James Tait confessed along with another man.

Dan Satterberg and Maggie Nave claimed that because there were no bestiality laws in Washington State they were not able to prosecute Tait. They only charged him with criminal trespassing on the neighbor's barn and horses. They both apparently forgot about the manslaughter-murder part.

After three months they set Tait free to go to another state and start up another animal sex brothel where he was again incarcerated for – but not before Tait was able to showcase his trade in with Jenny Edwards from “Hope for Horses” and Hannah Mueller Evergreen a movie called “ZOO” that advocated the practice of having sex with animals.

Kelli William's untimely disclosure producing the Westberg and Cleary personnel files resulted in another still current Public Records Act lawsuit against King County in which they have admitted all guilt during mediation but have been unaccountable for the damage they have done. That case is also still pending.

Further troubling (and also an undisclosed conflict of interest) is the fact that Jenee's mother, Ann Westberg was the Level V administrator for King County Deputy Chief Dan Clark who is the founder and current chair of the King County Brady Committee since 2007. This committee decides who gets added to the Brady list as a Brady Officer. This committee is

an unaccountable ad hoc committee operating illegally against the Open Meeting Act. They are secreting this on tax dollars.

Markley was prosecuted along with his wife, Cherish Thomas, for animal cruelty in the first degree that appears to have been done through a system of racketeering sourced directly from the King County Prosecutor's Office and through its elected prosecutor, Dan Satterberg.

Exhibit 14) GoldBarReporter- GoldBarReporterMacliciouslyProsecuting100s
<https://goldbarreporter.org/2016/05/26/king-county-washington-malicious-prosecution-of-hundreds/>




Satterberg has personally used his influence inappropriately to set up the structure within legislation under which he can achieve his fraudulent prosecutions of innocent people and property owners in order to illegally acquire innocent property owner's property slated for development.

Satterberg's actions outlined within his position of King County Prosecutor protecting his Animal Rights Extremist's (ARE) "friends" are well-documented in the public records.

Mr. Markley asks that this case, Thomas and Diemond be vacated with prejudice or new trials granted.

Respectfully submitted this 1st day of September, 2016,

 Jason Markley, pro se



thefallenfeather@outlook.com


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Exhibit List

- 1) [Exhibit – Public video Pierce County Council](http://www.lifeinpiercecounty.com/jenny-edwards-hope-for-horses/Rose-Corey_Letter-to-Council/document_a_letter_from_rose_corey.htm) - online
http://www.lifeinpiercecounty.com/jenny-edwards-hope-for-horses/Rose-Corey_Letter-to-Council/document_a_letter_from_rose_corey.htm
- 2) [Exhibit – \(former exhibit 5\) Public video Pierce Map. Exhibit - Amended Exhibit No. 5 and additional related Exhibit No. 28](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/5-AlexHeboInvoicesVsTestimony.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/5-AlexHeboInvoicesVsTestimony.pdf>
- 3) [Exhibit – Arial map of subsection](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/160601AllCompromisedParcels.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/160601AllCompromisedParcels.pdf>
- 4) [Exhibit – Dunham Restitution Demand](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/DunhamRestitutionDemand.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/DunhamRestitutionDemand.pdf>
- 5) [Exhibit – updated invoice map, Heather Stewart invoicing, Hannah Mueller Evergreen \(Cedarbrook invoicing, SAFE invoicing, Ben and Gera Dobin invoicing, WSART invoicing and Holmgren’s failed restitution bilking.](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/160724EmbezzlementGraph.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/160724EmbezzlementGraph.pdf>
- 6) [Exhibit – Tarvin and Piculall emails](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/TarvinPiculellHolmgrenEmailThreadREWestb.org.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/TarvinPiculellHolmgrenEmailThreadREWestb.org.pdf>
- 7) [Exhibit – Lindsey 2011 case](#)
- 8) [Exhibit – WestbergNotesWithInvoice](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/WestbergStatementWNNotes.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/WestbergStatementWNNotes.pdf>
- 9) [Exhibit – Stewart Invoicing](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/StewartInvoicesAlexCooter.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/StewartInvoicesAlexCooter.pdf>
- 10) [Exhibit – Hannah Mueller Evergreen invoices](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/HannahInvoices.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/HannahInvoices.pdf>
- 11) [Exhibit – SAFE Invoices](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/SAFEInvoicesMarkleyEtc.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160724ExhibitsNew/SAFEInvoicesMarkleyEtc.pdf>
- 12) [Exhibit – Carey email thread](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/150817EmailThread.pdf)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/150817EmailThread.pdf>
- 13) [Exhibit –Audio of Carey’s BW hearing](http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/150928CareyBenchWarrantUpdated.wma)
<http://uninformedconsent.org/Kathy/Markley/ExhibitsPRP/160821Exhibits/150928CareyBenchWarrantUpdated.wma>
- 14) [Exhibit - GoldBarReporter- GoldBarReporterMacliciouslyProsecuting100s](https://goldbarreporter.org/2016/05/27/king-county-washington-maliciously-prosecuting-hundreds-of-innocent-citizens/)
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Certificate of Service


I, Jason Edward Markley do swear under the penalty of perjury of the laws of the state of Washington that the following is true and correct. On September 2, 2016 I delivered, uploaded, emailed and/or mailed a copy of the foregoing to the following:

Washington State Supreme Court
415 12 Ave SW
Olympia, WA 98501-2314
supreme@courts.wa.gov

Prosecuting Attorney King County
King Co Prosecutor's Office
W554 King County Courthouse
Seattle, WA 98104
Attn: Gretchen Holmgren

The Court of Appeals Div I
Attn: Richard Johnson
One Union Square
600 University Street
Seattle, WA 98101- 4179

Dated this 2nd day of September, 2016 by,

 *Pro se 02 Sep 2016*

Jason Edward Markley, pro se

thefallenfeather@outlook.com