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KITSAP COUNTY CLERK

2021 SEP 27 AM 11:46

DAVID T. LEWIS III
KITSAP COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

v.

HOUSTON WADE,

Defendants.

NO. 18-2-03205-18

FINDINGS OF FACT,
CONCLUSIONS OF LAW
JUDGMENT AND PERMANENT
INJUNCTION

I. JUDGMENT SUMMARY

Judgment Creditor:	William Nelson
Attorneys for Judgment Creditor:	David P. Horton and Kitsap Law Group
Judgment Debtor:	Houston Wade
Principal Amount:	\$500,000.00
Attorney's Fees	\$3000.00
Total Judgment Amount:	\$503,000.00
Judgment Interest Rate	12%

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II. FINDINGS OF FACT

The Court having previously ordered Defendant was in default and having reviewed Plaintiffs' Motion for Entry of Judgment and the Declarations in Support, The Court make the following Findings of Fact.

1. Mr. Nelson has lived and worked on Bainbridge Island for his entire life, over 62 years. He has lifelong friendships. He has worked as a contractor his entire career and relies on his reputation to obtain business for his contracting company. He started his business in 1987.
2. In October 2018 Mr. Wade began publishing defamatory statements about Mr. Nelson. These statements included:
 - a. Allegations that he raped a woman in Fort Ward on Bainbridge Island and engaged in a coverup with the Bainbridge Police Department.
 - b. Allegations that a "victim" of his, Elizabeth Kaltreider, committed suicide as a result of his actions, four years after the "alleged" rape.
 - c. Allegations that he engaged in illegal conduct, in conjunction with the Bainbridge Island Police and Fire Departments, with underage women at a "speakeasy" called the "Chicken Coop," including paying money, liquor, and drugs in exchange for illegal and immoral conduct, including rape and child abuse; and claims the FBI is investigating.
 - d. Allegations that he conspired with the Bainbridge Island Police Department to cover up the alleged crimes defendant accuses Mr. Nelson of, such as running a child sex ring.
 - e. Allegations that he committed domestic violence against his former spouse.

1 f. Allegations that he has “beaten the shit out of” his step-children.

2 g. That he is a “coke” head.

3 h. That he has stalked defendant and tried to kill him several times.

4 3. The allegations were all false. Defendant’s purpose in doing these things was to “run Mr.
5 Nelson off the island.”

6 4. Mr. Nelson’s clients and friends have seen these posts and also received letters in the
7 mail of letters cut out of magazines glued to paper and copied and sent warning the
8 recipients of the dangers of my reputation. Mr. Nelson’s reputation has been injured and
9 he fears future injury if these exact lies are continued to be repeated.

10 5. After these posts and publications came to light, he lived in constant fear that there would
11 be vigilante retribution, that the threats Mr. Nelson saw on social media would be carried
12 out. He was always afraid that people he knew and saw regularly would think less of him
13 when he saw them in town.

14 6. He was afraid he would lose jobs. He did lose business. He was dropped from the BISD
15 Small Works Roster because of these allegations.

16 7. He suffered from emotional distress because of these allegations. Bainbridge Island is a
17 small community, and he was in constant fear that someone was looking at him to do
18 harm– thinking these allegations were true.

19 8. He lost substantial income. He lost over \$200,000.00 in income in 2018 and 2019 due to
20 the allegations Mr. Wade made.

21 9. He lives in constant fear that he will again start making these wild allegations that have
22 no basis in reality.

1 10. After this action was filed Mr. Nelson tried to do discovery. But Mr. Wade obstructed
2 that process.

3 11. On April 6, 2020 the Court entered an order finding Mr. Wade in default for failure to
4 comply with the discovery rules.

5 III. CONCLUSIONS OF LAW

6 Based on the above Findings of Fact, the Court enters the following Conclusion of Law:

7 1. Because Mr. Wade's defamatory publications are defamatory *per se*, no proof of
8 damages is required. Nevertheless, Mr. Nelson's damages are well laid out in his
9 declaration. He was accused in these publications of the most heinous acts a man can
10 be accused of – rape, child abuse, and domestic violence – and of conspiring with
11 authorities to hide his alleged misdeeds.

12 2. Damages are presumed when there is defamation *per se*. “When a statement is
13 defamatory *per se*, ““damage to the plaintiff is said to be “presumed,” and the jury,
14 without any further data, is at liberty to assess substantial damages, upon the
15 assumption that the plaintiff's reputation has been injured and his feelings wounded.”¹
16 And a trial court has discretion to award substantial presumed damages.²

17 3. Substantial damages of \$500,000.00 are justified based on Mr. Nelson's sworn
18 testimony and actual losses.

19 4. “To be valid, a prior restraint on defamation requires “certainty” that the court order
20 will restrain defamatory speech, as opposed to speech that is insulting or imprecise.”³
21

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23 ¹ *Canfield v. Clark*, 385 P.3d 156 (2016) citing *Arnold v. Nat'l Union of Marine Cooks &*
Stewards, 44 Wn.2d 183, 187, 265 P.2d 1051 (1954), quoting Charles T. McCormick, *Handbook*
on the Law of Damages § 116, at 423 (1935).

24 ² *Maison de France v. Mais Oui!*, 126 Wn. App. 34, 37, 108 P.3d 787, 790 (2005).

25 ³ *In re Marriage of Suggs*, 152 Wn.2d 74 (2004).

1 “Mere labels do not work in this context.”⁴ Instead, a prior restraint order must be
2 narrowly worded in a way that does not chill protected speech.”⁵

3 5. Here the Court can prohibit Mr. Wade precisely from making or publishing statements
4 about Mr. Nelson that he has made in the past. Specifically, the Court will restrain Mr.
5 Wade from stating:

- 6 a. Mr. Nelson raped a woman in Fort Ward community
7 b. Mr. Nelson engaged in a coverup with the Bainbridge Fire Department of said rape.
8 c. A “victim” of Mr. Nelson, Elizabeth Kaltreider, committed suicide as a result of his
9 actions.
10 d. Mr. Nelson engaged in illegal conduct at a “speakeasy” called the “Chicken Coop,”
11 including paying money and liquor and drugs in exchange for illegal and immoral
12 conduct including rape and child abuse.
13 e. Said illegal conduct at the “Chicken Coop” was done in conjunction with the
14 Bainbridge Island Police and Fire Department.
15 f. Mr. Nelson conspired with the Bainbridge Island Police Department to cover up the
16 alleged crimes defendant accuses Nelson of, such as running a child sex ring.
17 g. Mr. Nelson committed domestic violence against his former spouse.
18 h. Mr. Nelson has “beaten the shit out of” his step-children and abuses children.
19 i. Mr. Nelson is a “coke” head.
20 j. Mr. Nelson stalked Wade and tried to kill him several times.
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24 ⁴ *Id.*

25 ⁵ *Id.*

1 6. This order is necessary because Mr. Wade has shown a complete disregard for the Court
2 process. He has continued to publish false information.

3 Now, therefore, it is hereby ORDERED. ADJUDGED AND DECREED,

4 1. That William Nelson is awarded judgment against Houston Wade in the sum of
5 \$500,000.00, as set forth in the judgment summary above.

6 2. Interest shall accrue on this judgment at the rate of 12% per annum.

7 3. Defendant is awarded their attorney's fees as previously ordered.

8 4. The Clerk of the Court is directed to enter the judgment against Houston Wade in the
9 execution docket in accordance with RCW 4.64.030.

10 5. Wade Houston is permanently enjoined from stating or inferring that:

11 a. Mr. Nelson raped a woman in Fort Ward community

12 b. Mr. Nelson engaged in a coverup with the Bainbridge Fire Department of said rape.

13 c. A "victim" of Mr. Nelson, Elizabeth Kaltreider, committed suicide as a result of his
14 actions.

15 d. Mr. Nelson engaged in illegal conduct at a "speakeasy" called the "Chicken Coop,"
16 including paying money and liquor and drugs in exchange for illegal and immoral conduct
17 including rape and child abuse.

18 e. That the illegal conduct at the "Chicken Coop" was done in conjunction with the
19 Bainbridge Island Police and Fire Department.

20 f. Mr. Nelson conspired with the Bainbridge Island Police Department to cover up the
21 alleged crimes defendant accuses Nelson of, such as running a child sex ring.

22 g. Mr. Nelson committed domestic violence against his former spouse.
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1 h. Mr. Nelson has “beaten the shit out of” his step-children and abuses children.

2 i. Mr. Nelson is a “coke” head.

3 j. Mr. Nelson stalked Mr. Wade and tried to kill him several times.

4 DONE IN OPEN COURT this 27th day of September 2021.

5 

6 JUDGE

7 *Presented by:*

WILLIAM C. HOUSER

8 KITSAP LAW GROUP

9
10 By: David P. Horton, WSBA #7123
11 Attorney for Plaintiff

FILED

09/27/2021

ALISON H. SONNTAG
Kitsap County, Washington

CASE NUMBER: 18-2-03205-18

SUB NUMBER

NOT USED

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**SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KITSAP COUNTY**

WILLIAM NELSON,

Plaintiff,

vs.

HOUSTON WADE,

Defendant.

No. 18-2-03205-18

**RULING ON PLAINTIFF'S MOTION
FOR: ORDER OF DEFAULT AND/OR
FINDING OF CONTEMPT, AND
AWARD OF ATTORNEY FEES AND
COSTS UNDER CR 37**

THIS MATTER comes before the Court on the Plaintiff's Motion for Order of Default and/or Finding of Contempt, and Award Attorney Fees and Costs Under CR 37. A hearing on the motion was held on January 17, 2020 with Plaintiff William Nelson appearing by and through is attorney Alexander Savojni; and Defendant Houston Wade appearing as an unrepresented litigant.

The Court; having the benefit of briefing by the parties and oral argument on the motion; makes the following findings and conclusions:

1. On March 20, 2019, Plaintiff, though his attorney, propounded interrogatories and requests for production upon Defendant Wade.
2. Defendant Wade provided his response to the interrogatories and requests for production on May 7, 2019. Plaintiff did not consider the responses complete. They were

RULING ON PLAINTIFF'S MOTION
FOR ORDER OF DEFAULT AND/OR
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AWARD OF ATTORNEY FEES AND
COSTS UNDER CR 37

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Kitsap C Courts Decision
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1 non-responsive, combative and, in some instances, insulting to Plaintiff and Plaintiff's
2 counsel.

3 3. A CR 26(i) conference was held on May 16, 2019. During the telephone call,
4 Defendant agreed to provide the requested documents and told Plaintiff's counsel he would
5 need until May 23, 2019 to comply.

6 4. Defendant did not make further responses to the requests for production or
7 interrogatories by May 23, 2019.

8 5. A motion to compel was noted on June 14, 2019. On the day of the hearing Defendant
9 provided to Plaintiff's attorney additional documents. The matter was continued until June
10 28, 2019 for Plaintiff to review the newly submitted documents.

11 6. Plaintiff, through his counsel, reviewed the materials, and determined they were
12 insufficient responses to the requests for production and interrogatories propounded on
13 March 20, 2019.

14 7. On June 28, 2019, the Court ordered Defendant to provide full and complete
15 responses to Plaintiff's First interrogatories and produce all documents responsive to the
16 Plaintiff's Request for Production by July 12, 2019. The Court also required Defendant to
17 pay \$3,000.00 to Plaintiff for attorney fees by July 5, 2019.

18 8. Defendant has not paid any of the Court ordered attorney fees to date.

19 9. Defendant attempted to comply with his discovery obligation on July 17, 2019. This
20 attempt did not meet the requirements of the discovery requests.

21 10. A second CR 26(i) conference was scheduled for August 9, 2019. A letter from
22 Plaintiff's attorney instructed Defendant on the deficiencies of his attempts to provide
23 adequate responses to Plaintiff's discovery requests.

24 11. Defendant then provided his fourth attempt to provide adequate responses to the
25 discovery requests. This fourth attempt did not comply with the requests for production and
26 interrogatories propounded to Defendant on March 20, 2019.

27 12. During the time attempts to obtain adequate responses to the Plaintiff's discovery
28 requests occurred, Defendant continued to post about Plaintiff on the internet on Facebook.

1 Posts occurred on July 27, August 6, September 1, October 12 and October 19. These posts
2 were concerning Plaintiff and the present litigation.

3 13. Defendant submitted to a deposition on October 2, 2019. During this deposition,
4 Defendant acknowledged failing to attempt to obtain the contact information of his
5 witnesses. The June 28, 2019 court order required Defendant to obtain and provide his
6 witnesses' contact information to Plaintiff.

7 14. During the deposition, Defendant provided the names of previously undisclosed
8 witnesses. He did not provide, nor did he appear to have any other contact information for
9 these previously undisclosed witnesses.

10 15. Defendant has provided the address of one witness and has provided no phone
11 numbers of any witness.

12 16. As of January 17, 2020, Defendant has failed to adequately answer the Plaintiff's
13 propounded interrogatories and requests for production. Defendant has failed to make a
14 reasonable attempt to provide adequate responses to those requests. Plaintiff extended time
15 limits for Defendant to allow full disclosure and those time limits have been ignored.
16 Defendant has been held in contempt, and continues to be in contempt, of the court order of
17 June 28, 2019.

18 17. During Defendant's October 2, 2019 deposition, Defendant stated that he had contact
19 with Deputy Prosecuting Attorney Stokes, and indicated that she was inclined to charge
20 Plaintiff with a felony if the case against Defendant was not dismissed by Plaintiff.

21 18. In a subsequent declaration dated December 18, 2019¹ DPA Stokes: denied having
22 any contact with Defendant since a brief email exchange on November 8, 2018, denied
23 having any contact with Defendant between November 8, 2018 and October 2, 2019, denied
24 having any discussions with Defendant regarding Plaintiff at any time prior to the October
25 2, 2019 deposition, and denied telling Defendant she had any inclination to prosecute a
26 number of individuals, including Plaintiff, of a felony. DPA Stokes stated that Defendant
27 emailed her October 3, 2019, the day after his deposition, about Plaintiff and witness
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30 ¹ See Dec. of Savojni, Exhibit 9.

1 tampering charges. This conduct supports the conclusion that Defendant purposefully and
2 knowing lied under oath at his deposition.

3 19. During Defendant's deposition, Defendant admitted he had not tried to obtain contact
4 information of at least 17 of his 41 witnesses. He has not done the bare minimum of
5 providing contact information for his own witnesses.

7 DISCUSSION

8 Plaintiff requests the Court strike Defendant's responsive pleadings in this matter and
9 issue an order of default against Defendant pursuant to the authority of CR 37. In the
10 alternative, Plaintiff is requesting Defendant be held in contempt and sanctions be imposed
11 for that contempt in some way that less than striking Defendant's pleadings.

12 The striking of pleadings is an extreme remedy under the rules of civil procedure.
13 The Court has authority to enter a default judgment when a party fails to make discovery.
14 CR 37(d) authorizes a court to impose sanctions for failure to meet their obligations regarding
15 discovery in litigation. The sanctions may range from a finding of contempt, to exclusion of
16 evidence, to granting a default judgment.² Furthermore,

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18 When the trial court "chooses one of the harsher remedies allowable under CR 37(b),
19 ... it must be apparent from the record that the trial court explicitly considered whether
20 a lesser sanction would probably have sufficed," and whether it found that the
21 disobedient party's refusal to obey a discovery order was willful or deliberate and
substantially prejudiced the opponent's ability to prepare for trial.³

22 Defendant has done next to nothing to respond to the discovery requests propounded upon
23 him by Plaintiff. While Defendant has listed up to 60 witnesses he may call, he does not
24 appear to have, or he is intentionally hiding, contact information for these witnesses. His
25 sworn deposition answers are admissions of a failure to perform even the most rudimentary
26 actions required under the civil rules. His conduct is a direct disregard for the rules, and for
27 this Court's order. "A party's disregard of a court order without reasonable excuse or

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29 ²See *Smith v. Behr Process Corp.* 113 Wn. App. 306, 324 54 P.3d 665 (2002).

30 ³ *Burnet v. Spokane Ambulance*, 131 Wn.2d 484, 494, 933 P.2d 1036, 1040 (1997), as amended on denial of
reconsideration (June 5, 1997) citing *Snedigar v. Hodderson*, 53 Wash.App. 476, 487, 768 P.2d 1 (1989).

1 justification is deemed willful.”⁴ This willful disregard of a court order and the administration
2 of justice is further demonstrated by Defendant’s brazen unwillingness to answer truthfully
3 at his deposition regarding his communications with DPA Stokes.

4 Defendant has no reasonable excuse for the complete lack of effort in complying with
5 the court rules and this Court's order.

6 Plaintiff is unable to adequately prepare for trial without the responses from
7 Defendant on the basic information about witnesses, as well as other requests for production
8 and interrogatories. Plaintiff is confronted by the pleadings with a defense by Defendant.
9 The responses by Defendant to the discovery requests on that defense place Plaintiff in limbo
10 as to the quality of the defense, and the quality of the witnesses for Defendant. It deprives
11 Plaintiff the opportunity to gain information required by our discovery rules to rebut defenses
12 and plan his case in chief. Plaintiff has established substantial prejudice in his ability to
13 prepare for trial based upon Defendant's inaction to Plaintiff's discovery requests.

14 This court issued a contempt ruling on Defendant's failure to adequately respond to
15 Plaintiff's discovery requests. Multiple extensions for Defendant to produce the requested
16 material and answers to interrogatories were granted by the Court. Deadlines for that
17 compliance were set. Attorney's fees were granted as part of that sanction. In light of the
18 Court's ruling, Defendant has not complied satisfactorily with any of the Court's orders.
19 Discovery was not provided by the deadline. Court ordered attorney's fees were not paid by
20 the deadline.

21 Now, Plaintiff requests further court enforcement of the court rules. It is clear
22 that another order of contempt will be fruitless. Defendant has not demonstrated a
23 willingness to accept the responsibility of cooperating with the Court in this litigation. This
24 Court could restrict Defendant's witnesses as a potential sanction. This option is directly tied
25 to the lack of information from Defendant. To evaluate this option for sanction, the Court
26 understands that Defendant does not have contact information for most, if not all, of his
27 potential witnesses, only because he has not demonstrated any reasonable effort to get that
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29 ⁴ *Rivers v. Washington State Conference of Mason Contractors*, 145 Wn.2d 674, 686–87, 41 P.3d 1175, 1181
30 (2002).


1 contact information. To restrict Defendant's pool of potential witnesses, denies Defendant
2 the evidence he needs to put on his defense; unless additional names of potential witnesses
3 are provided prior to the trial in the matter. As such, the restriction of witnesses is an
4 inappropriate remedy.

5 In as much as prior contempt sanctions, allowing for additional time to comply, as
6 well as providing a monetary incentive to comply, have not motivated Defendant to comply
7 with the Defendant's discovery obligations, or demonstrated a willingness to comply with
8 court orders. Furthermore, Defendant's willingness to knowingly lie under oath at deposition
9 demonstrates a complete disregard to the legal process and the administration of justice.
10 There is no other alternative for this Court than to Grant Plaintiff's motion for default and
11 strike Defendant's responsive pleadings.

12 The Court also awards reasonable attorney's fees and costs to Plaintiff pursuant to
13 CR 37. Plaintiffs' attorney shall submit the appropriate declarations clearly setting out the
14 time and costs allocated in preparing and arguing this motion.

15 Plaintiff's counsel is further directed to prepare orders in accordance with this ruling
16 for presentation to the Court.

17 Dated this 6th Day of April 2020.

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William C. Houser
Superior Court Judge

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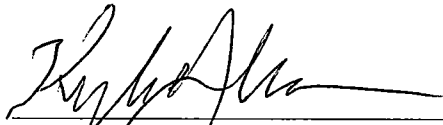
CERTIFICATE OF SERVICE

I, Kyle Gallagher, certify under penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above entitled action, and competent to be a witness herein.

Today I caused a copy of the foregoing document to be served in the manner noted on the following:

Alexander Savojni 918 S Horton St Ste 901 Seattle, WA 98134-1953	<input checked="" type="checkbox"/> Via U.S. Mail
Houston Wade c/o Bruciato 236 Winslow Way E. Bainbridge Island, WA 98110	<input checked="" type="checkbox"/> Via U.S. Mail

DATED ^{April} ~~March~~ 6, 2020, at Port Orchard, Washington.



Kyle Gallagher #47769
Staff Attorney

11/11/18

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KITSAP

WILLIAM NELSON,

Plaintiff,

v.

HOUSTON WADE,

Defendants.

NO. 18-2-03205-18

DECLARATION OF ALEXANDER SAVOJNI IN SUPPORT OF MOTION FOR DEFAULT AND/OR FINDING OF CONTEMPT, AND AWARD OF FEES AND COSTS

I, Alexander Savojni, declare the following matters to be true and correct under the penalty of perjury under the laws of the State of Washington:

1. I am the attorney of record for Plaintiff William Nelson. I am over the age of 18 and am competent to be a witness to the matters stated herein. I am making this declaration based upon facts within my personal knowledge which would be admissible in court.

2. Such facts appear by way of records in my possession and such records are kept in the regular course of business. No changes or alterations in these records have been made since the date of origination. As the attorney for the Plaintiff, I am the custodian of said records.

18-2-03205-18
DCLR 51
Declaration Affidavit
7435904



1 3. I make this Declaration in support of Plaintiff's Motion for Default and award
2 attorney fees and costs.

3 4. Attached as **Exhibit 1** is a true and correct copy of Plaintiff's discovery request
4 to Plaintiff.

5 5. Attached as **Exhibit 2** is a true and correct copy of Defendant's first attempt at
6 answers in response to the Plaintiff's interrogatories.

7 6. Attached as **Exhibit 3** is a true and correct copy of a follow up letter after the
8 CR 26(i) conference call.

9 7. Attached as **Exhibit 4** is a true and correct copy of Defendant's documents,
10 served on me during the June 14, 2019 hearing, in response to the Plaintiff's request for
11 production. Eight of the eleven documents provided were labeled by the Defendant as
12 "Exhibits A" through "J" but there was no "Exhibit H" or "Exhibit I." Please be aware, the
13 Plaintiff's Exhibits A through G are different than those of the Defendant.

14 8. Attached as **Exhibit 5** is a true and correct copy of the Court's Order to
15 Compel Discovery and Award Costs & fees which was issued on June 28, 2019. Please note
16 there is a typo on the heading – it was the *Plaintiff's* motion not the *Defendant's*.

17 9. Attached as **Exhibit 6** is a true and correct copy of the Defendant's 3rd attempt
18 in response to the Plaintiff's request for Production and Plaintiff's First Set of Interrogatories
19 which were signed and verified by the Defendant on July 8, 2019 but received on July 17th.
20 These documents were due July 12, 2019. No documents were provided. Only answers to
21 interrogatories.

22 10. Attached as **Exhibit 7** is a true and correct copy of a letter sent to the
23 Defendant requesting a second CR 26(i) conference and explanation of why his latest
24 response was insufficient.

11. Attached as **Exhibit 8** is a true and correct copy of the Defendant's 4th attempt in response to the Plaintiff's request for Production and Plaintiff's first set of interrogatories based on the Party's *second* CR 26(i) conference.

12. Attached as **Exhibit 9** is a true and correct copy of a Declaration from Kitsap County Prosecutor Cassie Stokes with attachments.

13. Attached as **Exhibit 10** are true and correct copies of some of the Defendant's ongoing posts about the Plaintiff which he has an ongoing obligation to disclose and produce as they are responsive to a discovery request but has failed to do so.

14. Attached as **Exhibit 11** are true and correct copies of cited portions regarding the Defendant's communication with Kitsap County Prosecutor Cassie Stokes from the October 2, 2019 Deposition of the Defendant.

15. Attached as **Exhibit 12** are true and correct copies of cited portions regarding Defendant's attempts to obtain contact information of his witnesses from the October 2, 2019 Deposition of the Defendant.

16. I have been practicing law since 2005. My hourly rate is \$350.00 an hour, which is more than reasonable for an attorney with my level of experience. I estimate that I will have billed a total of 11 hours in bringing this motion, which includes the preparation of this motion for default, a declaration and proposed order, reviewing Defendant's material, and reviewing the deposition transcript, and having to appear to court. Thus, the total attorney's fees and costs estimated to be incurred in preparing Plaintiff's motion to compel are \$3850, which is reasonable under the circumstances.

Signed this January 9, 2020 in Seattle, Washington.



Alexander Savojni WSBA #37010
Attorney for the Plaintiff

SECRET

EXHIBIT 1

RECEIVED

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KITSAP

WILLIAM P. NELSON,

Plaintiff,

v.

HOUSTON WADE, an individual, and DOES I
through XX

Defendants.

NO. 18-2-03205-18

PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO DEFENDANTS

I. INSTRUCTIONS AND DEFINITIONS

COMES NOW Plaintiff William Nelson and submits the following written
interrogatories and requests for production to the Defendants Houston Wade, an individual,
and Does I through XX.

In accordance with Rule 33 and 34, Civil Rules for Superior Court, please answer the
attached interrogatories and requests for production. As required by applicable Rules, please
answer each interrogatory and request within the blank space provided, inserting additional
pages where necessary; verify your answers under oath on the form provided after the last
interrogatory; and serve the original set of the interrogatories and requests for production, and

1 answers thereto, to this office. You are required to serve your written response within thirty
2 (30) days after service of these interrogatories and requests for production.
3

4 THESE INTERROGATORIES AND REQUESTS FOR PRODUCTION ARE TO BE
5 TREATED AS CONTINUING. IF ADDITIONAL INFORMATION IS DISCOVERED
6 BETWEEN THE TIME OF MAKING THESE ANSWERS AND THE TIME OF TRIAL,
7 THESE INTERROGATORIES AND REQUESTS FOR PRODUCTION ARE ALSO
8 DIRECTED TO THAT INFORMATION. IF SUCH INFORMATION IS NOT
9 FURNISHED, THE UNDERSIGNED WILL MOVE, AT THE TIME OF TRIAL, TO
10 EXCLUDE FROM EVIDENCE ANY INFORMATION REQUESTED AND NOT
11 FURNISHED.

12 1. The term "person" means any individual, firm, association, partnership,
13 proprietorship, corporation, joint venture, business trust, government or public entity or other
14 business or legal entity.

15 2. As used in these interrogatories, the term "document" means and includes, the
16 original and any copy, regardless of origin or location, of any book, pamphlet, periodical,
17 letter, report, email, calendar, schedule notebook, memorandum, notation, message, telegram,
18 cable, record, study, working paper, chart, graph, index, tape, correspondence, computer
19 record, purchase order, change order, inspection report, log and/or diary of construction,
20 contracts, agreements, leases, invoices, payment requests, payment certifications, electronic or
21 other transcriptions or taping of telephone or personal conversations or conferences, or any
22 and all other written, printed, typed, punched, taped, filmed, or graphic matter, or tangible
23 thing, however produced or reproduced.

24 3. The term "you" and "your" refers to the person or entity to which these
25 interrogatories and requests are directed, including but not limited to all other persons acting
26 or purporting to act on its behalf.

1 4. The term "communication" means any transfer of information, ideas, opinions
2 or thoughts by any means, at any time or place, under any circumstances, and is not limited to
3 transfers between persons, but includes other transfers, such as records and memoranda to
4 file.

5 5. The term "statement" means any oral, written, stenographic, or recorded
6 declaration of any kind or description as defined in CR 26(b)(4).

7 6. When asked to "identify" and locate documents, you are required to state the
8 nature of each document (e.g., item of correspondence, file, contract, etc.) in detail sufficient
9 to enable it to be produced on motion or request, the specific location of the document (e.g.,
10 building name, address, and room number), the name and address of the individual having
11 physical possession and control thereof, and where the same may be made available for
12 inspection and copying upon motion or request.

13 7. The term "identify" when used in reference to an individual person means to
14 state his full name, present address, and telephone number, if known; his present position, and
15 business affiliation. The term "identify" when used in reference to an entity other than an
16 individual person means to state the entity's full name, last address and telephone number; and
17 the name, last known address and telephone number of any representative(s) of said entity of
18 whom you are aware.

19 8. It is not intended that these interrogatories and requests for production require
20 the disclosure of any document that you claim is protected against disclosure as "work
21 product" or "privileged", although the Plaintiffs reserves the right to move for disclosure
22 thereof for good cause shown. Accordingly, whenever a document called for herein is
23 claimed to be protected against disclosure as "work product" or "privileged" and is withheld
24 on that ground, please provide a written response with the following information:
25
26

1 (a) A description of the document sufficiently particular to identify it and to
2 enable your company to identify, disclose, or produce it in response to an order of the above-
3 entitled court;

4 (b) The nature of the protection claimed;

5 (c) A list of all persons who participated in the preparation of the document; and

6 (d) A list of all persons to whom the document was circulated, or its content
7 communicated.

8 9. The term or name "Houston Wade" shall hereinafter be referred to as "Wade"
9 or "Defendant."

10 10. It is expected that your production, pursuant to these requests, will include
11 records in the possession of your accountants, bankers, lawyers, investigators or other persons
12 who possess records deemed to be in you or your company's custody and control.

13 11. IF YOU CANNOT ANSWER OR PRODUCE AFTER CONDUCTING A
14 REASONABLE INVESTIGATION, YOU SHOULD SO STATE AND ANSWER TO THE
15 EXTENT YOU CAN, STATING WHAT INFORMATION YOU CANNOT PROVIDE AND
16 STATING WHAT EFFORTS YOU MADE TO OBTAIN THE UNKNOWN
17 INFORMATION.

18 12. The Plaintiffs requests that you produce all items requested below by attaching
19 legible copies hereto. Plaintiffs will pay a reasonable charge for the copying of said
20 documents upon presentation of an itemized statement or, in the alternative, to produce digital
21 copies of the originals, or, in the alternative, the original of said documents for inspection and
22 copying at the office of Rhodes Legal Group, within thirty (30) days of service of this Request
23 or at some other date that is mutually agreed upon by the attorneys of record.

SEARCHED

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2 **II. INTERROGATORIES**

3 **INTERROGATORY NO. 1:** Identify all Persons with knowledge concerning the
4 subject matter of this Action and describe the facts of which each Person identified has
5 knowledge.

6 **ANSWER:**
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10 **INTERROGATORY NO. 2:** Identify any Person whom you believe you may call as a
11 witness in this case and describe the nature of their testimony and/or any evidence they might
12 present at trial.

13 **ANSWER:**
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23 **INTERROGATORY NO. 3:** List any blogs, forums, or other websites on which you
24 commented regarding the Plaintiff, including the username/handle under which the comments
25 were made, the date of the posts, and the number of readers.
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INTERROGATORY NO. 6: Who authored and who posted on the “Houston Wade” Facebook page a post on or about October 4, 2018, which stated “Years ago a connected, alcoholic Republican politician/real estate developer raped my friend’s daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing” and how many people read this post?

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INTERROGATORY NO. 7: Did Defendant identify the “alcoholic Republican politician/real estate developer” referenced in a post on or about October 4, 2018 (the post referenced in the Interrogatory No. 6) as the Plaintiff and if so, how?

ANSWER:

INTERROGATORY NO. 8: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018 “Years ago a connected, alcoholic Republican politician/real estate developer raped my friend’s daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing.”

ANSWER:

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INTERROGATORY NO. 9: Who authored on the “Houston Wade” Facebook page a post on or about October 4, 2018 stating “About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn’t just cops, there were other prominent members of the community like the above Bill Nelson who were regulars” and how many people read this post?

ANSWER:

INTERROGATORY NO. 10: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018, “About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn’t just cops, there were other prominent members of the community like the above Bill Nelson who were regulars”

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INTERROGATORY NO. 11: Who authored and published on or about October 21, 2018 a Facebook post which stated “Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don’t give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor’s home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administration of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice.” and how many people read this post?

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INTERROGATORY NO. 12: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 21, 2018, "Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don't give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor's home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administrat on of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice."

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INTERROGATORY NO. 13: Identify all Persons who were consulted, relied upon, or otherwise constituted a source of information in connection with the preparation of the answers to these Interrogatories, and document requests, listing with respect to each Person the number(s) of the Interrogatories he or she helped to prepare or for which he or she was consulted, relied upon, or otherwise constituted a source of information.

ANSWER:

INTERROGATORY NO. 14: Identify the women Defendant claims the Plaintiff raped, where it took place, how it took place, when it took place, and the evidentiary basis/source for such claims.

ANSWER:

1 **INTERROGATORY NO. 15:** Identify the individuals Defendant claims the Plaintiff
2 was abusive of, where it took place, how it took place, when it took place, and the evidentiary
3 basis/source for such claims.

4 **ANSWER:**
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12 **INTERROGATORY NO. 16:** Identify and explain in detail all methods you have used
13 to investigate the truth or falsity of your claims regarding the Plaintiff, made directly or by
14 denying in your Answer to the Complaint having made any false statements, including, but
15 not limited to claims that the Plaintiff is a rapist, an abuser, cheats investors, a psychopath, a
16 cokehead, participated in underage sex parties. Include, but do not limit your response to the
17 identity of any individuals with which you have had contact regarding those claims and any
18 communications you have issued or received with regard to those claims.

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20 **ANSWER:**
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INTERROGATORY NO. 17: Identify the substance and factual basis for each and every defense(s) to allegations in Plaintiff's complaint.

ANSWER:

INTERROGATORY NO. 18: Identify each exhibit you intend or reasonably expect to introduce into evidence at any hearing, trial, deposition, or by affidavit in this case.

ANSWER:

INTERROGATORY NO. 19: Please state all names by which you have been known, your date and place of birth, your social security number, your residential address for the past ten (10) years, your driver's license number, the full name of each spouse that you have had, and the dates of marriage and divorce for each of your spouses.

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2 **ANSWER:**
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9 **III. REQUESTS FOR PRODUCTION**

10 **REQUEST FOR PRODUCTION NO. 1:** Produce any and all documents,
11 correspondence, or posts you have authored which reference the Plaintiff from January 1,
12 2014 until present.

13 **RESPONSE:**
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18 **REQUEST FOR PRODUCTION NO. 2:** Produce true and correct copies of all
19 documents and any other forms of evidence that prove, support, or otherwise relate to your
20 answer to Interrogatory No. 2.
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22 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 3:**

2 Produce true and correct copies of all
3 documents, correspondence, posts, and any other forms of evidence that prove, support, or
4 otherwise relate to your answer to Interrogatory No.3.

5 **RESPONSE:**
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10 **REQUEST FOR PRODUCTION NO. 4:**

11 Produce true and correct copies of all
12 documents and any other forms of evidence that prove, support, or otherwise relate to your
13 answer to Interrogatory No. 4.

14 **RESPONSE:**
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20 **REQUEST FOR PRODUCTION NO. 5:**

21 Produce true and correct copies of all
22 documents and any other forms of evidence that prove, support, or otherwise relate to your
23 answer to Interrogatory No. 5.

24 **RESPONSE:**
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REQUEST FOR PRODUCTION NO. 6:

Produce all documents, correspondence, or posts from January 1, 2014 until present which have been sent to you or are in your possession concerning the Plaintiff.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7:

Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 7.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8:

Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 8.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 9.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 10.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 11.

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REQUEST FOR PRODUCTION NO. 12:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 12.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 13.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 14.

RESPONSE:

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REQUEST FOR PRODUCTION NO. 15:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 15.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 16.

RESPONSE:

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REQUEST FOR PRODUCTION NO. 17:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 17.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 18.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19:

Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 19.

RESPONSE:

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INTERROGATORIES and REQUESTS FOR PRODUCTION propounded this 19th day of March, 2019, and signed pursuant to Washington Court Rules, CR 26(g).

Alexander Savojni WSBA # 37010
Attorney for Plaintiff

SCANNED

VERIFICATION

I, _____, declare under the penalty of perjury under the laws of the State of Washington that I have read the foregoing answers to interrogatories and requests for production, know the contents thereof, and believe the same to be true.

Signed at _____, Washington, this _____ day of _____, 201_.

By: _____

Defendant

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SCANNED

EXHIBIT 2

II. INTERROGATORIES

INTERROGATORY NO. 1: Identify all Persons with knowledge concerning the subject matter of this Action and describe the facts of which each Person identified has knowledge.

ANSWER: Listed in attached declaration

INTERROGATORY NO. 2: Identify any Person whom you believe you may call as a witness in this case and describe the nature of their testimony and/or any evidence they might present at trial.

ANSWER: If a name is mentioned in the attached documents, then it is likely they will be called as a witness

INTERROGATORY NO. 3: List any blogs, forums, or other websites on which you commented regarding the Plaintiff, including the username/handle under which the comments were made, the date of the posts, and the number of readers.

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ANSWER: FBI as Houston Wade & Bainbridge
Island Bad List

INTERROGATORY NO. 4: Identify any/all legal charges, convictions, lawsuits or other court proceedings you have been involved with, either as a party or a witness, and state the substance of the charges, parties' respective claims, defenses and the outcome of the action(s).

ANSWER: Du Wiers v. Wade

INTERROGATORY NO. 5: Identify all written documents that you authored in full or part, regarding the Plaintiff, and the number of readers for each.

ANSWER:

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2 You have ~~and~~ already submitted as
3 ev. mac such items. No clue on readership
4 because you made me delete with a ~~#~~ TPO
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11 **INTERROGATORY NO. 6:** Who authored and who posted on the "Houston Wade"
12 Facebook page a post on or about October 4, 2018, which stated "Years ago a connected,
13 alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward.
14 She escaped and ran naked to the door of the neighbors, who happened to be another friend of
15 mine, screaming for help. They took her in, and called the police. When the cops arrived
16 they shook hands with the rapist and joked with him for some time and then left. No arrests,
17 no charges, no taking the victim for a medical exam or rape kit. Nothing" and how many
18 people read this post?

19 **ANSWER:** I did. That's why my name
20 was on it as the author.
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1 **INTERROGATORY NO. 7:** Did Defendant identify the “alcoholic Republican
2 politician/real estate developer” referenced in a post on or about October 4, 2018 (the post
3 referenced in the Interrogatory No. 6) as the Plaintiff and if so, how?
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5 **ANSWER:**

Bill Nelson.

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14 **INTERROGATORY NO. 8:** Please state the facts Defendant relied upon and identify
15 the source of said facts, when Defendant published on or about October 4, 2018 “Years ago a
16 connected, alcoholic Republican politician/real estate developer raped my friend’s daughter in
17 Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be
18 another friend of mine, screaming for help. They took her in, and called the police. When the
19 cops arrived they shook hands with the rapist and joked with him for some time and then left.
20 No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing.”
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22 **ANSWER:**

all listed in Attached documents
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INTERROGATORY NO. 9: Who authored on the "Houston Wade" Facebook page a post on or about October 4, 2018 stating "About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn't just cops, there were other prominent members of the community like the above Bill Nelson who were regulars" and how many people read this post?

ANSWER: Again, that was me as my name is attached to it. No clue how many people read that comment. You made me delete it.

INTERROGATORY NO. 10: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018, "About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn't just cops, there were other prominent members of the community like the above Bill Nelson who were regulars"

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INTERROGATORY NO. 11: Who authored and published on or about October 21, 2018 a Facebook post which stated “Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don’t give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor’s home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administrat on of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice.” and how many people read this post?

ANSWER: I did.

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INTERROGATORY NO. 12: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 21, 2018, "Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don't give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor's home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administrat on of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice."

ANSWER: *Attache document, detail this.*

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2 **INTERROGATORY NO. 13:** Identify all Persons who were consulted, relied upon, or
3 otherwise constituted a source of information in connection with the preparation of the
4 answers to these Interrogatories, and document requests, listing with respect to each Person
5 the number(s) of the Interrogatories he or she helped to prepare or for which he or she was
6 consulted, relied upon, or otherwise constituted a source of information.

7 **ANSWER:** Listed & mentioned in attached documents
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15 **INTERROGATORY NO. 14:** Identify the women Defendant claims the Plaintiff
16 raped, where it took place, how it took place, when it took place, and the evidentiary
17 basis/source for such claims.

18 **ANSWER:** Nelson Identified her in his
19 TRO petition. You might want to ask
20 him
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1 **INTERROGATORY NO. 15:** Identify the individuals Defendant claims the Plaintiff
2 was abusive of, where it took place, how it took place, when it took place, and the evidentiary
3 basis/source for such claims.

4 **ANSWER:** Gilger Larson
5 Audrey Olson
6 Andy Olson
7 April Olson
8 Matthew Nelson

9
10 It took/takes place whenever ~~Bill~~ Bill Nelson was/is
11 in a room with them.

12 **INTERROGATORY NO. 16:** Identify and explain in detail all methods you have used
13 to investigate the truth or falsity of your claims regarding the Plaintiff, made directly or by
14 denying in your Answer to the Complaint having made any false statements, including, but
15 not limited to claims that the Plaintiff is a rapist, an abuser, cheats investors, a psychopath, a
16 cokehead, participated in underage sex parties. Include, but do not limit your response to the
17 identity of any individuals with which you have had contact regarding those claims and any
18 communications you have issued or received with regard to those claims.

19
20 **ANSWER:** I had conversations with people,
21 and had multiple independent cooperations from
22 several sources. Including ~~some~~ ~~of~~ women
23 who have been raped or ~~assaulted~~ assaulted
24 by Nelson, and men who have witnessed or
25 responded to such actions.
26

1 **INTERROGATORY NO. 17:** Identify the substance and factual basis for each and
2 every defense(s) to allegations in Plaintiff's complaint.

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4 **ANSWER:** clearly outlined in the attached
5 documents
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12 **INTERROGATORY NO. 18:** Identify each exhibit you intend or reasonably expect to
13 introduce into evidence at any hearing, trial, deposition, or by affidavit in this case.

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15 **ANSWER:** Attached
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23 **INTERROGATORY NO. 19:** Please state all names by which you have been known, your
24 date and place of birth, your social security number, your residential address for the past ten
25 (10) years, your driver's license number, the full name of each spouse that you have had, and
26 the dates of marriage and divorce for each of your spouses.

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2 **ANSWER:**

3 objection, not relevant.
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9 **III. REQUESTS FOR PRODUCTION**

10 **REQUEST FOR PRODUCTION NO. 1:** Produce any and all documents,
11 correspondence, or posts you have authored which reference the Plaintiff from January 1,
12 2014 until present.

13 **RESPONSE:**

14 Already submitted by plaintiff.
15 I had to ~~delete~~ delete due to the TRO
16 s. I ~~no~~ no longer have access.
17

18 **REQUEST FOR PRODUCTION NO. 2:** Produce true and correct copies of all
19 documents and any other forms of evidence that prove, support, or otherwise relate to your
20 answer to Interrogatory No. 2.

21 **RESPONSE:**

22 Attached
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1 **REQUEST FOR PRODUCTION NO. 3:**

2 Produce true and correct copies of all
3 documents, correspondence, posts, and any other forms of evidence that prove, support, or
4 otherwise relate to your answer to Interrogatory No.3.

5 **RESPONSE:**

6 *Attached*

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10 **REQUEST FOR PRODUCTION NO. 4:**

11 Produce true and correct copies of all
12 documents and any other forms of evidence that prove, support, or otherwise relate to your
13 answer to Interrogatory No. 4.

14 **RESPONSE:**

15 *Attached*

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19 **REQUEST FOR PRODUCTION NO. 5:**

20 Produce true and correct copies of all
21 documents and any other forms of evidence that prove, support, or otherwise relate to your
22 answer to Interrogatory No. 5.

23 **RESPONSE:**

24 *Attached*

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2 **REQUEST FOR PRODUCTION NO. 6:**

3 Produce all documents, correspondence,
4 or posts from January 1, 2014 until present which have been sent to you or are in your
5 possession concerning the Plaintiff.

6 **RESPONSE:**

7 *Attached*

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10 **REQUEST FOR PRODUCTION NO. 7:**

11 Produce true and correct copies of all
12 documents and any other forms of evidence that prove, support, or otherwise relate to your
13 answer to Interrogatory No. 7.

14 **RESPONSE:**

15 *Attached*

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19 **REQUEST FOR PRODUCTION NO. 8:**

20 Produce true and correct copies of all
21 documents and any other forms of evidence that prove, support, or otherwise relate to your
22 answer to Interrogatory No. 8.

23 **RESPONSE:**

24 *Attached*

1 **REQUEST FOR PRODUCTION NO. 9:** Produce true and correct copies of all
2 documents and any other forms of evidence that prove, support, or otherwise relate to your
3 answer to Interrogatory No. 9.

4 **RESPONSE:**

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6 *Attached*
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11 **REQUEST FOR PRODUCTION NO. 10:** Produce true and correct copies of all
12 documents and any other forms of evidence that prove, support, or otherwise relate to your
13 answer to Interrogatory No. 10.

14 **RESPONSE:**

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16 *Attached*
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19 **REQUEST FOR PRODUCTION NO. 11:** Produce true and correct copies of all
20 documents and any other forms of evidence that prove, support, or otherwise relate to your
21 answer to Interrogatory No. 11.

22 **RESPONSE:**

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24 *Attached*
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2 **REQUEST FOR PRODUCTION NO. 12:** Produce true and correct copies of all
3 documents and any other forms of evidence that prove, support, or otherwise relate to your
4 answer to Interrogatory No. 12.

5 **RESPONSE:**

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7 *Attached*
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11 **REQUEST FOR PRODUCTION NO. 13:** Produce true and correct copies of all
12 documents and any other forms of evidence that prove, support, or otherwise relate to your
13 answer to Interrogatory No. 13.

14 **RESPONSE:**

15 *Attached*
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20 **REQUEST FOR PRODUCTION NO. 14:** Produce true and correct copies of all
21 documents and any other forms of evidence that prove, support, or otherwise relate to your
22 answer to Interrogatory No. 14.

23 **RESPONSE:**

24 *Attached*
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REQUEST FOR PRODUCTION NO. 15: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 15.

RESPONSE:

Attached

REQUEST FOR PRODUCTION NO. 16: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 16.

RESPONSE:

Attached

1 **REQUEST FOR PRODUCTION NO. 17:**

Produce true and correct copies of all

2 documents and any other forms of evidence that prove, support, or otherwise relate to your
3 answer to Interrogatory No. 17.

4 **RESPONSE:**

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6 *Attached*
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11 **REQUEST FOR PRODUCTION NO. 18:**

Produce true and correct copies of all

12 documents and any other forms of evidence that prove, support, or otherwise relate to your
13 answer to Interrogatory No. 18.

14 **RESPONSE:**

15 *Attached*
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20 **REQUEST FOR PRODUCTION NO. 19:**

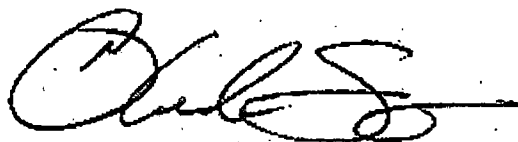
Produce true and correct copies of all

21 documents and any other forms of evidence that prove, support, or otherwise relate to your
22 answer to Interrogatory No. 19.

23 **RESPONSE:**

24 *Attached*
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2 INTERROGATORIES and REQUESTS FOR PRODUCTION propounded this 19th day of
3
4 March, 2019, and signed pursuant to Washington Court Rules, CR 26(g).
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Alexander Savojni WSBA # 37010
Attorney for Plaintiff
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VERIFICATION

I, Houston Wade, declare under the penalty of perjury under the laws of the State of Washington that I have read the foregoing answers to interrogatories and requests for production, know the contents thereof, and believe the same to be true.

Signed at Bainbridge Island, Washington, this 14 day of June, 2019

By: [Signature]

Defendant

EXHIBIT 3

RHODES LEGAL GROUP PLLC



918 South Horton St,
Suite 901
Seattle, WA 98134

Phone: 206-708-7852
Fax: 206-906-9230
www.rhodeslegallgroup.com

Robert Rhodes, Manager
Alexander Savojni, Of Counsel
Patrick Kwan, Of Counsel

May 16, 2019

Houston Wade
C/O Bruciato
236 Winslow Way E.
Bainbridge Island, WA 98110

Sent via Email

RE: Nelson v. Wade #18-2-03205-18

Dear Mr. Wade,

This letter is in regard to the CR 26(i) telephonic conference we had earlier today. Based off our conversation, it seems we have reached an agreement and understanding of what is to be expected as an appropriate and acceptable response to our interrogatories and request to produce.

As previously discussed, write out the actual answer and produce the requested documents for *each* interrogatory/request to produce – even if you think I have the answer already. When providing documents, you are to indicate which documents are being provided for which specific request. If you believe a document is responsive to several different requests, you can indicate in your answer which ones otherwise it will look like and be interpreted as you not responding to a specific request. Supplying a stack of documents without any indication of which specific request each document is responsive for is also not acceptable.

For your convenience, attached is another copy of the discovery requests if you returned your only copy to me previously. If you cannot produce an answer, please explain why not, such as the fact that there is no proof, only a suspicion.

If you have questions or concerns throughout the process, please contact me to seek clarification. I have agreed to your request for an additional week to prepare your answers. If further time is required for specific items, please explain why and what is being done to address the issue. However, additional time requirements for specific items is not cause for waiting to respond to the rest of the items. It is also important to note additional time for specific items is not infinite and not automatically acceptable.

Respectfully,

Alexander Savojni
WSBA No. 37010
Attorney for William Nelson

EXHIBIT 4

1 Houston Wade
2 C/O Bruciato
3 236 Winslow Way E.
4 Bainbridge Island, WA 98110
5 houstonwade@gmail.com

6 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

7 IN AND FOR THE COUNTY OF KITSAP

8 WILLIAM P. NELSON,

9 Plaintiff,

10 vs.

11 HOUSTON WADE,

12 Defendant

Case No.: 18-2-03205-18

DECLARATION OF HOUSTON WADE,
DEFENDANT.

13 Comes now the defendant herein, Houston Wade, declaring under penalty of perjury as follows:

- 14 1. I, Houston Wade, am the defendant in the above entitled action and I am over the age of 18 and make these
15 statements under the penalty of perjury in the under the laws of the State of Washington. I make this
16 declaration of my personal knowledge.
- 17 2. I have known Bill Nelson since I was four years old. He married my best friend Audrey Olson's mother,
18 Ginger Larson. From the moment Mr. Nelson was around, my mother told me that I was no longer allowed
19 to go to Audrey's home (she lived two floors above me), but that Audrey was allowed to come to our
20 home. My young mind didn't know the reason why this was the case, but what I didn't know at the time
21 and was later revealed to me, was that Mr. Nelson was a violent alcoholic and cocaine addict and this was
22 why I was not allowed to go to Audrey's home. Mr. Nelson even confirmed under oath at the Du Wors v.
23 Wade hearing in the Bainbridge Island Municipal Court on November 6th that this was a period of intense
24 cocaine use for him.
- 25 3. After Audrey and her family moved to a new home on the island, I did not have any memorable
26 interactions with Mr. Nelson until I was a teen, although, during that time he still managed to get in trouble
27 with others, be arraigned for numerous DUIs, and had a domestic violence restraining order against him
28 protecting his wife Ginger Larson. I did not have much contact with Mr. Nelson aside from a meeting
where the high school's Earth Service Corps held their Christmas party hosted by his then step daughter at
their home in Eagledale in 1998; but then in March of 1999, after the Tolo dance my senior year, a

DECLARATION OF HOUSTON WADE, DEFENDANT. - 1

1 contingent of us students went to an after party. Yes, there was some underage drinking, but the party was
2 mostly tame, until a drunk, 40-year old Bill Nelson appeared with a baggy of cocaine and almost
3 immediately tried to force himself on an incapacitated 15-year old girl. The other boys and I managed to
4 get the drunk Mr. Nelson out of the home and then stood guard in case he made another appearance. One of
5 my greatest regrets in life was not calling the police that night, but many of my friends were in possession
6 of alcohol and in my juvenile brain I justified it by telling myself that I didn't want them to get in trouble
7 for that.

8 4. In 2001 Mr. Nelson announced his candidacy for the Bainbridge city council and towards the end of the
9 filing period he was still running unopposed. After what I witnessed at that high school party a little more
10 than two years earlier, I decided that I could not in good conscience allow a man like Bill Nelson to have
11 any political power on the Island and I paid the filing fee and threw my hat into the ring. Unbeknownst to
12 me, Bill Knobloch had also had disturbing run-ins with Mr. Nelson and filed to run the last minute just as I
13 had done.

14 5. As the summer wore on, it became apparent that Mr. Knobloch had the better chance to win than my
15 inexperienced, youthful 20 years, so I dropped out of the race and endorsed him. I did some research into
16 Mr. Nelson's fundraising and wrote a letter to the editor of the Bainbridge Review published the
17 Wednesday before the election on October 31st, 2001. In my letter I highlighted just how much money
18 Nelson had raised at the time, some \$13,000, and made note of the television commercials Nelson managed
19 to run during the Nielson ratings record-breaking 2001 Mariners games, as well as Mr. Nelson's ulterior
20 motive which was to skirt and drastically change building code and zoning laws and start developing the
21 island. Mr. Nelson has a history of violating code. Trees determined to remain as greenspace would
22 somehow all be cut down on a weekend. Homes that were to be set aside to low-income residents would be
23 sold to Mr. Nelson's family members...

24 6. Mr. Nelson never responded to my letter with one of his own. Instead, The Bainbridge Review published a
25 front-page article on Saturday November 3rd (The Review was twice a week back then) about how much
26 money was being raised to fund campaigns on the Island, and where much of this money was coming from.
27 Mr. Nelson's response to my letter and The Review article was to get drunk all Saturday morning at the
28 Wing Point Country Club, Where Ms. Janelle Jefferson was his server, and then come to my place of work,

1 the Town & Country coffee bar at about 3pm, and threaten me in front of dozens of customers. Mr. Nelson
2 also loudly said he was going to get me fired from my job.

- 3 7. The following Tuesday Mr. Nelson lost the city council race in a big way and the next night came into
4 T&C as I was closing the coffee bar and threatened my life, this time while I was alone. I called the police
5 and got a manager and Nelson left. Mr. Nelson continued sneaking into the coffee bar several nights in a
6 row to threaten me, sometimes saying things, sometimes passing by the window of my work area to stare
7 me down and draw a finger across his throat. The store eventually had to hire a security guard whose entire
8 job was to sit with me at night in case Mr. Nelson showed up. It was also during this time that Mr.
9 Knobloch's next door neighbor and campaign manager, Mike Smith, had to obtain a restraining order
10 against, and police protection from, Mr. Nelson for the exact same manner of physical threat and stalking.
- 11 8. Flash forward a few years to around 2004/2005, and Katie Wainio was the commercial loan officer for
12 Sterling Savings Bank on Bainbridge Island. The bank rejected Mr. Nelson's commercial loan application
13 for his desire to construct a large development in the Lynwood neighborhood of Bainbridge Island, a
14 development he named "Blossom Hill". A few weeks later Ms. Wainio began her new job as the
15 commercial loan officer at Kitsap Bank. Mr. Nelson applied for a similar commercial loan there as well and
16 was rejected by Ms. Wainio a second time. Mr. Nelson then began stalking and threatening Ms. Wainio and
17 she apparently sought a protective order against him.
- 18 9. Ms. Wainio then phoned other banks in an effort to blackball Mr. Nelson from every commercial lender she
19 could think of and this delayed Mr. Nelson's development plans by many, many months. Mr. Nelson
20 finally secured a loan from City Bank of Lynnwood and when construction began, a more than \$1 million
21 renovation of the Manor House had to be completed before other construction could commence on the rest
22 of the development. The initial development plan was scaled back to about 80 residential units. During
23 construction Mr. Nelson ran afoul of the law by illegally dumping more than 2200 dump truck loads of soil
24 into the sand pit between Bucklin Hill Road and Lynwood Center Road. The geologists who alerted the
25 State about the illegal and possibly toxic dumping then also experienced physical threats and harassment
26 from Mr. Nelson. Financial delays, construction delays due to the Manor House renovation, and legal
27 troubles like the soil swap ate into Mr. Nelson's capital and as the economy collapsed into the Great
28

1 Recession, so did Mr. Nelson's project and it fell into foreclosure. This foreclosure cost many investors
2 millions of dollars..

3 10. Never one to miss an opportunity Mr. Nelson attempted to file liens against himself for work completed in
4 an effort to retain control of the development. It didn't work, for unknown to Mr. Nelson, one of the
5 principal investors in Whidbey Island Bank was Jerry Dennon, and Mr. Dennon hated Mr. Nelson with
6 every fiber of his being which is why Whidbey Island Bank was willing to bid \$10 million in April of 2011
7 for the deeds to the development that had been held by City Bank of Lynnwood prior to its collapse. Mr.
8 Dennon's daughter was Elizabeth Kaltreider whom Mr. Nelson had raped a few years earlier and never
9 faced the consequences of his actions for that atrocity. Ms. Kaltreider had committed suicide only two
10 months before, and Mr. Dennon blamed Mr. Nelson for her death.

11 11. Mr. Dennon made sure that the Blossom Hill development was foreclosed upon and later sold to John
12 Jacobi to complete in early Summer of 2011 and renamed to "Pleasant Beach Village".

13 12. I had only learned of Mr. Nelson's rape of Ms. Kaltreider about that time in 2011 when during a
14 conversation about the foreclosure of the development Troy Dettman told me about how he and his wife
15 Gretchen were awoken in the middle of the night at their Ft. Ward home by a woman screaming for help.
16 When they opened their front door, they found a naked Elizabeth Kaltreider shaking and exclaiming that
17 she had just been raped and needed help. They witnessed several men quickly get into a car and drive away
18 from the scene. The couple covered and comforted her and called the police. When the cops arrived, they
19 found Mr. Nelson standing in the Dettman's driveway staring the couple down and smirking. The police
20 briefly spoke with the Dettman's and Ms. Kaltreider and then returned to Mr. Nelson where they visibly
21 shook his hand and then talked and joked with Mr. Nelson for a period of time. After which, the police
22 informed the Dettman's that nothing nefarious had happened. The Dettmen's witnessed the police
23 physically assault Ms. Kaltreider and throw her onto the hood of the police car and threaten her with arrest.
24 The police then left the scene, no official statements taken, no police report filed, no trip to the hospital for
25 the victim, no rape kit administered. The police just got into their patrol cars and drove away, leaving a
26 naked and traumatized Elizabeth Kaltreider in the care of two complete strangers. Sadly, Ms. Kaltreider
27 jumped to her death off the Agate Pass Bridge in February of 2011 after telephoning her son to say
28 goodbye, but according to an ex-girlfriend of Mr. Nelson's, Mr. Nelson had informed her that Ms.

1 Kaltreider had indeed accused him of rape and had also telephoned him in the moments leading up to her
2 death.

3 13. Including my own witnessing of Mr. Nelson attempting to force himself on a teenager at a party over a
4 decade earlier, this made for the third instance of sexual assault by Mr. Nelson of which I was personally
5 aware. In 2009, my coworker Meghan Kent, now Meghan Angell, a graduate of Bainbridge High School in
6 2004, told me about how when she was an underage teen one of her female friends invited her to a party at
7 the "Chicken Coop" speakeasy in the Lynwood neighborhood of Bainbridge Island and she went along.
8 When Mrs. Angell arrived, she was horrified to discover that Mr. Nelson and several prominent members
9 of the Island's community, including Bainbridge police officers and members of the fire department, were
10 engaged in plying these underage girls with drugs, alcohol, and cash to strip and perform sex acts on the
11 men. She said the room was out of control and deeply disturbing. This information I found so completely
12 astounding that I didn't know what to make of it or how to process it at the time. You will note that Mrs.
13 Angell confirms the story in a comment under my initial Facebook post about Mr. Nelson in the documents
14 submitted as evidence in Exhibit D by Mr. Nelson where she writes "Disgusting. And True..." Apparently
15 just like in the Jeffrey Epstein case that has recently been in the news, the men would have the girls who
16 performed bring in their friends to also perform at later parties.

17 14. A few years later I was discussing the Blossom Hill development and John Jacobi's takeover with a Mr.
18 Ryan Landworth in 2012, when Mr. Landworth said that Bill Nelson and the Chicken Coop was the entire
19 reason he had quit the fire department and went back to school to become a blacksmith. He then told me
20 about how one of his superiors at the department invited him to a party at the Chicken Coop speakeasy in
21 2006 where he discovered Mr. Nelson and other powerful men including Bainbridge police officers and
22 fellow firefighters engaged in plying underage girls with drugs, alcohol, and cash to strip and perform
23 sexual acts on them. Horrified that his son's classmates from the high school were being exploited like this
24 by men who should be pillars of the community, Mr. Landworth left. The accounts of these two sources,
25 Mr. Landworth and Mrs. Angell, means that Mr. Nelson perjured himself during the Du Wors hearing
26 when he claimed that no such parties ever happened at the Chicken Coop.

27 15. I suddenly had independent corroboration of the same event from individuals who did not know each other
28 and sent an email to Josh Farley of the Kitsap Sun relaying what I knew and got Mr. Farley in contact with

1 both Mr. Landworth and Ms. Angell. Eventually, after a 7-month investigation, the Kitsap Sun did not run
2 the story citing that since the initial incident occurred almost decade earlier and the police involved were no
3 longer with the department thanks to the hiring of Chief Hamner, it was no longer "news-worthy". I was
4 completely disappointed.

5 16. Since that time Mr. Dean Gellert confirmed that these parties had been going on for years at the home of
6 Mr. Nelson's friend Bill Blakely even prior to the Chicken Coop existing, where Mr. Blakely had a stripper
7 pole installed and regularly hired girls from Bainbridge High School to do strip shows and more for large
8 groups of his friends. These illegal events continued when Mr. Blakeley built the Chicken Coop and
9 installed a stripper pole in there as well. Apparently, these parties are where noted porn star Tori Black got
10 her start doing sex work while she was still a student at Bainbridge High School. Mr. Blakely even
11 convinced one of the teenagers who performed at these parties, Mrs. Molly Aquino Roth, to drop out of
12 school and move in with him.

13 17. My initial Facebook post concerning Mr. Nelson was inspired by the treatment of Dr. Blasey-Ford during
14 the Kavanaugh hearing in early October. Many people had complained that Blasey-Ford had waited 35
15 years to come forward and my post was a demonstration of how a victim can come forward immediately
16 and still nothing will be done. I have little doubt that the officers who responded to the Dettman's 911 call
17 were among the officers present at the Chicken Coop speakeasy sex parties.

18 18. After being fed up with years of whispers about rape, assault, and abuse on the Island, I created the news
19 page The Bainbridge Island Bad List, and Mr. Nelson was one of the first men I decided to profile on the
20 page. A large portion of the women on the island are well-aware of Mr. Nelson's bad intentions. If the
21 comments under my initial Facebook post are any indication, Mr. Nelson will willingly go after underage
22 girls. There is a reason they referred to him as "Bad Bill".

23 19. Mrs. Ashley Cross Degrow wrote to me about how Mr. Nelson was very inappropriate towards her when
24 she, as a child, was visiting a job site where her father was a subcontractor for Mr. Nelson, and later groped
25 her at a party at the Chicken Coop where Mr. Nelson's son Matt witnessed it and almost got into a fight
26 with his father over the incident. Mrs. Cross Degrow also witnessed Mr. Nelson attempting to get young
27 women drunk specifically to take advantage of them while they were too intoxicated to consent. Mrs. Cross
28 Degrow can also testify that Mr. Nelson lied under oath about when he stopped using cocaine and

1 witnessed Mr. Nelson use cocaine recently. Mr. Jerod Ouellette recounted to me how he showed up to the
2 Chicken Coop one night to find his girlfriend passed out and Mr. Nelson's hand down her pants. I was also
3 made aware of two women, who at this time wish to remain nameless, who agreed to go to the Chicken
4 Coop with Mr. Nelson and have no memory of the evening and woke up in a strange place with no clothes
5 and had to escape with only a stolen blanket to cover the both of them. I was contacted by Mrs. Katie
6 Fisher who relayed to me that Mr. Nelson took advantage of her intoxication and inability to consent and
7 raped her in the Fall of 2012. Three people have now informed me about how at his own wife's birthday
8 party Mr. Nelson was caught sexually assaulting a woman. I was also informed by a former employee of
9 his about inappropriate contact Mr. Nelson had with the minor child of the former general manager of his
10 failed restaurant. Some of the photographs on the walls of the Chicken Coop were cropped to show the
11 faceless naked bodies of underage teen girls who had performed at the sex parties; as if displaying underage
12 girls from the neck down somehow made it ok. Mr. Landworth has a photo on his cellphone of these
13 "decorations" at the Chicken Coop. These stories all show a pattern of behavior by Mr. Nelson and his
14 friends and easily establish that he is a threat to women and girls in our community, and that I was being
15 forthright and responsible by publishing my article about him.

16 20. I created the Bainbridge Island Bad List as a news page to inform the community of who the predators are
17 among us, and Mr. Nelson fits that bill to a 'T'. I didn't stalk Mr. Nelson, and I didn't harass him. I wrote
18 an article about his predatory actions which were confirmed by many, many sources. My goal is to warn
19 people, especially young girls, to stay away from Mr. Nelson for their own safety. The purpose of
20 journalism is to expose abuse, and that is exactly what I have done in this instance. The abuse of women
21 and girls, and the abuse of the system designed to serve and protect them.

22 21. Mr. Nelson is not scared of me, he is not intimidated by me. What he does not like is my publicly revealing
23 what so many women and girls on this island already know; that he is a sexual predator. I don't care what
24 the abusers think. I am done being silent about the behavior of these men, and the members of our
25 community deserve to be warned about them and to know the truth.

26 22. It is impossible to defame a man who is infamous in our community for his drunken, abusive, and
27 predatory behavior. He lost \$27 million of other people's money, he illegally dumped thousands of
28 truckloads of soil, he has a history of violence and threats, he is a well-known drunk with multiple DUI

1 arrests to his name, including a pending charge of DUI and hit and run at the Seattle ferry terminal from
2 June 28th of this year. At the Du Wors hearing when the judge called for a recess at 3pm in the afternoon on
3 a Tuesday, Mr. Nelson loudly exclaimed, "Damn, I need a beer!" to which both the Judge and the bailiff
4 shot Mr. Nelson looks of bewilderment since he had just been questioned under oath about his alcoholism
5 and drug use; and let's not forget that Mr. Nelson has raped or sexually assaulted many women and girls on
6 Bainbridge Island. I wrote an article and have sources for my statements. That is not defamation.

7
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9 Dated 22nd of April 2019.

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11 _____
Houston Wade
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1 Houston Wade
2 C/O Bruciato
3 236 Winslow Way E.
4 Bainbridge Island, WA 98110
5 houstonwade@gmail.com

6 SUPERIOR COURT OF WASHINGTON
7
8 IN AND FOR THE COUNTY OF KITSAP

9 WILLIAM P. NELSON,
10
11 Plaintiff,

Case No.: 18-2-03205-18

12 vs.

DECLARATION OF KATIE FISHER IN RESPONSE
TO SUMMARY JUDGEMENT MOTION

13 HOUSTON WADE,
14
15 Defendant

16 I, Katie Fisher, declare that the following matters to be true and correct under the penalty of
17 perjury under the laws of the State of Washington:

18 1. I am Katie Fisher. I am over the age of 18 and am competent to be a witness to the
19 matters herein. I am making this declaration based upon facts within my personal knowledge which would be
20 admissible in court.

21 2. I met Bill Nelson at a bar in 2012, September, I believe. I had been drinking with friends
22 at Isla Bonita, a bar on Bainbridge Island. I don't remember talking to him much as he was older than my dad, a
23 good 20 years older than me. After the bar, I remember very little. Being in the car and him telling me he was taking
24 me to his home.

25 3. I remember being in his big master bath Jacuzzi and then a brief memory of him on top of
26 me. I came to enough to get a ride home immediately and hid the incident as I was embarrassed.

27 4. Now that I've heard Nelson has done this exact same thing to other women before, I am
28 questioning a lot more about that night. I would not agree to go home with a man my dad's age if I had been able to
consent.

Dated this 22nd of April 2019.

Katie Fisher

1 Houston Wade
2 C/O Bruciato
3 236 Winslow Way E
4 Bainbridge Island, WA 98110
5 housotnwde@gmail.com

6 SUPERIOR COURT OF THE STATE OF WASHINGTON

7 IN AND FOR THE COUNTY OF KITSAP

8 WILLIAM P NELSON,

9 Plaintiff,

10 vs.

11 HOUSTON WADE,

12 Defendant

Case No.: 18-2-03205-18

FACTS AND FINDINGS, LEGAL ANALYSIS, AND
CONCLUSIONS OF LAW

13 **I. PROCEDURAL HISTORY**

- 14 1. On October 23rd, 2018, Plaintiff, William P. Nelson (herein referred to as Plaintiff or "Nelson"), filed a
15 temporary restraining order in Bainbridge Island Municipal Court, alleging stalking and harassment by the
16 Defendant, Houston Wade (herein referred to as Defendant or "Wade").
- 17 2. Nelson's lawyer, Paul Cullen, asked for a continuance to the hearing scheduled for November 5th, 2018 and
18 rescheduled for November 13th.
- 19 3. In the court room on November 13th Nelson appeared with a new attorney, Kent R. Bratt, who claimed to
20 have just been hired after Cullen had to recuse himself claiming that he may be called as a witness. Bratt,
21 then explained that Nelson had retained Anne Bremner to represent him, but that a short while later
22 Bremner returned his retainer citing that she would not be willing to represent him and that he should not
23 contact anyone in her firm. Bratt said that he had only just been hired and did not know the facts of the case
24 and asked for a continuance. The court granted Nelson a second continuance for December 3rd, 2018.
- 25 4. At the hearing on December 3rd, Nelson, via his attorney, asked to vacate the TRO and chose instead to
26 serve Wade with a lawsuit for \$5 million claiming defamation.
- 27 5. On December 10th at the hearing in Superior Court for the injunction filed against Mr. Wade, Wade asked
28 for a continuance so that he might prepare for the case with more time. A continuance was granted.
6. January 14th, 2019 a full hearing was held regarding the injunction against Wade.

FACTS AND FINDINGS, LEGAL ANALYSIS, AND CONCLUSIONS OF LAW - 1

1 **II. FINDINGS OF FACT**

- 2 1. Plaintiff, William P. Nelson resides on Bainbridge Island, WA. Defendant, Houston Wade also lives on
3 Bainbridge Island. Nelson's attorney successfully argued that his client was a public figure, or at minimum
4 a limited public figure, due to the public exposure and presence of his two failed campaigns for public
5 office, his standing in the greater Bainbridge Island community, his sole control and ownership of a
6 Bainbridge Island-based business bearing his name, and for the notable public media exposure he has
7 received for his promotion and coverage of large-scale real estate developments (defendant's exhibit E).
- 8 2. Nelson failed to prove malice during argument, something that is a necessary requirement for establishing
9 defamation of a public figure. Nelson's council had to be told by the Court what the definition of "malice"
10 was.
- 11 3. Nelson failed to establish how his character has been defamed. Indeed, the evidence that Nelson himself
12 submitted only validated that the community of Bainbridge Island does not hold his character in high
13 regard, corroborating his established reputation in our community as a leech, philanderer, con man, and
14 sexual predator who prefers underage girls (Plaintiff's exhibit D). There were two types of responses to an
15 article concerning Nelson on the Bainbridge Island Bad List Facebook news page and to a post to Wade's
16 personal Facebook page: those who did not know Nelson personally, and those who affirmed that Nelson
17 behaves exactly in the manner as described in the article and post. Not one person who responded to the
18 article or post defended Nelson's character, but indeed quite the opposite. All respondents affirmed that
19 Nelson's offensive behavior was widely known within the greater Bainbridge Island community. Nelson is
20 also no stranger to law enforcement nor is he to civil court for failure to make good on debts. During the
21 Du Wors vs. Wade hearing, Nelson admitted to being a cocaine abuser and that he is a serial drunk driver,
22 currently facing charges for drunk driving and hit and run from separate events in both King County and
23 Bainbridge Island. (Defendant's exhibit C).
- 24 4. Nelson's son Matt Nelson's written testimony counters his father's oral witness testimony during the Du
25 Wors vs. Wade hearing in Bainbridge Island Municipal Court (Defendant's exhibit A) of which Nelson
26 denied ever groping Mrs. Ashley Cross Degrow. Matt Nelson's only contention with the groping allegation
27 was that he admitted to not defending Ashley against his father's alleged assault on Mrs. Cross Degrow.
28 (Defendant's exhibit A). Matt Nelson's written testimony also counters his father's own witness testimony

1 people have witnessed Nelson at the scene of several assaults and criminal endeavors consistent with what
2 was written. The Court finds that Nelson failed in this task.

- 3 4. Suing those to shine a light on abusers and rapists by the accused themselves has become a way of
4 silencing victims and their advocates. Recent unsuccessful cases include *Glaser v. Pierce*, *Her v. Xiong*,
5 *Ratner v. Kohler*, and *Bensussen v. Tadros* among many others. What Nelson is doing is no different.
6 Nelson is trying to silence uproar over his years of abuse and sexual assault.
- 7 5. Both the *Time, Inc v. Firestone* and the *Gertz* decisions ruled that if the matters at hand are such that the
8 information may be of "public interest," it is sufficient to make a private person a "public figure" for
9 purposes of the standard of protection in defamation cases. Since the information details years of sexual
10 assault and abuse, the Court finds that the post and article by Wade most certainly falls under "public
11 interest" as far as Nelson is concerned.
- 12 6. In *Philadelphia Newspaper v. Hepps* court precedent established that the burden is on the plaintiff to
13 establish falsity of information. The Court finds that Nelson did not even attempt to deny any of the
14 arguments and allegations made by Wade during oral arguments, when Wade established that there was a
15 preexisting negative public perception of Nelson's character to which he is claiming defamation.
- 16 7. The Court finds that it is reasonable to assume that Nelson knew that his actions were wrong, and that what
17 he has done would eventually come to light. That the proper response to this is not to deny multiple
18 witnesses, but to accept blame, apologize for his actions, and seek forgiveness.
- 19 8. The Court finds that Nelson did not meet the requirements set forth via precedent to restrict Wade's right to
20 free speech with an injunction. That Nelson, as a public figure, even in a limited capacity, cannot provide
21 any proof or example that Wade wrote the articles with actual malice, nor did Nelson object or deny to the
22 allegations made during open arguments that he is a serial sexual predator with a history of inflicting
23 emotional and physical abuse.

24
25 Evidence submitted:

26 Exhibit A: Bill Nelson's oral testimony from Bainbridge Island Municipal Court, November 6th, 2018, *Du*
27 *Wors v. Wade*.

1 Exhibit B: Private communication from Bainbridge Island Resident and Wade confirming Nelson's poor
2 reputation.

3 Exhibit C: Bill Nelson's court records

4 Exhibit D: A sample of event invites from Ashley Cross Degrow to Matt Nelson.

5 Exhibit E: Press about Bill Nelson

6
7 Dated this 22nd of January 2019.

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Houston Wade

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KITSAP

WILLIAM P. NELSON,

Plaintiff,

and

HOUSTON WADE,

Defendant.

)
) No. 18-2-03205-18
)
)
)
)
)

TRANSCRIPT OF PROCEEDINGS
BAINBRIDGE ISLAND MUNICIPAL COURT
Testimony of William P. Nelson
[Stenographically Transcribed via Digital Recording]

November 6, 2018

Transcribed By: CRYSTAL R. McAULIFFE, RPR, CCR
Washington License No. 2121
(360) 710-4864

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November 6, 2018

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EXHIBIT INDEX

<u>No.</u>	<u>Description</u>	<u>Marked</u>
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- None -

[Excerpt from the proceedings held on November 6, 2018, in the case of DuWors v. Wade.]

1 THE COURT: All right. Mr. Nelson, you can
2 come on up here. Before you sit down, I'll have you
3 raise your right hand. Do you swear or affirm the
4 testimony you are about to provide is the truth, the
5 whole truth, and nothing but the truth?
6

7 MR. NELSON: I do.

8 THE COURT: Okay. You can have a seat, please.
9 And state your full name for the record.
10

11 MR. NELSON: William Peter Nelson.

12 THE COURT: All right. And, Mr. DuWors, would
13 you like to ask him some questions?

14 MR. DuWORS: Yes, please, Your Honor. Does
15 Your Honor prefer that I stand?

16 THE COURT: No. You can remain seated.

17 DIRECT EXAMINATION

18 BY MR. DuWORS:

19 Q. Mr. Nelson, what do you do for work here on the
20 Island?

21 A. Construction. I'm a building contractor. I have my
22 own business. Have had for 30 years.

23 Q. How long have you lived here on the Island?

24 A. All my life; 59 years.

25 Q. Okay. When did you first meet Houston Wade?

William Nelson - Direct by Mr. DuWors

1 A. 2001 was my first recollection of ever laying eyes
2 on or knowing who Houston Wade is.

3 Q. And how did you come to meet him?

4 A. City Council race. I was running for city council
5 against Bill Knobloch and Houston Wade. Houston, at
6 the time, was 20 years old and a barista at Town &
7 Country Market.

8 Q. Okay. Did you come to become acquainted with him in
9 the course of that City Council race?

10 A. Very little. Just at the coffee stand getting
11 coffee.

12 Q. What was the nature of your interactions with him?

13 A. Getting coffee. I don't recall having any
14 conversations with Houston Wade.

15 Q. Now, are you aware of blog posts made by Houston
16 Wade in late September or early October of this
17 year --

18 A. Painfully.

19 Q. -- on his Facebook page? Okay.

20 Between the time that you met him in that City
21 Council race and the time that you read those blog
22 posts, have you had any other interactions with him?

23 A. No.

24 Q. Have you ever --

25 A. I should take that back. He was served at his place

1 of work by our professional service company. I
2 accompanied -- I came with the professional service
3 company to identify Mr. Wade.

4 Q. But that was after the blog posts?

5 A. That's correct.

6 Q. Okay. My question is have you had dealings with
7 Mr. Wade that would give rise to a personal dispute
8 between the two of you?

9 A. No.

10 Q. Have you spent any time with him between that City
11 Council race and the time the blog posts arose?

12 A. None.

13 Q. Do you have any idea why Mr. Wade would have any ill
14 will toward you?

15 A. It's to be investigated. I have no idea.

16 Q. What blog posts were the first blog posts that you
17 saw or were made aware of in late September or early
18 October 2018?

19 A. It was about -- I was made aware of the fact these
20 posts went up on October 4th. But they had been up
21 for several weeks. I was made aware of them on -- I
22 don't have the exact date. It was Monday or
23 Tuesday, approximately three weeks ago. So
24 mid-October is when I was made aware of
25 Mr. Houston's writings.

1 Q. And how were you made aware?

2 A. Through a mutual friend.

3 Q. Did you get a chance to see them?

4 A. I'm not a Facebooker, so it was brought to my
5 attention through a mutual friend.

6 Q. Were there -- did Mr. Wade make grave allegations
7 against you in those posts?

8 A. He made extensive allegations against me that were
9 all untrue.

10 Q. What allegations did he make that were untrue?

11 A. Rape of a woman. Abusing my stepchildren that
12 evidently he felt he had knowledge of which, beyond
13 me, how he would ever have attained that, because
14 I've never abused anyone. My children. He accused
15 me of abusing my ex-wives. He accused me of being
16 married five to seven times. He accused me of
17 abusing and taking advantage of my partners. He
18 accused me of bringing outside money in from out of
19 state for my campaign.

20 I mean, it goes on and on and on. All untrue.
21 Unfactual and unsubstantiated. He has no facts to
22 the matter. He just brought these out openly to
23 disparage and destroy my character.

24 I've been in this community all my life. I've
25 never done anything to anybody including my two

1 ex-wives. I treat them with kindness and love. My
2 stepchildren, kindness and love.

3 My generosity in the community and the people I
4 know and don't know, kindness and love.

5 So this is completely contrary to who I am.

6 Q. Did Mr. -- did Mr. Wade's posts include any mention
7 of the Bainbridge Island Police or the Bainbridge
8 Island Fire Department?

9 A. Yes, it did.

10 Q. What were those or were the substances of those
11 posts?

12 A. He was associating my activities and those of the
13 police department and the fire department with a
14 backyard private bar that's in what's called "The
15 Chicken Coop" or was. There was an auto mechanic
16 that lived there and who owned The Chicken Coop and
17 the auto business.

18 He afforded me a corner of his property after
19 my 2009 financial collapse at Lynnwood Center which
20 I was developing, and I stored equipment and lumber
21 and supplies on one corner of his property.

22 So Mr. Wade associated my attendance on the
23 property as someone that was involved with The
24 Chicken Coop, involved with deplorable examples of
25 taking advantage of either underage or young women.

1 He also accused the police department of this.
2 He also accused the fire department of this. So
3 everybody is included in Mr. Wade's fantasy world.

4 Q. Is The Chicken Coop essentially like a clubhouse on
5 this auto yard where the old guys get together to
6 drink beer?

7 A. Typically, it was just business and attorney friends
8 of his unrelated to you or me. His friends, older
9 gentlemen that had a boat repair business. Other
10 people that would come and have a cocktail at four
11 or five in the afternoon and leave by six or so.

12 Place sat empty, as far as I recall, quite a
13 bit of the time. It was just his little backyard
14 place for guys to hang out, have a cocktail, and
15 enjoy their company of each other in that
16 environment.

17 Whatever he alludes to never went on, I never
18 saw it, I never experienced it and neither did the
19 other people that could testify to the fact that
20 that's the case.

21 Q. In the comment -- in the online post on Facebook
22 that started Mr. Wade's comments about you, did it
23 include allegations by Mr. Wade that the Bainbridge
24 Police Department used The Chicken Coop to drug and
25 rape underage girls?

- 1 A. Yes.
- 2 Q. Did he say the same thing about the fire department?
- 3 A. He alluded to the fact that the fire department was
- 4 also taking advantage of girls at The Chicken Coop.
- 5 Q. Did he say that you were participating in similar
- 6 activities?
- 7 A. Yes, he did.
- 8 Q. Was it true?
- 9 A. No.
- 10 Q. Did he say that you raped a young adolescent friend
- 11 of his?
- 12 A. Did I rape an adolescent friend?
- 13 Q. A woman who committed suicide --
- 14 A. I've never raped anybody in my life.
- 15 Q. Did he accuse you of raping a woman who later
- 16 committed suicide?
- 17 A. He did.
- 18 Q. Who's that woman?
- 19 A. Elizabeth Kaltreider.
- 20 Q. Was she a girlfriend?
- 21 A. Brief relationship with Elizabeth for a period of a
- 22 few months, and it was not to be discussed about
- 23 what Elizabeth's condition was. But I ended up
- 24 getting restraining orders enforced against
- 25 Elizabeth because at night she would call me and

1 leave messages endlessly. I have 250 pages of
2 transcriptions in the file in this court where the
3 restraining orders were violated not once, but
4 twice, to get her to stop calling my phone and to
5 leave me alone. And she finally did. That was my
6 interaction and that was years prior to her death.

7 Q. Were you ever charged with rape?

8 A. No.

9 Q. You ever committed rape?

10 A. No.

11 Q. Officer Weiss said Houston reported in the police
12 report that his sole source of information about
13 this rape was some stepfather of the young girl.

14 Do you know who that might have been?

15 A. Jerry Dennon.

16 Q. Do you know anything about that?

17 A. What I knew of Jerry is he liked to sit at the
18 Harbor Pub from about two to four every day, was his
19 routine, and then at the Treehouse Cafe from four to
20 six. I'm just approximating. But that was his
21 normal routine to drink and then drive home to Point
22 White where he resided with his wife.

23 THE COURT: Mr. DuWors, do you have questions
24 of this witness related to the harassment of you?

25 BY MR. DuWORS:

1. Q. Did you see posts about me online?

2. A. I did.

3. Q. Have you heard people talking about them?

4. A. I have.

5. Q. Who have you heard talking about them?

6. A. Do I have to mention specific names?

7. Q. Not if you feel uncomfortable.

8. A. I don't care to bring anyone else into it right now.

9. But it's known in the public. It's known -- he's
10. got 1100 followers. Word spreads on the 25,000
11. population base. Everybody knows everybody and
12. knows what's going on and bad news travels faster
13. than good news.

14. The advocate of bad news has spread the word
15. out in the community to the point where I don't know
16. how you feel, Mr. DuWors, but I don't feel
17. comfortable going into a grocery store right now.

18. Q. No, I don't.

19. How has Mr. Wade's various statements about you
20. that you -- that you characterize as harassing your
21. person, how have they affected you emotionally and
22. professionally?

23. A. Devastating.

24. Q. Why?

25. A. It's counterintuitive to my character. It is

1 counterintuitive to what the majority of Bainbridge
2 Island that knows me would say about me.

3 It's counterintuitive to my reputation as a
4 businessman, as a father, as a stepfather.

5 My ex-wife would easily come in and testify
6 right now to the fact that my credibility and my
7 character.

8 So this misinformation campaign has been lodged
9 against you, Mr. DuWors, and to me, is beyond my
10 understanding, fact or fiction. Which one hundred
11 percent of what he spoke about me is fiction created
12 in his own mind.

13 I can't imagine what you are going through.
14 What you and I are sharing in this public
15 humiliation and foggy, and I've called it stoney.
16 My internal mechanisms, my sense of fear, my sense
17 of being outcast, my sense of looking from the
18 outside in going -- my heart is beating right now
19 how bad I feel about myself and you. That any of
20 this insane civil society should occur.

21 I don't care what the internet means to you or
22 anybody else, but if this exceeds the power of the
23 newspaper and print and is that people can do
24 whatever they want and this is the wild, wild west
25 to destroy people, count me out.

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MR. DuWORS: I have no further question for this witness.

THE COURT: All right. Mr. Wade, would you like to ask any questions?

MR. WADE: I would. Thank you.

CROSS-EXAMINATION

BY MR. WADE:

Q. We've known each other since I was four years old when you married my best friend's mother. So to say that you only met me in 2001 --

THE COURT: Is there a question? Ask him a question. You are going to get a chance to provide testimony.

BY MR. WADE:

Q. So, yes, in 2001 when we ran for City Council, and later I was out in the primary, you went on to general election, did you ever come into Town & Country and threaten my life?

A. No.

Q. Did you ever do so in front of 30 witnesses?

A. No.

Q. Did you ever come in repeatedly over a course of five nights and threaten my life?

A. No.

Q. Did Town & Country have to obtain a security guard

1 to guard me at night because you would come in and
2 try to kill me?

3 A. You are fantasizing. No.

4 Q. Excellent.

5 Did you ever grope Ashley Cross?

6 A. No.

7 Q. Did you do so in front of her father?

8 A. No.

9 Q. Did you ever get charged with drunk driving?

10 A. I have.

11 Q. Recently?

12 A. I have.

13 Q. Are you an alcoholic?

14 A. That's to be decided by the treatment program that
15 I'm in.

16 Q. Okay.

17 MR. DuWORS: Your Honor, I'm going to object on
18 relevance grounds to the DUI. None of those are part
19 of the posts.

20 MR. WADE: The posts I refer to him as an
21 alcoholic.

22 THE COURT: If so, then I think it is
23 reasonable.

24 BY MR. WADE:

25 Q. Have you ever used cocaine?

1 A. Years ago.

2 Q. Have you ever used it recently?

3 A. No.

4 Q. When was the last time you used cocaine?

5 A. In my 20s.

6 Q. Really? So you were 20 years old in 1999?

7 A. I'm sorry.

8 Q. Were you 20 years old in 1999?

9 A. Do you have something you are trying to drive to
10 here?

11 Q. Yes. Because I witnessed you using cocaine when you
12 showed up to a high school party March of 1999 and
13 forced yourself on a 15-year-old girl?

14 THE COURT: Okay. Mr. -- you are going to
15 get --

16 THE WITNESS: You are going to have to
17 substantiate that through background information.

18 BY MR. WADE:

19 Q. I will --

20 MR. WADE: Sorry, Your Honor.

21 THE COURT: Any other questions, Mr. Wade?

22 MR. WADE: No. We'll probably discuss the rest
23 of this next week at his hearing.

24 THE COURT: All right. Any further questions,
25 Mr. DuWors?

1 MR. DuWORS: No, Your Honor.

2 THE COURT: All right. Mr. Nelson, you can be
3 excused. Does this witness -- any objection to him
4 remaining in the courtroom or are you still asking him
5 to be removed?

6 MR. DuWORS: No objection, Your Honor.

7 MR. WADE: I would like him to be removed, Your
8 Honor.

9 MR. DuWORS: Now that he's testified, I think
10 the only basis for excluding him from the --

11 THE COURT: Subject to being recalled.

12 MR. DuWORS: I have no intention to recall this
13 witness. So I don't think -- I assume Mr. Wade's case
14 would be closed at this time.

15 THE COURT: Did you intend to recall him as a
16 witness here today?

17 MR. WADE: That is yet to be determined.

18 THE COURT: I'm going to allow him to remain in
19 the courtroom. He's done testifying here. I think his
20 testimony is very limited helpfulness to the court in
21 Mr. DWAUZ's case. I appreciate and understand why he
22 was called.

23 So, Mr. Nelson, you can have a seat on the bench
24 and remain in the courtroom, if you wish.

25

C E R T I F I C A T E

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STATE OF WASHINGTON)
) ss
COUNTY OF KITSAP)

I, Crystal R. McAuliffe, a Certified Court Reporter
in and for the State of Washington, do hereby certify:

That the foregoing transcript was transcribed by
me;

That the foregoing transcript is a verbatim report
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for the inaudible or indecipherable sections thereto
noted in the transcript by "[inaudible]" or
"[indecipherable]" to the best of my ability.

I further certify that I am in no way related to
any party to this matter nor to any of Counsel, nor do I
have any interest in the matter.

DATED this 7th day of January, 2019.

Crystal R. McAuliffe

CRYSTAL R. McAULIFFE, RPR, CCR
Washington License No. 2121

Exhibit B



Audrey Olson

You're friends on facebook

Pastry Cook at Protector Of Middle Earth, Pastry Cook at Ritz Carlton Hotel and Bread and Pastry Baker at Blackbird Bakery
Studied Mathematics at Seattle Central Community College
Lives in Suquamish, Washington

TUE 5:15 PM

Hey there. My "baby" brother, Matt, recently reached out to me and told me the hot gossip about you and Bill Nelson. I don't really want to get involved but I'm very curious about what info you have. He was my stepfather and I hate home more than Hitler, so...

I'm glad you reached out. I was hoping to see you, but I assume you're off at the shipyard now being a badass!

Well, I wrote an article about how he raped my friend's daughter and got away with it. He's suing me for defamation (\$5 million). Since my article came out six other women with similar stories have come forward. He is evil.

He's a piece of garbage. I reached out to my mom and want to ask her if he ever sexually abused her or anyone she knows of. After all these years, she is still repulsed by the mention of his name.

I found a DV restraining order you mom got to protect herself from him

Sometimes around 2006 while I was a member of the Bainbridge Island Fire Dept. I was invited to attend a party at the Chicken Coop speak easy. When I went it was hosted by Bill Blakely and Bill Nelson. There were other members of the Fire Dept. and Bainbridge Police Dept. off duty, that were attending. Shortly after arriving it was revealed to me that they would be having a stripper that was still a Bainbridge Highschool student. I was not OK with any aspect of what was happening (I had a child that was a student at BIHS) ~~I~~ ^{thought} the whole situation was very wrong and would not participate in any way ~~so~~ so I immediately left.



Nov 30, 2018



191 of 12,257



31

Bill Nelson

Inbox x



Katie Wiedenman <indiebanditas@hotmail.com>

Dec 9, 2018, 2:08 PM



to me

My name is Katie Fisher and I met Bill Nelson at a bar in 2012, September, I believe. I had been drinking with friends at Isla Bonita, a bar on Bainbridge island. I don't remember talking to him much as he was older than my dad, a good 20 years older than me. After the bar, I remember very little. Being in the car and him telling me he was taking me to his home. I remember being in his big master bath jacuzzi and then a brief memory of him on top of me. I came to enough to get a ride home immediately and shrugged the incident off as I was embarrassed. Now that I've heard it's happened to women before, I'm questioning a lot more. How and why would I agree to go home with a man my dad's age etc. Anyhow, I hope he stops.
Katie Fisher
indiebanditas@hotmail.com

OCT 5TH, 8:49AM

Do you know the address of the chicken coup? I'm assuming it was the derelict house right across the street from treehouse bordering Blossoms parking lot?

That's the one!

Laura has a friend who confided in her that she was with a girlfriend and Nelson at Treehouse after her divorce ten years ago. Bill convinced them to head to the chicken coup. The next thing she remembered was both her and her friend waking up naked. She couldn't find her cloths, wrapped a blanket around herself and got the fuck out. She had no recollection of where she was.

Jerod Ouellette

Active 5h ago



I fn hate rapist bastards

Same here! Bill Nelson can go get hit by a bus!

Glad the coop is gone, f those guys! I was dating a girl showed up there she was wasted and nelson had his hand down her pants.

I always told women to stay away from there. Some of them did and some of them had to find out the hard way. I feel so sorry for those ladies.



1/8/18, 10:17 AM



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Case Number:	17841702
Case Type:	Criminal Traffic
Appearance Date:	Tuesday, January 29, 2019
Time:	09:00 AM
Courtroom:	1
Participant	
Name:	CULLEN, PAUL A.
Participant Type:	Attorney
Participant	
Name:	NELSON, WILLIAM PETER
Participant Type:	Defendant

Go back to the list of cases.

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Use the standard Case Search feature for best speed (this database is updated once a day at 3:00am) for non-calendar related searches, or general research.

Contact Information

Bainbridge Municipal
Location: 10255 NE Valley Rd
Bainbridge Island, WA 98110-4337

Map & Directions
206-842-5641[Phone]
206-842-0316[Fax]
[Email Icon] [Office Email]

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How can I contact the court?

Exhibit C



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This is a detailed view of your court appearance.

Case Number:	17841702
Case Type:	Criminal Traffic
Appearance Date:	Tuesday, August 06, 2019
Time:	09:30 AM
Courtroom:	1
Participant	
Name:	CULLEN, PAUL A.
Participant Type:	Attorney
Participant	
Name:	NELSON, WILLIAM PETER
Participant Type:	Defendant

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Use the standard **Case Search** feature for best speed (this database is updated once a day at 3:00am) for non-calendar related searches, or general research.

Contact Information

Bainbridge Municipal
Location: 10255 NE Valley Rd
Bainbridge Island, WA 98110-4337

Map & Directions
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206-842-0316[Fax]
[Office Email]

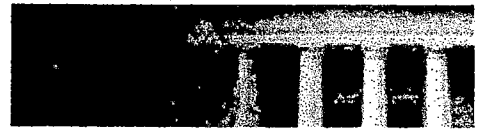
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 - Please use this link <https://odysseyportal.courts.wa.gov/odyportal>
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7 names match your search criteria.

Name	Court	Case Number	Judgment Record	Court Information
1 Nelson, William Peter Defendant	Bainbridge Municipal	31371		08-24-1994
2 Nelson, William Peter Defendant	Bainbridge Municipal	C00006919		11-27-2006
3 Nelson, William Peter Defendant	Bainbridge Municipal	17841702		05-12-2014
4 Nelson, William Peter Defendant	King County District	8Z0679612		07-02-2018
5 Nelson, William Peter Defendant	King County District	8Z0683358		07-05-2018
6 Nelson, William Peter Defendant	King County District	718017238		06-30-2018
7 Nelson, William Peter Petitioner	Bainbridge Municipal	47-000018		10-23-2018

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About Name List

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Name

Date of Birth

Cases (1)

Case Number	File Date	Type	Location	Party Name
94-2-01102-4	05/03/1994	DVP Domestic Violence	Kitsap	

1 - 1 of 1 items

1 - 12 of 12 items

Party Search Results

Name

Date of Birth

NELSON, WILLIAM P

Cases (1)

Case Numb...	File Date	Type	Location	Party Na...
14-2-03185-6	03/27/2014	TRJ Transcript of Judgment	Snohomish	

1 - 1 of 1 items

NELSON, WILLIAM P

Cases (1)

Case Number	File Date	Type	Location	Party Name
18-2-03205-18	11/30/2018	INJ Injunction	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P

Name

Date of Birth

Cases (1)

Case Number	File Date	Type	Location	Party Name
08-2-02652-5	10/24/2008	COM Commercial	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P

Cases (1)

Case Number	File Date	Type	Location	Party Name
09-2-07399-4	08/04/2009	COM Commercial	Snohomish	

1 - 1 of 1 items

NELSON, WILLIAM P

Cases (1)

Case Number	File Date	Type	Location	Party Name
08-2-00388-6	02/13/2008	COM Commercial	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P

Name

Date of Birth

Cases (1)

Case Numb...	File Date	Type	Locati...	Party Na...
09-3-01109-1	08/24/2009	DIN Dissolution of Marriage with No Children	Kitsap	

1 - 1 of 1 Items

NELSON, WILLIAM P

Cases (1)

Case Number	File Date	Type	Location	Party Name
12-2-00580-1	03/13/2012	COM Commercial	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P

Cases (1)

Case Number	File Date	Type	Location	Party Name
11-2-00887-0	04/21/2011	COM Commercial	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P

Name

Date of Birth

Cases (1)

Case Number	File Date	Type	Location	Party Name
09-2-02641-8	10/15/2009	COM Commercial	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P

Cases (1)

Case Number	File Date	Type	Location	Party Name
12-2-00785-5	04/06/2012	COM Commercial	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P

Cases (1)

Case Numb...	File Date	Type	Locati...	Party Na...
94-3-00522-2	04/04/1994	DIC Dissolution of Marriage with Children	Kitsap	

1 - 1 of 1 items

NELSON, WILLIAM P



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There are 5 public non-sealed records that match your search criteria.

Case Number	Person Name	File Date	Participant Code	Status
155-00923	Nelson, William	01-27-15	Defendant	
124-00334	Nelson, William Arnold Jr	04-17-12	Old Name	
75-006031	Nelson, William J	05-30-07	Defendant	Closed
85-008905	Nelson, William J	07-18-08	Defendant	Closed
115-01477	Nelson, William P	11-30-11	Petitioner	Closed

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206-205-9200[Phone]
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Superior Court Judgment Record

Directions: Below is the judgment record for case - 10-2-16541-0
The clerk is required by law to create a separate record of the judgment entered by the court in the case.

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Judgment Record Number	Name	Participant	File Date
10-9-15368-9	FUNCHESS, AMY J	ATTY CR	05/14/2010
10-9-15368-9	NELSON, WILLIAM P	DEBTOR	05/14/2010
10-9-15368-9	OLSON LLC EDNA	DEBTOR	05/14/2010
10-9-15368-9	TRIPLE B CORP	CREDITOR	05/14/2010

About Judgment Records

About Name List

Judgment Records- The clerk is required by law to create a separate record of the judgment entered by the court in the case.

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Case Number	Person Name	File Date	Participant Code	Status
Y12-07647	Nelson, William Michael	07-12-12	Defendant	
Y11-05530	Nelson, William P	10-12-11	Defendant	Closed
98-002664	Nelson, William R	06-23-98	Defendant	Closed
Y1-000993	Nelson, William V	03-08-01	Defendant	Closed
Y7-000055	Nelson, William V Jr	01-17-07	Defendant	Closed

Directions

Kitsap District
614 Division St, MS 25 Rm 106
Port Orchard, WA 98366-4684
Map & Directions
360-337-7109[Phone]
360-337-4865[Fax]
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13 Events

Events

Calendar 1

Birthdays

Discover

Hosting 1

+ Create Event

JAN

2

Cards Against Humanity!!

Private · Hosted by Ashley Cross DeGrow

X Can't Go



Jan 2, 2014 at 7 PM – Jan 3, 2014 at 10:30 PM

More than a year ago



751 High School Rd Nw



Invited by Ashley Cross DeGrow

6 Went · 1 Maybe · 45 Invited

See All



Ashley, Sydney and 3 other friends went



Message Host

Happy New Years mo'fuckas!

Anyways.... Bring something to consume per usual.

Let's try to avoid drinking straight alcohol this time, 'kay? Let's try to be a little less cray..

Exhibit D

Can't go
Private

Guests

Search guests

WENT (6) MAYBE (1) INVITED (45) CANT GO (6)

FRIENDS (1)

Matt Nelson

[Message](#)

Events

Events

Calendar

Birthdays

Discover

Hosting

+ Create Event

ever truly
nderstood

til I
countered

A good sniff.

My genitals.

PICK 2

Cards Against Humanity

Cards Against Humanity

NOV

14

Cards Against Humanity!!

Private · Hosted by Ashley Cross DeGrow

✓ Going ? Maybe

🕒 Thursday, November 14, 2013 at 7:30 PM – 11 PM
More than a year ago

📍 751 High School Rd Nw

5 Went · 2 Maybe · 45 Invited

See All



Ashley, Sydney and 2 other friends went

🗨 Message Host

13 Events

Events

Calendar 1

Birthdays

Discover

Hosting 1

+ Create Event

ever truly
derstood

ull
countered

PICK 2

A good sniff.

My genitals.

Cards Against Humanity

Cards Against Humanity

NOV

7

Cards Against Humanity!!

Private - Hosted by Ashley Cross DeGrow

✓ Going ? Maybe

🕒 Thursday, November 7, 2013 at 7:30 PM – 11 PM
More than a year ago

📍 751 High School Rd Nw

8 Went · 3 Maybe · 26 Invited

See All



Ashley, Houston and 3 other friends went

Guests

Search guests

WENT (8) MAYBE (3) INVITED (26) CAN'T GO (5)

FRIENDS (5)



Matt Nelson

Message



Addison Houston

Message



Bron Barry

Message



Ashley Cross DeGrow

Message



Houston Wade

Message

Guests

Search guests

WENT (5) MAYBE (2) INVITED (45) CAN'T GO (1)



Garrett Black

Message



Matt Nelson

Message



Jamie Maslach

Message



Sean Walker Holliday

Message



Arthur Carbajal

Message

Guests

Search guests

WENT (3) MAYBE (1) INVITED (38) CAN'T GO (2)

FRIENDS (6)



Matt Nelson

Message



Jamie Maslach

Message



Sean Walker Holliday

Message



Arthur Carbajal

Message



Griffin Cooper-Steik

Message

Events

Events

Calendar 1

Birthdays

Discover

Hosting 1

[+ Create Event](#)



NOV
21

Cards Against Humanity!!

Private · Hosted by Ashley Cross DeGrow

✓ **Going** ? **Maybe**

🕒 Thursday, November 21, 2013 at 7:30 PM – 11 PM
More than a year ago

📍 751 High School Rd Nw

3 Went · 1 Maybe · 38 Invited

[See All](#)



Ashley, Joshua and Kristen went

Events

Events

Calendar 1

Birthdays

Discover

Hosting 1

[+ Create Event](#)



NOV
25

Cards Against Humanity Special Monday Edition

Private · Hosted by Ashley Cross DeGrow

✓ **Going** ? **Maybe**

🕒 Monday, November 25, 2013 at 6:30 PM – 11:30 PM
More than a year ago

📍 751 High School Rd Nw

4 Went · 2 Maybe · 30 Invited

[See All](#)



Guests

Search guests

WENT (7) MAYBE (2) INVITED (34) CAN'T GO (2)

FRIENDS (2)



Matt Nelson

[Message](#)



Miller Spittler

[Message](#)

Guests

Search guests

WENT (4) MAYBE (2) INVITED (30) CAN'T GO (3)

FRIENDS (1)



Matt Nelson

Message

OTHERS (1)



Kym Johnson

Add Friend

Events

Events

Calendar 1

Birthdays

Discover

Hosting 1

+ Create Event

ever truly
derstood

til I
countered

PICK 2

A good sniff.

My genitals.

Cards Against Humanity

Cards Against Humanity

DEC
5

Cards Against Humanity!!

Private · Hosted by Ashley Cross DeGrow

✓ Going ? Maybe

🕒 Thursday, December 5, 2013 at 7 PM – 10:30 PM
More than a year ago

📍 751 High School Rd Nw

7 Went · 2 Maybe · 34 Invited

See All



Ashley, Houston and 4 other friends went

Events

Events

Calendar 1

Birthdays

Discover

Hosting 1

+ Create Event

ever truly
derstood

til I
countered

A good sniff.

My genitals.

PICK 2

Cards Against Humanity

Cards Against Humanity

DEC
20

Cards Against Humanity!!

Private · Hosted by Ashley Cross DeGrow

✓ Going ? Maybe

🕒 Friday, December 20, 2013 at 7 PM – 10:30 PM
More than a year ago

📍 751 High School Rd Nw

3 Went · 0 Maybe · 38 Invited

See All








Ashley and Kristen went

Guests

Search guests

WENT (3) MAYBE (0) INVITED (38) CANT GO (4)

-  **Matt Nelson** [Message](#)
-  **Jamie Maslach** [Message](#)
-  **Sean Walker Holliday** [Message](#)
-  **Arthur Carbajal** [Message](#)
-  **Griffin Cooper-Steik** [Message](#)

seattlepi

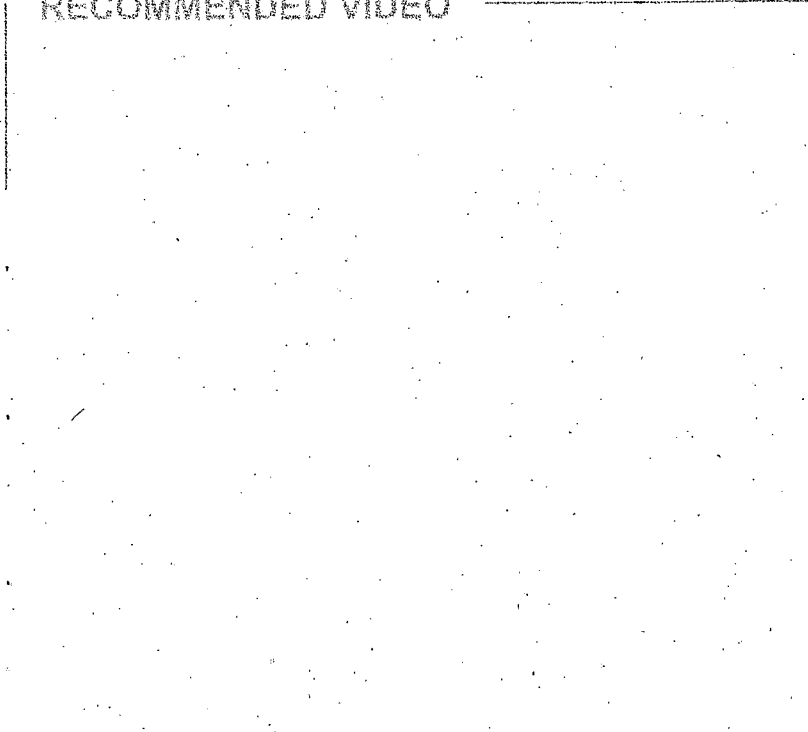
<https://www.seattlepi.com/local/sound/article/Development-is-ready-to-blossom-with-new-owner-2153046.php>

Development is ready to blossom with new owner

By Dennis Anstine, BAINBRIDGE ISLAND REVIEW Published 12:30 pm PDT, Friday, September 2, 2011

John Jacobi now has a challenge to tackle during his "semi-retirement" years.

RECOMMENDED VIDEO



The founder nearly 40 years ago of Windermere Real Estate in Seattle has purchased the stalled Blossom Hill development on Bainbridge Island into a community.

Whidbey Island Bank he was one of the puzzle, other than to continue with the general partnership Pass LLC.

ultimate goal.

like it before and had some help from Jacobi, who has spent his life is about leaving a legacy for a good contribution to this

Jacobi still spends some days at his office in Lake Forest Park and has houses in both Seattle and Bainbridge. But much of his family lives on the island, where, at 70, he's spending more time these days. And that will increase as he assumes a "hands-on" approach to his new project.

A family affair

Exhibit E

As is his nature, he said, he's surrounding himself with many people who share his x

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and Norm Landry, who served as Nelson's project supervisor for the four unfinished buildings fronting Pleasant Beach Drive.

After spending 60 days of due-diligence analysis before purchasing the property from Whidbey Island Bank for less than \$10 million, Jacobi said it's "now full speed ahead" with the first phase of the project's new life.

Some parts of the plan are still being formulated, but the general concept is to turn the area into a service center that supports the south end of the island. It goes something like this:

. The last phase of the project - construction of some living units on the upper part of the property - remains intact at this point and is still at least a few years from fruition.

However, the original concept called for some 75 living units of various types and Jacobi said the number of units may be reduced and the types of residences changed, too. He considers a hillside community viable in the future, but there's no rush because of the current real estate climate.

. The first move involves Edna's, the current name of the large restaurant sitting on the bluff above Pleasant Beach Drive. Nelson spent more than \$1 million renovating it inside and out, and then reopened it as an upscale eatery just about the time the economy slowed

It bombed, and was on the market at one time for about \$3 million.

Jacobi wants to turn it into an event center, which he thinks makes sense considering the size of the complex and the dramatic view it offers of Rich Passage.

Work is already under way to return the interior into the dark-wooded "manor house" environment that still exists in the small "fireplace lounge." Jacobi hopes to hire an event director soon with the goal of opening the complex before the holidays.

The pivotal change involves scuttling the condominium/apartment concept for th X

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The fourth building, which is northerly and the furthest from being done, might become a microbrewery and provide an anchor tenant. The bottom floor of the other three buildings would remain retail space.

This part is tentative, of course, since Jacobi would need to get a rezone from the city in order for an overnight lodge to be included in the project. He sees the lodge as overnight accommodations for people attending weddings or other large events at the restaurant.

"We're still open to what the community wants and we feel this will complement what is already there - what Steve Romein has done at Lynwood Center, which is terrific," he said.

With that in mind, he wants the exterior facade of the four buildings to be similar to the historic Lynwood Center complex. Originally, the four buildings on Blossom Hill were going to have a wood and brick facade, but Jacobi wants it to be only wood so it mirrors the building across the road.

"My vision of this is as a service center that fits in with what exists," he said. "And I have no restrictions. I am open to suggestions and I will be in touch with Romein and others involved in commerce in the area."

A different time

Whidbey Island Bank took over the City Bank of Lynnwood's assets and loans after a FDIC-forced closure, including the Rich Pass LLC loan. The bank officially became the development's owner in early April when it paid \$10 million for the property at a foreclosure auction.

Nelson said this week that he has "pending negotiations" with the new owner for equipment, fixtures and furniture in the restaurant. He said there's also the matter of nearly \$1 million in liens - including nearly 400,000 by Nelson Wood & Glass as a

subcontractor for the project - that were filed against Rich Pass LCC after the

X

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Nelson said he understood and has no hard feelings about what has happened.

"It's really a global problem, I'd like to take it personal, but it's hard to do that unless I'm abused on the way out the door," he said. "I started this thing six years ago and it was a hell of an opportunity, but not for this time. These days, only people with cash can play. But I've moved on and now Mr. Jacobi can go forward with it. For him, I think the value is three to five years out."

Jacobi said after work on the event center is done his team's attention will turn to getting the four building completed, and then focus on what will be placed inside them.

RELATED STORIES

- [Bainbridge buzzing over Blossom Hill soil swap](#)
- [Blossom Hill project may have a buyer in John Jacobi](#)

This article was originally published in the Bainbridge Island Review on September 01, 2011.

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HEARST



LOCAL NEWS

Work to resume on Bainbridge development that's been frozen two years



Work will resume in two on what is now being called Pleasant Beach Village. The giant mixed-used project at Lynwood Center on Bainbridge Island has stood idle for two years. (Contributed photo/Wenzlau Architects)

By Rachel Pritchett



Here is a timeline of the evolution of Pleasant Beach Village at Lynwood Center on Bainbridge Island, formerly known as Blossom Hill:

1990s: Lynwood Center, a quaint Tudor-style neighborhood on southwest Bainbridge Island, is designated by the city as a neighborhood service center, allowing for more intensive development.



new restaurant tenant.

2006: Nelson and architect Charlie Wenzlau introduce the Blossom Hill vision to neighbors nervous about erosion and increased traffic. The project is to include retail and condos on Lynwood Center Road, and roughly 80 homes going up a hillside on the 16.5-acre site, making it one of the biggest developments in island history. Nelson is among the investors.

2007: Steve Romein buys a similarly styled old commercial center nearby, Lynwood Center, and begins renovations, building hope among islanders that the center's charm will survive into the future.

2009: The giant project is halted as the recession hits. The project's bank, City Bank of Lynnwood, fails and Nelson no longer can draw on loans. Almost \$1 million in liens are filed by subcontractors.

April 15, 2011: The aborted development reverts back to the bank, now Whidbey Island Bank. Some \$27 million is owned on two original deeds. Whidbey purchases the project for \$10 million.

June and July 2011: An island investor group headed by real-estate leader John Jacobi investigates the feasibility of buying the project and resuming construction.

Aug. 17, 2011: The purchase deal closes, with the Jacobi group picking up the project for less than \$10 million.

Aug. 19: Jacobi says the project, now called Pleasant Beach Village, will resume.

Rachel Pritchett

Much to the delight and relief of Bainbridge Island's south-end business owners and residents, work soon will resume on a major development at Lynwood Center that has stood unfinished for two years.



The deal with the project's owner, Whidbey Island Bank, closed Wednesday, and work will start within three weeks.

"We'd like to get going as soon as possible," said Jacobi, whose partners include his family, Tad Fairbank of Fairbank Construction Co. of Bainbridge Island, and Jim Laws, owner of Windermere Real Estate of Bainbridge Island. Fairbank will do the work.

Jacobi is 70, and the founder of the Seattle-based chain of 220 Windermere Real Estate offices wants to see the project come to be in his lifetime.

"I hope it's sooner than later," Jacobi, of Bainbridge Island and Seattle, said of the 16.5-acre purchase made for less than \$10 million.

The vision is unchanged. A row of buildings along Lynwood Center Road is to house retail and commercial on the ground floor, with 16 living units above. That's all that's been constructed at this point, and it's only about three-quarters done.

Jacobi said his group hasn't yet decided whether to make the living units above condominiums or apartments, and it's a little too early to talk about tenants on the ground floor.

"We haven't talked with one soul," he admitted.

Behind that, roughly 80 homes are to be perched on the hill overlooking Pleasant Bay. They are to be built later as the economy allows. A stunning historic building on the property known as the manor house could become another restaurant or even a destination for weddings and events, similar to the Hood Canal Vista Pavilion in Port Gamble. It will now be called Pleasant Beach Manor House.

If and when completed as originally envisioned, the project will be among the biggest ever completed on Bainbridge.



"It will play a major role in the revitalization of Lynwood Center as a new shopping district for the south end of Bainbridge Island. When completed, Pleasant Beach Village ... will become a self-sufficient neighborhood, as envisioned by the island's comprehensive plan," he said.

In the 1990s, Lynwood Center was named one of three "neighborhood service centers" on Bainbridge. That designation and the sewers installed later allowed for more dense building.

The news Friday delighted nearby business owners at Lynwood Center, forced to look out their windows at the unfinished buildings enveloped by cyclone fencing.

Jeff Brein, an owner of the old-time Lynwood Theatre, said, "It goes without saying that expansion of businesses as well as an expansion of a residential base, especially within walking distance of the theater, is good news for us."

Alan Simcoe, owner of Village Music, said, "Having something across the street will be delightful, to say the least."

The mess won't be missed.

"At first it was just ugly, and then you just don't see it," Simcoe said.

The project has had a lot of past heartache and pain.

Island native Bill Nelson had the dream initially. He undertook a \$1 million rebuild of the manor house in 2006. He and investors in Rich Pass, LLC ? mostly island folks ? then began building the mixed-used portion of what then was known as Blossom Hill.

Then the recession struck. The bank carrying the project, City Bank of Lynnwood, failed, preventing Nelson from making critical draws on his construction loans.

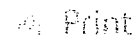
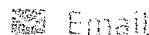
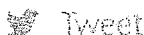
Worked stopped in 2009, as subcontractors slapped almost \$1 million in liens against the property. The subs were never paid and the investors lost



The property slipped into foreclosure and this spring was returned to the bank that resumed City Bank's business, Whidbey Island Bank. More than \$27 millions was owing on the two original deeds. The bank picked it up for \$10 million.

Jacobi sees the potential of completing the final piece of this charming and historic little corner of Bainbridge Island.

"It has a real European village feel," he concluded.



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Bainbridge buzzing over Blossom Hill soil swap

Like the hole that marks their origin, the mountains of dirt – atop the triangle of land bordered by Fletcher Bay, Bucklin Hill and Lynwood Center roads – are growing. The dirt will eventually be loaded into dump trucks and hauled a short distance south to a new resting place, beneath the Blossom Hill development taking shape on the hillside above Lynwood Center. Simply put, the project is a soil swap: Blossom Hill is getting about 2,200 dump truck loads of workable sand in exchange for a larger amount of less desirable glacial till that will go back into the ground at the borrow site.

Vednesday, June 11, 2008 6:41pm | **NEWS**

Like the hole that marks their origin, the mountains of dirt – atop the triangle of land bordered by Fletcher Bay, Bucklin Hill and Lynwood Center roads – are growing.

The dirt will eventually be loaded into dump trucks and hauled a short distance south to a new resting place, beneath the Blossom Hill development taking shape on the hillside above Lynwood Center.

Simply put, the project is a soil swap: Blossom Hill is getting about 2,200 dump truck loads of workable sand in exchange for a larger amount of less desirable glacial till that will go back into the ground at the borrow site.

The project has piqued the curiosity of passing motorists, and raised questions about its possible impacts on underground water in the area, since there is an aquifer beneath the dig site and several wells nearby.

Some neighbors simply can't get over the enormity of the hole and its associated piles, which were enough to prompt long-time contractor and Lynwood Center resident Charlie Christenson to take his first trip to City

fall.

"I've never been in here before," Christenson said last week at the planning meeting. "But when I saw this... I can't even imagine something like this going on. I guess there are no rules here anymore."

A grade-and-fill permit for the work was issued by the city last month to Nelson, Wood and Glass, the firm behind the Blossom Hill project.

Project managers Bill Nelson and Norm Landry said the dig site – owned by Wing Point resident Bill Moore – has long been used as a source of sand, as have other nearby sites that have since been capped without causing damage to the aquifer.

As part of the permitting process, the firm was required to pay for an outside evaluation of the project's potential impacts.

Completed by Bainbridge-based Aspect Consulting, the study found the project would require mitigation to ensure proper recharge of the aquifer.

"Removal of the sand material and placement of low permeability fill materials will diminish recharge," it said. "The flux of recharge through the lower permeability materials will be significantly less than under current conditions."

The study went on to say the total loss of recharge is "relatively small on a basin-wide scale... but has the potential to be locally significant to any existing or future wells completed close to the project."

Bioswales and infiltration galleries – both modern stormwater management techniques – will be part of the mitigation work. To ease stormwater flow, the perimeter of the site will have a slightly raised berm.

A layer of sand and hydroseed will be placed atop the glacial till. No organic materials will be put into the site.

Work began about three weeks ago, and could take another six weeks, depending on the weather.

'We looked carefully at the risks and are confident in what we're doing to take care of the aquifer,' Nelson said. "We spent nine months studying this - It's not just a guessing game."

But not everyone is satisfied with the Aspect study or the process by which the city permit was issued, according to comments submitted to planners.

Some people were worried about potential impacts of the dig on their wells. Others said the project wasn't properly noticed, which left an inadequate amount of time for public comment.

South-end resident and hydrologist Douglas Dow said the Aspect study isn't sufficient.

'While Aspect's analysis of the possible water quality changes to water passing through these soils may be true, I don't believe it has any relevance to the question of potential degradation of groundwater under the triangle pit,' he wrote in his comments.

'Without background monitoring of the water quality of the underlying aquifer pre- and post-pit, how can the pit operators determine there has been no degradation?'

Dow, who said he has worked with the city on other projects and is familiar with the area's hydrology, said he'd prefer to see the work stopped until a more thorough analysis can be done.

City Planner Josh Machen said Aspect has been monitoring the work and will be required to sign off on the final product. He said he isn't aware of any negative impacts associated with past excavations of sand that had happened nearby.

'Those projects were closer to the well sites,' he said. "If there were problems, we probably would have seen them show up by now."

Along with the city and Aspect, the Kitsap County Health District reviewed the plans.

The excavation falls just short of being a mining project, a designation that would have required additional permits.

The excavation area is permitted to be just under three acres in area and 15 feet deep. Originally the plan was to haul the Blossom Hill dirt to Duquamish, but Nelson said their chosen option is better because it reduced fuel costs and emissions from trucks having to take loads off the island.

Trucks traverse about a mile of roadway before dropping loads at the Blossom Hill site, which will soon transform the area around Lynwood Center.

The first four mixed-use buildings will begin to rise at the bottom of the hill this summer, and should be finished by 2010. Over the next five years, some 30 residential units are slated to fill out the hillside.

Meanwhile, Moore said he hopes the triangle of land he's owned since 1989 will be improved when the excavation is finished.

He doesn't have any plans to develop it, but said it's been prone to problems in the past, including off-roading, drinking parties and bonfires. The appearance of junk on the lot has also been routine.

Moore said he hauled away \$3,500 worth of garbage a few years ago – three rusted cars were among the load – and had done his own grading work to limit illegal uses of the land before deciding to partner with Nelson.

He said that when the work is finished the site will look much the same as it did before, hopefully minus some of the old problems.

But even he's shocked by the way things look now.

"It's an interesting site," Moore said. "When you see the pit it looks like they're getting ready to build the Seafirst Building (skyscraper) – but here's no Seafirst Building going in."

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The big dig that was undone

An appeal against a stop-work order at a south-end sand pit was denied by the city hearing examiner last week.

Tuesday, September 23, 2008 8:54pm | **NEWS**



The city hearing examiner denied an appeal on a stop-work order for the sand pit near Lynwood Center.

A court order denies an appeal on work-site.

An appeal against a stop-work order at a south-end sand pit was denied by the city hearing examiner last week.

The stop-work order at the sand pit borrow side – a triangle of land bordered

by Fletcher Bay, Bucklin Hill and Lynwood Center roads – was issued in June of this year. Sand at the site was being extracted by Nelson Wood and Glass, owned by Bill Nelson, for the ongoing Blossom Hill development at Lynwood Center.

Upholding the stop-work order meant that Nelson would have needed a conditional-use permit issued by the city to continue with the filling of the site. However, now Nelson will have to seek additional permits from the Department of Natural Resources to continue reclamation since the agency is taking over jurisdiction in the matter.

DNR has argued that, since the site has historically been used as a sand mine, Nelson will be responsible for reclamation on the whole 4.2-acre site, not just the three acres he was originally permitted to use.

Under state law, a dig that exceeds three acres and a depth of 15 feet is classified as a surface mine subject to regulation under the Surface Mining Act of 1971. DNR in essence argued that access to a portion of the site constitutes access to the entire site and applicable laws.

Activity originally approved at the site allowed for the removal of 20,000 cubic yards of sand from a 3-acre area which was to be replaced by roughly 30,000 cubic yards of glacial till. The entire site was to then be covered with top soil.

The project was tagged by the city after citizen complaints. The stop-work order was issued because the size of the site being used in the project exceeded the three-acre maximum surface area due to the storage of stockpiled top soil for the final phase of reclamation. The storage of that soil on-site was also not allowed in the original permit.

When DNR officials were contacted, they said they had received a partially completed surface mining application that had not yet been paid for.

Nelson could not be contacted regarding the permit or the hearing examiner's decision at the time of printing.

Notes from last week's hearing show that Nelson admitted the project exceeded its required scope. The hearing examiner also noted that ongoing activities at the site were not threatening to the environment.

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LOCAL NEWS

Dreamed-of Bainbridge development foreclosed on, a victim of recession



Work on the Blossom Hill development in Lynwood Center on Bainbridge Island stopped nearly two years ago. A bank bought two original deeds of trust for the development during a foreclosure auction on Friday. (LARRY STEAGALL/ KITSAP SUN)

By Rachel Pritchett



Blossom Hill, the aborted development that would have resulted in an expansive hillside neighborhood and commercial district at Lynwood Center on Bainbridge Island, reverted to the bank in a foreclosure auction Friday.

More than \$27 million was owing on two original deeds of trusts. Whidbey Island Bank purchased the deeds at auction for \$10 million. There were no other bids.



some of the project to finish the four commercial/condo buildings along Lynwood Center Road that initiated construction.

"All I know is I put six long, hard years into this project — not planning on standing down," Nelson said quietly at the auction near the Kitsap County Courthouse. Dozens listened in a cold April drizzle as a trustee droned through the foreclosure readings, including Rich Pass investors angry at losing their money.

"I feel extremely let down," said one who asked not to be identified. "I think nobody in Rich Pass had the expertise to pull off a large project like this."

The investment group consisted of 15 people, most from Bainbridge Island and the rest from other parts of the nation.

Nelson's vision was to create a self-contained community at Lynwood Center where residents would have no reason to go to congested Winslow for groceries, to mail a letter or eat out.

The commercial part would be Tudor-style to mesh with nearby Lynwood Center, and would serve residents of the 88 homes Nelson was to build on the hillside above, all looking down on Pleasant Bay.

Nelson had his eye on Lynwood Center since he was a boy growing up on the island.

"I used to marvel at the architecture of Lynwood. It was so odd and different," he said.

He had his chance in 2005, when he started a first-class renovation of a historic mansion-turned-restaurant on the 16-acre Blossom Hill site. The restaurant now is closed.

In 2006, he introduced his dream of Blossom Hill to neighbors in nearby Blakely Heights and along Pleasant Beach Drive in a couple of community meetings. Some were concerned about traffic, erosion, water



pieces that would make the Lynwood Center neighborhood new and whole.

Construction began before the economy tanked, but stopped in 2009 in the midst of construction of the four commercial buildings. None of the hillside homes were ever built.

The project's original banker, City Bank of Lynnwood, had failed, and Nelson was unable to draw on a little less than \$500,000 remaining on his construction loan, according to Volney Howard, original investor with Nelson.

When City Bank's loans were picked up by Whidbey Island Bank, Nelson still could not make draws. The project was financially strangled. A host of subcontractors slapped liens on the property.

Since then, Lynwood Center visitors have edged by cyclone fencing and the buttoned-up construction site to get to a movie at the Lynwood Theatre or enjoy a bite at the Treehouse Café.

They long for the once charm-filled corner of Bainbridge Island to return to normal.

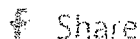
So do some of Nelson's loyal investors.

"We're hopeful that we can make a deal with the bank. We have some outside investment interest," said Howard, who now lives in California.

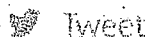
Another investor, Barbara Sinnott of Bainbridge Island, said, "Lynwood Center really has to have something over there like that, and a lot of people have told us that."



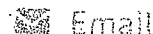
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Bainbridge Conversation Rachel Anne Seymour engages island residents in a conversation about their community.

Developer says Blossom Hill project isn't dead

[tristan baurick](#)

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With a lot of rumors circulating about the demise of the Blossom Hill project, I called up its developer, Bill Nelson, last week to see what's what.

Nelson called the rumors "ludicrous" and "silly."

Despite some serious financial problems and a months of inactivity at the Lynwood Center site, he isn't ready to declare the project dead.


"We're taking it day by day," he said.

Of course, the other big question – besides whether or not the project will be finished – is how all that new commercial space along Lynwood Center Road will be filled.

Read more [here](#).

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Development is ready to blossom with new owner

John Jacobi now has a challenge to tackle during his "semi-retirement" years.

By Brian Kelly

Thursday, September 1, 2011 7:50pm | **NEWS**

John Jacobi now has a challenge to tackle during his "semi-retirement" years.

The founder nearly 40 years ago of Windermere Real Estate in Seattle has purchased the stalled Blossom Hill development with the goal of helping turn the Lynwood Center neighborhood into a community service center that is second only to Winslow on Bainbridge Island.

When Jacobi bought the 16.5 acres two weeks ago from Whidbey Island Bank he was still unsure about exactly what to do with the three pieces of the puzzle, other than to rename the development Pleasant Beach Village and to continue with the general vision of the original developer/owner, Bill Nelson and Rich Pass J.C.

It is no longer vague, however, especially about his ultimate goal.

"It's a huge project, though I've actually done something like it before and had some success. But this is not about the money in this case," said Jacobi, who has spent his working life buying, selling and developing property.

"This is about leaving a legacy for my family and being a steward for property that will be a good contribution to this community. I feel very strongly about it."

Jacobi still spends some days at his office in Lake Forest Park and has houses in both Seattle and Bainbridge. But much of his family lives on the island, where, at 70, he's spending more time these days. And that will increase as he assumes a "hands-on" approach to his new project.

A family affair

As is his nature, he said, he's surrounding himself with many people who share his vision for Lynwood Center, including: several family members; Tab Fairbank (of Fairbank Construction Co.); Bainbridge Island Windermere broker/manager Jim Laws; architect Charlie Wenzlau, who created the original design for the Blossom Hill project; and Norm Landry, who served as Nelson's project supervisor for the four unfinished buildings fronting Pleasant Beach Drive.

After spending 60 days of due-diligence analysis before purchasing the property from Whidbey Island Bank for less than \$10 million, Jacobi said it's "now full speed ahead" with the first phase of the project's new life.

Some parts of the plan are still being formulated, but the general concept is to turn the area into a service center that supports the south end of the island. It goes something like this:

The last phase of the project – construction of some living units on the upper part of the property – remains intact at this point and is still at least a few years from fruition.

However, the original concept called for some 75 living units of various types and Jacobi said the number of units may be reduced and the types of residences changed, too. He considers a hillside community viable in the future, but there's no rush because of the current real estate climate.

The first move involves Edna's, the current name of the large restaurant sitting on the bluff above Pleasant Beach Drive. Nelson spent more than \$1 million renovating it inside and out, and then reopened it as an upscale eatery just about the time the economy slowed

it bombed, and was on the market at one time for about \$3 million.

Jacobi wants to turn it into an event center, which he thinks makes sense considering the size of the complex and the dramatic view it offers of Rich Passage.

Work is already under way to return the interior into the dark-wooded "manor house" environment that still exists in the small "fireplace lounge." Jacobi hopes to hire an event director soon with the goal of opening the complex before the holidays.

The pivotal change involves scuttling the condominium/apartment concept for the planned 15 units located in the four two-story buildings that are now about three-fourths finished. Instead, he'd like to create a "small, boutique-type lodge" of about a half-dozen units in the upstairs of the three buildings that are currently connected.

The fourth building, which is northerly and the furthest from being done, might become a microbrewery and provide an anchor tenant. The bottom floor of the other three buildings would remain retail space.

This part is tentative, of course, since Jacobi would need to get a rezone from the city in order for an overnight lodge to be included in the project. He sees the lodge as overnight accommodations for people attending weddings or other large events at the restaurant.

"We're still open to what the community wants and we feel this will complement what is already there – what Steve Romein has done at Lynwood Center, which is terrific," he said.

With that in mind, he wants the exterior facade of the four buildings to be similar to the historic Lynwood Center complex. Originally, the four buildings on Blossom Hill were going to have a wood and brick facade, but Jacobi wants it to be only wood so it mirrors the building across the road.

"My vision of this is as a service center that fits in with what exists," he said. "And I have no restrictions. I am open to suggestions and I will be in touch with Romein and others involved in commerce in the area."

A different time

Whidbey Island Bank took over the City Bank of Lynnwood's assets and loans after a FDIC-forced closure, including the Rich Pass LLC loan. The bank officially became the development's owner in early April when it paid \$10 million for the property at a foreclosure auction.

Nelson said this week that he has "pending negotiations" with the new owner for equipment, fixtures and furniture in the restaurant. He said there's also the matter of nearly \$1 million in liens - including nearly \$500,000 by Nelson Wood & Glass as a subcontractor for the project - that were filed against Rich Pass LCC after the Lynnwood bank stopped funding the development in 2009.

Macobi, who said he's never met Nelson but admires the vision he had for the area, said the sale by Whidbey Island Bank was "subject to all liens being cleared."

Nelson said he understood and has no hard feelings about what has happened.

"It's really a global problem, I'd like to take it personal, but it's hard to do that unless I'm abused on the way out the door," he said. "I started this thing six years ago and it was a hell of an opportunity, but not for this time. These days, only people with cash can play. But I've moved on and now Mr. Macobi can go forward with it. For him, I think the value is three to five years out."

Macobi said after work on the event center is done his team's attention will turn to getting the four buildings completed, and then focus on what will be placed inside them.

Candidate profile — Bill Nelson

Environmental concerns are driving out other values in city decision-making, contractor Bill Nelson says. In what he calls an effort to "restore balance," Nelson is running for the central ward, position 4, city council seat being vacated by Merrill Robison. "For the sake of protecting Bainbridge Island's environment, we've forsaken other parts of the quality of life, such as human interaction," Nelson said. The 42-year-old island native says that excessive regulation is driving up costs and depriving the island of diversity. He is critical of council decisions such as the proposed landscape ordinance that have the effect of lowering housing densities, saying that lower densities require more land per home, which, in turn, raises prices. Conversely, he believes that to make housing more affordable, zoning needs to be changed to make higher densities possible in areas such as Lynwood Center. "We can promote affordable housing through zoning," he said. "We don't need higher density everywhere, but we need it in some areas for affordability — you can't have it both ways." Nelson believes the city could contract out much of the regulatory work it does, particularly on development matters, saving both money and staff time. "The developers have to pay for bureaucracies, and they pass those costs on to the end-users," he said. "And it takes time away from work that the city engineer, for instance, needs to spend on public projects."

Wednesday, October 10, 2001 8:00pm | **NEWS**

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“The developers have to pay for bureaucracies, and they pass those costs on to the end-users,” he said.

“And it takes time away from work that the city engineer, for instance, needs to spend on public projects.”

Nelson favors allowing four south-end neighborhoods that claim widespread septic failures to install sewer service.

“There is a known health and safety issue,” he said, “and it is incumbent upon the city to act.”

He does not share concerns expressed by some council members that any additional sewer service will lead to increased densities, saying that the existing zoning is adequate to address growth issues.

Nelson is also opposed to the Bainbridge Harbor Commission’s draft plan for Eagle Harbor, which would permit liveaboards to continue using a portion of the harbor.

“The water is for everybody,” he said. “I don’t want to see the liveaboards leave – I like those people – but why should they have open space at everyone’s expense?”

He disputes that argument that living on board constitutes a long-standing, historic use of the inner harbor.

“The first time anybody anchored out there was in the late ‘70s or early ‘80s, when some kids towed a houseboat out there and used it for parties,” he said.

Instead of an anchor-out liveboard area in the inner harbor, Nelson would like to see an extension of the city dock at Waterfront Park to create a number of additional mooring slips.

Some of those should be subsidized, he said, to provide affordable-housing opportunities.

Island industry

After graduating from Bainbridge High School, Nelson worked at a variety of jobs – commercial fishing, construction, on a tug, and at the old Wyckoff plant.

He founded Nelson Wood and Glass in 1987, and the company now employs 17 people.

This is his second try for a city council seat. In 1993, he narrowly lost to incumbent Charles Averill.

Nelson criticizes opponent Bill Knobloch as a single-issue candidate, referring to Knobloch’s opposition to the proposed driving range at Wing Point golf club, saying single-issue advocacy does not produce a well-rounded candidate.

But Nelson, a Wing Point member, is not adamantly in favor of the driving range itself. He would like to see the city consider building a public driving range, open to everybody, perhaps on the SR-305 corridor.

“Land right on the highway is too noisy to be developed, but the traffic wouldn’t be a problem for a driving range,” he said.

Nelson thinks the no-growth or slow-growth faction in the community – “the people who want Bainbridge Island to stay exactly the way it was when they moved here” – is over-represented on the present city council.

He blames that on the lack of involvement from those with different viewpoints.

“Very few people who work on the island are involved in government,” he said.

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Nelson residency challenged Two islanders say the council candidate lives outside the central ward.

"Two challenges to the legal residency of Bainbridge City Council candidate Bill Nelson were filed this week, leaving county election officials to determine whether Nelson is eligible for a central ward seat. Nelson filed last week for the open central ward, position 4 seat, joining Wing Point activist Bill Knobloch and espresso vendor Houston Wade in a three-way race. "

Saturday, August 4, 2001 4:00pm | **NEWS**

"Two challenges to the legal residency of Bainbridge City Council candidate Bill Nelson were filed this week, leaving county election officials to determine whether Nelson is eligible for a central ward seat. Nelson filed last week for the open central ward, position 4 seat, joining Wing Point activist Bill Knobloch and espresso vendor Houston Wade in a three-way race. In filing documents, Nelson listed a Park Avenue address in the Yeomalt neighborhood as his place of residence. But in separate challenges lodged with election officials – one was filed Monday, the second on Friday – islanders Stewart Atkinson and Michael Smith allege that Nelson actually lives on Old Mill Road at the island's south ward. Maintaining a primary residence there would disqualify Nelson from the race for a central ward council seat. Nelson, a contractor making his second bid for the council, told the Review Friday that he does in fact live on Park Avenue. He cited what he called an ambiguity between county and city standards for when residency must be effective – day of filing versus day of election – and said he will seek legal clarification of the issue. Because the challenges were filed more than 30 days before the Sept. 18 primary election, a formal hearing will be held before Kitsap County Auditor Karen Flynn. She will adjudicate the matter, and will have a county deputy prosecutor on hand for legal guidance. Had the challenge come within 30 days of the election, the challenge would have gone before a three-person board including Flynn, Kitsap County Commission chair Chris Endresen and county Prosecutor Russ Hauge, or in case of conflicts, their designees. Under the legal standard, Nelson's residency is considered valid, putting the burden of proof with

clear and convincing evidence on the challengers, Flynn said. It is a high legal standard, to prove that someone doesn't live where they say they do, she said. The hearing date will be set Monday, with the proceeding to be held sometime before Aug. 19. It marks at least the fifth time in the past several years that such a challenge has been made in Kitsap elections. Perhaps the highest profile dispute came in 1999, when a North Kitsap political activist filed for the office of mayor of Poulsbo. The house in which she claimed to reside turned out to be vacant, and was razed shortly thereafter to make way for a new development. The candidate's registration was canceled. That same year, a man who won a seat on the North Kitsap School Board was disqualified from office after the election, when a challenge against his residency was sustained. The house in which he claimed to live was found to lack basic utility service, and had been condemned by the county. Two other recent challenges, both involving candidates in the Bremerton area, were not upheld. It's fairly extraordinary, Flynn said. We have more than our share of these in Kitsap County, and I'm not sure why. Both Atkinson and Smith are residents of Azalea Avenue, the same street on which Knobloch lives. "

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Exhibit F



IN THE SUPERIOR/DISTRICT COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KITSAP

FILED
SAP COUNTY CLERK

MAY 3 11 28 AM '94

Ginger S Nelson, Petitioner,

vs.

William P. Nelson, Respondent.

No. 94 2 01103 DEPT. 4 FREUDENSTEIN
SMB DEPUTY
DECLARATION
(DCLA)

The following declaration may be incorporated by reference to a Petition for an Order of Protection pursuant to a RCW 26.50 or RCW 10.14:

RCW 26.50.010(1) DOMESTIC VIOLENCE means: (a) physical harm, bodily injury, assault, or the infliction of fear of imminent physical harm, bodily injury or assault, between family or household members; or (b) sexual assault of one family or household member by another.

RCW 10.14.020(1) UNLAWFUL HARASSMENT means: a knowing and willful course of conduct directed at a specific person which seriously alarms, annoys, or harasses such person, and which serves no legitimate or lawful purpose. The course of conduct shall be such as would cause a reasonable person to suffer substantial emotional distress, and shall actually cause substantial emotional distress to the petitioner.

Describe specific acts and approximate dates of domestic violence/unlawful harassment.

I am the victim of domestic violence and/or unlawful harassment committed against me as follows:
My husband William P. Nelson has violated the restraining order by coming into our house last week while my 13 yr. old daughter was present and screamed obscenities at me and chased me through the house, leaving then returning and behaving violently. My daughter locked herself in the bathroom. In March of 1992 he tried to strangle me in the kitchen of our home. The children were afraid to call 911. He has behaved so violently toward me in front of my children that they are terrified of him and request that he not have any contact at all with, or approach them in public places to try to force shows of affection from them. We request that he be kept anywhere near the house. He has been seen and admitted to being in the woods behind our house at night. We have had to hang blankets in the windows. My 8 yr old Matthew is afraid to get up to go to the bathroom now at night so has started wetting the bed.
He has been calling and dropping in on my daughter April at work. She requests no contact from him.

He has threatened that he will drive me crazy by his actions. We request this restraining order for our safety. In March I called 911 for fear that he would harm me.

I understand if a Temporary Order for Protection is granted, I must appear at the scheduled hearing or I will no longer be protected under the law.

I declare under penalty of perjury under the Laws of the State of Washington that the foregoing statements in this declaration are true and correct.

Dated 5-03-94

Ginger S. Nelson
Signature Page 1 of 1

Exhibit G

BAINBRIDGE ISLAND MUNICIPAL COURT Kitsap County, Washington	Mailing Address: PO Box 151, Rollingbay, WA 98061 Location Address: 10255 NE Valley Rd, Bainbridge Is., WA Phone # 206-842-5641 Fax # 206-842-0316 www.bainbridgewa.gov/court email: court@bainbridgewa.gov
CITY OF BAINBRIDGE ISLAND, Plaintiff, vs <u>NELSON, WILLIAM PETER</u> Defendant.	Case No(s): <u>17B41702</u> SCRAM ALCOHOL MONITORING ORDER

The Court has ordered you to abstain from using alcohol and to submit to SCRAM alcohol monitoring as a condition of your pre-trial release or while on probation. Based on the allegations of the offense and your prior criminal history, the Court finds that you are likely to commit a violent offense while out on release if the Court does not monitor these conditions of release or probation terms by SCRAM alcohol monitoring.

Your conditions of release require:

- Abstain from alcohol, marijuana, and non-prescribed drugs.
- Submit to alcohol monitoring by wearing a SCRAM bracelet on your ankle
- Commit no criminal law violations
- Abide by all other previously imposed conditions of release including no-contact orders
-

FILED
JUL 06 2018
BAINBRIDGE ISLAND
MUNICIPAL COURT

Warning to Defendant: If you violate any conditions of this SCRAM Alcohol Monitoring Order, a warrant for your arrest may issue, and you may be held with higher bail requirements and/or serve confinement for the violation. Issuance of a warrant will also result in forfeiting any bail you have posted.

You must contact Officer Guy Roche at 206-396-7966 to make an appointment to schedule installation of your SCRAM bracelet immediately upon release and appear at the court no later than 7/6/18 (date) for installation.

SCRAM costs of \$20 for installation and \$10 per day are due weekly in advance or on a time pay agreement as arranged with the clerk. You are responsible for keeping the unit plugged in and operational as instructed by Officer Roche. You may be required to appear at court for occasional maintenance of the unit. Failure to comply with these requirements could result in a change of your conditions of release and/or a warrant being issued for your arrest.

If you successfully comply with SCRAM monitoring for a period of 30 days with no violations, you may be eligible to switch to the Smart Start alcohol monitoring device at a cost of approximately \$99/ month. You may request a hearing before the Judge if you would like to switch to this option in 30 days.

7/6/18
Date

[Signature]
Judge/ Pro Tem

Katie Wainio

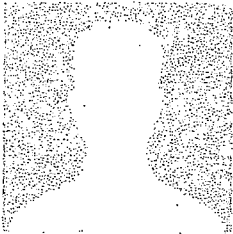
Sprint Wi-Fi 9:49 PM 96%

Find Friends

- Suggestions
- Search
- Requests ³
- Contacts
- Friends
- Outgoing

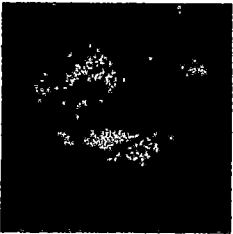
Exhibit J

FRIEND REQUESTS



William Nelson
3 mutual friends · 10h

Confirm Delete



Caity Dunmire
19 mutual friends · 22w

Confirm Delete



Kyeleigh Marie
3 mutual friends · 2w

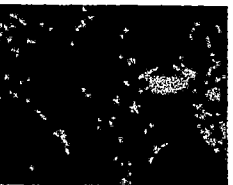
Confirm Delete

PEOPLE YOU MAY KNOW



P Elliot Thom
3 mutual friends

Add Friend Remove



Tom Francisco
11 mutual friends

Add Friend Remove

Reply

EXHIBIT 5

RECEIVED AND FILED
IN OPEN COURT
JUN 28 2019
ALISON H. SONNTAG
KITSAP COUNTY CLERK

1
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8 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KITSAP

9 WILLIAM NELSON,

10 Plaintiff,

11 v.

12 HOUSTON WADE,

13 Defendants.

NO. 18-2-03205-18

ORDER GRANTING DEFENDANTS'
MOTION TO COMPEL DISCOVERY

~~PROPOSED~~

14
15 This matter came on for hearing before the Court on Plaintiff William Nelson's
16 ("Nelson") Motion to Compel Discovery and For Attorney's Fees and Costs Pursuant to CR
17 37. The Court reviewed the pleadings and files on record, heard argument of counsel, and
18 reviewed the following documents:

19 1) Plaintiff Nelson's Motion to Compel Discovery and For Attorney's Fees and
20 Costs Pursuant to CR 37;

21 2) Declaration of Alexander Savojni in Support of Motion to Compel and
22 attached exhibits;

23 3) Plaintiff's response in opposition, if any; and

24 4) Plaintiff Nelson's Reply in Support of Motion to Compel, if any.

25 The Court, being fully advised in the premises, NOW, THEREFORE, IT IS HEREBY
26 ORDER, ADJUDGED, AND DECREED,

1 1. That Plaintiff Nelson's Motion to Compel Discovery and For Attorney's Fees
2 and Costs Pursuant to CR 37 is GRANTED.

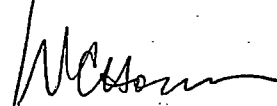
3 2. That Plaintiff shall provide full and complete responses to Nelson's First
4 Interrogatories and Requests for Production of Documents within ^{fourteen days} ~~seven (7)~~ days of this
5 Order. (July 12, 2019)

6 3. That Plaintiff shall produce all documents responsive to Nelson's discovery
7 requests at its sole expense and that the documents shall be copied and shipped to Attorney
8 Alexander Savojni.

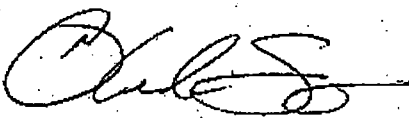
9 4. That Defendant shall pay Nelson's reasonable attorney's fees and costs in the
10 amount of ~~\$3,150.00~~ ^{\$3,000.00}, no later than seven (7) days from the date of this Order.

11 5. That Plaintiff Nelson is entitled to recover from Plaintiff reasonable attorney's
12 fees and costs incurred in enforcing this Order if necessary.

13 DATED this 28th day of June, 2019.

14
15 
16 _____
17 Honorable Judge/Commissioner
18 **WILLIAM C. HOUSER**

18 Presented by:

19 
20
21 _____
22 Alexander Savojni WSBA #37010
23 Attorney for the Plaintiff

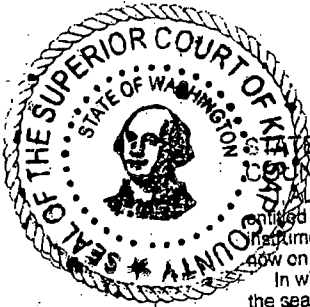
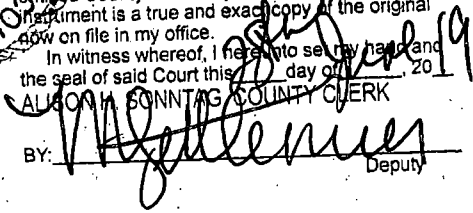
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STATE OF WASHINGTON
COUNTY OF KITSAP
ALISON H. SONNTAG, Clerk of the above
County do hereby certify that the foregoing
instrument is a true and exact copy of the original
now on file in my office.
In witness whereof, I hereunto set my hand and
the seal of said Court this 28th day of June, 2019
ALISON H. SONNTAG, COUNTY CLERK
BY: 
Deputy

EXHIBIT 6

INTERROGATORY NO. 1: Identify all Persons with knowledge concerning the subject matter of this Action and describe the facts of which each Person identified has knowledge.

ANSWER:

1. **Ginger Larsen: Former wife and abuse victim of Mr. Nelson.**
2. **Audrey Olson: Former stepdaughter and abuse victim of Mr. Nelson. Can verify that Matthew Nelson was a victim of Bill Nelson's abuse and committed perjury in his declaration.**
3. **Andy Olson: Former stepson and abuse victim of Mr. Nelson**
4. **April Olson: Former stepdaughter and abuse victim of Mr. Nelson**
5. **Katie Fisher: Rape victim of Mr. Nelson**
6. **Billy (Hunter?): Sexual assault victim of Mr. Nelson**
7. **Jared Ouellette: Witnessed Mr. Nelson sexually assault Mr. Ouellette's then incapacitated girlfriend**
8. **Ben Kardong: Two of Mr. Kardong's friends were raped by Mr. Nelson.**
9. **Megan Angell: As a teen was brought to parties at the Chicken Coop owned by Bill Blakely and asked to perform strip teases while underage. Witnessed other underage girls do strip teases and perform sexual acts drugs, booze, and cash.**
10. **Ryan Landworth: Was invited to parties at the Chicken Coop where underage girls were paid to perform strip and perform sex acts. Can place Mr. Nelson there.**
11. **Dean Gellert: Was invited to parties hosted at Bill Blakely's home where Bainbridge High Schoolers were paid to stip.**
12. **Bill Knobloch: Former Bainbridge Island city council member and witness to Mr. Nelson's threats, intimidation, and stalking.**
13. **Mike Smith: Bill Knobloch's former campaign manager and victim of threats, harassment, and stalking by Mr. Nelson.**
14. **Katie Wainio: Commercial loan officer, and victim of Mr. Nelson's threats, harassment, and stalking.**
15. **Kim Bracket: Former Bainbridge Island city council member, and victim of Mr. Nelson's threats and harassment.**

16. Malcolm Gander: geologist and victim of Mr. Nelson's threats and harassment
17. Melanie Keenan: Geologist and victim of Mr. Nelsons' threats and stalking.
18. Troy Dettman: Called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape.
19. Gretchen Dettman: called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape.
20. Todd Baylor: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
21. Phil Ahern: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
22. Sai DeRosalia: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
23. Christie Nelson (no relation): was warned about Mr. Nelson as a sexual danger by her boss when she moved to Bainbridge.
24. Gina Baker: Was shown a graphic sexual video Mr. Nelson filmed without his partner Haley's knowledge.
25. Ashley Cross DeGrow: Was sexually assaulted by Mr. Nelson and witnessed him forcing alcohol on women. Can verify Mr. Nelson's recent use of cocaine, can verify Matthew Nelson's abuse by his father. Can verify that Matthew Nelson committed perjury in his declaration.
26. Alaina Brooke-Simcoe Seyssel: Witnessed Mr. Nelson specifically seek out younger and underage girls for relations.
27. Shannon Evans: Witnessed Mr. Nelson's inappropriate contact with her son's then underage girlfriend.
28. Jeffrey Sneller: Lost his investment in Nelson's Blossom Hill development.
29. Steve Nagle: former partner of Alicia Heath, can verify that Mr. Nelson was paying Ms. Heath hundreds of dollars or more each month, likely for sexual favors
30. Bill Blakely: Former Island resident and owner of the Chicken Coop and host of numerous parties where underage girls were paid to strip and perform sex acts.
31. Molly Aquino Roth: A former underage stripper at the Chicken Coop whom Mr. Blakely dated, convinced to drop out of high school, and move in with him.

32. Gina Magraw: Performed at the Chicken Coop.
33. Cynthia Remash: Former employee of Edna's. Witnessed Mr. Nelson be very inappropriate towards an underage girl.
34. Melissa Bryant: Former partner of Mr. Nelson, and victim of harassment. Can verify that Mr. Nelson admitted to her that he acknowledged that Elizabeth Kaltreider had accused him of rape before I ever published.
35. Tracy Lang: Has witnessed Mr. Nelson's temper aggression as a neighbor.
36. Julie Myers: Has witnessed Mr. Nelson's temper aggression as a neighbor.
37. Chris Cannon: Has witnessed Mr. Nelson's temper and aggression in social settings.

INTERROGATORY NO. 2: Identify any Person whom you believe you may call as a witness in this case and describe the nature of their testimony and/or any evidence they might present at trial.

ANSWER:

1. Ginger Larsen: Former wife and abuse victim of Mr. Nelson.
2. Audrey Olson: Former stepdaughter and abuse victim of Mr. Nelson. Can verify that Matthew Nelson was a victim of Bill Nelson's abuse and committed perjury in his declaration.
3. Andy Olson: Former stepson and abuse victim of Mr. Nelson
4. April Olson: Former stepdaughter and abuse victim of Mr. Nelson
5. Katie Fisher: Rape victim of Mr. Nelson
6. Billy (Hunter?): Sexual assault victim of Mr. Nelson
7. Jared Ouellette: Witnessed Mr. Nelson sexually assault Mr. Ouellette's then incapacitated girlfriend
8. Ben Kardong: Two of Mr. Kardong's friends were raped by Mr. Nelson.
9. Megan Angell: As a teen was brought to parties at the Chicken Coop owned by Bill Blakely and asked to perform strip teases while underage. Witnessed other underage girls do strip teases and perform sexual acts drugs, booze, and cash.
10. Ryan Landworth: Was invited to parties at the Chicken Coop where underage girls were paid to perform strip and perform sex acts. Can place Mr. Nelson there.

11. **Dean Gellert:** Was invited to parties hosted at Bill Blakely's home where Bainbridge High Schoolers were paid to stip.
12. **Bill Knobloch:** Former Bainbridge Island city council member and witness to Mr. Nelson's threats, intimidation, and stalking.
13. **Mike Smith:** Bill Knobloch's former campaign manager and victim of threats, harassment, and stalking by Mr. Nelson.
14. **Katie Wainio:** Commercial loan officer, and victim of Mr. Nelson's threats, harassment, and stalking.
15. **Kim Bracket:** Former Bainbridge Island city council member, and victim of Mr. Nelson's threats and harassment.
16. **Malcolm Gander:** geologist and victim of Mr. Nelson's threats and harassment
17. **Melanie Keenan:** Geologist and victim of Mr. Nelson's threats and stalking.
18. **Troy Dettman:** Called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape.
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21. **Phil Ahern:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
22. **Sal DeRosalia:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
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24. **Gina Baker:** Was shown a graphic sexual video Mr. Nelson filmed without his partner Haley's knowledge.
25. **Ashley Cross DeGrow:** Was sexually assaulted by Mr. Nelson and witnessed him forcing alcohol on women. Can verify Mr. Nelson's recent use of cocaine, can verify Matthew Nelson's abuse by his father. Can verify that Matthew Nelson committed perjury in his declaration.

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35. Tracy Lang: Has witnessed Mr. Nelson's temper aggression as a neighbor.
36. Julie Myers: Has witnessed Mr. Nelson's temper aggression as a neighbor.
37. Chris Cannon: Has witnessed Mr. Nelson's temper and aggression in social settings.

INTERROGATORY NO. 3: List any blogs, forums, or other websites on which you commented regarding the Plaintiff, including the username/handle under which the comments were made, the date of the posts, and the number of readers.

ANSWER:

My own personal Facebook page under "Houston Wade" and The Bainbridge Island Bad List under "The Bainbridge Island Bad List". Both posts I had to delete due to the TRO filed by Mr. Nelson. The posts were in

October 2018. No clue how many readers read the posts. Had Mr. Nelson not forced me to delete you might have had access to that information.

INTERROGATORY NO. 4: Identify any/all legal charges, convictions, lawsuits or other court proceedings you have been involved with, either as a party or a witness, and state the substance of the charges, parties' respective claims, defenses and the outcome of the action(s).

ANSWER: Du Wors v. Wade. I won that case as the Judge determined that Mr. Du Wors in fact was convicted for several domestic violence charges, and convicted for hit and run, as well as admitted to alcohol and drug abuse.

INTERROGATORY NO. 5: Identify all written documents that you authored in full or part, regarding the Plaintiff, and the number of readers for each.

ANSWER:

My own personal Facebook page under "Houston Wade" and The Bainbridge Island Bad List under "The Bainbridge Island Bad List". Both posts I had to delete due to the TRO filed by Mr. Nelson. The posts were in October 2018. No clue how many readers read the posts. Had Mr. Nelson not forced me to delete you might have had access to that information. You are in possession of screenshots of said documents and you already submitted such as evidence back in October 2018.

INTERROGATORY NO. 6: Who authored and who posted on the "Houston Wade" Facebook page a post on or about October 4, 2018, which stated "Years ago a connected, alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing" and how many

people read this post?

ANSWER:

I authored it.

INTERROGATORY NO. 7: Did Defendant identify the "alcoholic Republican politician/real estate developer" referenced in a post on or about October 4, 2018 (the post referenced in the Interrogatory No. 6) as the Plaintiff and if so, how?

ANSWER:

Yes, Identified the alcoholic Republican" when asked as Bill Nelson, because that is who it was.

INTERROGATORY NO. 8: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018 "Years ago a connected, alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing."

ANSWER:

The person who rescued Ms. Kaltreider and who called 911 on her behalf, Troy Dettman, told me about it.

INTERROGATORY NO. 9: Who authored on the "Houston Wade" Facebook page a post on or about October 4, 2018 stating "About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn't just cops, there were other prominent members of the community like the above Bill Nelson who were regulars" and how many people read this post?

ANSWER:

I did. That is why my name is on the comment. Answering this question for a third time, and it is just as silly as the first two times. No clue how many people read this, you made me delete it due to filing a TRO. It appears that it was a mistake to file the TRO if you wanted to know how many people read my post. Kind of hard to prove damages if the offending document is removed before you can prove that it was disseminated far and wide, huh?

INTERROGATORY NO. 10: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018, "About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn't just cops, there were other prominent members of the community like the above Bill Nelson who were regulars"

ANSWER:

Three people: Meghan Angell, who was an underage girl brought to perform there; Ryan Landworth, who was invited to attend one of these parties; and Dean Gellert who was also invited to attend one of these parties.

INTERROGATORY NO. 11: Who authored and published on or about October 21, 2018 a Facebook post which stated "Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don't give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor's home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administration of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice." and how many people read this post?

ANSWER:

I wrote it. Again, no clue how many people read it since you filed a TRO and I was forced to remove the post.

INTERROGATORY NO. 12: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 21, 2018, "Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don't give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor's home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administration of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice."

ANSWER:

The Bankruptcy of Mr. Nelson's Blossom Hill development was widely published in local news sources. You are in possession of examples of these articles. Mr. Nelson admits to his cocaine use and alcoholism (multiple DUIs) and has done so under oath. His former wife, Ginger Larson, admits to being abused by Mr. Nelson and even filed a domestic violence restraining order against Mr. Nelson, of which you are also in possession. Troy Dettman was a witness to the aftermath of Mr. Nelson's assault on Ms. Kaltreider. Ms. Kaltreider's death was detailed in articles in both the Kitsap Sun and Bainbridge Review.

INTERROGATORY NO. 13: Identify all Persons who were consulted, relied upon, or otherwise constituted a source of information in connection with the preparation of the answers to these Interrogatories, and document requests, listing with respect to each Person

the number(s) of the Interrogatories he or she helped to prepare or for which he or she was consulted, relied upon, or otherwise constituted a source of information.

ANSWER:

I consulted with no one in preparation of these interrogatories. There are plenty of sources of information, but these were established long before the interrogatories were ever submitted. I will list my sources of said information as the following:

1. Ginger Larsen: Former wife and abuse victim of Mr. Nelson.
2. Audrey Olson: Former stepdaughter and abuse victim of Mr. Nelson. Can verify that Matthew Nelson was a victim of Bill Nelson's abuse and committed perjury in his declaration.
3. Andy Olson: Former stepson and abuse victim of Mr. Nelson
4. April Olson: Former stepdaughter and abuse victim of Mr. Nelson
5. Katie Fisher: Rape victim of Mr. Nelson
6. Billy (Hunter?): Sexual assault victim of Mr. Nelson
7. Jared Ouellette: Witnessed Mr. Nelson sexually assault Mr. Ouellette's then incapacitated girlfriend
8. Ben Kardong: Two of Mr. Kardong's friends were raped by Mr. Nelson.
9. Megan Angell: As a teen was brought to parties at the Chicken Coop owned by Bill Blakely and asked to perform strip teases while underage. Witnessed other underage girls do strip teases and perform sexual acts drugs, booze, and cash.
10. Ryan Landworth: Was invited to parties at the Chicken Coop where underage girls were paid to perform strip and perform sex acts. Can place Mr. Nelson there.
11. Dean Gellert: Was invited to parties hosted at Bill Blakely's home where Bainbridge High Schoolers were paid to stip.
12. Bill Knobloch: Former Bainbridge Island city council member and witness to Mr. Nelson's threats, intimidation, and stalking.
13. Mike Smith: Bill Knobloch's former campaign manager and victim of threats, harassment, and stalking by Mr. Nelson.
14. Katie Wainio: Commercial loan officer, and victim of Mr. Nelson's threats, harassment, and stalking.

15. **Kim Bracket:** Former Bainbridge Island city council member, and victim of Mr. Nelson's threats and harassment.
16. **Malcolm Gander:** geologist and victim of Mr. Nelson's threats and harassment
17. **Melanie Keenan:** Geologist and victim of Mr. Nelsons' threats and stalking.
18. **Troy Dettman:** Called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape.
19. **Gretchen Dettman:** called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape.
20. **Todd Baylor:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
21. **Phil Ahern:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
22. **Sal DeRosalia:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche.
23. **Christie Nelson (no relation):** was warned about Mr. Nelson as a sexual danger by her boss when she moved to Bainbridge.
24. **Gina Baker:** Was shown a graphic sexual video Mr. Nelson filmed without his partner Haley's knowledge.
25. **Ashley Cross DeGrow:** Was sexually assaulted by Mr. Nelson and witnessed him forcing alcohol on women. Can verify Mr. Nelson's recent use of cocaine, can verify Matthew Nelson's abuse by his father. Can verify that Matthew Nelson committed perjury in his declaration.
26. **Alaina Brooke-Simcoe Seyssel:** Witnessed Mr. Nelson specifically seek out younger and underage girls for relations.
27. **Shannon Evans:** Witnessed Mr. Nelson's inappropriate contact with her son's then underage girlfriend.
28. **Jeffrey Sneller:** Lost his investment in Nelson's Blossom Hill development.
29. **Steve Nagle:** former partner of Alicia Heath, can verify that Mr. Nelson was paying Ms. Heath hundreds of dollars or more each month, likely for sexual favors
30. **Bill Blakely:** Former Island resident and owner of the Chicken Coop and host of numerous parties where underage girls were paid to strip and perform sex acts.

31. Molly Aquino Roth: A former underage stripper at the Chicken Coop whom Mr. Blakely dated, convinced to drop out of high school, and move in with him.
32. Gina Magraw: Performed at the Chicken Coop.
33. Cynthia Remash: Former employee of Edna's. Witnessed Mr. Nelson be very inappropriate towards an underage girl.
34. Melissa Bryant: Former partner of Mr. Nelson, and victim of harassment. Can verify that Mr. Nelson admitted to her that he acknowledged that Elizabeth Kaltreider had accused him of rape before I ever published.
35. Tracy Lang: Has witnessed Mr. Nelson's temper aggression as a neighbor.
36. Julie Myers: Has witnessed Mr. Nelson's temper aggression as a neighbor.
37. Chris Cannon: Has witnessed Mr. Nelson's temper and aggression in social settings.

INTERROGATORY NO. 14: Identify the women Defendant claims the Plaintiff raped, where it took place, how it took place, when it took place, and the evidentiary basis/source for such claims.

ANSWER:

Mr. Nelson is who identified the woman who I wrote about on both my personal page and The Bainbridge Island Bad List. He did so in the handwritten portion for his TRO against me. You even submitted the TRO as evidence in this suit. You will note that Mr. Nelson also submitted screenshots of my articles as evidence, neither of which identify Mr. Nelson's victim by name, but Mr. Nelson was so familiar with the story that he identified the victim as "Elizabeth Kaltreider" in the TRO. This is essentially an admission of guilt on behalf of Mr. Nelson. It would be smartest thing for Mr. Nelson to do is drop this suit, because this line of questioning will not go well before a jury when Mr. Nelson submitted as evidence his own intimate knowledge of the crime for which he is being accused. Think on that one.

INTERROGATORY NO. 15: Identify the individuals Defendant claims the Plaintiff was abusive of, where it took place, how it took place, when it took place, and the evidentiary basis/source for such claims.

ANSWER:

Mr. Nelson raped Elizabeth Kaltreider in Fort Ward on Bainbridge Island, WA; not sure of the exact date. Mr. Dettman is likely to know more about when. Mr. Nelson raped Katie Fisher in his home on Bainbridge Island, WA in the fall of 2012. Mr. Nelson raped two women (friends of Ben Kardong) at the Chicken Coop; not sure of the date (exhibit B). Mr. Nelson sexually assaulted the then girlfriend of Jared Ouellette at the Chicken Coop; not sure of the date (exhibit B). Mr. Nelson was present at parties where underage girls were hired to strip and perform sex acts throughout the 2000's (Exhibit B). Mr. Nelson abused Ginger Larson and her children from about 1985/1986 until 1994 (when the DV restraining order was filed). Mr. Nelson was caught sexually assaulting a woman named Billy at his then wife's birthday party and this event was witnessed by numerous people and relayed to me on three separate and independently corroborating occasions by Todd Baylor, Sal DeRosalia, and Phil Aherns. Mr. Nelson filmed he and his partner having sex without her knowledge and then disseminated the video fairly widely so that Gina baker was shown the video. Mr. Nelson threatened and harassed Katie Wanio, Melanie Keenan, Malcom Gander, Kim Bracket, Mike Smith, and myself.

INTERROGATORY NO. 16: Identify and explain in detail all methods you have used to investigate the truth or falsity of your claims regarding the Plaintiff, made directly or by denying in your Answer to the Complaint having made any false statements, including, but not limited to claims that the Plaintiff is a rapist, an abuser, cheats investors, a psychopath, a cokehead, participated in underage sex parties. Include, but do not limit your response to the identity of any individuals with which you have had contact regarding those claims and any communications you have issued or received with regard to those claims.

ANSWER:

Mr. Nelson admits to his own cocaine use under oath. Several people have told me that they have witnessed Mr. Nelson sexually assault or rape women. Women have told me that they were the victims of Mr. Nelson. I have witnessed Mr. Nelson attempt to force himself on an incapacitated underage girl. Multiple people can testify that Mr. Nelson was present at the underage stripper parties at the Chicken Coop. There is a court record of Mr. Nelson abusing his wife and children. The Bainbridge Island Municipal Court even deemed Mr. Nelson as "prone to violence". The vast majority of these methods were conversational in nature. Some of these

conversations were done online. Those conversations are submitted as exhibit B. Mr. Nelson is a psychopath because he has zero remorse for his actions and will gaslight and deny multiple instances which fit a typical modus operandi despite the overwhelming available eyewitness testimony and court records. While I am not a trained mental health professional, these are certainly the traits of a serious personality disorder. I encourage Mr. Nelson to take the Minnesota test (the Minnesota Multiphasic Personality Inventory) and prove that he does not indeed have a deep seeded personality disorder. The fact that there is ample journalistic pieces written about the failure of the Blossom development, and where Mr. Nelson filed liens against himself on that development hoping to recover investment from the purchaser of the land, Whidbey Island Bank, demonstrates that his participation in that project was not above board.

INTERROGATORY NO. 17: Identify the substance and factual basis for each and every defense(s) to allegations in Plaintiff's complaint.

ANSWER:

1. I have known Bill Nelson since I was four years old. He married my best friend Audrey Olson's mother, Ginger Larson. From the moment Mr. Nelson was around, my mother told me that I was no longer allowed to go to Audrey's home (she lived two floors above me), but that Audrey was allowed to come to our home. My young mind didn't know the reason why this was the case, but what I didn't know at the time and was later revealed to me, was that Mr. Nelson was a violent alcoholic and cocaine addict and this was why I was not allowed to go to Audrey's home. Mr. Nelson even confirmed under oath at the Du Wors v. Wade hearing in the Bainbridge Island Municipal Court on November 6th that this was a period of intense cocaine use for him.
2. After Audrey and her family moved to a new home on the island, I did not have any memorable interactions with Mr. Nelson until I was a teen, although, during that time he still managed to get in trouble with others, be arraigned for numerous DUIs, and had a domestic violence restraining order against him protecting his wife Ginger Larson. I did not have much contact with Mr. Nelson aside from a meeting where the high school's Earth Service Corps held their Christmas party hosted by his then step daughter at

their home in Eagledale in 1998; but then in March of 1999, after the Tolo dance my senior year, a contingent of us students went to an after party. Yes, there was some underage drinking, but the party was mostly tame, until a drunk, 40-year old Bill Nelson appeared with a baggy of cocaine and almost immediately tried to force himself on an incapacitated 15-year old girl. The other boys and I managed to get the drunk Mr. Nelson out of the home and then stood guard in case he made another appearance. One of my greatest regrets in life was not calling the police that night, but many of my friends were in possession of alcohol and in my juvenile brain I justified it by telling myself that I didn't want them to get in trouble for that.

3. In 2001 Mr. Nelson announced his candidacy for the Bainbridge city council and towards the end of the filing period he was still running unopposed. After what I witnessed at that high school party a little more than two years earlier, I decided that I could not in good conscience allow a man like Bill Nelson to have any political power on the Island and I paid the filing fee and threw my hat into the ring. Unbeknownst to me, Bill Knobloch had also had disturbing run-ins with Mr. Nelson and filed to run the last minute just as I had done.
4. As the summer wore on, it became apparent that Mr. Knobloch had the better chance to win than my inexperienced, youthful 20 years, so I dropped out of the race and endorsed him. I did some research into Mr. Nelson's fundraising and wrote a letter to the editor of the Bainbridge Review published the Wednesday before the election on October 31st, 2001. In my letter I highlighted just how much money Nelson had raised at the time, some \$13,000, and made note of the television commercials Nelson managed to run during the Nielson ratings record-breaking 2001 Mariners games, as well as Mr. Nelson's ulterior motive which was to skirt and drastically change building code and zoning laws and start developing the island. Mr. Nelson has a history of violating code. Trees determined to remain as greenspace would somehow all be cut down on a weekend. Homes that were to be set aside to low-income residents would be sold to Mr. Nelson's family members...
5. Mr. Nelson never responded to my letter with one of his own. Instead, The Bainbridge Review published a front-page article on Saturday November 3rd (The Review was twice a week back then) about how much money was being raised to fund campaigns on the Island, and where much of this money was coming from. Mr. Nelson's response to my letter and The Review article was to get drunk all Saturday morning at the

Wing Point Country Club, Where Ms. Janelle Jefferson was his server, and then come to my place of work, the Town & Country coffee bar at about 3pm, and threaten me in front of dozens of customers. Mr. Nelson also loudly said he was going to get me fired from my job.

6. The following Tuesday Mr. Nelson lost the city council race in a big way and the next night came into T&C as I was closing the coffee bar and threatened my life, this time while I was alone. I called the police and got a manager and Nelson left. Mr. Nelson continued sneaking into the coffee bar several nights in a row to threaten me, sometimes saying things, sometimes passing by the window of my work area to stare me down and draw a finger across his throat. The store eventually had to hire a security guard whose entire job was to sit with me at night in case Mr. Nelson showed up. It was also during this time that Mr. Knobloch's next door neighbor and campaign manager, Mike Smith, had to obtain a restraining order against, and police protection from, Mr. Nelson for the exact same manner of physical threat and stalking.
7. Flash forward a few years to around 2004/2005, and Katie Wainio was the commercial loan officer for Sterling Savings Bank on Bainbridge Island. The bank rejected Mr. Nelson's commercial loan application for his desire to construct a large development in the Lynwood neighborhood of Bainbridge Island, a development he named "Blossom Hill". A few weeks later Ms. Wainio began her new job as the commercial loan officer at Kitsap Bank. Mr. Nelson applied for a similar commercial loan there as well and was rejected by Ms. Wainio a second time. Mr. Nelson then began stalking and threatening Ms. Wainio and she apparently sought a protective order against him.
8. Ms. Wainio then phoned other banks in an effort to blackball Mr. Nelson from every commercial lender she could think of and this delayed Mr. Nelson's development plans by many, many months. Mr. Nelson finally secured a loan from City Bank of Lynwood and when construction began, a more than \$1 million renovation of the Manor House had to be completed before other construction could commence on the rest of the development. The initial development plan was scaled back to about 80 residential units. During construction Mr. Nelson ran afoul of the law by illegally dumping more than 2200 dump truck loads of soil into the sand pit between Bucklin Hill Road and Lynwood Center Road. The geologists who alerted the State about the illegal and possibly toxic dumping then also experienced physical threats and harassment from Mr. Nelson. Financial delays, construction delays due to the Manor House renovation, and legal troubles like the soil swap ate into Mr. Nelson's capital and as the economy collapsed into the Great

Recession, so did Mr. Nelson's project and it fell into foreclosure. This foreclosure cost many investors millions of dollars..

9. Never one to miss an opportunity Mr. Nelson attempted to file liens against himself for work completed in an effort to retain control of the development. It didn't work, for unknown to Mr. Nelson, one of the principal investors in Whidbey Island Bank was Jerry Dennon, and Mr. Dennon hated Mr. Nelson with every fiber of his being which is why Whidbey Island Bank was willing to bid \$10 million in April of 2011 for the deeds to the development that had been held by City Bank of Lynnwood prior to its collapse. Mr. Dennon's daughter was Elizabeth Kaltreider whom Mr. Nelson had raped a few years earlier and never faced the consequences of his actions for that atrocity. Ms. Kaltreider had committed suicide only two months before, and Mr. Dennon blamed Mr. Nelson for her death.
10. Mr. Dennon made sure that the Blossom Hill development was foreclosed upon and later sold to John Jacobi to complete in early Summer of 2011 and renamed to "Pleasant Beach Village".
11. I had only learned of Mr. Nelson's rape of Ms. Kaltreider about that time in 2011 when during a conversation about the foreclosure of the development Troy Dettman told me about how he and his wife Gretchen were awoken in the middle of the night at their Ft. Ward home by a woman screaming for help. When they opened their front door, they found a naked Elizabeth Kaltreider shaking and exclaiming that she had just been raped and needed help. They witnessed several men quickly get into a car and drive away from the scene. The couple covered and comforted her and called the police. When the cops arrived, they found Mr. Nelson standing in the Dettman's driveway staring the couple down and smirking. The police briefly spoke with the Dettman's and Ms. Kaltreider and then returned to Mr. Nelson where they visibly shook his hand and then talked and joked with Mr. Nelson for a period of time. After which, the police informed the Dettman's that nothing nefarious had happened. The Dettmens witnessed the police physically assault Ms. Kaltreider and throw her onto the hood of the police car and threaten her with arrest. The police then left the scene, no official statements taken, no police report filed, no trip to the hospital for the victim, no rape kit administered. The police just got into their patrol cars and drove away, leaving a naked and traumatized Elizabeth Kaltreider in the care of two complete strangers. Sadly, Ms. Kaltreider jumped to her death off the Agate Pass Bridge in February of 2011 after telephoning her son to say goodbye, but according to an ex-girlfriend of Mr. Nelson's, Mr. Nelson had informed her that Ms.

Kaltreider had indeed accused him of rape and had also telephoned him in the moments leading up to her death.

12. Including my own witnessing of Mr. Nelson attempting to force himself on a teenager at a party over a decade earlier, this made for the third instance of sexual assault by Mr. Nelson of which I was personally aware. In 2009, my coworker Meghan Kent, now Meghan Angell, a graduate of Bainbridge High School in 2004, told me about how when she was an underage teen one of her female friends invited her to a party at the "Chicken Coop" speakeasy in the Lynwood neighborhood of Bainbridge Island and she went along. When Mrs. Angell arrived, she was horrified to discover that Mr. Nelson and several prominent members of the Island's community, including Bainbridge police officers and members of the fire department, were engaged in plying these underage girls with drugs, alcohol, and cash to strip and perform sex acts on the men. She said the room was out of control and deeply disturbing. This information I found so completely astounding that I didn't know what to make of it or how to process it at the time. You will note that Mrs. Angell confirms the story in a comment under my initial Facebook post about Mr. Nelson in the documents submitted as evidence in Exhibit D by Mr. Nelson where she writes "Disgusting. And True..." Apparently just like in the Jeffrey Epstein case that has recently been in the news, the men would have the girls who performed bring in their friends to also perform at later parties.
13. A few years later I was discussing the Blossom Hill development and John Jacobi's takeover with a Mr. Ryan Landworth in 2012, when Mr. Landworth said that Bill Nelson and the Chicken Coop was the entire reason he had quit the fire department and went back to school to become a blacksmith. He then told me about how one of his superiors at the department invited him to a party at the Chicken Coop speakeasy in 2006 where he discovered Mr. Nelson and other powerful men including Bainbridge police officers and fellow firefighters engaged in plying underage girls with drugs, alcohol, and cash to strip and perform sexual acts on them. Horrified that his son's classmates from the high school were being exploited like this by men who should be pillars of the community, Mr. Landworth left. The accounts of these two sources, Mr. Landworth and Mrs. Angell, means that Mr. Nelson perjured himself during the Du Wors hearing when he claimed that no such parties ever happened at the Chicken Coop.
14. I suddenly had independent corroboration of the same event from individuals who did not know each other and sent an email to Josh Farley of the Kitsap Sun relaying what I knew and got Mr. Farley in contact with

both Mr. Landworth and Ms. Angell. Eventually, after a 7-month investigation, the Kitsap Sun did not run the story citing that since the initial incident occurred almost decade earlier and the police involved were no longer with the department thanks to the hiring of Chief Hamner, it was no longer "news-worthy". I was completely disappointed.

15. Since that time Mr. Dean Gellert confirmed that these parties had been going on for years at the home of Mr. Nelson's friend Bill Blakely even prior to the Chicken Coop existing, where Mr. Blakely had a stripper pole installed and regularly hired girls from Bainbridge High School to do strip shows and more for large groups of his friends. These illegal events continued when Mr. Blakeley built the Chicken Coop and installed a stripper pole in there as well. Apparently, these parties are where noted porn star Tori Black got her start doing sex work while she was still a student at Bainbridge High School. Mr. Blakely even convinced one of the teenagers who performed at these parties, Mrs. Molly Aquino Roth, to drop out of school and move in with him.
16. My initial Facebook post concerning Mr. Nelson was inspired by the treatment of Dr. Blasey-Ford during the Kavanaugh hearing in early October. Many people had complained that Blasey-Ford had waited 35 years to come forward and my post was a demonstration of how a victim can come forward immediately and still nothing will be done. I have little doubt that the officers who responded to the Dettman's 911 call were among the officers present at the Chicken Coop speakeasy sex parties.
17. After being fed up with years of whispers about rape, assault, and abuse on the Island, I created the news page The Bainbridge Island Bad List, and Mr. Nelson was one of the first men I decided to profile on the page. A large portion of the women on the island are well-aware of Mr. Nelson's bad intentions. If the comments under my initial Facebook post are any indication, Mr. Nelson will willingly go after underage girls. There is a reason they referred to him as "Bad Bill".
18. Mrs. Ashley Cross Degrow wrote to me about how Mr. Nelson was very inappropriate towards her when she, as a child, was visiting a job site where her father was a subcontractor for Mr. Nelson, and later groped her at a party at the Chicken Coop where Mr. Nelson's son Matt witnessed it and almost got into a fight with his father over the incident. Mrs. Cross Degrow also witnessed Mr. Nelson attempting to get young women drunk specifically to take advantage of them while they were too intoxicated to consent. Mrs. Cross Degrow can also testify that Mr. Nelson lied under oath about when he stopped using cocaine and

witnessed Mr. Nelson use cocaine recently. Mr. Jerod Ouellette recounted to me how he showed up to the Chicken Coop one night to find his girlfriend passed out and Mr. Nelson's hand down her pants. I was also made aware of two women, who at this time wish to remain nameless, who agreed to go to the Chicken Coop with Mr. Nelson and have no memory of the evening and woke up in a strange place with no clothes and had to escape with only a stolen blanket to cover the both of them. I was contacted by Mrs. Katie Fisher who relayed to me that Mr. Nelson took advantage of her intoxication and inability to consent and raped her in the Fall of 2012. Three people have now informed me about how at his own wife's birthday party Mr. Nelson was caught sexually assaulting a woman. I was also informed by a former employee of his about inappropriate contact Mr. Nelson had with the minor child of the former general manager of his failed restaurant. Some of the photographs on the walls of the Chicken Coop were cropped to show the faceless naked bodies of underage teen girls who had performed at the sex parties; as if displaying underage girls from the neck down somehow made it ok. Mr. Landworth has a photo on his cellphone of these "decorations" at the Chicken Coop. These stories all show a pattern of behavior by Mr. Nelson and his friends and easily establish that he is a threat to women and girls in our community, and that I was being forthright and responsible by publishing my article about him.

19. I created the Bainbridge Island Bad List as a news page to inform the community of who the predators are among us, and Mr. Nelson fits that bill to a 'T'. I didn't stalk Mr. Nelson, and I didn't harass him. I wrote an article about his predatory actions which were confirmed by many, many sources. My goal is to warn people, especially young girls, to stay away from Mr. Nelson for their own safety. The purpose of journalism is to expose abuse, and that is exactly what I have done in this instance. The abuse of women and girls, and the abuse of the system designed to serve and protect them.
20. Mr. Nelson is not scared of me, he is not intimidated by me. What he does not like is my publicly revealing what so many women and girls on this island already know; that he is a sexual predator. I don't care what the abusers think. I am done being silent about the behavior of these men, and the members of our community deserve to be warned about them and to know the truth.
21. It is impossible to defame a man who is infamous in our community for his drunken, abusive, and predatory behavior. He lost \$27 million of other people's money, he illegally dumped thousands of truckloads of soil, he has a history of violence and threats, he is a well-known drunk with multiple DUI

arrests to his name, including a pending charge of DUI and hit and run at the Seattle ferry terminal from June 28th of this year. At the Du Wors hearing when the judge called for a recess at 3pm in the afternoon on a Tuesday, Mr. Nelson loudly exclaimed, "Damn, I need a beer!" to which both the Judge and the bailiff shot Mr. Nelson looks of bewilderment since he had just been questioned under oath about his alcoholism and drug use; and let's not forget that Mr. Nelson has raped or sexually assaulted many women and girls on Bainbridge Island. I wrote an article and have sources for my statements. That is not defamation.

INTERROGATORY NO. 18: Identify each exhibit you intend or reasonably expect to introduce into evidence at any hearing, trial, deposition, or by affidavit in this case.

ANSWER:

You are in possession of all exhibits so far submitted for trial. It would be reasonable to expect more evidence, depositions, declarations, and police and court records as they are obtained.

INTERROGATORY NO. 19: Please state all names by which you have been known, your date and place of birth, your social security number, your residential address for the past ten (10) years, your driver's license number, the full name of each spouse that you have had, and the dates of marriage and divorce for each of your spouses.

ANSWER:

I object to this Interrogatory as it is not pertinent to the suit at hand. Also, counsel voluntarily represents not one, but two of the three people who have ever stalked and/or threatened me. The third, John Du Wors, is volunteering as a witness for the plaintiff in this case (also someone with a history of domestic violence convictions). Any of this personal identifying information will no doubt be published publicly putting my safety in jeopardy since Mr. Savojni's other client, Richard Lee Rynearson, has a history of stalking, harassment, and doxxing of not just citizens but also law enforcement officers, members of the military, and local and federal judges. Mr. Rynearson is in close

contact with Mr. Nelson and is currently disseminating any and all documents provided in this case to the public far and wide. I will not be providing any of this information.

REQUEST FOR PRODUCTION NO. 1: Produce any and all documents, correspondence, or posts you have authored which reference the Plaintiff from January 1, 2014 until present.

RESPONSE:

You are in possession of all correspondence (Exhibit B), documents, and posts (Plaintiff's exhibits). Since I was forced to delete my own copies of the posts due to the TRO filed by the Plaintiff, I am not able to also provide redundant copies.

REQUEST FOR PRODUCTION NO. 2: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 2.

RESPONSE:

You were physically given these documents before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 3: Produce true and correct copies of all documents, correspondence, posts, and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No.3.

RESPONSE:

You were physically given these documents before Judge Houser on June 14th. Any other documents related to this Interrogatory were deleted due the Plaintiff filing a TRO, the only copies appear to have been submitted by the Plaintiff as evidence.

REQUEST FOR PRODUCTION NO. 4: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 4.

RESPONSE:

Mr. Nelson's testimony from the Du Wors v. Wade hearing was given to you before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 5: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 5.

RESPONSE:

The Plaintiff submitted these documents as evidence. I am not in possession of copies to submit since the Plaintiff filed a TRO and I was forced to delete the documents.

REQUEST FOR PRODUCTION NO. 6: Produce all documents, correspondence, or posts from January 1, 2014 until present which have been sent to you or are in your possession concerning the Plaintiff.

RESPONSE:

You submitted these documents as evidence. This is why you were able to quote them for your question. Since redundancy appears to be your forte, I will oblige: I cannot provide copies due to the fact that the Plaintiff filed a TRO necessitating my deletion of said posts/documents.

REQUEST FOR PRODUCTION NO. 7: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 7.

RESPONSE:

Again, the Plaintiff submitted copies these documents as evidence which is why counsel was able to quote them for this interrogatory. Also, again, I am not able to provide copies due to the fact that the Plaintiff filed a TRO necessitating in my deleting said comment.

REQUEST FOR PRODUCTION NO. 8: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your

answer to Interrogatory No. 8.

RESPONSE:

There are as of yet no documents to submit with regards to this allegation as the information was relayed during a conversation.

REQUEST FOR PRODUCTION NO. 9: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 9.

RESPONSE:

Once more, the Plaintiff submitted all pertinent documents with regard to this interrogatory which is why counsel was able to quote said document. Again, the TRO filed by the Plaintiff resulted in my deleting said originals as ordered by the court.

REQUEST FOR PRODUCTION NO. 10: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 10.

RESPONSE:

The Plaintiff was physically given exhibit B before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 11: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 11.

RESPONSE:

Again, the Plaintiff submitted any and all pertinent documents regarding this interrogatory as evidence when they filed the complaint against me. Again, I cannot provide redundant copies in response due to the fact that the Plaintiff filed a TRO against me that required I delete the related documents from the Internet.

REQUEST FOR PRODUCTION NO. 12: Produce true and correct copies of all

RESPONSE:

The Plaintiff was physically given any and all pertinent documents in my possession regarding this interrogatory before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 17: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 17.

RESPONSE:

The Plaintiff was physically given any and all pertinent documents in my possession regarding this interrogatory before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 18: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 18.

RESPONSE:

The Plaintiff was physically given any and all pertinent documents in my possession regarding this interrogatory before Judge Houser on June 14th. The exhibits are labeled and identified in the subsequent filings dating from December of 2018 to present day.

REQUEST FOR PRODUCTION NO. 19: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 19.

RESPONSE:

I have objected to this Interrogatory due to the fact that it is not pertinent to this suit and puts my safety in danger since the Plaintiff and Mr. Savojni's other client, Richard Lee Rynearson, have both stalked me in the past and Mr. Rynearson is being given everything submitted in this case by Mr. Nelson in order to be published and disseminated including videos of me at my place of work.

VERIFICATION

I, Houston Wade, declare under the penalty of perjury under the laws of the State of Washington that I have read the foregoing answers to interrogatories and requests for production, know the contents thereof, and believe the same to be true.

Signed at Bainbridge Island, Washington, this 8th day of July 2019.

By: _____

Defendant

EXHIBIT 7

RHODES LEGAL GROUP PLLC



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Robert Rhodes, Manager
Alexander Savojni, Of Counsel
Patrick Kwan, Of Counsel

August 2, 2019

Houston Wade
C/O Bruciato
236 Winslow Way E.
Bainbridge Island, WA 98110

Sent via Email

RE: Nelson v. Wade #18-2-03205-18

Dear Mr. Wade,

The purpose of this letter is to request a second CR 26(i) telephonic conference next week. In reviewing your most recent response to the Plaintiff's First Interrogatories and Requests for Production of Documents, a great deal of requested material still remains outstanding. You have still not fully complied with your obligations under discovery nor the Judge's order compelling you to comply. The Plaintiff requests one final CR 26(i) conference with you to try and resolve the issues raised in this letter otherwise we will be moving to find you in contempt and seek a default judgment. I would also like to remind you that your obligations to answer these interrogatories and request for production are to be *treated as continuing*.

Mr. Nelson's Interrogatory No. 1 states as follows:

INTERROGATORY NO. 1: Identify all Persons with knowledge concerning the subject matter of this Action and describe the facts of which each Person identified has knowledge.

You provided a list of 37 individuals but did provide any contact information. Instruction #7 orders you to state the full name, present address, telephone number, and if known, their position and business affiliation. You have provided no explanation for the missing information as required under instruction #11 as well.

Mr. Nelson's Interrogatory No. 2 states as follows:

INTERROGATORY NO. 2: Identify any Person whom you believe you may call as a witness in this case and describe the nature of their testimony and/or any evidence they might present at trial.

You provided a list of 37 individuals but did provide any contact information. Instruction #7 orders you to state the full name, present address, telephone number, and if known, their position and business affiliation. You have provided no explanation for the missing information as required under instruction #11 as well.

Mr. Nelson's Interrogatory No. 3 states as follows:

INTERROGATORY NO. 8: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018 "Years ago a connected, alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing."

You have listed one individuals but have not provided the necessary information in order to fully identify him as required under instruction #7. You have provided no explanation for the missing information as required under instruction #11 as well.

Mr. Nelson's Interrogatory No. 10 states as follows:

INTERROGATORY NO. 10: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018, "About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn't just cops, there were other prominent members of the community like the above Bill Nelson who were regulars"

You have listed three individuals but have not provided the necessary information in order to fully identify them as required under instruction #7. You have provided no explanation for the missing information as required under instruction #11 as well.

Mr. Nelson's Interrogatory No. 12 states as follows:

INTERROGATORY NO. 12: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 21, 2018, "Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don't give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor's home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administrat on of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police

force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice.”

You have listed two individuals but have not provided the necessary information in order to fully identify them as required under instruction #7. You have provided no explanation for the missing information as required under instruction #11 as well.

Mr. Nelson’s Interrogatory No. 13 states as follows:

INTERROGATORY NO. 13: Identify all Persons who were consulted, relied upon, or otherwise constituted a source of information in connection with the preparation of the answers to these Interrogatories, and document requests, listing with respect to each Person the number(s) of the Interrogatories he or she helped to prepare or for which he or she was consulted, relied upon, or otherwise constituted a source of information.

You provided a list of 37 individuals but did provide any contact information. Instruction #7 orders you to state the full name, present address, telephone number, and if known, their position and business affiliation. You have provided no explanation for the missing information as required under instruction #11 as well.

Mr. Nelson’s Interrogatory No. 14 states as follows:

INTERROGATORY NO. 14: Identify the women Defendant claims the Plaintiff raped, where it took place, how it took place, when it took place, and the evidentiary basis/source for such claims.

Your answer is argumentative and evasive. You do not answer the question of who you were referring to.

Mr. Nelson’s Interrogatory No. 15 states as follows:

INTERROGATORY NO. 15: Identify the individuals Defendant claims the Plaintiff was abusive of, where it took place, how it took place, when it took place, and the evidentiary basis/source for such claims.

You name several individuals but did provide any contact information. Instruction #7 orders you to state the full name, present address, telephone number, and if known, their position and business affiliation. Additionally, you refer to several other individuals without even naming them nor providing the demanded contact information. You have provided no explanation for the missing information as required under instruction #11 as well.

Mr. Nelson's Interrogatory No. 16 states as follows:

INTERROGATORY NO. 16: Identify and explain in detail all methods you have used to investigate the truth or falsity of your claims regarding the Plaintiff, made directly or by denying in your Answer to the Complaint having made any false statements, including, but not limited to claims that the Plaintiff is a rapist, an abuser, cheats investors, a psychopath, a cokehead, participated in underage sex parties. Include, but do not limit your response to the identity of any individuals with which you have had contact regarding those claims and any communications you have issued or received with regard to those claims.

Your answer is evasive and argumentative. You do not identify any of the individuals you refer to.

Mr. Nelson's Interrogatory No. 17 states as follows:

INTERROGATORY NO. 17: Identify the substance and factual basis for each and every defense(s) to allegations in Plaintiff's complaint.

Your answer is evasive and incomplete. Your answer "they said he did it" does not explain the substance and factual basis for each of your defenses. If you are waiving all other defenses and are only proceeding with a claim of veracity, you must still identify who "they" are and what they say he "did." The Plaintiff is entitled to a complete, non-evasive answer to this interrogatory.

Your answer is evasive and incomplete. It refers to several people without identifying or even naming them. Furthermore, individuals referenced in your answer are not listed in any other answer you provide, including No. 1 and No. 2. Examples include the referenced "boys" in paragraph 2, and your manager in paragraph 6.

Mr. Nelson's Interrogatory No. 18 states as follows:

INTERROGATORY NO. 18: Identify each exhibit you intend or reasonably expect to introduce into evidence at any hearing, trial, deposition, or by affidavit in this case.

Your answer is evasive and nonresponsive. Your answer of "you are in possession of all exhibits so far submitted for trial" is an improper burden shifting.

Mr. Nelson's Interrogatory No. 19 states as follows:

INTERROGATORY NO. 19: Please state all names by which you have been known, your date and place of birth, your social security number, your residential address for the past ten (10) years, your driver's license number, the full name of each spouse that you have had, and the dates of marriage and divorce for each of your spouses.

Your objection is not well founded and is contrary to the Judge's order compelling you to answer the question.

Request for Production

Additionally, and most notably, every response you have given for the Plaintiff's request for production are insufficient. You were explicitly warned at the initial CR 26(i) conference not to simply give a stack of documents without any explanation and again in my follow up letter to the conference call. Instead, you chose to provide a stack of documents without any explanation of what they were in response to. In response to many requests, it was impossible to even imagine what you could possibly be referring to as being a relevant responsive document. You were then warned yet again in court when the Judge signed the order compelling you to properly respond to our discovery requests and that a stack of documents without any explanation was insufficient.

Rather than listen to the many warnings and instructions to correct the past "mistake", you have chosen to not provide *any* documents in this attempt. Instead, you have simply referred to what has already been provided despite the fact you were already explicitly told it was insufficient. Simply because you say you have given everything to me already does not negate the fact that everything you gave me was already insufficient in form. You have done nothing to correct this problem. You cannot expect your "response" to now somehow be acceptable when you literally did nothing but refer to your prior response which you were already told was not acceptable.

Furthermore, you repeatedly claim as an excuse you do not have access to certain documents because you were forced to delete them from Facebook but then state the Plaintiff already has said documents and has submitted them. Based off of your own statement, it would appear you do have copies which you have obtained via the court proceedings. As the Court and I have previously instructed, you cannot ignore your responsibilities simply because you think the Plaintiff already has the document. That is not a decision for you to make. In addition, you have not provided any explanation as to what you have done in an attempt to retrieve these supposedly deleted documents. Facebook has methods of retrieving your complete digital history, including deleted posts, and yet, you have not explained what procedures you have attempted to retrieve your supposedly lost posts.

As soon as possible, please confirm your availability for a CR 26(i) phone conference which can be scheduled between August 5 and 7 during normal business hours. Presumably, you will wish to call my office as before or you can provide a phone number you would like to be reached at. Like the last telecommerce, I anticipate the call can be accomplished in less than 20 minutes. If you do not respond to this attempt to schedule a CR 26(i), I will seek additional court intervention due to your unwillingness to comply with its order compelling you to answer.

Lastly, you have been ordered to pay attorney fees on two separate occasions by Judges in this matter. The most recent order was for \$3,000 which was supposed to be paid

by July 5th. You are now a month past due on the lasted order and never paid the initial order. Please send *all* fees due to my office immediately otherwise I will have to proceed with enforcing the Judgement which will include additional costs that you will be required to pay.

Respectfully,

Alexander Savojni
WSBA No. 37010
Attorney for William Nelson

EXHIBIT 8

INTERROGATORY NO. 1: Identify all Persons with knowledge concerning the subject matter of this Action and describe the facts of which each Person identified has knowledge.

ANSWER:

1. **Ginger Larsen: Former wife and abuse victim of Mr. Nelson. I believe is retired, currently living in North Bend, WA. Do not yet have contact information.**
2. **Audrey Olson: Former stepdaughter and abuse victim of Mr. Nelson. Can verify that Matthew Nelson was a victim of Bill Nelson's abuse and committed perjury in his declaration. Lives in Belfair, WA, works at Puget Sound Naval Shipyard: Contact info: audolson@gmail.com**
3. **Andy Olson: Former stepson and abuse victim of Mr. Nelson. I believe lives in Suquamish, WA and works construction. Do not as of yet have contact information.**
4. **April Olson: Former stepdaughter and abuse victim of Mr. Nelson. Don't know occupation, I believe she lives in North Bend, WA. Do not yet have contact information.**
5. **Katie Fisher: Rape victim of Mr. Nelson. Homemaker. Lives in Bremerton, WA. Contact info: indibanditas@hotmail.com**
6. **Billy (Hunter?): Sexual assault victim of Mr. Nelson. Do not know location or have contact info as of yet.**
7. **Jarod Ouellette: Witnessed Mr. Nelson sexually assault Mr. Ouellette's then incapacitated girlfriend. Do not know job description. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/jerod.ouellette>**
- X 8. **Ben Kardong: Two of Mr. Kardong's friends were raped by Mr. Nelson. Contractor. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/benjamin.kardong>**
9. **Megan Angell: As a teen was brought to parties at the Chicken Coop owned by Bill Blakely and asked to perform strip teases while underage. Witnessed other underage girls do strip teases and perform sexual acts drugs, booze, and cash. Lives in Kauai, HI. Is a teacher. Contact info: megckent@gmail.com**
10. **Ryan Landworth: Was invited to parties at the Chicken Coop where underage girls were paid to perform strip and perform sex acts. Can place Mr. Nelson there. Lives on Bainbridge Island, WA. Is an architectural blacksmith and former BI Fire Fighter. Contact info: coolcati@hotmail.com**

11. Dean Gellert: Was invited to parties hosted at Bill Blakely's home where Bainbridge High Schoolers were paid to strip. Owner of San Carlos Restaurant. Lives on Bainbridge Island, WA. Contact info: san.carlos.98110@gmail.com
12. Bill Knobloch: Former Bainbridge Island city council member and witness to Mr. Nelson's threats, intimidation, and stalking. Retired. I think he is living in Las Vegas now. Do not as of yet have contact info.
13. Mike Smith: Bill Knobloch's former campaign manager and victim of threats, harassment, and stalking by Mr. Nelson. I believe he still lives on Bainbridge Island. Do not yet have contact info.
14. Katie Wainio: Commercial loan officer, and victim of Mr. Nelson's threats, harassment, and stalking. Lives in Poulsbo, WA. Contact info: <https://www.facebook.com/katiEWainio>
15. Kim Bracket: Former Bainbridge Island city council member, and victim of Mr. Nelson's threats and harassment. Lives on Bainbridge Island works as an attorney. Contact info: 10890 Skinner Rd NE, Bainbridge Is, WA, 98110-3449
16. Malcolm Gander: geologist and victim of Mr. Nelson's threats and harassment. Lives on Bainbridge Island, no contact info as of yet.
17. Melanie Keenan: Geologist and victim of Mr. Nelson's threats and stalking. Lives on Bainbridge Island, no contact info as of yet.
18. Troy Dettman: Called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape. Fly Fishing Guide. Lives on Bainbridge Island, WA. Contact info: <https://www.facebook.com/troy.s.dettman>
19. Gretchen Dettman: called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape. Lives on Bainbridge Island. Unknown job. No contact info as of yet.
20. Todd Baylor: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Hair Stylist and former BI Fire Fighter and former Marine Corps sniper. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/sniper2snipper>
21. Phil Ahrens: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Engineer. Lives on Bainbridge Island. Former employee of Mr. Nelson. Contact info: <https://www.facebook.com/phil.ahrens>

22. Sal DeRosalia: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Business owner and former BI fire Fighter. Bainbridge Island. Contact info: <https://www.facebook.com/sal.derosalia>
23. Kristi Nelson (no relation): was warned about Mr. Nelson as a sexual danger by her boss when she moved to Bainbridge. Real Estate agent with Sotheby's. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/kristi.m.nelson>
24. Gina Baker: Was shown a graphic sexual video Mr. Nelson filmed without his partner Haley's knowledge. Lives on Bainbridge. Nursing assistant. Contact info: <https://www.facebook.com/gina.mazzei.1>
25. Ashley Cross DeGrow: Was sexually assaulted by Mr. Nelson and witnessed him forcing alcohol on women. Can verify Mr. Nelson's recent use of cocaine, can verify Matthew Nelson's abuse by his father. Can verify that Matthew Nelson committed perjury in his declaration. Hair stylist married to Matthew Nelson's best friend's brother. Contact info: ashleycross206@gmail.com
26. Alaina Brooke-Simcoe Seyssel: Witnessed Mr. Nelson specifically seek out younger and underage girls for relations. Homemaker. Lives in Kitsap County. Contact: <https://www.facebook.com/Alaina.Seyssel>
27. Shannon Evans: Witnessed Mr. Nelson's inappropriate contact with her son's then underage girlfriend. College Professor and Author. Lives in Washington State. Contact info: pshannon.evans@gmail.com
28. Jeffrey Sneller: Lost his investment in Nelson's Blossom Hill development. Developer. Not sure where he currently lives. Do not yet have contact info.
29. Steve Nagle: former partner of Alicia Heath, can verify that Mr. Nelson was paying Ms. Heath hundreds of dollars or more each month, likely for sexual favors. Musician. Lives in Poulsbo, WA. Contact info: <https://www.facebook.com/steve.nagle.39>
30. Bill Blakely: Former Island resident and owner of the Chicken Coop and host of numerous parties where underage girls were paid to strip and perform sex acts. Retired mechanic. Whereabouts unknown. Contact info unknown. Mr. Nelson would know.
31. Molly Aquino Roth: A former underage stripper at the Chicken Coop whom Mr. Blakely dated, convinced to drop out of high school, and move in with him. Lives on Bainbridge Island. Occupation unknown. Contact info: <https://www.facebook.com/molly.a.aquino>
32. Gina Magraw: Performed at the Chicken Coop. Lives in Kitsap County. Contact info unknown.

33. Cynthia Remash: Former employee of Edna's. Witnessed Mr. Nelson be very inappropriate towards an underage girl. Lives on Bainbridge Island, works as a wine rep. No contact info yet.
34. Melissa Bryant: Former partner of Mr. Nelson, and victim of harassment. Can verify that Mr. Nelson admitted to her that he acknowledged that Elizabeth Kaltreider had accused him of rape before I ever published. Lives on Bainbridge Island. Mr. Nelson should have contact info as I do not yet have it.
35. Tracy Lang: Has witnessed Mr. Nelson's temper aggression as a neighbor. Tattoo artist and business owner in same Building as Mr. Nelson. Contact info: <http://www.tracylang.net/>
36. Julie Myers: Has witnessed Mr. Nelson's temper and aggression as a neighbor. Real Estate Agent. Bainbridge Island. Contact info: <https://www.facebook.com/julie.meyers.10>
37. Chris Cannon: Has witnessed Mr. Nelson's temper and aggression in social settings. Former fisheries biologist. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/Cannon.Chris>
38. Jonathan Evison. Was invited to Chicken Coop and became aware that underage girls performed there. Best selling author. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/jonathan.evison>
39. Michelle Chapman (aka Tori Black). Adult film star who got her start in adult entertainment as a child who performed strip teases for cash and other considerations at the Chicken Coop. Lives in Hollywood, CA. Contact info: <https://twitter.com/misstoriblack> and <https://www.facebook.com/shellie.chapman.338>
40. Lisa Marie Presti. Nurse. Was warned about Mr. Nelson's sexual predation when she moved to Bainbridge Island. Contact info: <https://www.facebook.com/lisamarie.presti>
41. Jennifer Hayner Boynton. Her daughter worked for Lee Jorgenson when she was a teen and was repeatedly inappropriately touched by Mr. Jorgenson and regularly made to feel uncomfortable by him. Knows of other girls who were victims of the same treatment. Works at Children's Hospital. Bainbridge Island resident. Contact: <https://www.facebook.com/jennifer.h.boynton>

INTERROGATORY NO. 2: Identify any Person whom you believe you may call as a witness in this case and describe the nature of their testimony and/or any evidence they might present at trial.

ANSWER:

1. Ginger Larsen: Former wife and abuse victim of Mr. Nelson. I believe is retired, currently living in North Bend, WA. Do not yet have contact information.
2. Audrey Olson: Former stepdaughter and abuse victim of Mr. Nelson. Can verify that Matthew Nelson was a victim of Bill Nelson's abuse and committed perjury in his declaration. Lives in Belfair, WA, works at Puget Sound Naval Shipyard: Contact info: audolson@gmail.com
3. Andy Olson: Former stepson and abuse victim of Mr. Nelson. I believe lives in Suquamish, WA and works construction. Do not as of yet have contact information.
4. April Olson: Former stepdaughter and abuse victim of Mr. Nelson. Don't know occupation, I believe she lives in North Bend, WA. Do not yet have contact information.
5. Katie Fisher: Rape victim of Mr. Nelson. Homemaker. Lives in Bremerton, WA. Contact info: indibanditas@hotmail.com
6. Billy (Hunter?): Sexual assault victim of Mr. Nelson. Do not know location or have contact info as of yet.
7. Jarod Ouellette: Witnessed Mr. Nelson sexually assault Mr. Ouellette's then incapacitated girlfriend. Do not know job description. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/jerod.ouellette>
8. Ben Kardong: Two of Mr. Kardong's friends were raped by Mr. Nelson. Contractor. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/benjamin.kardong>
9. Megan Angell: As a teen was brought to parties at the Chicken Coop owned by Bill Blakely and asked to perform strip teases while underage. Witnessed other underage girls do strip teases and perform sexual acts drugs, booze, and cash. Lives in Kauai, HI. Is a teacher. Contact info: megckent@gmail.com
10. Ryan Landworth: Was invited to parties at the Chicken Coop where underage girls were paid to perform strip and perform sex acts. Can place Mr. Nelson there. Lives on Bainbridge Island, WA. Is an architectural blacksmith and former BI Fire Fighter. Contact info: coolcati@hotmail.com
11. Dean Gellert: Was invited to parties hosted at Bill Blakely's home where Bainbridge High Schoolers were paid to strip. Owner of San Carlos Restaurant. Lives on Bainbridge Island, WA. Contact info: san.carlos.98110@gmail.com

12. **Bill Knobloch:** Former Bainbridge Island city council member and witness to Mr. Nelson's threats, intimidation, and stalking. Retired. I think he is living in Las Vegas now. Do not as of yet have contact info.
13. **Mike Smith:** Bill Knobloch's former campaign manager and victim of threats, harassment, and stalking by Mr. Nelson. I believe he still lives on Bainbridge Island. Do not yet have contact info.
14. **Katie Wainio:** Commercial loan officer, and victim of Mr. Nelson's threats, harassment, and stalking. Lives in Poulsbo, WA. Contact info: <https://www.facebook.com/katiewainio>
15. **Kim Bracket:** Former Bainbridge Island city council member, and victim of Mr. Nelson's threats and harassment. Lives on Bainbridge Island, works as an attorney. Contact info: 10890 Skinner Rd NE, Bainbridge Is, WA, 98110-3449
16. **Malcolm Gander:** geologist and victim of Mr. Nelson's threats and harassment. Lives on Bainbridge Island, no contact info as of yet.
17. **Melanie Keenan:** Geologist and victim of Mr. Nelson's threats and stalking. Lives on Bainbridge Island, no contact info as of yet.
18. **Troy Dettman:** Called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape. Fly Fishing Guide. Lives on Bainbridge Island, WA. Contact info: <https://www.facebook.com/troy.s.dettman>
19. **Gretchen Dettman:** called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape. Lives on Bainbridge Island. Unknown job. No contact info as of yet.
20. **Todd Baylor:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Hair Stylist and former BI Fire Fighter and former Marine Corps sniper. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/sniper2snipper>
21. **Phil Ahrens:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Engineer. Lives on Bainbridge Island. Fomer employee of Mr. Nelson. Contact info: <https://www.facebook.com/phil.ahrens>
22. **Sal DeRosalia:** Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Business owner and former BI fire Fighter. Bainbridge Island. Contact info: <https://www.facebook.com/sal.derosalia>

23. Kristi Nelson (no relation): was warned about Mr. Nelson as a sexual danger by her boss when she moved to Bainbridge. Real Estate agent with Sotheby's. Lives on Bainbridge Island. Contact info:
<https://www.facebook.com/kristi.m.nelson>
24. Gina Baker: Was shown a graphic sexual video Mr. Nelson filmed without his partner Haley's knowledge. Lives on Bainbridge. Nursing assistant. Contact info: <https://www.facebook.com/gina.mazzei.1>
25. Ashley Cross DeGrow: Was sexually assaulted by Mr. Nelson and witnessed him forcing alcohol on women. Can verify Mr. Nelson's recent use of cocaine, can verify Matthew Nelson's abuse by his father. Can verify that Matthew Nelson committed perjury in his declaration. Hair stylist married to Matthew Nelson's best friend's brother. Contact info: ashleycross206@gmail.com
26. Alaina Brooke-Simcoe Seyssel: Witnessed Mr. Nelson specifically seek out younger and underage girls for relations. Homemaker. Lives in Kitsap County. Contact: <https://www.facebook.com/Alaina.Seyssel>
27. Shannon Evans: Witnessed Mr. Nelson's inappropriate contact with her son's then underage girlfriend. College Professor and Author. Lives in Washington State. Contact info: pshannon.evans@gmail.com
28. Jeffrey Sneller: Lost his investment in Nelson's Blossom Hill development. Developer. Not sure where he currently lives. Do not yet have contact info.
29. Steve Nagle: former partner of Alicia Heath, can verify that Mr. Nelson was paying Ms. Heath hundreds of dollars or more each month, likely for sexual favors. Musician. Lives in Poulsbo, WA. Contact info:
<https://www.facebook.com/steve.nagle.39>
30. Bill Blakely: Former Island resident and owner of the Chicken Coop and host of numerous parties where underage girls were paid to strip and perform sex acts. Retired mechanic. Whereabouts unknown. Contact info unknown. Mr. Nelson would know.
31. Molly Aquino Roth: A former underage stripper at the Chicken Coop whom Mr. Blakely dated, convinced to drop out of high school, and move in with him. Lives on Bainbridge Island. Occupation unknown. Contact info: <https://www.facebook.com/molly.a.aquino>
32. Gina Magraw: Performed at the Chicken Coop. Lives in Kitsap County. Contact info unknown.
33. Cynthia Remash: Former employee of Edna's. Witnessed Mr. Nelson be very inappropriate towards an underage girl. Lives on Bainbridge Island, works as a wine rep. No contact info yet.

34. Melissa Bryant: Former partner of Mr. Nelson, and victim of harassment. Can verify that Mr. Nelson admitted to her that he acknowledged that Elizabeth Kaltreider had accused him of rape before I ever published. Lives on Bainbridge Island. Mr. Nelson should have contact info as I do not yet have it.
35. Tracy Lang: Has witnessed Mr. Nelson's temper aggression as a neighbor. Tattoo artist and business owner in same Building as Mr. Nelson. Contact info: <http://www.tracylang.net/>
36. Julie Myers: Has witnessed Mr. Nelson's temper aggression as a neighbor. Real Estate Agent. Bainbridge Island. Contact info: <https://www.facebook.com/julie.meyers.10>
37. Chris Cannon: Has witnessed Mr. Nelson's temper and aggression in social settings. Former fisheries biologist. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/Cannon.Chris>
38. Jonathan Evison. Was invited to Chicken Coop and became aware that underage girls performed there. Best selling author. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/jonathan.evison>
39. Michelle Chapman (aka Tori Black). Adult film star who got her start in adult entertainment as a child who performed strip teases for cash and other considerations at the Chicken Coop. Lives in Hollywood, CA. Contact info: <https://twitter.com/misstoriblack> and <https://www.facebook.com/shellie.chapman.338>
40. Lisa Marie Presti. Nurse. Was warned about Mr. Nelson's sexual predation when she moved to Bainbridge Island. Contact info: <https://www.facebook.com/lisamarie.presti>
41. Jennifer Hayner Boynton. Her daughter worked for Lee Jorgenson when she was a teen and was repeatedly inappropriately touched by Mr. Jorgenson and regularly made to feel uncomfortable by him. Knows of other girls who were victims of the same treatment. Works at Children's Hospital. Bainbridge Island resident. Contact: <https://www.facebook.com/jennifer.h.boynton>

INTERROGATORY NO. 3: List any blogs, forums, or other websites on which you commented regarding the Plaintiff, including the username/handle under which the comments were made, the date of the posts, and the number of readers.

ANSWER:

My own personal Facebook page under "Houston Wade" and The Bainbridge Island Bad List under "The Bainbridge Island Bad List". Both posts I had to delete due to the TRO filed by Mr. Nelson. The posts were in

October 2018. No clue how many readers read the posts. Had Mr. Nelson not forced me to delete you might have had access to that information.

INTERROGATORY NO. 4: Identify any/all legal charges, convictions, lawsuits or other court proceedings you have been involved with, either as a party or a witness, and state the substance of the charges, parties' respective claims, defenses and the outcome of the action(s).

ANSWER: Du Wors v. Wade. I won that case as the Judge determined that Mr. Du Wors in fact was convicted for several domestic violence charges, and convicted for hit and run, as well as admitted to alcohol and drug abuse.

INTERROGATORY NO. 5: Identify all written documents that you authored in full or part, regarding the Plaintiff, and the number of readers for each.

ANSWER:

My own personal Facebook page under "Houston Wade" and The Bainbridge Island Bad List under "The Bainbridge Island Bad List". Both posts I had to delete due to the TRO filed by Mr. Nelson. The posts were in October 2018. No clue how many readers read the posts. Had Mr. Nelson not forced me to delete you might have had access to that information. You are in possession of screenshots of said documents and you already submitted such as evidence back in October 2018. (Attached is exhibit A from the Plaintiff)

INTERROGATORY NO. 6: Who authored and who posted on the "Houston Wade" Facebook page a post on or about October 4, 2018, which stated "Years ago a connected, alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing" and how many

people read this post?

ANSWER:

I authored it. I do not know how many people read this post before the TRO filed by the Plaintiff forced me to delete it.

INTERROGATORY NO. 7: Did Defendant identify the "alcoholic Republican politician/real estate developer" referenced in a post on or about October 4, 2018 (the post referenced in the Interrogatory No. 6) as the Plaintiff and if so, how?

ANSWER:

Yes, Identified the "alcoholic Republican" as Bill Nelson when I was asked to the predator's identity, because that is who it was.

INTERROGATORY NO. 8: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018 "Years ago a connected, alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happened to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing."

ANSWER:

The person who rescued Ms. Kaltreider and who called 911 on her behalf, Troy Dettman, told me about it.

INTERROGATORY NO. 9: Who authored on the "Houston Wade" Facebook page a post on or about October 4, 2018 stating "About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn't just cops, there were other prominent members of the community

like the above Bill Nelson who were regulars” and how many people read this post?

ANSWER:

I did. That is why my name is on the comment. Answering this question for a third time, and it is just as silly as the first two times. No clue how many people read this, you made me delete it due to filing a TRO. It appears that it was a mistake to file the TRO if you wanted to know how many people read my post. Kind of hard to prove damages if the offending document is removed before you can prove that it was disseminated far and wide, huh?

INTERROGATORY NO. 10: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 4, 2018, “About 10-15 years ago the Chicken Coop Speakeasy in Lynwood Center was used for sex parties between Bainbridge cops and underage girls (it wasn’t just cops, there were other prominent members of the community like the above Bill Nelson who were regulars”

ANSWER:

Three people: Meghan Angell, who was an underage girl brought to perform there; Ryan Landworth, who was invited to attend one of these parties; and Dean Gellert who was also invited to attend one of these parties.

INTERROGATORY NO. 11: Who authored and published on or about October 21, 2018 a Facebook post which stated “Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don’t give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor’s home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administration of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a

psychopath rapist. He has also run for public office twice.” and how many people read this post?

ANSWER:

I wrote it. Again, no clue how many people read it since you filed a TRO and I was forced to remove the post.

INTERROGATORY NO. 12: Please state the facts Defendant relied upon and identify the source of said facts, when Defendant published on or about October 21, 2018, “Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well. Stay away from Bill Nelson and definitely don’t give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor’s home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administration of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force) Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge. Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice.”

ANSWER:

The Bankruptcy of Mr. Nelson’s Blossom Hill development was widely published in local news sources. You are in possession of examples of these articles. Mr. Nelson admits to his cocaine use and alcoholism (multiple DUIs) and has done so under oath (attached Exhibit A). His former wife, Ginger Larson, admits to being abused by Mr. Nelson and even filed a domestic violence restraining order against Mr. Nelson, of which you are also in possession (attached Exhibit F). Troy Dettman was a witness to the aftermath of Mr. Nelson’s assault on Ms. Kaltreider. Ms. Kaltreider’s death was detailed in articles in both the Kitsap Sun and Bainbridge Review.

INTERROGATORY NO. 13: Identify all Persons who were consulted, relied upon, or otherwise constituted a source of information in connection with the preparation of the answers to these Interrogatories, and document requests, listing with respect to each Person the number(s) of the Interrogatories he or she helped to prepare or for which he or she was consulted, relied upon, or otherwise constituted a source of information.

ANSWER:

I consulted with no one in preparation of these interrogatories. There are plenty of sources of information, but these were established long before the interrogatories were ever submitted. I will list my sources of said information as the following:

1. **Ginger Larsen: Former wife and abuse victim of Mr. Nelson. I believe is retired, currently living in North Bend, WA. Do not yet have contact information.**
2. **Audrey Olson: Former stepdaughter and abuse victim of Mr. Nelson. Can verify that Matthew Nelson was a victim of Bill Nelson's abuse and committed perjury in his declaration. Lives in Belfair, WA, works at Puget Sound Naval Shipyard: Contact info: audolson@gmail.com**
3. **Andy Olson: Former stepson and abuse victim of Mr. Nelson. I believe lives in Suquamish, WA and works construction. Do not as of yet have contact information.**
4. **April Olson: Former stepdaughter and abuse victim of Mr. Nelson. Don't know occupation, I believe she lives in North Bend, WA. Do not yet have contact information.**
5. **Katie Fisher: Rape victim of Mr. Nelson. Homemaker. Lives in Bremerton, WA. Contact info: indibanditas@hotmail.com**
6. **Billy (Hunter?): Sexual assault victim of Mr. Nelson. Do not know location or have contact info as of yet.**
7. **Jarod Ouellette: Witnessed Mr. Nelson sexually assault Mr. Ouellette's then incapacitated girlfriend. Do not know job description. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/jerod.ouellette>**
8. **Ben Kardong: Two of Mr. Kardong's friends were raped by Mr. Nelson. Contractor. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/benjamin.kardong>**

9. Megan Angell: As a teen was brought to parties at the Chicken Coop owned by Bill Blakely and asked to perform strip teases while underage. Witnessed other underage girls do strip teases and perform sexual acts drugs, booze, and cash. Lives in Kauai, HI. Is a teacher. Contact info: megckent@gmail.com
10. Ryan Landworth: Was invited to parties at the Chicken Coop where underage girls were paid to perform strip and perform sex acts. Can place Mr. Nelson there. Lives on Bainbridge Island, WA. Is an architectural blacksmith and former BI Fire Fighter. Contact info: coolcati@hotmail.com
11. Dean Gellert: Was invited to parties hosted at Bill Blakely's home where Bainbridge High Schoolers were paid to strip. Owner of San Carlos Restaurant. Lives on Bainbridge Island, WA. Contact info: san.carlos.98110@gmail.com
12. Bill Knobloch: Former Bainbridge Island city council member and witness to Mr. Nelson's threats, intimidation, and stalking. Retired. I think he is living in Las Vegas now. Do not as of yet have contact info.
13. Mike Smith: Bill Knobloch's former campaign manager and victim of threats, harassment, and stalking by Mr. Nelson. I believe he still lives on Bainbridge Island. Do not yet have contact info.
14. Katie Wainio: Commercial loan officer, and victim of Mr. Nelson's threats, harassment, and stalking. Lives in Poulsbo, WA. Contact info: <https://www.facebook.com/katiwainio>
15. Kim Bracket: Former Bainbridge Island city council member, and victim of Mr. Nelson's threats and harassment. Lives on Bainbridge Island, works as an attorney. Contact info: 10890 Skinner Rd NE, Bainbridge Is, WA, 98110-3449
16. Malcolm Gander: geologist and victim of Mr. Nelson's threats and harassment. Lives on Bainbridge Island, no contact info as of yet.
17. Melanie Keenan: Geologist and victim of Mr. Nelsons' threats and stalking. Lives on Bainbridge Island, no contact info as of yet.
18. Troy Dettman: Called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape. Fly Fishing Guide. Lives on Bainbridge Island, WA. Contact info: <https://www.facebook.com/troy.s.dettman>
19. Gretchen Dettman: called 911 on Mr. Nelson and Nelson's friends after Elizabeth Kaltreider sought help as a victim of rape. Lives on Bainbridge Island. Unknown job. No contact info as of yet.

20. Todd Baylor: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Hair Stylist and former BI Fire Fighter and former Marine Corps sniper. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/sniper2snipper>
21. Phil Ahrens: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Engineer. Lives on Bainbridge Island. Fomer employee of Mr. Nelson. Contact info: <https://www.facebook.com/phil.ahrens>
22. Sal DeRosalia: Has knowledge of Mr. Nelson committing a sexual assault at the birthday party of his then wife, Janine Courtemanche. Business owner and former BI fire Fighter. Bainbridge Island. Contact info: <https://www.facebook.com/sal.derosalia>
23. Kristi Nelson (no relation): was warned about Mr. Nelson as a sexual danger by her boss when she moved to Bainbridge. Real Estate agent with Sotheby's. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/kristi.m.nelson>
24. Gina Baker: Was shown a graphic sexual video Mr. Nelson filmed without his partner Haley's knowledge. Lives on Bainbridge. Nursing assistant. Contact info: <https://www.facebook.com/gina.mazzei.1>
25. Ashley Cross DeGrow: Was sexually assaulted by Mr. Nelson and witnessed him forcing alcohol on women. Can verify Mr. Nelson's recent use of cocaine, can verify Matthew Nelson's abuse by his father. Can verify that Matthew Nelson committed perjury in his declaration. Hair stylist married to Matthew Nelson's best friend's brother. Contact info: ashleyrcross206@gmail.com
26. Alaina Brooke-Simcoe Seyssel: Witnessed Mr. Nelson specifically seek out younger and underage girls for relations. Homemaker. Lives in Kitsap County. Contact: <https://www.facebook.com/Alaina.Seyssel>
27. Shannon Evans: Witnessed Mr. Nelson's inappropriate contact with her son's then underage girlfriend. College Professor and Author. Lives in Washington State. Contact info: pshannon.evans@gmail.com
28. Jeffrey Sneller: Lost his investment in Nelson's Blossom Hill development. Developer. Not sure where he currently lives. Do not yet have contact info.
29. Steve Nagle: former partner of Alicia Heath, can verify that Mr. Nelson was paying Ms. Heath hundreds of dollars or more each month, likely for sexual favors. Musician. Lives in Poulsbo, WA. Contact info: <https://www.facebook.com/steve.nagle.39>

30. **Bill Blakely:** Former Island resident and owner of the Chicken Coop and host of numerous parties where underage girls were paid to strip and perform sex acts. Retired mechanic. Whereabouts unknown. Contact info unknown. Mr. Nelson would know.
31. **Molly Aquino Roth:** A former underage stripper at the Chicken Coop whom Mr. Blakely dated, convinced to drop out of high school, and move in with him. Lives on Bainbridge Island. Occupation unknown. Contact info: <https://www.facebook.com/molly.a.aquino>
32. **Gina Magraw:** Performed at the Chicken Coop. Lives in Kitsap County. Contact info unknown.
33. **Cynthia Remash:** Former employee of Edna's. Witnessed Mr. Nelson be very inappropriate towards an underage girl. Lives on Bainbridge Island, works as a wine rep. No contact info yet.
34. **Melissa Bryant:** Former partner of Mr. Nelson, and victim of harassment. Can verify that Mr. Nelson admitted to her that he acknowledged that Elizabeth Kaltreider had accused him of rape before I ever published. Lives on Bainbridge Island. Mr. Nelson should have contact info as I do not yet have it.
35. **Tracy Lang:** Has witnessed Mr. Nelson's temper aggression as a neighbor. Tattoo artist and business owner in same Building as Mr. Nelson. Contact info: <http://www.tracylang.net/>
36. **Julie Myers:** Has witnessed Mr. Nelson's temper aggression as a neighbor. Real Estate Agent. Bainbridge Island. Contact info: <https://www.facebook.com/julie.meyers.10>
37. **Chris Cannon:** Has witnessed Mr. Nelson's temper and aggression in social settings. Former fisheries biologist. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/Cannon.Chris>
38. **Jonathan Evison.** Was invited to Chicken Coop and became aware that underage girls performed there. Bestselling author. Lives on Bainbridge Island. Contact info: <https://www.facebook.com/jonathan.evison>
39. **Michelle Chapman (aka Tori Black).** Adult film star who got her start in adult entertainment as a child who performed strip teases for cash and other considerations at the Chicken Coop. Lives in Hollywood, CA. Contact info: <https://twitter.com/misstoriblack> and <https://www.facebook.com/shellie.chapman.338>
40. **Lisa Marie Presti.** Nurse. Was warned about Mr. Nelson's sexual predation when she moved to Bainbridge Island. Contact info: <https://www.facebook.com/lisamarie.presti>
41. **Jennifer Hayner Boynton.** Her daughter worked for Lee Jorgenson when she was a teen and was repeatedly inappropriately touched by Mr. Jorgenson and regularly made to feel uncomfortable by him. Knows of

other girls who were victims of the same treatment. Works at Children's Hospital. Bainbridge Island resident. Contact: <https://www.facebook.com/jennifer.h.boynton>

INTERROGATORY NO. 14: Identify the women Defendant claims the Plaintiff raped, where it took place, how it took place, when it took place, and the evidentiary basis/source for such claims.

ANSWER:

Mr. Nelson is who identified the woman who I wrote about on both my personal page and The Bainbridge Island Bad List. He did so in the handwritten portion for his TRO against me. You even submitted the TRO as evidence in this suit. You will note that Mr. Nelson also submitted screenshots of my articles as evidence (plaintiff's Exhibit A), neither of which identify Mr. Nelson's victim by name, but Mr. Nelson was so familiar with the story that he correctly identified the victim as "Elizabeth Kaltreider" in the TRO. This is essentially an admission of guilt on behalf of Mr. Nelson. It would be the smartest thing for Mr. Nelson to do is drop this suit, because this line of questioning will not go well before a jury when Mr. Nelson submitted as evidence his own intimate knowledge of the crime for which he is being accused. Think on that one.

I know Counsel believes this answer is "evasive" but that must be a euphemism for "not wanting to admit his client's guilt". The answer is not evasive, it is accurate and will not be changed to reflect an answer Counsel wishes were true. Bill Nelson raped Elizabeth Kaltreider as well as other women. Bill Nelson is a rapist.

INTERROGATORY NO. 15: Identify the individuals Defendant claims the Plaintiff was abusive of, where it took place, how it took place, when it took place, and the evidentiary basis/source for such claims.

ANSWER:

Mr. Nelson raped Elizabeth Kaltreider in Fort Ward on Bainbridge Island, WA; not sure of the exact date. Mr. Dettman is likely to know more about when. Mr. Nelson raped Katie Fisher in his home on Bainbridge Island, WA in the fall of 2012 (Exhibit B). Mr. Nelson raped two women (friends of Ben Kardong) at the Chicken Coop; not sure of the date (Exhibit B). Mr. Nelson sexually assaulted the then girlfriend of Jared Ouellette at the Chicken Coop; not sure of the date (exhibit B). Mr. Nelson was present at parties where underage girls were

hired to strip and perform sex acts throughout the 2000's (Exhibit B). Mr. Nelson abused Ginger Larson and her children from about 1985/1986 until 1994 (when the DV restraining order was filed, Exhibit F)). Mr. Nelson was caught sexually assaulting a woman named Billy at his then wife's birthday party and this event was witnessed by numerous people and relayed to me on three separate and independently corroborating occasions by Todd Baylor, Sal DeRosalia, and Phil Aherns. Mr. Nelson filmed he and his partner having sex without her knowledge and then disseminated the video widely so that Gina Baker was shown the video. Mr. Nelson threatened and harassed Katie Wanio, Melanie Keenan, Malcom Gander, Kim Bracket, Mike Smith, and myself.

INTERROGATORY NO. 16: Identify and explain in detail all methods you have used to investigate the truth or falsity of your claims regarding the Plaintiff, made directly or by denying in your Answer to the Complaint having made any false statements, including, but not limited to claims that the Plaintiff is a rapist, an abuser, cheats investors, a psychopath, a cokehead, participated in underage sex parties. Include, but do not limit your response to the identity of any individuals with which you have had contact regarding those claims and any communications you have issued or received with regard to those claims.

ANSWER:

Mr. Nelson admits to his own cocaine use under oath (Exhibit A). Several people have told me that they have witnessed Mr. Nelson sexually assault or rape women (Sal DeRosalia, Todd Baylor, Phil Ahrens, Ashley Cross DeGrow). Women have told me that they were the victims of Mr. Nelson (Katie Fisher, Ashley Cross DeGrow). I have witnessed Mr. Nelson attempt to force himself on an incapacitated underage girl. Multiple people can testify that Mr. Nelson was present at the underage stripper parties at the Chicken Coop (Ryan Landworth and Meghan Angell). There is a court record of Mr. Nelson abusing his wife and children (Exhibit F). The Bainbridge Island Municipal Court even deemed Mr. Nelson as "prone to violence" (Exhibit G). The vast majority of these methods were conversational in nature. Some of these conversations were done online. Those conversations are submitted as exhibit B. Mr. Nelson is a psychopath because he has zero remorse for his actions and will gaslight and deny multiple instances which fit a typical modus operandi despite the

overwhelming available eyewitness testimony and court records. While I am not a trained mental health professional, these are certainly the traits of a serious personality disorder. I encourage Mr. Nelson to take the Minnesota test (the Minnesota Multiphasic Personality Inventory) and prove that he does not indeed have a deep seeded personality disorder. The fact that there is ample journalistic pieces written about the failure of the Blossom development, and where Mr. Nelson filed liens against himself on that development hoping to recover investment from the purchaser of the land, Whidbey Island Bank, demonstrates that his participation in that project was not above board.

INTERROGATORY NO. 17: Identify the substance and factual basis for each and every defense(s) to allegations in Plaintiff's complaint.

ANSWER:

1. I have known Bill Nelson since I was four years old. He married my best friend Audrey Olson's mother, Ginger Larson. From the moment Mr. Nelson was around, my mother told me that I was no longer allowed to go to Audrey's home (she lived two floors above me), but that Audrey was allowed to come to our home. My young mind didn't know the reason why this was the case, but what I didn't know at the time and was later revealed to me, was that Mr. Nelson was a violent alcoholic and cocaine addict and this was why I was not allowed to go to Audrey's home. Mr. Nelson even confirmed under oath at the Du Wors v. Wade hearing in the Bainbridge Island Municipal Court on November 6th that this was a period of intense cocaine use for him.
2. After Audrey and her family moved to a new home on the island, I did not have any memorable interactions with Mr. Nelson until I was a teen, although, during that time he still managed to get in trouble with others, be arraigned for numerous DUIs, and had a domestic violence restraining order against him protecting his wife Ginger Larson. I did not have much contact with Mr. Nelson aside from a meeting where the high school's Earth Service Corps held their Christmas party hosted by his then step daughter at their home in Eagledale in 1998; but then in March of 1999, after the Tolo dance my senior year, a contingent of us students went to an after party. Yes, there was some underage drinking, but the party was

mostly tame, until a drunk, 40-year old Bill Nelson appeared with a baggy of cocaine and almost immediately tried to force himself on an incapacitated 15-year old girl. The other boys (I don't recall which specific teens helped me remove Nelson from the party) and I managed to get the drunk Mr. Nelson out of the home and then stood guard in case he made another appearance. One of my greatest regrets in life was not calling the police that night, but many of my friends were in possession of alcohol and in my juvenile brain I justified it by telling myself that I didn't want them to get in trouble for that.

3. In 2001 Mr. Nelson announced his candidacy for the Bainbridge city council and towards the end of the filing period he was still running unopposed. After what I witnessed at that high school party a little more than two years earlier, I decided that I could not in good conscience allow a man like Bill Nelson to have any political power on the Island and I paid the filing fee and threw my hat into the ring. Unbeknownst to me, Bill Knobloch had also had disturbing run-ins with Mr. Nelson and filed to run the last minute just as I had done.
4. As the summer wore on, it became apparent that Mr. Knobloch had the better chance to win than my inexperienced, youthful 20 years, so I dropped out of the race and endorsed him. I did some research into Mr. Nelson's fundraising and wrote a letter to the editor of the Bainbridge Review published the Wednesday before the election on October 31st, 2001. In my letter I highlighted just how much money Nelson had raised at the time, some \$13,000, and made note of the television commercials Nelson managed to run during the Nielson ratings record-breaking 2001 Mariners games, as well as Mr. Nelson's ulterior motive which was to skirt and drastically change building code and zoning laws and start developing the island. Mr. Nelson has a history of violating code. Trees determined to remain as greenspace would somehow all be cut down on a weekend. Homes that were to be set aside to low-income residents would be sold to Mr. Nelson's family members...
5. Mr. Nelson never responded to my letter with one of his own. Instead, The Bainbridge Review published a front-page article on Saturday November 3rd (The Review was twice a week back then) about how much money was being raised to fund campaigns on the Island, and where much of this money was coming from. Mr. Nelson's response to my letter and The Review article was to get drunk all Saturday morning at the Wing Point Country Club, Where Ms. Janelle Jefferson was his server, and then come to my place of work,

the Town & Country coffee bar at about 3pm, and threaten me in front of dozens of customers. Mr. Nelson also loudly said he was going to get me fired from my job.

6. The following Tuesday Mr. Nelson lost the city council race in a big way and the next night came into T&C as I was closing the coffee bar and threatened my life, this time while I was alone. I called the police and got a manager (I believe that evening it was Bryan Biggs, I will see if I can find contact information) and Nelson left. Mr. Nelson continued sneaking into the coffee bar several nights in a row to threaten me, sometimes saying things, sometimes passing by the window of my work area to stare me down and draw a finger across his throat. The store eventually had to hire a security guard whose entire job was to sit with me at night in case Mr. Nelson showed up. It was also during this time that Mr. Knobloch's next door neighbor and campaign manager, Mike Smith, had to obtain a restraining order against, and police protection from, Mr. Nelson for the exact same manner of physical threat and stalking.
7. Flash forward a few years to around 2004/2005, and Katie Wainio was the commercial loan officer for Sterling Savings Bank on Bainbridge Island. The bank rejected Mr. Nelson's commercial loan application for his desire to construct a large development in the Lynwood neighborhood of Bainbridge Island, a development he named "Blossom Hill". A few weeks later Ms. Wainio began her new job as the commercial loan officer at Kitsap Bank. Mr. Nelson applied for a similar commercial loan there as well and was rejected by Ms. Wainio a second time. Mr. Nelson then began stalking and threatening Ms. Wainio and she apparently sought a protective order against him.
8. Ms. Wainio then phoned other banks in an effort to blackball Mr. Nelson from every commercial lender she could think of and this delayed Mr. Nelson's development plans by many, many months. Mr. Nelson finally secured a loan from City Bank of Lynnwood and when construction began, a more than \$1 million renovation of the Manor House had to be completed before other construction could commence on the rest of the development. The initial development plan was scaled back to about 80 residential units. During construction Mr. Nelson ran afoul of the law by illegally dumping more than 2200 dump truck loads of soil into the sand pit between Bucklin Hill Road and Lynwood Center Road. The geologists who alerted the State about the illegal and possibly toxic dumping then also experienced physical threats and harassment from Mr. Nelson. Financial delays, construction delays due to the Manor House renovation, and legal troubles like the soil swap ate into Mr. Nelson's capital and as the economy collapsed into the Great

Recession, so did Mr. Nelson's project and it fell into foreclosure. This foreclosure cost many investors millions of dollars..

9. Never one to miss an opportunity Mr. Nelson attempted to file liens against himself for work completed in an effort to retain control of the development. It didn't work, for unknown to Mr. Nelson, one of the principal investors in Whidbey Island Bank was Jerry Dennon, and Mr. Dennon hated Mr. Nelson with every fiber of his being which is why Whidbey Island Bank was willing to bid \$10 million in April of 2011 for the deeds to the development that had been held by City Bank of Lynnwood prior to its collapse. Mr. Dennon's daughter was Elizabeth Kaltreider whom Mr. Nelson had raped a few years earlier and never faced the consequences of his actions for that atrocity. Ms. Kaltreider had committed suicide only two months before, and Mr. Dennon blamed Mr. Nelson for her death.
10. Mr. Dennon made sure that the Blossom Hill development was foreclosed upon and later sold to John Jacobi to complete in early Summer of 2011 and renamed to "Pleasant Beach Village".
11. I had only learned of Mr. Nelson's rape of Ms. Kaltreider about that time in 2011 when during a conversation about the foreclosure of the development Troy Dettman told me about how he and his wife Gretchen were awoken in the middle of the night at their Ft. Ward home by a woman screaming for help. When they opened their front door, they found a naked Elizabeth Kaltreider shaking and exclaiming that she had just been raped and needed help. They witnessed several men quickly get into a car and drive away from the scene. The couple covered and comforted her and called the police. When the cops arrived, they found Mr. Nelson standing in the Dettman's driveway staring the couple down and smirking. The police briefly spoke with the Dettman's and Ms. Kaltreider and then returned to Mr. Nelson where they visibly shook his hand and then talked and joked with Mr. Nelson for a period of time. After which, the police informed the Dettman's that nothing nefarious had happened. The Dettmens witnessed the police physically assault Ms. Kaltreider and throw her onto the hood of the police car and threaten her with arrest. The police then left the scene, no official statements taken, no police report filed, no trip to the hospital for the victim, no rape kit administered. The police just got into their patrol cars and drove away, leaving a naked and traumatized Elizabeth Kaltreider in the care of two complete strangers. Sadly, Ms. Kaltreider jumped to her death off the Agate Pass Bridge in February of 2011 after telephoning her son to say goodbye, but according to an ex-girlfriend of Mr. Nelson's, Mr. Nelson had informed her that Ms.

Kaltreider had indeed accused him of rape and had also telephoned him in the moments leading up to her death.

12. Including my own witnessing of Mr. Nelson attempting to force himself on a teenager at a party over a decade earlier, this made for the third instance of sexual assault by Mr. Nelson of which I was personally aware. In 2009, my coworker Meghan Kent, now Meghan Angell, a graduate of Bainbridge High School in 2004, told me about how when she was an underage teen one of her female friends invited her to a party at the "Chicken Coop" speakeasy in the Lynwood neighborhood of Bainbridge Island and she went along. When Mrs. Angell arrived, she was horrified to discover that Mr. Nelson and several prominent members of the Island's community, including Bainbridge police officers and members of the fire department, were engaged in plying these underage girls with drugs, alcohol, and cash to strip and perform sex acts on the men. She said the room was out of control and deeply disturbing. This information I found so completely astounding that I didn't know what to make of it or how to process it at the time. You will note that Mrs. Angell confirms the story in a comment under my initial Facebook post about Mr. Nelson in the documents submitted as evidence in Exhibit D by Mr. Nelson where she writes "Disgusting. And True..." Apparently just like in the Jeffrey Epstein case that has recently been in the news, the men would have the girls who performed bring in their friends to also perform at later parties.
13. A few years later I was discussing the Blossom Hill development and John Jacobi's takeover with a Mr. Ryan Landworth in 2012, when Mr. Landworth said that Bill Nelson and the Chicken Coop was the entire reason he had quit the fire department and went back to school to become a blacksmith. He then told me about how one of his superiors at the department invited him to a party at the Chicken Coop speakeasy in 2006 where he discovered Mr. Nelson and other powerful men including Bainbridge police officers and fellow firefighters engaged in plying underage girls with drugs, alcohol, and cash to strip and perform sexual acts on them. Horrified that his son's classmates from the high school were being exploited like this by men who should be pillars of the community, Mr. Landworth left. The accounts of these two sources, Mr. Landworth and Mrs. Angell, means that Mr. Nelson perjured himself during the Du Wors hearing when he claimed that no such parties ever happened at the Chicken Coop.
14. I suddenly had independent corroboration of the same event from individuals who did not know each other and sent an email to Josh Farley of the Kitsap Sun relaying what I knew and got Mr. Farley in contact with

both Mr. Landworth and Ms. Angell. Eventually, after a 7-month investigation, the Kitsap Sun did not run the story citing that since the initial incident occurred almost decade earlier and the police involved were no longer with the department thanks to the hiring of Chief Hamner, it was no longer "news-worthy". I was completely disappointed.

15. Since that time Mr. Dean Gellert confirmed that these parties had been going on for years at the home of Mr. Nelson's friend Bill Blakely even prior to the Chicken Coop existing, where Mr. Blakely had a stripper pole installed and regularly hired girls from Bainbridge High School to do strip shows and more for large groups of his friends. These illegal events continued when Mr. Blakeley built the Chicken Coop and installed a stripper pole in there as well. Apparently, these parties are where noted porn star Tori Black got her start doing sex work while she was still a student at Bainbridge High School. Mr. Blakely even convinced one of the teenagers who performed at these parties, Mrs. Molly Aquino Roth, to drop out of school and move in with him.
16. My initial Facebook post concerning Mr. Nelson was inspired by the treatment of Dr. Blasey-Ford during the Kavanaugh hearing in early October. Many people had complained that Blasey-Ford had waited 35 years to come forward and my post was a demonstration of how a victim can come forward immediately and still nothing will be done. I have little doubt that the officers who responded to the Dettman's 911 call were among the officers present at the Chicken Coop speakeasy sex parties.
17. After being fed up with years of whispers about rape, assault, and abuse on the Island, I created the news page The Bainbridge Island Bad List, and Mr. Nelson was one of the first men I decided to profile on the page. A large portion of the women on the island are well-aware of Mr. Nelson's bad intentions. If the comments under my initial Facebook post are any indication, Mr. Nelson will willingly go after underage girls. There is a reason they referred to him as "Bad Bill".
18. Mrs. Ashley Cross Degrow wrote to me about how Mr. Nelson was very inappropriate towards her when she, as a child, was visiting a job site where her father was a subcontractor for Mr. Nelson, and later groped her at a party at the Chicken Coop where Mr. Nelson's son Matt witnessed it and almost got into a fight with his father over the incident. Mrs. Cross Degrow also witnessed Mr. Nelson attempting to get young women drunk specifically to take advantage of them while they were too intoxicated to consent. Mrs. Cross Degrow can also testify that Mr. Nelson lied under oath about when he stopped using cocaine and

witnessed Mr. Nelson use cocaine recently. Mr. Jerod Ouellette recounted to me how he showed up to the Chicken Coop one night to find his girlfriend passed out and Mr. Nelson's hand down her pants. I was also made aware of two women, who at this time wish to remain nameless, who agreed to go to the Chicken Coop with Mr. Nelson and have no memory of the evening and woke up in a strange place with no clothes and had to escape with only a stolen blanket to cover the both of them. I was contacted by Mrs. Katie Fisher who relayed to me that Mr. Nelson took advantage of her intoxication and inability to consent and raped her in the Fall of 2012. Three people have now informed me about how at his own wife's birthday party Mr. Nelson was caught sexually assaulting a woman. I was also informed by a former employee of his about inappropriate contact Mr. Nelson had with the minor child of the former general manager of his failed restaurant. Some of the photographs on the walls of the Chicken Coop were cropped to show the faceless naked bodies of underage teen girls who had performed at the sex parties; as if displaying underage girls from the neck down somehow made it ok. Mr. Landworth has a photo on his cellphone of these "decorations" at the Chicken Coop. These stories all show a pattern of behavior by Mr. Nelson and his friends and easily establish that he is a threat to women and girls in our community, and that I was being forthright and responsible by publishing my article about him.

19. I created the Bainbridge Island Bad List as a news page to inform the community of who the predators are among us, and Mr. Nelson fits that bill to a 'T'. I didn't stalk Mr. Nelson, and I didn't harass him. I wrote an article about his predatory actions which were confirmed by many, many sources. My goal is to warn people, especially young girls, to stay away from Mr. Nelson for their own safety. The purpose of journalism is to expose abuse, and that is exactly what I have done in this instance. The abuse of women and girls, and the abuse of the system designed to serve and protect them.
20. Mr. Nelson is not scared of me, he is not intimidated by me. What he does not like is my publicly revealing what so many women and girls on this island already know; that he is a sexual predator. I don't care what the abusers think. I am done being silent about the behavior of these men, and the members of our community deserve to be warned about them and to know the truth.
21. It is impossible to defame a man who is infamous in our community for his drunken, abusive, and predatory behavior. He lost \$27 million of other people's money, he illegally dumped thousands of truckloads of soil, he has a history of violence and threats, he is a well-known drunk with multiple DUI

arrests to his name, including a pending charge of DUI and hit and run at the Seattle ferry terminal from June 28th of this year. At the Du Wors hearing when the judge called for a recess at 3pm in the afternoon on a Tuesday, Mr. Nelson loudly exclaimed, "Damn, I need a beer!" to which both the Judge and the bailiff shot Mr. Nelson looks of bewilderment since he had just been questioned under oath about his alcoholism and drug use; and let's not forget that Mr. Nelson has raped or sexually assaulted many women and girls on Bainbridge Island. I wrote an article and have sources for my statements. That is not defamation.

INTERROGATORY NO. 18: Identify each exhibit you intend or reasonably expect to introduce into evidence at any hearing, trial, deposition, or by affidavit in this case.

ANSWER:

You are in possession of all exhibits so far submitted for trial. It would be reasonable to expect in the coming months more evidence, depositions, declarations, and police and court records as they are obtained and become available. As of this time I do not have anything else to hand over.

INTERROGATORY NO. 19: Please state all names by which you have been known, your date and place of birth, your social security number, your residential address for the past ten (10) years, your driver's license number, the full name of each spouse that you have had, and the dates of marriage and divorce for each of your spouses.

ANSWER:

I object to this Interrogatory as it is not pertinent to the suit at hand. Also, counsel voluntarily represents not one, but two of the three people who have ever stalked and/or threatened me. The third, John Du Wors, is volunteering as a witness for the plaintiff in this case (also someone with a history of domestic violence convictions). Any of this personal identifying information will no doubt be published publicly putting my safety in jeopardy since Mr. Savojni's other client, Richard Lee Rynearson, has a history of stalking, harassment, and doxxing of not just private citizens but also law enforcement officers, members of the military, and local and federal judges. Mr. Rynearson is

in close contact with Mr. Nelson and Mr. Du Wors and is currently disseminating any and all documents provided in this case to the public far and wide. I will not be providing any of this information. It should be noted that Mr. Rynearson is currently being sought by the Bainbridge Police for questioning in the repeated breaking and entering of someone's home and has been avoiding the police and ignoring requests to answer questions.

The judge's order did not overrule this objection and I still will not answer it. My safety is in danger with regards to these three men. You should also note that John Du Wars has since been arrested and charged with yet another crime in the period since our last hearing.

REQUEST FOR PRODUCTION NO. 1: Produce any and all documents, correspondence, or posts you have authored which reference the Plaintiff from January 1, 2014 until present.

RESPONSE:

You are in possession of all correspondence (Exhibit B), documents, and screenshots of the posts in question (Plaintiff's Exhibit A). Since I was forced to delete my own copies of the posts due to the TRO filed by the Plaintiff, I am not able to also provide original copies.

REQUEST FOR PRODUCTION NO. 2: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 2.

RESPONSE:

You were physically given these documents before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 3: Produce true and correct copies of all documents, correspondence, posts, and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No.3.

RESPONSE:

You were physically given these documents before Judge Houser on June 14th. Any other documents related to this Interrogatory were deleted due the Plaintiff filing a TRO, the only copies that now exist were submitted by the Plaintiff as evidence.

REQUEST FOR PRODUCTION NO. 4: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 4.

RESPONSE:

Mr. Nelson's testimony from the Du Wors v. Wade hearing was given to you before Judge Houser on June 14th
(Exhibit A)

REQUEST FOR PRODUCTION NO. 5: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 5.

RESPONSE:

The Plaintiff submitted these documents as evidence. I am not in possession of the originals to submit since the Plaintiff filed a TRO and I was forced to delete the documents (Plaintiff's Exhibit A).

REQUEST FOR PRODUCTION NO. 6: Produce all documents, correspondence, or posts from January 1, 2014 until present which have been sent to you or are in your possession concerning the Plaintiff.

RESPONSE:

You submitted these documents as evidence. This is why you were able to quote them for your question (Plaintiff's Exhibit A). Since redundancy appears to be your forte, I will oblige: I cannot provide original copies due to the fact that the Plaintiff filed a TRO necessitating the deletion of said posts/documents.

REQUEST FOR PRODUCTION NO. 7: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your

answer to Interrogatory No. 7.

RESPONSE:

Again, the Plaintiff submitted copies these documents as evidence (Plaintiff's Exhibit A) which is why counsel was able to quote them for this interrogatory. Also, again, I am not able to provide original copies due to the fact that the Plaintiff filed a TRO necessitating in my deleting said comment.

REQUEST FOR PRODUCTION NO. 8: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 8.

RESPONSE:

There are as of yet no documents to submit with regards to this allegation as the information was relayed during a conversation.

REQUEST FOR PRODUCTION NO. 9: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 9.

RESPONSE:

Once more, the Plaintiff submitted all pertinent documents with regard to this interrogatory which is why counsel was able to quote said document (Plaintiff's Exhibit A). Again, the TRO filed by the Plaintiff resulted in my deleting said originals as ordered by the court.

REQUEST FOR PRODUCTION NO. 10: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 10.

RESPONSE:

The Plaintiff was physically given exhibit B before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 11: Produce true and correct copies of all

documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 11.

RESPONSE:

Again, the Plaintiff submitted any and all pertinent documents regarding this interrogatory as evidence when they filed the complaint against me (Plaintiff's Exhibit A). Again, I cannot provide redundant copies in response due to the fact that the Plaintiff filed a TRO against me that required I delete the original related documents from the Internet.

REQUEST FOR PRODUCTION NO. 12: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 12.

RESPONSE:

Copies of any and all pertinent documents were physically given the Plaintiff before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 13: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 13.

RESPONSE:

Copies of any and all pertinent documents were physically given the Plaintiff before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 14: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 14.

RESPONSE:

The Plaintiff submitted as evidence a copy of the TRO in which he identified the victim and thus inadvertently admitted his guilt in the crime of raping Elizabeth Kaltreider. TRO is attached with Elizabeth Kaltreider's name highlighted.

REQUEST FOR PRODUCTION NO. 15: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 15.

RESPONSE:

The Plaintiff was physically given any and all pertinent documents in my possession regarding this interrogatory before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 16: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 16.

RESPONSE:

The Plaintiff was physically given any and all pertinent documents in my possession regarding this interrogatory before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 17: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 17.

RESPONSE:

The Plaintiff was physically given any and all pertinent documents in my possession regarding this interrogatory before Judge Houser on June 14th.

REQUEST FOR PRODUCTION NO. 18: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 18.

RESPONSE:

The Plaintiff was physically given any and all pertinent documents in my possession regarding this interrogatory before Judge Houser on June 14th. The exhibits are labeled and identified in the subsequent filings dating from December of 2018 to present day.

REQUEST FOR PRODUCTION NO. 19: Produce true and correct copies of all documents and any other forms of evidence that prove, support, or otherwise relate to your answer to Interrogatory No. 19.

RESPONSE:

I have objected to this Interrogatory due to the fact that it is not pertinent to this suit and puts my safety in danger since the Plaintiff and Mr. Savojni's other client, Richard Lee Rynearson, have both stalked me in the past and Mr. Rynearson is being given everything submitted in this case by Mr. Nelson in order to be published and disseminated including videos of me at my place of work.

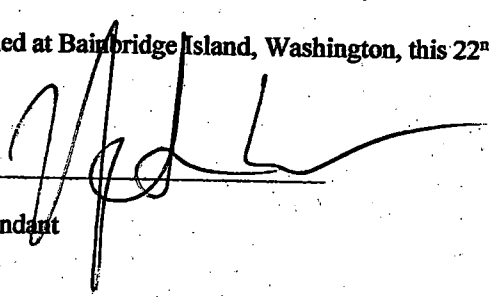
VERIFICATION

I, Houston Wade, declare under the penalty of perjury under the laws of the State of Washington that I have read the foregoing answers to interrogatories and requests for production, know the contents thereof, and believe the same to be true.

Signed at Bainbridge Island, Washington, this 22nd day of August 2019.

By: _____

Defendant

A handwritten signature in black ink, appearing to be 'H. Wade', written over a horizontal line. The signature is cursive and extends to the right of the line.

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KITSAP

WILLIAM P. NELSON,

Plaintiff,

and

HOUSTON WADE,

Defendant.

)
) No. 18-2-03205-18
)
)
)
)
)
)

TRANSCRIPT OF PROCEEDINGS

BAINBRIDGE ISLAND MUNICIPAL COURT

Testimony of William P. Nelson

[Stenographically Transcribed via Digital Recording]

November 6, 2018

Transcribed By:

CRYSTAL R. McAULIFFE, RPR, CCR
Washington License No. 2121
(360) 710-4864

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WILLIAM P. NELSON

Direct by Mr. DuWors

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Cross by Mr. Wade

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EXHIBIT INDEX

No.

Description

Marked

- None -

[Excerpt from the proceedings held on November 6, 2018, in the case of DuWors v. Wade.]

THE COURT: All right. Mr. Nelson, you can come on up here. Before you sit down, I'll have you raise your right hand. Do you swear or affirm the testimony you are about to provide is the truth, the whole truth, and nothing but the truth?

MR. NELSON: I do.

THE COURT: Okay. You can have a seat, please. And state your full name for the record.

MR. NELSON: William Peter Nelson.

THE COURT: All right. And, Mr. DuWors, would you like to ask him some questions?

MR. DuWORS: Yes, please, Your Honor. Does Your Honor prefer that I stand?

THE COURT: No. You can remain seated.

DIRECT EXAMINATION

BY MR. DuWORS:

Q. Mr. Nelson, what do you do for work here on the Island?

A. Construction. I'm a building contractor. I have my own business. Have had for 30 years.

Q. How long have you lived here on the Island?

A. All my life; 59 years.

Q. Okay. When did you first meet Houston Wade?

1 A. 2001 was my first recollection of ever laying eyes
2 on or knowing who Houston Wade is.

3 Q. And how did you come to meet him?

4 A. City Council race. I was running for city council
5 against Bill Knobloch and Houston Wade. Houston, at
6 the time, was 20 years old and a barista at Town &
7 Country Market.

8 Q. Okay. Did you come to become acquainted with him in
9 the course of that City Council race?

10 A. Very little. Just at the coffee stand getting
11 coffee.

12 Q. What was the nature of your interactions with him?

13 A. Getting coffee. I don't recall having any
14 conversations with Houston Wade.

15 Q. Now, are you aware of blog posts made by Houston
16 Wade in late September or early October of this
17 year --

18 A. Painfully.

19 Q. -- on his Facebook page? Okay.

20 Between the time that you met him in that City
21 Council race and the time that you read those blog
22 posts, have you had any other interactions with him?

23 A. No.

24 Q. Have you ever --

25 A. I should take that back. He was served at his place

1 of work by our professional service company. I
2 accompanied -- I came with the professional service
3 company to identify Mr. Wade.

4 Q. But that was after the blog posts?

5 A. That's correct.

6 Q. Okay. My question is have you had dealings with
7 Mr. Wade that would give rise to a personal dispute
8 between the two of you?

9 A. No.

10 Q. Have you spent any time with him between that City
11 Council race and the time the blog posts arose?

12 A. None.

13 Q. Do you have any idea why Mr. Wade would have any ill
14 will toward you?

15 A. It's to be investigated. I have no idea.

16 Q. What blog posts were the first blog posts that you
17 saw or were made aware of in late September or early
18 October 2018?

19 A. It was about -- I was made aware of the fact these
20 posts went up on October 4th. But they had been up
21 for several weeks. I was made aware of them on -- I
22 don't have the exact date. It was Monday or
23 Tuesday, approximately three weeks ago. So
24 mid-October is when I was made aware of
25 Mr. Houston's writings.

1 Q. And how were you made aware?

2 A. Through a mutual friend.

3 Q. Did you get a chance to see them?

4 A. I'm not a Facebooker, so it was brought to my
5 attention through a mutual friend.

6 Q. Were there -- did Mr. Wade make grave allegations
7 against you in those posts?

8 A. He made extensive allegations against me that were
9 all untrue.

10 Q. What allegations did he make that were untrue?

11 A. Rape of a woman. Abusing my stepchildren that
12 evidently he felt he had knowledge of which, beyond
13 me, how he would ever have attained that, because
14 I've never abused anyone. My children. He accused
15 me of abusing my ex-wives. He accused me of being
16 married five to seven times. He accused me of
17 abusing and taking advantage of my partners. He
18 accused me of bringing outside money in from out of
19 state for my campaign.

20 I mean, it goes on and on and on. All untrue.
21 Unfactual and unsubstantiated. He has no facts to
22 the matter. He just brought these out openly to
23 disparage and destroy my character.

24 I've been in this community all my life. I've
25 never done anything to anybody including my two

1 ex-wives. I treat them with kindness and love. My
2 stepchildren, kindness and love.

3 My generosity in the community and the people I
4 know and don't know, kindness and love.

5 So this is completely contrary to who I am.

6 Q. Did Mr. -- did Mr. Wade's posts include any mention
7 of the Bainbridge Island Police or the Bainbridge
8 Island Fire Department?

9 A. Yes, it did.

10 Q. What were those or were the substances of those
11 posts?

12 A. He was associating my activities and those of the
13 police department and the fire department with a
14 backyard private bar that's in what's called "The
15 Chicken Coop" or was. There was an auto mechanic
16 that lived there and who owned The Chicken Coop and
17 the auto business.

18 He afforded me a corner of his property after
19 my 2009 financial collapse at Lynnwood Center which
20 I was developing, and I stored equipment and lumber
21 and supplies on one corner of his property.

22 So Mr. Wade associated my attendance on the
23 property as someone that was involved with The
24 Chicken Coop, involved with deplorable examples of
25 taking advantage of either underage or young women.

1 He also accused the police department of this.
2 He also accused the fire department of this. So
3 everybody is included in Mr. Wade's fantasy world.

4 Q. Is The Chicken Coop essentially like a clubhouse on
5 this auto yard where the old guys get together to
6 drink beer?

7 A. Typically, it was just business and attorney friends
8 of his unrelated to you or me. His friends, older
9 gentlemen that had a boat repair business. Other
10 people that would come and have a cocktail at four
11 or five in the afternoon and leave by six or so.

12 Place sat empty, as far as I recall, quite a
13 bit of the time. It was just his little backyard
14 place for guys to hang out, have a cocktail, and
15 enjoy their company of each other in that
16 environment.

17 Whatever he alludes to never went on, I never
18 saw it, I never experienced it and neither did the
19 other people that could testify to the fact that
20 that's the case.

21 Q. In the comment -- in the online post on Facebook
22 that started Mr. Wade's comments about you, did it
23 include allegations by Mr. Wade that the Bainbridge
24 Police Department used The Chicken Coop to drug and
25 rape underage girls?

1 A. Yes.

2 Q. Did he say the same thing about the fire department?

3 A. He alluded to the fact that the fire department was
4 also taking advantage of girls at The Chicken Coop.

5 Q. Did he say that you were participating in similar
6 activities?

7 A. Yes, he did.

8 Q. Was it true?

9 A. No.

10 Q. Did he say that you raped a young adolescent friend
11 of his?

12 A. Did I rape an adolescent friend?

13 Q. A woman who committed suicide --

14 A. I've never raped anybody in my life.

15 Q. Did he accuse you of raping a woman who later
16 committed suicide?

17 A. He did.

18 Q. Who's that woman?

19 A. Elizabeth Kaltreider.

20 Q. Was she a girlfriend?

21 A. Brief relationship with Elizabeth for a period of a
22 few months, and it was not to be discussed about
23 what Elizabeth's condition was. But I ended up
24 getting restraining orders enforced against
25 Elizabeth because at night she would call me and

1 leave messages endlessly. I have 250 pages of
2 transcriptions in the file in this court where the
3 restraining orders were violated not once, but
4 twice, to get her to stop calling my phone and to
5 leave me alone. And she finally did. That was my
6 interaction and that was years prior to her death.

7 Q. Were you ever charged with rape?

8 A. No.

9 Q. You ever committed rape?

10 A. No.

11 Q. Officer Weiss said Houston reported in the police
12 report that his sole source of information about
13 this rape was some stepfather of the young girl.

14 Do you know who that might have been?

15 A. Jerry Dennon.

16 Q. Do you know anything about that?

17 A. What I knew of Jerry is he liked to sit at the
18 Harbor Pub from about two to four every day, was his
19 routine, and then at the Treehouse Cafe from four to
20 six. I'm just approximating. But that was his
21 normal routine to drink and then drive home to Point
22 White where he resided with his wife.

23 THE COURT: Mr. DuWors, do you have questions
24 of this witness related to the harassment of you?

25 BY MR. DuWORS:

1 Q. Did you see posts about me online?

2 A. I did.

3 Q. Have you heard people talking about them?

4 A. I have.

5 Q. Who have you heard talking about them?

6 A. Do I have to mention specific names?

7 Q. Not if you feel uncomfortable.

8 A. I don't care to bring anyone else into it right now.

9 But it's known in the public. It's known -- he's
10 got 1100 followers. Word spreads on the 25,000
11 population base. Everybody knows everybody and
12 knows what's going on and bad news travels faster
13 than good news.

14 The advocate of bad news has spread the word
15 out in the community to the point where I don't know
16 how you feel, Mr. DuWors, but I don't feel
17 comfortable going into a grocery store right now.

18 Q. No, I don't.

19 How has Mr. Wade's various statements about you
20 that you -- that you characterize as harassing your
21 person, how have they affected you emotionally and
22 professionally?

23 A. Devastating.

24 Q. Why?

25 A. It's counterintuitive to my character. It is

1 counterintuitive to what the majority of Bainbridge
2 Island that knows me would say about me.

3 It's counterintuitive to my reputation as a
4 businessman, as a father, as a stepfather.

5 My ex-wife would easily come in and testify
6 right now to the fact that my credibility and my
7 character.

8 So this misinformation campaign has been lodged
9 against you, Mr. DuWors, and to me, is beyond my
10 understanding, fact or fiction. Which one hundred
11 percent of what he spoke about me is fiction created
12 in his own mind.

13 I can't imagine what you are going through.
14 What you and I are sharing in this public
15 humiliation and foggy, and I've called it stoney.
16 My internal mechanisms, my sense of fear, my sense
17 of being outcast, my sense of looking from the
18 outside in going -- my heart is beating right now
19 how bad I feel about myself and you. That any of
20 this insane civil society should occur.

21 I don't care what the internet means to you or
22 anybody else, but if this exceeds the power of the
23 newspaper and print and is that people can do
24 whatever they want and this is the wild, wild west
25 to destroy people, count me out.

1 MR. DuWORS: I have no further question for
2 this witness.

3 THE COURT: All right. Mr. Wade, would you
4 like to ask any questions?

5 MR. WADE: I would. Thank you.

6 CROSS-EXAMINATION

7 BY MR. WADE:

8 Q. We've known each other since I was four years old
9 when you married my best friend's mother. So to say
10 that you only met me in 2001 --

11 THE COURT: Is there a question? Ask him a
12 question. You are going to get a chance to provide
13 testimony.

14 BY MR. WADE:

15 Q. So, yes, in 2001 when we ran for City Council, and
16 later I was out in the primary, you went on to
17 general election, did you ever come into Town &
18 Country and threaten my life?

19 A. No.

20 Q. Did you ever do so in front of 30 witnesses?

21 A. No.

22 Q. Did you ever come in repeatedly over a course of
23 five nights and threaten my life?

24 A. No.

25 Q. Did Town & Country have to obtain a security guard

1 to guard me at night because you would come in and
2 try to kill me?

3 A. You are fantasizing. No.

4 Q. Excellent.

5 Did you ever grope Ashley Cross?

6 A. No.

7 Q. Did you do so in front of her father?

8 A. No.

9 Q. Did you ever get charged with drunk driving?

10 A. I have.

11 Q. Recently?

12 A. I have.

13 Q. Are you an alcoholic?

14 A. That's to be decided by the treatment program that
15 I'm in.

16 Q. Okay.

17 MR. DuWORS: Your Honor, I'm going to object on
18 relevance grounds to the DUI. None of those are part
19 of the posts.

20 MR. WADE: The posts I refer to him as an
21 alcoholic.

22 THE COURT: If so, then I think it is
23 reasonable.

24 BY MR. WADE:

25 Q. Have you ever used cocaine?

1 A. Years ago.

2 Q. Have you ever used it recently?

3 A. No.

4 Q. When was the last time you used cocaine?

5 A. In my 20s.

6 Q. Really? So you were 20 years old in 1999?

7 A. I'm sorry.

8 Q. Were you 20 years old in 1999?

9 A. Do you have something you are trying to drive to
10 here?

11 Q. Yes. Because I witnessed you using cocaine when you
12 showed up to a high school party March of 1999 and
13 forced yourself on a 15-year-old girl?

14 THE COURT: Okay. Mr. -- you are going to
15 get --

16 THE WITNESS: You are going to have to
17 substantiate that through background information.

18 BY MR. WADE:

19 Q. I will --

20 MR. WADE: Sorry, Your Honor.

21 THE COURT: Any other questions, Mr. Wade?

22 MR. WADE: No. We'll probably discuss the rest
23 of this next week at his hearing.

24 THE COURT: All right. Any further questions,
25 Mr. DuWors?

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MR. DuWORS: No, Your Honor.

THE COURT: All right. Mr. Nelson, you can be excused. Does this witness -- any objection to him remaining in the courtroom or are you still asking him to be removed?

MR. DuWORS: No objection, Your Honor.

MR. WADE: I would like him to be removed, Your Honor.

MR. DuWORS: Now that he's testified, I think the only basis for excluding him from the --

THE COURT: Subject to being recalled.

MR. DuWORS: I have no intention to recall this witness. So I don't think -- I assume Mr. Wade's case would be closed at this time.

THE COURT: Did you intend to recall him as a witness here today?

MR. WADE: That is yet to be determined.

THE COURT: I'm going to allow him to remain in the courtroom. He's done testifying here. I think his testimony is very limited helpfulness to the court in Mr. DWAUZ's case. I appreciate and understand why he was called.

So, Mr. Nelson, you can have a seat on the bench and remain in the courtroom, if you wish.

C E R T I F I C A T E

STATE OF WASHINGTON)	
)	ss
COUNTY OF KITSAP)	

I, Crystal R. McAuliffe, a Certified Court Reporter in and for the State of Washington, do hereby certify:

That the foregoing transcript was transcribed by me;

That the foregoing transcript is a verbatim report of the court proceedings from digital recording, except for the inaudible or indecipherable sections thereto noted in the transcript by "[inaudible]" or "[indecipherable]" to the best of my ability.

I further certify that I am in no way related to any party to this matter nor to any of Counsel, nor do I have any interest in the matter.

DATED this 7th day of January, 2019.

CRYSTAL R. McAULIFFE, RPR, CCR
Washington License No. 2121

Exhibit B



Audrey Olson

You're friends on Facebook

Pastry Cook at Protector Of Middle Earth, Pastry Cook at Ritz Carlton Hotel and Bread and Pastry Baker at Blackbird Bakery
Studied Mathematics at Seattle Central Community College
Lives in Suquamish, Washington

TUE 5:16 PM

Hey there. My "baby" brother, Matt, recently reached out to me and told me the hot gossip about you and Bill Nelson. I don't really want to get involved but I'm very curious about what info you have. He was my stepfather and I hate home more than Hitler, so...

I'm glad you reached out. I was hoping to see you, but I assume you're off at the shipyard now being a badass!

Well, I wrote an article about how he raped my friend's daughter and got away with it. He's suing me for defamation (\$5 million). Since my article came out six other women with similar stories have come forward. He is evil.

He's a piece of garbage. I reached out to my mom and want to ask her if he ever sexually abused her or anyone she knows of. After all these years, she is still repulsed by the mention of his name.

I found a DV restraining order you mom got to protect herself from him

Jerod Ouellette

Active 2h ago

I fn hate rapist bastards

Same here! Bill Nelson can go get hit by a bus!


Glad the coop is gone, f those guys! I was dating a girl showed up there she was wasted and nelson had his hand down her pants.

I always told women to stay away from there. Some of them did, and some of them had to find out the hard way. I feel so sorry for those ladies.



11/5/18, 10:17 AM



Bill  **Inbox** 



Ashley Cross DeGrow <ashleycross206@gmail.c... Thu, Nov 8, 2018, 8:20 PM



to me 

Houston,

Here are a few stories I could think of. I hope they help.

Bill Nelson is a creep. I met him when I was probably around 13 on a job site with my dad. I was one of the few girls my age that had already developed a sizeable chest. I was regularly mistaken for 16 at the time, which old creepy men seemed to find an acceptable age to hit on me. I remember Bill clearly looking down my shirt and my dad saying something to him like, "hey that's my CHILD." My poor dad had no idea what to do with me other than to warn me. Afterwards in the truck on the way home my dad said to me very seriously, "stay away from Bill." I've heard my dad say this quite a few times. I'm sure my dad has seen many things happen with Bill. They went to high school together and I've never heard a good story about him from my dad.

I've had quite a few experiences with Bill and I really can't recall any of them being good. On multiple occasions I have encountered Bill at the coop and he shamelessly hit on me and touched me without consent. I can pretty clearly remember one specific time he touched me without asking. There was a resurgence of partying at the Chicken Coop at some point. This time he clearly grabbed my butt and his son almost got into a physical fight with him about it. He tried to play it off that we were in a small space and his hand grazed my butt, but at his height he would have to bend over a fair amount to even get close.

On another occasion he brought a date to my friends house, and we headed over to Bremerton on the boat for dinner. The whole night he was practically forcing drinks down her throat. It made me and obviously her very uncomfortable. She obviously was not having a good time and he was pushing and pushing her. She miraculously made it back to my friends without puking off of the boat, but did as soon as we got back. My friend insisted they stay the night and she just wanted to get away from him. I don't know what ended up happening to her that night but based on how he was touching her and giving her even more alcohol anyone could have guessed what happened after I left.



-Ashley Cross DeGrow

Ryan Landworth

Sometime around 2006 while I was a member of the Bainbridge Island Fire Dept. I was invited to attend a party at the Chicken Coop speak easy. When I went it was hosted by Bill Blakely and Bill Nelson. There were other members of the Fire Dept. and Bainbridge Police Dept. off duty, that were attending. Shortly after arriving it was revealed to me that they would be having a stripper that was still a Bainbridge Highschool student. I was not OK with any aspect of what was happening (I had a child that was a student at BIHS) ^{the whole} situation was very wrong and would not ^{through} participate in any way ~~and~~ so I immediately left.



Nov 30, 2018



191 of 12,257



Bill Nelson

Inbox x



Katie Wiedenman <indiebanditas@hotmail.com>

Dec 9, 2018, 2:08 PM



to me

My name is Katie Fisher and I met Bill Nelson at a bar in 2012, September, I believe. I had been drinking with friends at isla Bonita, a bar on Bainbridge island. I don't remember talking to him much as he was older than my dad, a good 20 years older than me. After the bar, I remember very little. Being in the car and him telling me he was taking me to his home. I remember being in his big master bath jaccuzi and then a brief memory of him on top of me. I came to enough to get a ride home immediately and shrugged the incident off as I was embarrassed. Now that I've heard it's happened to women before, I'm questioning a lot more. How and why would I agree to go home with a man my dad's age etc. Anyhow, I hope he stops.
Katie Fisher
indiebanditas@hotmail.com

Ben Gordon
Kavdong

OCT 5TH, 8:49AM

Do you know the address of the chicken coup? I'm assuming it was the derelict house right across the street from treehouse bordering Blossoms parking lot?

That's the one!

Laura has a friend who confided in her that she was with a girlfriend and Nelson at Treehouse after her divorce ten years ago. Bill convinced them to head to the chicken coup. The next thing she remembered was both her and her friend waking up naked. She couldn't find her cloths, wrapped a blanket around herself and got the fuck out. She had no recollection of where she was.

Exhibit F



IN THE SUPERIOR/DISTRICT COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KITSAP

FILED
SAP COUNTY CLERK

MAY 3 11 28 AM '94

Ginger S Nelson Petitioner,

VS.

William P. Nelson Respondent.

No. 94 2 01103 DEPT. 4. FREIDENSTEIN
EWB DEPUTY
DECLARATION
(DCLR)

The following declaration may be incorporated by reference to a Petition for an Order of Protection pursuant to a RCW 26.50 or RCW 10.14:

RCW 26.50.010(1) DOMESTIC VIOLENCE means: (a) physical harm, bodily injury, assault, or the infliction of fear of imminent physical harm, bodily injury or assault, between family or household members; or (b) sexual assault of one family or household member by another.

RCW 10.14.020(1) UNLAWFUL HARASSMENT means: a knowing and willful course of conduct directed at a specific person which seriously alarms, annoys, or harasses such person, and which serves no legitimate or lawful purpose. The course of conduct shall be such as would cause a reasonable person to suffer substantial emotional distress, and shall actually cause substantial emotional distress to the petitioner.

Describe specific acts and approximate dates of domestic violence/unlawful harassment.

I am the victim of domestic violence and/or unlawful harassment committed against me as follows:

My husband William P. Nelson has violated the Restraining Order by coming into our house last week while my 13 yr. old daughter was present and screamed obscenities at me and chased me through the house, leaving then returning and behaving violently. My daughter locked herself in the bathroom. In March of 1992 he tried to strangle me in the kitchen of our home. The children were afraid to call 911. He has behaved so violently toward me in front of my children that they are terrified of him and request that he not have any contact at all with, or approach them in public places to try to force shows of affection from them. We request that he be kept anywhere near the house. He has been seen and admitted to being in the woods behind our house at night. We have had to hang blankets in the windows. My 8 yr old Matthew is afraid to get up to go to the bathroom now at night so has started wetting the bed.

He has been calling and dropping in on my daughter April at work. She requests no contact from him.

He has threatened that he will drive me crazy by his actions. We request this restraining order for our safety. In March I called 911 for fear that he would harm me.

I understand if a Temporary Order for Protection is granted, I must appear at the scheduled hearing or I will no longer be protected under the law.

I declare under penalty of perjury under the Laws of the State of Washington that the foregoing statements in this declaration are true and correct.

Dated 5-03-94

Ginger S. Nelson
Signature Page 1 of 1

Exhibit G

BAINBRIDGE ISLAND MUNICIPAL COURT Kitsap County, Washington	Mailing Address: PO Box 151, Rollingbay, WA 98061 Location Address: 10255 NE Valley Rd, Bainbridge Is., WA Phone # 206-842-5641 Fax # 206-842-0316 www.bainbridgewa.gov/court email: court@bainbridgewa.gov
CITY OF BAINBRIDGE ISLAND, Plaintiff, vs <u>NELSON, WILLIAM PETER</u> Defendant.	Case No(s): <u>17B41702</u> SCRAM ALCOHOL MONITORING ORDER

The Court has ordered you to abstain from using alcohol and to submit to SCRAM alcohol monitoring as a condition of your pre-trial release or while on probation. Based on the allegations of the offense and your prior criminal history, the Court finds that you are likely to commit a violent offense while out on release if the Court does not monitor these conditions of release or probation terms by SCRAM alcohol monitoring.

Your conditions of release require:

- Abstain from alcohol, marijuana, and non-prescribed drugs.
- Submit to alcohol monitoring by wearing a SCRAM bracelet on your ankle
- Commit no criminal law violations
- Abide by all other previously imposed conditions of release including no-contact orders
-

FILE
 JUL 06 2018
 BAINBRIDGE ISLAND
 MUNICIPAL COURT

Warning to Defendant: If you violate any conditions of this SCRAM Alcohol Monitoring Order, a warrant for your arrest may issue, and you may be held with higher bail requirements and/or serve confinement for the violation. Issuance of a warrant will also result in forfeiting any bail you have posted.

You must contact Officer Guy Roche at 206-396-7966 to make an appointment to schedule installation of your SCRAM bracelet immediately upon release and appear at the court no later than 7/6/18 (date) for installation.

SCRAM costs of \$20 for installation and \$10 per day are due weekly in advance or on a time pay agreement as arranged with the clerk. You are responsible for keeping the unit plugged in and operational as instructed by Officer Roche. You may be required to appear at court for occasional maintenance of the unit. Failure to comply with these requirements could result in a change of your conditions of release and/or a warrant being issued for your arrest.

If you successfully comply with SCRAM monitoring for a period of 30 days with no violations, you may be eligible to switch to the Smart Start alcohol monitoring device at a cost of approximately \$99/ month. You may request a hearing before the Judge if you would like to switch to this option in 30 days.

7/6/18
 Date

[Signature]
 Judge/ Pro Tem

Copy of Plaintiff's TRO

- Statement describing the victim/s need for protection from the respondent
 - Write clearly. If you need more space below, attach additional page/s. Do not write on the back.
5. Describe what the Respondent did or said that you think is harassment or stalking.
- You must describe what the respondent actually said.
 - You must describe what the respondent actually did.

The respondent has committed acts of harassment or stalking as follows:

A. Describe the most recent incident of harassment or stalking.

Date and time (on or around): October 4, 2018 To Present Time

Location: with face book on One Post

What did the respondent do or say that you believe to be harassing or stalking behavior?

Houston Wade, a Bannbridge Island resident lives at
mother of Walter Tallen at a local restaurant
on October 4 2018 he posted damaging & false
information regarding a rape of a friend of his that
never happened. The alleged victim who has since
committed suicide was represented as a victim of
my actions, actions that never occurred. In fact
it is of record with this Court that in 2007
the alleged victim Elizabeth K. Altman had in
fact through her Harassment of me Counsel action
taken against her to stop her harassment towards
me. The effort to enforce the restraining order
granted me by the Court required 3 attempts of enforcing
the original restraining order granted me.
This information is offered so that the Court may understand
that the accusation of "Rape" by me never happened
and the additional Damaging information on his face book
Post is causing extreme pain & suffering, loss of
Business opportunity Character assassination, & Damage
to my Reputation that is unjustified, unfair & will
be pursued with a law suit against Houston
Wade & his accomplice. I Petition the Court to
review his Face book Page. He also has created a page
called "Bad Bannbridge" where he has myself & Frank
Roe a convicted Child molester side by side.

Plaintiffs Exhibit A

Write a comment

Houston Wade
October 4 at 11:46 AM

Years ago a connected, alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happens to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing.

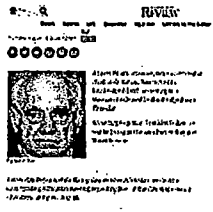
Years later, in the middle of the night, she phoned her 13 year old son and said her goodbyes, then jumped from the Agate Pass Bridge.

It doesn't seem to matter if it is reported the moment it happens, or 35 years later. Rich, drunk, asshole frat boys will still get away with it.

#DumpKavanaugh

143 24 Comments 12 Shares

Like



The Bainbridge Island Bad List

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Interested in this Page? Like it to see updates in your News Feed.

Create Post



Write a post...

Photo/Video Tag Friends Check in

Posts



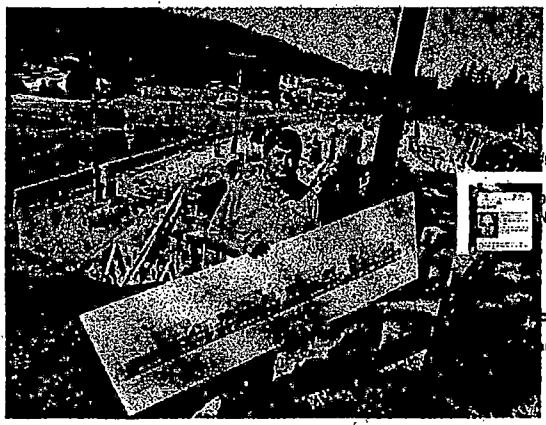
The Bainbridge Island Bad List
October 21 at 11:05 PM ·

Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke head, and also abusive not only to his partners and wives, but his children as well.

Stay away from Bill Nelson and definitely don't give him any money. Years ago Bill Nelson raped a woman. She ran naked to a neighbor's home and beat on the door screaming for help. The neighbors took her in and called the police. The Bainbridge police showed up, chatted and joked with her rapist and then left. No arrests made. No taking the victim to the hospital for a wellness check or administration of a rape kit. (Thankfully Chief Hamner was hired and managed to clean house of the corrupt old guard and usher in an era of a new compassionate police force)

Sadly, in 2011 she called her family to say goodbye and then jumped to her death off the Agate Pass Bridge.

Bill Nelson is still alive and still a psychopath rapist. He has also run for public office twice.



5

1 Comment

Like Comment Share Type a message...

- Karyn Prouty 5h
- Alex Delaurenti 2h
- Beon Caha Sr.
- Tonya Purser Bray 1m
- Lisa Jerrell- Johnson 45m
- Kaola Mills 33m
- Susan Hinckley-Porter 3h
- Liz Shertzer 12h
- Brianna Davis 5m
- Ed Burmood 31m
- Kaleigh Ritchie 6h
- See All Julie Eason MacFarlane
- Patty Horn 13m
- Kelly Charneski 2h

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Typically replies within a day
people like this

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EXHIBIT 9

**State of Washington
Kitsap County Superior Court**

WILLIAM NELSON

Plaintiff,

v.

HOUSTON WADE

Defendant.

No. 18-2-03205-18

**Declaration of
Cassie Stokes**

I Declare:

1. My name is Cassie Stokes and I am a Deputy Prosecuting Attorney for Kitsap County.
2. I have reviewed the transcribed pages 130 through 136 from the October 2, 2019 Deposition of Mr. Houston Wade in Civil Case 18-2-03205-18, where Mr. Wade discusses me.
3. At the heart of Mr. Wade's testimony from pages 130 through 136 is his claim that he and I communicated about potential witness tampering charges against John Du Wors, Lee Jorgenson, Matthew Nelson and William Nelson. At this time, I had not communicated with Mr. Wade about any witness tampering charges.
4. On p. 131, ¶ 4, and again on p. 133, ¶ 1, Mr. Wade stated he had communicated with me within a week of October 2, 2019. I have had no communication with Mr. Wade between November 8, 2018 and October 2, 2019.
5. I performed a search of my email on October 2, 2019 (the address listed by Mr. Wade on p. 135, ¶ 24) and confirmed the last communication I have had with Mr. Wade was a brief email exchange from November 8, 2018. *See Attached Emails.* This also matches my independent recollection. Mr. Nelson was not a topic in the emails nor had he ever been discussed with Mr. Wade.
6. On p. 133, ¶ 15, 17, 19, and 22, Mr. Wade stated that I told him I was inclined to prosecute a number of individuals, including Mr. William Nelson, on felony charges. I did not tell Mr. Wade this at any time. Mr. Wade states this conversation took place within a week of October 2, 2019. I have had no communications with Mr. Wade (prior to October 3, 2019) regarding Mr. Nelson nor have I indicated a willingness to prosecute anyone listed by Mr. Wade, including Mr. Nelson. *See Attached Emails.*

7. The day after this deposition, on October 3, 2019, Houston Wade emailed me about Bill Nelson and witness tampering charges. My response to this email was like my previous response to his email from 2018, I let Mr. Wade know that the prosecutor does not investigate crimes and that he needed to contact law enforcement. I have at no time indicated a willingness to pursue charges on behalf of Mr. Wade. *See Attached Emails.*

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Port Orchard, [City] WA [State] on December 18th, 2019, [Date].

Signature of Declarant

Cassie Stokes #50105
Kitsap County Deputy Prosecutor Cassie Stokes

Cassie L. Stokes

From: Cassie L. Stokes
Sent: Thursday, November 8, 2018 11:09 AM
To: Houston Wade
Subject: RE: John Du Wors

Mr. Wade,

If you would like to report a crime that you believe has occurred then it needs to be reported to law enforcement. In this case, the Bainbridge Island police. The prosecutor's office does not investigate crimes or write reports—that is what law enforcement does.

Thank you,
Cassie Stokes

From: Houston Wade <houstonwade@gmail.com>
Sent: Thursday, November 8, 2018 10:08 AM
To: Cassie L. Stokes <cstokes@co.kitsap.wa.us>
Subject: Re: John Du Wors

Ms. Stokes,

I am formally requesting that you charge John Du Wors with perjury and obstruction of a public officer. Mr. Du Wors is a licensed attorney in the state of Washington and should know better than to commit dozens of instances of perjury while under oath. He wasted my time, your time, the police department's time, and the court's time with his outrageous behavior.

What use is taking the oath if there are no consequences for violating it?

Thank you,

-Houston Wade

On Fri, Nov 2, 2018 at 9:10 PM Houston Wade <houstonwade@gmail.com> wrote:

Ms. Stokes,

John Du Wors has not stopped harassing me for weeks now after describing my mother's home to me in detail and then threatening to rape her. Du Wors continues to threaten myself and others with frivolous, baseless lawsuits, all because I wrote a news article about crimes he has committed. My police report came first and, as I was told by detective Weiss, should have priority.

There are crimes here and the journalist who exposed them should not be the focus. I look forward to you bearing witness on Tuesday in Bainbridge Municipal Court where Mr. Du Wors will perjure himself many, many times over and be exposed for the violent liar that he is. Officers of the court are to be held to a higher standard than the average person, and Mr. Du Wors has most certainly failed that standard in every conceivable way. I have documentation and witness to back up every allegation I made in my article and beyond.

Thank you for your time, but you are focused on the wrong person,

-Houston Wade

--
Houston Wade
President/CEO
Noosphere Geologic Services International
www.noospheregeologic.com
(808)989-2901

Cassie L. Stokes

From: Cassie L. Stokes
Sent: Thursday, October 3, 2019 4:42 PM
To: Houston Wade
Cc: Ione S. George
Subject: RE: Need help
Attachments: HOUSTON WADE EMAILS.pdf

Mr. Wade,

As I stated in my previous email to you back in November 2018 (attached for your reference), the Office of the Prosecuting Attorney does not investigate crime, and we are unable to receive or investigate the allegations you are reporting. If you believe yourself to be a victim of a crime, you should call 911 and ask to make a report.

Further, as a Prosecuting Attorney for Kitsap County, I am unable to provide any individual member of the public with legal advice. To obtain legal advice you would need to contact your own attorney.

Thank you,
Cassie Stokes

From: Houston Wade <houstonwade@gmail.com>
Sent: Thursday, October 3, 2019 12:57 PM
To: Cassie L. Stokes <castokes@co.kitsap.wa.us>
Subject: Need help

Ms. Stokes,

Last year I wrote an article about a man (Bill Neslon) who raped several woman and got away with it. He has since sued me for defamation, and despite many other women coming forward with allegations of rape and sexual assault by him, he continues to persue his suit against me. My issue is that he and his friends have begun systematically targeting my witnesses with threats and intimidation. Every time he does this it is a felony, but the Bainbridge Island Police refuse to even file a police report despite my possession of evidence telling me that threatening witnesses "isn't a crime".

What can I do? I hope you or someone in the prosecutor's office can give me some advice.

Thank you for your time,

-Houston Wade

EXHIBIT 10



Bainbridge Islanders

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Houston Wade And when you put those dudes on blast for rape or abuse, they like to think they can sue you into silence. How about rich asshole men on this island stop hurting women and children? There are a select few men here who have left dozens of victims in our community and too many of us turn a blind eye and hope it goes away.

Once this latest lawsuit gets out of the way, the Bainbridge Island Bad List will grow by a few more names.

Like · Reply · 2h



^ Hide 13 Replies



Andreas Nordstrom I guess I'll be the one to ask, what law suit?

Like · Reply · 2h



Houston Wade I'm being sued by Bill Nelson for writing an article about the women he raped and children he abused.

Like · Reply · 2h



Houston Wade Was sued by John Du Wors for writing an article about his convictions for beating his kid and wife. Won that one.

Like · Reply · 2h



Bainbridge Islanders
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Anna Geilfuss
2 hrs

Hello Bainbridge Islanders! As I approach leaving for college I've been reflecting on my 18 years living here and would like to shout out some people. First of all shout out to all the disgusting old men who have constantly harassed, and crept out the young girls who live here be it at there jobs where we have no choice but to be nice to you or in any other public spaces! Shout out to the moms and many community members who are so bored with their lives that they gossip about kids and slut shame/over sexualize young girls! Shout out to all the married couples who cheat on each other some of which whom start sugar daddy relationships with girls who, surprise, they know are under age (even the same age as their daughters)! Shout out to all the kids who have put fear into the lives of their peers and gotten away with it! And shout out to all the privileged sheltered kids who think its okay to use derogatory words! Yes things could be worse but it seems like everybody loves to act like we live in the most perfect little community when in reality this place breeds sexual harassment, mental illness and racism. Adults that live here need to step it up, stop acting like children and expose their kids to the real world.



157

131 Comments

Like Comment

Bainbridge Islanders

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Houston Wade Laurie, there is a large contingent of rich men on this island who prey on young girls. They even had a clubhouse called the Chicken Coop where they would pay underage girls to strip and perform sex acts at private parties. Members of the police department in the pre Hamner days would also go to these parties. It was completely predatory.

Like · Reply · 1d · Edited


Fiona Yates Houston Wade oh my! That is awful 😞 was it exposed publicly?

Like · Reply · 23h

Houston Wade I tried in 2012 to get the Kitsap Sun to report on it. They didnt. I finally brought it out in the open last year and one of the men involved (Bill Nelson) is suing me for defamation as a result. The other man who owned the establishment (Bill Blakely) has high tailed it out of our community.

Like · Reply · 23h · Edited

Bainbridge Islanders

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 Andrejs Zommers Ciara Michelle Houston Wade Are you talking about the house in Emerald Heights?


Like · Reply · 23h

 Ciara Michelle Andrejs, it's been so long since I thought about it that I don't remember it's exact location.


Like · Reply · 23h

 Houston Wade The Chicken Coop in Lynwood.


Like · Reply · 23h

 Andrejs Zommers Houston Wade Emerald Heights is just up the road from Lynwood. There was definitely a grungy old split-level used for prostitution near my mom's place. She only found out when the cops used her yard for spying and I think staging.


Like · Reply · 23h

 Houston Wade Yeah, there was that too. Around the time that place got busted was also when they ran stings at the Best Western. The Chicken Coop never got busted because for years the cops helped throw the stripper parties.

Like · Reply · 23h

 Kathryn Wood Houston Wade that is disgusting. I agree. Did you witness this first hand? Just for my own info...

Like · Reply · 13h

 Houston Wade No, but I have five witnesses, two women who were brought there as underage girls to "perform", and three men who attended and were horrified by what they saw who will be testifying at trial.

Like · Reply · 12h

Bainbridge Islanders

Closed group

 Bob Horan I think of your difficulties in libel court from time to time, Houston Wade. The future is not promising for iconoclasts. As we move more and more to a red flag society, I fear that your troubles may multiply.


Like · Reply · 9h

 Houston Wade So, you support men beating and raping women and children?


Why do you like wife beaters and rapists so much?

What is it about attacking women and children that gets you going, Bob?

Like · Reply · 9h


 Bob Horan Your exhibits are precious, Mr Wade. I have learned from folks like you that documents and logic don't matter. Plow on with the most absurd lie, say it repeatedly with as much vile you can summon, and repeat.

Like · Reply · 9h


 Houston Wade Documents and logic don't matter? Then why was I able to win my first lawsuit with copious documentation and police and court records? Why am I going to win this lawsuit with FORTY-THREE WITNESSES?

I would say being a racist and a homophobe who vocally supports rapists and abusers would classify as "vile", but you shamelessly support them because they vote and run for office as Republican.

Like · Reply · 9h

 Bob Horan Keep listening to those voices, Houston Wade. Something sound will break through one day.

Like · Reply · 9h

 Houston Wade Bob, do you even know how to reply to a comment? In case a thread/until now you have had at



Varon Mullis Andrejs Zommers - You remember that the next time a teen is abducted. Like I said, there are remedies for false allegations. There are none for the abducted.

Like · Reply · 18h



Andrejs Zommers Varon Mullis There are, effectively, no proper remedies for false allegations unless the defendant has deep pockets and the person smeared has enough money to hire a lawyer.

Best to leave the public notifications to the police. If you want to do something public yourself, tell people to stay away from a place or situation. Don't go identifying specific people.

Like · Reply · 18h · Edited



Houston Wade Been sued twice for outing separate rapists and abusers in the past year. One lost very badly, they other will also lose very badly. Shine a light on them if you have the receipts.

Like · Reply · 18h



Shannon Evans But first let the allegations be substantiated and not a tatty piece of weathered business card. Asking someone out for lunch is not against the law...and the alleged behavior of the man, while questionable in the way it was presented was not just doxing but was grounds for a defamation suit. It also violated the TOS 4-6 on this page. Y'all got your own personal pages to do that.

Like · Reply · 15h



Carrie LC Houston Wade Thanks for doing good work! I am pretty sure I know one of them and he is a dirtbag so thanks for doing it and sorry for the hassle of defending yourself.

Like · Reply · 3h



Houston Wade

2 hrs

Apparently Rick Rynearson is posting culled bits from Bill Nelson's lawsuit against me? I can't see it because "captain uncensored" ironically blocked me a long time ago. That's fine, he can be the kind of guy who champions a dude who raped a bunch of ladies. It's his prerogative. But, you know, if you are going to be pro drugging and raping women and girls, it would probably be wise to keep that to ones self.

News flash: drugging and raping women is a bad thing.

It's likely there are women in this very group who agreed to go for drinks with someone to the Chicken Coop and woke up naked in a strange place with no memory of what happened. Men, it is very likely that a woman you know, who you see and interact with every day, was drugged and raped by Nelson or one of his friends from the Chicken Coop, and she is too scared, embarrassed, or confused to come forward about it.

I have the utmost respect and honor for the victims who have come forward as witnesses in this lawsuit. These include women who were raped and sexually assaulted, as well as women, who as young girls, were lured to the Chicken Coop to strip and perform sex acts on adults for cash, drugs, and booze. It takes a lot of personal fortitude to work through that kind of trauma and to then be willing to confront the men who violated your trust like that when you were only a child. I also thank the men who have come forward as witnesses to Nelson groping, or sexually assaulting women, and who saw these young girls be exploited at the Chicken Coop and are now willing to testify at trial.

I don't care what end of the political spectrum you are on, being pro rape makes you a giant piece of shit. Yuck it up all you want, you degenerates, but the women in your life know exactly the kind of person you are.

The Chicken Coop might be gone, but these men are still out there doing what they do. Raping women and then threatening their lives and the lives of their families if they tell anyone (several recent cases of which will be discussed at trial).

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It's likely there are women in this very group who agreed to go for drinks with someone to the Chicken Coop and woke up naked in a strange place with no memory of what happened. Men, it is very likely that a woman you know, who you see and interact with every day, was drugged and raped by Nelson or one of his friends from the Chicken Coop, and she is too scared, embarrassed, or confused to come forward about it.

I have the utmost respect and honor for the victims who have come forward as witnesses in this lawsuit. These include women who were raped and sexually assaulted, as well as women, who as young girls, were lured to the Chicken Coop to strip and perform sex acts on adults for cash, drugs, and booze. It takes a lot of personal fortitude to work through that kind of trauma and to then be willing to confront the men who violated your trust like that when you were only a child. I also thank the men who have come forward as witnesses to Nelson groping, or sexually assaulting women, and who saw these young girls be exploited at the Chicken Coop and are now willing to testify at trial.

I don't care what end of the political spectrum you are on, being pro rape makes you a giant piece of shit. Yuck it up all you want, you degenerates, but the women in your life know exactly the kind of person you are.

The Chicken Coop might be gone, but these men are still out there doing what they do. Raping women and then threatening their lives and the lives of their families if they tell anyone (several recent cases of which will be discussed at trial).

To the women of Bainbridge Island: being drugged and violated is not your fault. You agreed to have some drinks, not to be slipped a roofie and to be raped. This is not on you. You are not to blame. If you do want to report, walk into the Seattle FBI field office at 3rd and Spring and ask to report a crime. The agents there are more than happy to assist.

If you need an ally and an advocate, please feel free contact me and I will help you in any way I am able, or I can connect you with someone who can.

to the women of Bainbridge Island: being drugged and violated is not your fault. You agreed to have some drinks, not to be slipped a roofie and to be raped. This is not on you. You are not to blame. If you do want to report, walk into the Seattle FBI field office at 3rd and Spring and ask to report a crime. The agents there are more than happy to assist.

If you need an ally and an advocate, please feel free contact me and I will help you in any way I am able, or I can connect you with someone who can.

  19

5 Comments

 Like

 Comment



Bethanee Randles You are a great human, Houston. I hope you know this. Thank you for standing up for so many.

Like · Reply · 2h

  3



Joseph Lawson Let me guess, he's suing you for defamation of character and libel/slander?

Like · Reply · 2h



Houston Wade Defamation, but my having 60 witnesses doesn't bode well for him.

Like · Reply · 1h · Edited

 1

Replying to Joseph Lawson



Elizabeth Tilghman McFadden What is the chicken coop?

Like · Reply · 1h



Houston Wade It was an illegal speakeasy in Lynwood.

Like · Reply · 50m

Replying to Elizabeth Tilghman McFadden



Matt McCulloch What's the purpose of talking about ongoing litigation on a public forum? Just wondering.

Like · Reply · 6h



Bob Drago Matt McCulloch He wants attention.

Like · Reply · 5h



Replied to Bob Drago



Matt McCulloch It appears that way.

Like · Reply · 5h



Houston Wade It's more talking about a child sex trafficking ring in a public forum and keeping the community aware that these men also drugged and raped dozens, if not hundreds, of women, and never faced consequences for it. Plus, the litigation isn't long for this world since Nelson keeps threatening witnesses (felonies).

Like · Reply · 1h



John Haydon Wow.

Like · Reply · 35m



Rock God
@TheHoustonWade

Replying to @emrazz @alamkara and @the_unitron

I'm trying. When I find out about them, they go on blast on my community page "The Bainbridge Island Bad List". Currently being sued for defamation by one of the rapists on there, but I'll win in the end. There are too many victims for him to prevail.

11:42 PM · Nov 16, 2019 · Twitter for Android

EXHIBIT 11

SUPERIOR COURT OF WASHINGTON FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

vs.

HOUSTON WADE,

Defendant.

No. 18-2-03205-18

COPY

Deposition Upon Oral Examination

of

HOUSTON CURRY WADE

9:02 a.m.

October 2, 2019

918 South Horton Street, Suite 901

Seattle, Washington

Kristin L. Mattsen, CCR, RPR

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ALSO PRESENT:

WILLIAM NELSON

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1 A. No.

2 Q. Have you ever spoken to her before?

3 A. Lots of times but not since she submitted a
4 declaration in Mr. Nelson's favor because that would be
5 witness tampering.

6 Q. And why do you believe that's witness
7 tampering?

8 A. Because the only way I could contact her is
9 through official capacities as to, like, depose her.

10 Q. Where do you get that information?

11 A. From the Washington State laws on witness
12 tampering and contacting --

13 Q. Which law are you referring to?

14 A. Can't remember the exact law. I can look it
15 up for you.

16 Q. When did you look this up?

17 A. Recently, when I was pursuing launching
18 potential charges against Mr. Nelson for witness
19 tampering.

20 Q. You said you plan on pressing charges?

21 A. Yes.

22 Q. Okay. And how are you going to go about
23 doing that?

24 A. Via the police and the Kitsap County
25 Prosecutor's Office.

1 Q. Have you spoken to the Kitsap County
2 Prosecutor's Office?

3 A. I have.

4 Q. And when did you speak with them?

5 A. This week.

6 Q. And who did you speak with?

7 A. I can't remember her name.

8 Q. It was a female?

9 A. Yes. It was the one that came to the Du Wors
10 hearing last year.

11 Q. What do you mean "the one"?

12 A. The -- the same prosecutor, and her name's
13 not coming to my mind right now.

14 Q. A prosecutor came to their hearing?

15 A. Yes. Because Mr. Du Wors had lied to her and
16 told her that, after I got a restraining order against
17 me, that she was going to then charge me with criminal
18 harassment and have me charged with a felony.

19 Q. She said that to you?

20 A. Yes. And then when it was revealed that
21 Mr. Du Wors perjured himself dozens of times in court
22 and I ended up winning that ruling with a mountain of
23 evidence, she stormed out of there, very upset at
24 Mr. Du Wors.

25 Q. And you have this person's information?

1 A. I have her email address at the County, yes.

2 Q. When -- how did you communicate with her?

3 A. With email.

4 Q. Regarding Du Wors or regarding Mr. Nelson or

5 both?

6 A. Du Wors originally, Mr. Nelson recently.

7 Q. You exchanged emails with her?

8 A. Yes.

9 Q. Okay. Which email address were you using?

10 A. The Kitsap County gov one.

11 Q. Your email address.

12 A. Oh.

13 Q. Which email address --

14 A. Oh, houstonwade@gmail.

15 Q. I'm sorry. Which one?

16 A. Houstonwade@gmail, the one I use for

17 everything.

18 Q. And you said it was with the Kitsap County --

19 A. Yeah.

20 Q. -- Prosecutor's Office?

21 A. Yeah.

22 Q. When did this take place?

23 A. This week.

24 Q. Monday? Tuesday? Or talking about past

25 seven days?

1 A. Past seven days, yes.

2 Q. Past seven days?

3 A. (No audible response.)

4 Q. But you don't remember her name?

5 A. Not off the top of my head, no.

6 Q. Last name, remember?

7 A. It is not ringing a bell. Just -- I remember
8 it's the same lady because that's the email address I
9 had. I can get it for you.

10 Q. Yeah. If you can get it, that would be
11 great.

12 A. Yeah.

13 Q. And it's -- and you indicated that -- rather
14 you stated that she was inclined to press charges?

15 A. Yes.

16 Q. Okay. That's what she told you?

17 A. Yes.

18 Q. Against John Du Wors?

19 A. John Du Wors, Lee Jorgensen, Matthew Nelson,
20 and Bill Nelson.

21 Q. Okay. And did she say why?

22 A. Because they're felonies.

23 Q. Did she -- well, that's -- did she say why
24 she felt --

25 A. Because I have evidence that they've been

1 threatening my witnesses, which are felonies in the
2 state of Washington.

3 Q. Did she say she was planning on doing this?

4 A. If we proceed and pushed for charges, yes.

5 Q. And what does she mean by you pressing
6 charges?

7 A. Well, seeing as I am the victim in this and
8 that he's suing me for \$5 million and then threatening
9 my witnesses, that's kind of a crime.

10 Q. Again, what did she say about you pressing
11 charges?

12 A. When you report a crime, you state what
13 happened to the police, and they refer it to a
14 prosecutor, and the prosecutor determines whether to
15 press charges or not.

16 Q. I thought you said you were the one to press
17 charges?

18 A. Yes. It would be me, as a victim, seeking
19 charges be pressed against them, yes.

20 Q. But it's the prosecutor's decision?

21 A. Well, if -- the prosecutor's the one who --
22 the one who will try the case, yes.

23 Q. So is it your decision or the prosecutor's
24 decision?

25 A. I think it's a little bit of both.

1 Q. Did she -- so did she say it's entirely up to
2 you?

3 A. No.

4 Q. So what did she say?

5 A. I told her that I was going to ask for the
6 case to be withdrawn and, if it didn't, that I was going
7 to go forward in requesting that we press charges.

8 Q. Do you have emails -- do you get email on
9 your phone?

10 A. Yes.

11 Q. Do you have access to this email?

12 A. Probably.

13 Q. Can you pull it up.

14 A. It's having me search through a lot of spam
15 in here. Okay. August -- Cassie Stokes. And this is
16 the email about Du Wors.

17 Q. Stokes, S-t-o-k-e-s?

18 A. Yes, S-t-o-k-e-s.

19 Q. And how do you spell "Cassie"?

20 A. C-a-s-s-i-e.

21 Q. Okay.

22 A. That's Du Wors. Let me do Nelson.

23 Q. What's her email address?

24 A. Oh, sorry. One sec. Cassie -- sorry. No.
25 That's not -- cstokes@co.kitsap.wa.us.

1 Q. Cstokes@ --

2 A. Co.kitsap.wa.us.

3 Q. Okay. What was the last email that you --
4 you received from her?

5 A. I don't know. Last week maybe.

6 Q. Could you pull it up.

7 A. I'm only showing the John Du Wors one on
8 here.

9 Q. So the John Du Wors one was separate from the
10 Bill Nelson one?

11 A. Yes. It's from last year.

12 Q. So you can't find the -- the one from last
13 week?

14 A. All I have is that one I put -- when I put
15 her email in. If I do "Cassie" maybe. Cassie --
16 whoops. No. I'm only showing the -- let me see in
17 trash. One sec. Trash.

18 I have Du Wors showing up. Cstokes. I only
19 have Du Wors showing up at the moment.

20 Q. Okay. You can't find the emails that you
21 sent her or responded regarding Mr. Nelson?

22 A. Not at the moment.

23 Q. Okay.

24 A. I'll try to get them for you.

25 Q. Well, let's move on. Let's talk about Bill

EXHIBIT 12

October 02, 2019

NELSON vs WADE

Houston Wade

SUPERIOR COURT OF WASHINGTON FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

vs.

HOUSTON WADE,

Defendant.

No. 18-2-03205-18

COPY

Deposition Upon Oral Examination

of

HOUSTON CURRY WADE

9:02 a.m.

October 2, 2019

918 South Horton Street, Suite 901

Seattle, Washington

Kristin L. Mattsen, CCR, RPR

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ALSO PRESENT:

WILLIAM NELSON

1 Q. Okay. But you don't know the name of the
2 cousin?

3 A. No.

4 Q. What's another -- that's -- you've listed
5 now -- what? -- five?

6 A. Yeah.

7 Q. And what are -- what about the sixth one?

8 A. Who else was I talking to recently? The
9 names aren't coming to my head at the moment. I need to
10 see a list.

11 Q. What about -- so you can't think of --

12 A. I will --

13 Q. -- any of the other five?

14 A. I will get you the list when -- when -- when
15 I have those -- their stories confirmed.

16 Q. Okay. Well, let's look at the list that
17 you've provided so far.

18 A. Yes.

19 Q. Ginger Larsen?

20 A. Yes.

21 Q. Have you met her?

22 A. I've known her since I was four.

23 Q. Okay. How do you know her?

24 A. She was the mother of my best friend and my
25 upstairs neighbor.

1 Q. Okay. Looks like you don't have -- you
2 haven't provided her contact information?

3 A. I know she's in North Bend.

4 Q. North Bend?

5 A. Yeah.

6 Q. Are you going to be getting us --

7 A. Yes.

8 Q. -- the contact information?

9 A. When I get it, yes.

10 Q. What have you done to try to get it?

11 A. Well, I have -- I have a job, and I've got to
12 do other things as well; so I -- I can work on this case
13 when I can.

14 Q. You do understand that you have obligations
15 with this case; correct?

16 A. Duh.

17 Q. Is that a "yes" or "no"?

18 A. That is a sarcastic "yes."

19 Q. And so you do understand that I made a
20 request for that information --

21 A. Uh-huh.

22 Q. -- several months ago?

23 A. Yes.

24 Q. And do you understand that the judge ordered
25 you to provide that information to me?

1 A. If I can, yes. I'm not a private
2 investigator.

3 Q. Sure. But --

4 A. I can do what I can.

5 Q. -- as part of your obligations, you have to
6 try to get that information.

7 A. And I've tried and --

8 Q. I just asked you what have you done?

9 A. I messaged Audrey Olson about it, and she
10 said she was going to get it to me and has not yet.

11 Q. Okay. When did you message her?

12 A. Sometime this summer.

13 Q. When was the last time you spoke to Ginger
14 Larsen?

15 A. In person? Probably ten years ago.

16 Q. And it sounds like you've communicated with
17 her more recently than that?

18 A. I have not.

19 Q. I'm sorry. You qualified it as "in person";
20 so --

21 A. Like ten years ago? Yeah.

22 Q. So the only time you've communicated with her
23 was ten years ago?

24 A. Yeah. Well, whenever it was she was last
25 working at Safeway on Bainbridge.

1 Q. Okay. So you haven't spoken to her in ten
2 years?

3 A. No.

4 Q. And you haven't communicated with her in any
5 way, shape, or form in ten years?

6 A. No.

7 Q. Okay. All right. And you list her as -- as
8 an abuse victim of Mr. Nelson?

9 A. I do.

10 Q. And she told you this?

11 A. No. It's from her domestic violence
12 restraining order she submitted with the Court.

13 Q. Okay. So have you had any -- or any
14 conversations with her about Mr. Nelson?

15 A. No. Only Audrey Olson.

16 Q. But regarding -- but from -- with Ginger
17 Larsen, you have not?

18 A. I have not, no.

19 Q. So since you brought up Audrey Olson, who's
20 Audrey Olson?

21 A. That is Ginger Larsen's daughter --

22 Q. Okay.

23 A. -- and Mr. Nelson's former stepdaughter.

24 Q. Okay. And where is she?

25 A. Belfair.

1 Q. Belfair?

2 A. Yeah.

3 Q. And have you gotten her contact information?

4 A. I have. I think I listed her email address
5 or her Facebook, one or the other.

6 Q. What about her address?

7 A. I don't have her physical address, no. I
8 asked her for that.

9 Q. Okay. But she hasn't gotten it back to you?

10 A. No.

11 Q. When did you ask her?

12 A. About the same time I asked for her mother's
13 and her brother and sister's.

14 Q. Okay. And she hasn't responded?

15 A. Not with that information, no.

16 Q. Okay. And when was the last time you spoke
17 with her?

18 A. In person or online?

19 Q. Both.

20 A. In person was at my high school reunion back
21 in July, and online was six weeks ago, August, sometime
22 in there.

23 Q. Okay. And what did she say to you about
24 Mr. Nelson?

25 A. That he used to beat her when she was a

1 A. The abuse? From probably 1985 until the
2 divorce.

3 Q. Do you know when that was?

4 A. '94, I believe.

5 Q. And you mentioned requesting information for
6 siblings?

7 A. Yes.

8 Q. How many siblings does she have?

9 A. She has two.

10 Q. Who are those?

11 A. April and Andy Olson.

12 Q. And have you spoken with them?

13 A. I have not. The last time I saw Andy Olson
14 was probably five or six years ago.

15 Q. Do you know where he's located?

16 A. I think he's in Suquamish.

17 Q. Have you spoken to him about Mr. Nelson?

18 A. I have not.

19 Q. Okay. What about April Olson?

20 A. I have not seen her in 20 years.

21 Q. Have you spoken to her about Mr. Nelson?

22 A. I have not.

23 Q. And do you have any idea where she is?

24 A. North Bend.

25 Q. Do you have any other contact information?

1 A. Not at this moment, no.

2 Q. Have you tried to obtain it?

3 A. Yes.

4 Q. How so?

5 A. Via Audrey Olson.

6 Q. Okay. But she hasn't responded?

7 A. She has not.

8 Q. Okay. Do you know if anyone else was living

9 in that house at the time?

10 A. Well, there was Matthew Nelson.

11 Q. Matthew Nelson?

12 A. Yes.

13 Q. Who's Matthew Nelson?

14 A. Mr. Nelson's son.

15 Q. Okay. And have you spoken with him?

16 A. I've spoken with him but not since this case.

17 Q. When was the last time you spoke with him?

18 A. Probably 2015/2016, somewhere in there --

19 Q. Okay.

20 A. -- at a friend's party.

21 Q. And have you spoken to him about Bill Nelson?

22 A. No.

23 Q. No, you haven't?

24 A. I avoid the topic with him, usually.

25 Q. Okay. So he hasn't said anything to you

1 A. Can't remember if I asked her or not. I
2 think I might -- actually, I think might, in a message
3 somewhere, have her mailing address. I'll try to get
4 that to you when I can.

5 Q. What about Todd Baylor? Are you able to get
6 his contact information?

7 A. No.

8 Q. Have you tried to?

9 A. I have not, no.

10 Q. What about Phil Ahrens's?

11 A. Phil has not responded to messages recently.

12 Q. So you don't have his contact information?

13 A. No.

14 Q. Okay. What about Sal DeRosalia?

15 A. He's Outcome Fitness. I can probably get an
16 address for that at least. But he's pretty responsive;
17 so I could probably get "contact" for him.

18 Q. Have you tried to get that yet?

19 A. No.

20 Q. Ben Kardong --

21 A. Yes.

22 Q. -- who is that?

23 A. He's a contractor on the island.

24 Q. Okay.

25 A. And he was -- he graduated a year ahead of me

1 in high school.

2 Q. Okay. And you've had conversations with him
3 about Mr. Nelson?

4 A. I have.

5 Q. And what has he said?

6 A. He said that he knows two women that had
7 agreed to go drinking with Mr. Nelson at The Chicken
8 Coop and later they woke up in a strange place, couldn't
9 find their clothes, and they had been raped.

10 Q. And do you know who those two people are?

11 A. I don't.

12 Q. Did he say who those people were?

13 A. Not to me, no.

14 Q. And did he say when this took place?

15 A. A couple years ago.

16 Q. "Couple" as in two years ago?

17 A. I think so, yes.

18 Q. When did The Chicken Coop close?

19 A. Last summer, I believe.

20 Q. Last summer?

21 A. Yeah.

22 Q. And did Mr. Kardong specifically say that
23 Mr. Nelson was the one who raped those two people?

24 A. Yes.

25 Q. And did he say how he knew that?

1 A. Because he -- they told him.

2 Q. They told him that?

3 A. Yes.

4 Q. Did he say that -- but he didn't say the name
5 of the two people?

6 A. No. He said that they were scared because
7 they had -- they were in long-term relationships and
8 they didn't want their significant others to find out
9 that they had been partying with another man.

10 Q. And do you know what's Ben's connection to
11 Mr. Nelson?

12 A. They're contractors, and I guess his mother
13 had been Mr. Nelson's doctor, I guess.

14 Q. Have you -- how many times have you spoken to
15 Ben about Mr. Nelson?

16 A. A couple times online and several times in
17 Bruciato when he's come in for dinner.

18 Q. Have you provided the -- the online
19 communications with him?

20 A. I have.

21 Q. All of them?

22 A. The one that I have, yes.

23 Q. When was the last time you spoke with him?

24 A. When he messaged me to say that Mr. Nelson
25 had contacted his mother and threatened him through her.

1 Q. Threatened him through her --

2 A. Yes.

3 Q. -- meaning his mother?

4 A. Yes.

5 Q. And have you -- was it -- been able to obtain
6 his contact information?

7 A. I've provided his email -- or his --

8 Q. His Facebook?

9 A. -- his Facebook, yes.

10 Q. But anything else beyond that?

11 A. No.

12 Q. Have you tried?

13 A. Not specifically, no.

14 Q. When you say "not specifically," that's -- is
15 that a "yes" or "no"? Have you --

16 A. Well, no. I --

17 Q. Okay.

18 A. Yeah.

19 Q. Meghan -- Meghan Angell --

20 A. Yes.

21 Q. -- who is that?

22 A. She's a young woman who worked with me at the
23 Pub back in 2009.

24 Q. The Pub, is that the name of the place? It's
25 called "The Pub"?

1 A. The Harbour Pub. Everyone refers to it as
2 "the Pub."

3 Q. Okay. So she was a coworker back then?

4 A. Yes.

5 Q. Okay. And what did she tell you?

6 A. That she -- when she was underage, she was
7 invited to a party at The Chicken Coop where --

8 Q. By who?

9 A. By a friend of hers.

10 Q. Do we know who that friend is?

11 A. She did not reveal that to me, no.

12 Q. Okay. And?

13 A. And that, when she showed up to -- to the
14 party at The Chicken Coop, it was populated by a bunch
15 of the firefighters and a bunch of the police officers,
16 Bill Blakely, and Bill Nelson.

17 Q. And?

18 A. And that this party consisted of underage
19 girls being plied with drugs and alcohol to strip and
20 perform sex acts on the men.

21 Q. What did she say specifically about
22 Mr. Nelson?

23 A. That he was there.

24 Q. Anything else?

25 A. That she left.

1 Q. Anything else about Mr. Nelson?

2 A. No. Just that he was there.

3 Q. Okay. And when did this take place?

4 A. When she was underage. So prior to 2004.

5 Q. So we're talking about over 13 years ago?

6 A. Yeah.

7 Q. When did she tell you this?

8 A. 2009.

9 Q. So ten years ago?

10 A. Yeah.

11 Q. And have you spoken to her since about this?

12 A. Yes.

13 Q. And what did she say?

14 A. I asked her to provide a written statement,
15 which we worked on online, and then she never mailed me
16 a signed copy.

17 Q. Did she send you an unsigned copy?

18 A. We have one in Google Docs that's unsigned.

19 Q. Have you tried to get her contact
20 information?

21 A. I have her email.

22 Q. Beyond that?

23 A. Yeah. No.

24 Q. No.

25 A. I just know she's in Kauai.

1 Q. She's in Kauai, you said?

2 A. Yeah.

3 Q. Have you asked her for her contact
4 information?

5 A. I have not.

6 Q. Ryan Landworth --

7 A. Yes.

8 Q. -- who is that?

9 A. He's a former firefighter.

10 Q. And how do you know him?

11 A. From working at the Pub.

12 Q. The same pub as before?

13 A. Yes.

14 Q. And how do you know him from the Pub?

15 A. He's a customer who'd come in.

16 Q. Okay. And?

17 A. He's a former firefighter.

18 Q. And how did Mr. Nelson's name come up with
19 him?

20 A. Again, we were talking about the collapse of
21 the Blossom development, and he mentioned that years ago
22 he had been brought to The Chicken Coop by the
23 firefighters for a party and it turned out that it was
24 underage girls being plied with drugs and alcohol to
25 perform sex acts and strip and that he was horrified and

1 quit the fire department as a result.

2 Q. And what did he say specifically about
3 Mr. Nelson?

4 A. That he was there and one of the guys who
5 organized it.

6 Q. Did he -- did he see -- did he say anything
7 else about Mr. Nelson?

8 A. No, just that he does not like him.

9 Q. Because he was there?

10 A. Yep.

11 Q. But he didn't say anything else beyond him
12 being there?

13 A. Nope. He didn't stay long enough to see the
14 dirty stuff.

15 Q. He what?

16 A. He didn't stay long enough to see the dirty
17 stuff, although he did say he took a picture of the
18 child pornography that were on the walls of The Chicken
19 Coop.

20 Q. Did he say how long he was there for?

21 A. No.

22 Q. No?

23 A. No.

24 Q. But you said that he left before --

25 A. He left when one of the young women who came

1 out happened to be in his son's class, and that's when
2 he left.

3 Q. And do you have his contact information?

4 A. I have -- I think I put -- can't remember if
5 I put -- did I put an email or a phone number for him?
6 I might have a phone number somewhere, but --

7 Q. Provided just an email.

8 A. Okay.

9 Q. Have you tried to get any of the other
10 contact information?

11 A. I've been -- since he signed the original
12 statement for me that was intended for the
13 restraining order hearing, he has not been too
14 responsive. I've tried to get him to -- to sign another
15 document, but he, I guess, is traveling and doing other
16 things.

17 Q. But you've tried to get his contact
18 information?

19 A. Yeah.

20 Q. How have you tried?

21 A. Email.

22 Q. Email? But no response?

23 A. No.

24 Q. When did you try?

25 A. This past spring a lot.

1 A. I've emailed her several times, yes.

2 Q. When was the last time you emailed her?

3 A. Probably in August.

4 Q. Katie Wainio --

5 A. Yes.

6 Q. -- who's that?

7 A. She's the commercial loan officer at Kitsap
8 Bank. We discussed her.

9 Q. Okay. And how do you know her?

10 A. She was in my class in high school.

11 Q. All right. And when was the last time you
12 spoke with her?

13 A. Probably a few weeks ago online.

14 Q. And those conversations were regarding
15 Mr. Nelson?

16 A. Yes, about -- about filing charges against
17 Nelson for witness intimidation.

18 Q. Okay. Was she the one that he just -- he
19 just went into her place of work?

20 A. Yep.

21 Q. And he -- he didn't have any conversation
22 with her?

23 A. He -- he -- no. He tried contacting her
24 online on Facebook via friend request.

25 Q. Friend request?

1 A. Yes.

2 Q. Okay. But nothing else; correct?

3 A. No, other than his stalking and harassment of
4 her back in 2005 or so.

5 Q. And did she say what exactly that entailed?

6 A. Phone calls, threats.

7 Q. Did she say what those threats were?

8 A. Not specifically, no.

9 Q. Did they have a business relationship back
10 then?

11 A. She denied him for two loans.

12 Q. Did she say where the phone calls were being
13 made to?

14 A. No.

15 Q. So her place of work?

16 A. Could have been work. Could have been home.
17 I don't know.

18 Q. Okay. Do you have her contact information?

19 A. I have her Facebook.

20 Q. Have you tried to actually get her phone
21 number and address?

22 A. I have not, no.

23 Q. Okay. Kim Brackett --

24 A. Yes.

25 Q. -- who's that?

1 Q. And you don't have their contact information?

2 A. I don't. I've heard that Melanie currently
3 has cancer and that they're working on that, but that's
4 just through the grapevine.

5 Q. And have you tried to get their contact
6 information yet?

7 A. I asked Bill Knobloch's ex-wife, when I asked
8 for Knobloch's information, for theirs as well because
9 they're all friends.

10 Q. So the only thing you've done for getting the
11 contact information for a number people -- so Bill
12 Knobloch, Mike Smith, Mike Smith's wife --

13 A. Yeah.

14 Q. -- Malcolm Gander, and Melanie Keenan -- so
15 far it sounds like all those are being waited on for
16 Bill Knobloch's wife to respond?

17 A. Yes.

18 Q. And do we even know Bill Knobloch's wife's
19 name?

20 A. I'm trying to remember her first name at the
21 moment, and it's not coming to my mind.

22 Q. Do we know her last name?

23 A. Knobloch.

24 Q. It's still Knobloch?

25 A. Yes. Oh, my goodness, what is her first

1 name? It's not coming to me at the moment. I have her
2 business card at home. I can get that to you.

3 Q. You said the only conversation you've had
4 with Malcolm Gander and Melanie Keenan was that one time
5 at the restaurant?

6 A. Yes.

7 Q. Troy Dettman --

8 A. Yes.

9 Q. -- how many times have you spoken with him
10 about Mr. Nelson?

11 A. Quite a few times.

12 Q. And when was the most recent?

13 A. When was the last time I saw him? Probably
14 in the spring, April or so.

15 Q. And have you provided his contact
16 information?

17 A. I think I provided his website.

18 Q. His Facebook?

19 A. Yeah.

20 Q. Have you tried to get his address and phone
21 number?

22 A. I have.

23 Q. How have you tried to do that?

24 A. Via Facebook.

25 Q. And what happened?

1 A. And I haven't heard from him. He's a
2 fly-fishing guy, and so he's all over the place.

3 Q. Do you know when you made that request?

4 A. Probably July, August, in there.

5 Q. Do you know how many times you've tried?

6 A. Just once.

7 Q. Just once?

8 A. Yeah.

9 Q. Have you also spoken to Gretchen Dettman?

10 A. I have not.

11 Q. So you don't know what she has to say about
12 the situation?

13 A. Oh, no. Sorry. I spoke to her in 2011 about
14 it as well, at a Halloween party.

15 Q. At a Halloween party? Which party was that?

16 A. It was a party at my house.

17 Q. How did she end up there?

18 A. Because she was the ex-wife of Troy Dettman.

19 Q. So you invited both Troy and Gretchen to your
20 holiday party?

21 A. No. Troy came as well, and she came along.
22 Actually, no. Troy was there because he lived there. I
23 was Troy's roommate for a year.

24 Q. You were roommates with Troy?

25 A. Yes.

1 Q. For how long were you roommates?

2 A. A year.

3 Q. Where was that?

4 A. I can't remember the exact address. It was
5 on Kallgren and Rolling Bay.

6 Q. How did you guys become roommates?

7 A. He said he needed a room -- or needed a
8 house, and I needed a house as well at the time.

9 Q. And were you friends before that?

10 A. Yes.

11 Q. How were you friends?

12 A. From him coming in the restaurant, the Pub.

13 Q. And how long have you known him for?

14 A. Since like 2002.

15 Q. Okay. And when was the last time you spoke
16 with him?

17 A. That was last spring.

18 Q. Spring of 2019?

19 A. Yes.

20 Q. And you said you spoke with Gretchen as well?

21 A. In 2011.

22 Q. 2011?

23 A. Yeah.

24 Q. And what did she say?

25 A. That she was there the night that Elizabeth

1 Kaltreider beat on the door, screaming for help naked.

2 Q. That was a conversation at a holiday party?

3 A. Yeah.

4 Q. Was that the only time you spoke to her?

5 A. It was the last time I saw her,, I believe.

6 Q. Was that the only time you spoke to her about
7 Mr. Nelson?

8 A. Yes.

9 Q. Do you have her contact information?

10 A. I do not.

11 Q. What have you done to try to get it?

12 A. Well, I assume that, when I get Troy's
13 contact information, he can give me hers.

14 Q. Todd Baylor, who's that?

15 A. We talked about him. He's a former
16 firefighter.

17 Q. Who's Kristi Nelson?

18 A. Kristi Nelson is a woman who works at
19 Sotheby's Real Estate.

20 Q. And how do you know her?

21 A. From, I think, online conversations, and we
22 became friends.

23 Q. You became friends online?

24 A. Yep.

25 Q. Have you met her before?

1 A. Yes.

2 Q. And where have you met her?

3 A. Working in the Pub.

4 Q. Which pub was this?

5 A. The Harbour Pub.

6 Q. The Harbour Pub? When was this?

7 A. She'd been coming in for years, so probably
8 since maybe 2012/2013.

9 Q. And when was the last time you spoke with
10 her?

11 A. Other than just greetings, probably a couple
12 weeks ago.

13 Q. And how many times have you spoken to her
14 about Mr. Nelson?

15 A. Once.

16 Q. And when was that?

17 A. She volunteered that, when she moved to the
18 island, one of the first things her boss at the time
19 told her was to stay away from Mr. Nelson.

20 Q. Who is her boss?

21 A. Some guy at a real estate company.

22 Q. And has she had any interaction with
23 Mr. Nelson?

24 A. I don't know.

25 Q. But she hasn't said she did?

1 A. No.

2 Q. Okay. Have you tried to get her contact
3 information?

4 A. I don't have -- I don't have her contact
5 information, no.

6 Q. I'm sorry. What?

7 A. I don't have her contact information.

8 Q. Have you tried to get it?

9 A. No.

10 Q. Gina Baker --

11 A. Gina Baker, yes.

12 Q. -- who is that?

13 A. She is someone who was in my sister's class
14 in high school.

15 Q. And you've spoken to her about Mr. Nelson?

16 A. She spoke to me about him.

17 Q. So you had a conversation with her about --

18 A. Yeah.

19 Q. -- Mr. Nelson?

20 A. She approached me about it.

21 Q. When was this?

22 A. Sometime last winter.

23 Q. And what did she say?

24 A. That she had been shown a tape that
25 Mr. Nelson had filmed of he and an ex-girlfriend having

1 sex.

2 Q. And who had shown that video to her?

3 A. She did not tell me.

4 Q. Did she say where she saw this video?

5 A. No.

6 Q. Did she say when this took place?

7 A. No.

8 Q. So all she said was only she saw a video?

9 A. A video of Mr. Nelson having sex and it was
10 obvious that who he was having sex with was not aware
11 that she was being filmed.

12 Q. Did she say why it was obvious?

13 A. No.

14 Q. Did she say anything about Mr. Nelson being
15 aware of it?

16 A. Yep.

17 Q. What did she say about that?

18 A. She said that he was the one spreading the
19 video.

20 Q. How did she know that?

21 A. I don't know. Probably because she saw it.

22 Q. But we don't know who showed it to her?

23 A. No.

24 Q. So you're just believing that -- her

25 conclusion that Mr. Nelson was the one spreading it?

1 A. Yep.

2 Q. Do you have her contact information?

3 A. I provided what I have for her. I believe
4 she actually moved into my mother's condo recently; so I
5 can probably find that out.

6 Q. Have you tried to find out yet?

7 A. No.

8 Q. When did you have this conversation with her?

9 A. Last winter.

10 Q. Last winter?

11 A. Yeah.

12 Q. And how did that come about?

13 A. She approached me at the restaurant.

14 Q. Bruciato?

15 A. Yep.

16 Q. Okay. How did you -- you said she was a
17 friend of your sister?

18 A. She was in my sister's class in high school.

19 Q. Okay.

20 THE COURT REPORTER: Counsel, when you
21 get to a good stopping point, can we take a five-minute
22 break?

23 MR. SAVOJNI: Sure.

24 (Break taken 10:42 a.m. to 10:55 a.m.)

25 MR. SAVOJNI: All right. Back on the

1 record.

2 Q. (BY MR. SAVOJNI) So we were just talking
3 about Gina Baker.

4 A. Yep.

5 Q. And to confirm, that was the -- you only
6 spoke to her one time about Mr. Nelson?

7 A. Yes.

8 Q. Okay. And when did that take place?

9 A. Sometime last winter.

10 Q. Okay. And have you tried to get her contact
11 information?

12 A. I told you I think she moved into my mom's
13 condo; so I can probably get that for you.

14 Q. Okay. Ashley Cross DeGrow --

15 A. Yes.

16 Q. -- who is that?

17 A. She's a friend.

18 Q. A friend of yours?

19 A. Yes.

20 Q. For how long?

21 A. Probably seven or eight years now.

22 Q. How did you meet her?

23 A. I met her at a New Year's party.

24 Q. New Year's party?

25 A. Yeah.

1 Q. Do you remember which one?

2 A. Probably New Year's 2011 into 2012, I
3 believe.

4 Q. Okay. And how many times have you spoken to
5 her about Mr. Nelson?

6 A. Quite a few times.

7 Q. When was the last time you spoke with her?

8 A. Probably a month ago.

9 Q. Is that orally or --

10 A. Orally. She came into the restaurant.

11 Q. Okay.

12 A. Yeah.

13 Q. And what did she say?

14 A. She just asked if the case was still going
15 on.

16 Q. And what did she say about Mr. Nelson?

17 A. Then or overall?

18 Q. Overall.

19 A. That he creeped her out when she was younger
20 and groped her.

21 Q. Did she say when that took place?

22 A. I think she wrote an email describing it as
23 when the construction was happening at Lynwood Center at
24 the Blossom Hill development.

25 Q. But she didn't say when exactly?

1 A. No.

2 Q. Did she say what --

3 A. Well, she may have. I can't remember the
4 exact wording she used.

5 Q. And that was in a statement that she's
6 provided?

7 A. Yeah. Or in an email that she provided, I
8 submitted as evidence.

9 Q. And she sent you an email?

10 A. Yes.

11 Q. And was that an email that you submitted to
12 the Court?

13 A. Yeah. It should be under Exhibit B, I
14 believe.

15 Q. Okay. And did she say anything beyond what's
16 in the email?

17 A. She also said -- well, she said in person
18 that she can testify to the fact that Mr. Nelson used
19 cocaine recently.

20 Q. Did she say how she knows that?

21 A. Because she was at a party where he was using
22 cocaine.

23 Q. Did she say when was that?

24 A. A few years ago.

25 Q. So "recently" was a few years ago?

1 A. Well, Mr. Nelson testified he hadn't used
2 cocaine since his 20s, and she said that was a lie.

3 MR. SAVOJNI: Objection. Nonresponsive.

4 Q. (BY MR. SAVOJNI) To you, "recently" is
5 within a few years?

6 A. "Recently" is within this last year.

7 Q. Okay. So -- okay. And where was this party?

8 A. I think it was at The Moose, which was a home
9 in Crystal Springs, owned by a mutual friend of theirs.

10 Q. It's a home?

11 A. Yeah. It was called "The Moose."

12 Q. Okay. Is it a private house or --

13 A. Yes.

14 Q. Okay. And when did this take place?

15 A. I'm not sure. You'll have to ask her.

16 Q. Okay. And did she say anything else?

17 A. She said that Matthew Nelson's testimony was
18 a lie, that they were close friends and that she's
19 married to his best friend's brother.

20 Q. What specifically about Matthew's testimony
21 did she say was incorrect?

22 A. That they weren't friends and they never
23 really did things together.

24 Q. "They" meaning who?

25 A. Ashley and Matthew.

1 Q. Okay. That was the extent of --

2 A. Yeah. Because Matthew also claimed that he
3 was never abused by Mr. Nelson, but Ashley can testify
4 that he was.

5 Q. And how does Ashley know that?

6 A. Because she witnessed it.

7 Q. She -- so Ashley says also that she witnessed
8 Matthew Nelson being abused?

9 A. Yes.

10 Q. And did she say how she witnessed that?

11 A. Not specifically, just that -- ongoing thing
12 throughout their life.

13 Q. Did she say when she witnessed that?

14 A. I think their entire lives.

15 Q. And she didn't say what exactly that abuse
16 consisted of?

17 A. She did say one time that Mr. Nelson had
18 threatened to kill his son in front of her.

19 Q. Anything else?

20 A. Not specifically, no.

21 Q. No?

22 And how did Ashley know Matt Nelson?

23 A. They grew up together.

24 Q. Grew up together?

25 A. Yeah.

1 Q. Neighbors?

2 A. I don't know.

3 Q. Don't know?

4 A. I know that -- that she's married to Matt
5 Nelson's best friend's brother.

6 Q. And who is that?

7 A. What's his first name? Mike, Mike DeGrow.

8 Q. And what's Ashley's contact information?

9 A. I think I put her email down there. I don't
10 have a home address. They just moved. I know that.

11 Q. When did they move?

12 A. Sometime in the last month, I think. They
13 moved to Poulsbo, I believe.

14 Q. Have you tried getting their address or phone
15 number for me?

16 A. I haven't seen them since then; so I -- I'll
17 get that for you.

18 Q. But you haven't tried yet?

19 A. No. They were in Fort Ward, but they moved.

20 Q. Alaina Brooke-Simcoe Seyssel --

21 A. Yes.

22 Q. -- who is that?

23 A. She is a woman who was in my class in
24 high school, and her family owned a business in Lynwood
25 Center.

1 Q. What was the business?

2 A. I think they built guitars.

3 Q. And when was the last time you spoke with
4 her?

5 A. Not for like a year. She commented on the
6 original post I made on my Facebook page.

7 Q. And what did she say?

8 A. That Mr. Nelson was constantly going after
9 underage girls.

10 Q. And did you have any further conversations
11 with her about that?

12 A. No.

13 Q. So you don't know what she's basing that
14 conclusion on?

15 A. I think she's basing it on the fact that she
16 worked in a business across the street from his
17 development, where he was constantly hanging out.

18 Q. So she didn't say what she was basing it off
19 of?

20 A. No.

21 Q. And you didn't follow up with her about that?

22 A. No.

23 Q. Have you tried to get her contact
24 information?

25 A. No.

1 Q. And that was the extent of the -- your
2 interaction with her regarding Mr. Nelson?

3 A. Yes.

4 Q. Shannon Evans, who's that?

5 A. She's someone who lived next door to The
6 Chicken Coop for years.

7 Q. And how do you know her?

8 A. Through political activism.

9 Q. How long have you known her for?

10 A. I don't know. Maybe four or five years now.

11 Q. And you've had conversations with her about
12 Mr. Nelson?

13 A. Yes.

14 Q. How many?

15 A. Online, mostly, via the posts I made about
16 Mr. Nelson and then once in person.

17 Q. You said "mostly."

18 A. Yeah.

19 Q. Any other than that one time in person and
20 then those public posts?

21 A. No.

22 Q. And what did she say?

23 A. She said that Mr. Nelson had been very creepy
24 and hit on his -- on her son's girlfriend at the time
25 when she was underage.

1 Q. Did she say anything else?

2 A. That the parties at The Chicken Coop would
3 get rambunctious, but she hadn't heard about underage
4 strippers.

5 Q. She wasn't at the parties?

6 A. No.

7 Q. So she didn't witness any of those?

8 A. No.

9 Q. And did she say when Mr. Nelson supposedly
10 hit on underage women?

11 A. She did not.

12 Q. Did she say where it took place?

13 A. I believe in Lynwood, but I'm not sure.

14 Q. Lynnwood, Washington?

15 A. Yeah. Lynwood Center on Bainbridge.

16 Q. Okay. Lynwood Center?

17 A. (No audible response.)

18 Q. And -- but she didn't say when?

19 A. No.

20 Q. Did she list the name of the woman?

21 A. No.

22 Q. Was that said to you in the oral conversation
23 or online?

24 A. I think it was one of the comments online,
25 but I can't quite remember.

1 Q. Did she say anything else orally?

2 A. Might have been along those same lines. It
3 was about a year ago.

4 Q. Was that the last time you spoke with her?

5 A. In person, yes.

6 Q. Have you spoken to her online since?

7 A. Just comments on Facebook pages.

8 Q. Okay.

9 A. Yeah.

10 Q. No private messaging?

11 A. We've private messaged actually a lot about
12 John Du Wors because she had filed a grievance against
13 him.

14 Q. But not about Mr. Nelson?

15 A. No.

16 Q. Are you sure?

17 A. I can double-check.

18 Q. It would be good if you did.

19 A. Okay.

20 Q. Do you have her contact information?

21 A. Just her Facebook.

22 Q. Have you tried to get her other contact
23 information?

24 A. I have not, no.

25 Q. Jeffrey Sneller, who's that?

1 Q. Steve Nagle --

2 A. Yes.

3 Q. -- who's that?

4 A. He is a man who dated Alicia Heath.

5 Q. And?

6 A. He can provide information that Mr. Nelson
7 was paying Alicia Heath for sex and that her testimony
8 or sworn -- her declaration is corrupted as a result.

9 Q. And when did he tell you this?

10 A. Last spring. And then I gave -- I submitted
11 the text messages to the Court as evidence, and it was
12 after that that John Du Wors started threatening him.

13 Q. And how do you know him?

14 A. I went to school with his brother. He was a
15 few years behind me.

16 Q. And what exactly did he -- you submitted to
17 the Court, you said?

18 A. It was text -- text messages between he and
19 Alicia Heath, discussing Mr. Nelson paying her for sex.

20 Q. You submitted this?

21 A. Yes.

22 Q. Do you know which exhibit?

23 A. I cannot remember the letter. It was
24 something I submitted, I think, last April.

25 Q. So you didn't submit it as a part of your

1 **discovery?**

2 A. No. It was submitted as an addendum.

3 Q. Okay. So when you were told to submit all of
4 **your exhibits as part of the discovery response, you**
5 **didn't submit it then?**

6 A. I may have. I can't remember. I think I
7 submitted all that stuff several times.

8 Q. **It was a text exchange, you said?**

9 A. Yes.

10 Q. **Between he and who?**

11 A. Alicia Heath.

12 Q. **Alicia Heath?**

13 A. Yes.

14 Q. **Are you sure you submitted it in your**
15 **discovery response?**

16 A. Yes. If not, I can get you another copy, if
17 you can't find it.

18 Q. **So you're not sure you sent it already?**

19 A. I know I submitted it to the Court, and you
20 received a copy then, and that was back in April. And I
21 know I put it in the stack I gave you in May. So, yeah,
22 you received it. I'm not -- I'm pretty sure I put it
23 also in the -- in the interrogatories as well.

24 MR. SAVOJNI: Can we mark this as
25 Exhibit 2.

1 (Exhibit No. 2 marked for
2 identification.)

3 Q. (BY MR. SAVOJNI) Do you recognize that?

4 A. Yep. It's interrogatory answers.

5 Q. Put any of that -- are those also your
6 requests for production --

7 A. Uh-huh.

8 Q. -- or responses?

9 A. That's Jerod, Ashley. That is Ben.
10 That's -- that's the restraining order. That is -- it
11 is not in this pile, no.

12 Q. Okay. So do you recognize that this was
13 the -- your final response after the judge ordered you
14 to comply fully?

15 A. Yes.

16 Q. You recognize that?

17 A. Yes.

18 Q. Okay. But it's not in that --

19 A. It's not in this particular one, no.

20 Q. No? Okay.

21 A. But I didn't reference it, I think, in -- in
22 any of the interrogatory responses.

23 Q. But you understood that you were supposed to
24 be providing all the documents?

25 A. You've been provided all the documents --

1 Q. In --

2 A. -- several times.

3 Q. But it wasn't in that stack --

4 A. This particular one? No. Because I didn't
5 reference it in the interrogatories. I only provided
6 things I referenced in the interrogatories.

7 Q. How many times have you spoken with Steve
8 Nagle about Mr. Nelson?

9 A. A couple of times.

10 Q. And --

11 A. Briefly text message, and then we met in
12 person. We talked on the phone once after John Du Wors
13 threatened him, and then we talked on the phone recently
14 about pursuing charges against Du Wors and Nelson for
15 witness intimidation.

16 Q. And the text messages with Steve, were they
17 about Mr. Nelson?

18 A. Yes.

19 Q. And have you provided those text messages?

20 A. I did.

21 Q. And were those in that stack there?

22 A. The ones about -- well, what Steve sent me
23 text messages was about the screenshots of when he
24 discovered that Nelson was paying his girlfriend for
25 sex.

1 Q. So the only text messages you're referring to
2 are forwarded text messages?

3 A. Yes.

4 Q. Any other things?

5 A. No.

6 Q. No? Okay.

7 But those are not in that stack right there?

8 A. No.

9 Q. Okay. That was the -- that was the full
10 conversation on text?

11 A. Yes.

12 Q. Okay. Did Steve have any -- tell you
13 anything beyond that text exchange about Alicia Heath?

14 A. Yes. Also John Du Wors's paying her for sex.

15 Q. How about regarding Mr. Nelson? Did he say
16 anything else beyond that accusation?

17 A. No. Just that he was willing to provide
18 those text messages and testify.

19 Q. Did he say how he got those text messages?

20 A. Because it was a text exchange between he and
21 Alicia Heath.

22 Q. So it was -- he had -- so it was a text
23 exchange between Alicia and him?

24 A. Yes.

25 Q. Okay. And do you know when that text

1 exchange took place?

2 A. Sometime last year.

3 Q. And what's the current status of his
4 relationship with Alicia?

5 A. Very toxic.

6 Q. So they're not on good terms?

7 A. No.

8 Q. Okay. And have you provided his contact
9 information?

10 A. I have. I think I put his phone number on
11 there, didn't I?

12 Q. (No audible response.)

13 A. No?

14 Q. I mean, you can look right there, but, no,
15 you didn't.

16 A. If not, I can get that for you.

17 Q. 29.

18 A. Oh, I can -- I can get his phone number for
19 you.

20 Q. And also his address.

21 A. I don't have his address, but I can ask.

22 Q. But you haven't tried to get that yet?

23 A. No.

24 Q. Okay. What about Alicia Heath? Have you had
25 any communication with Alicia Heath?

1 Q. Do you know how many years ago?

2 A. Maybe 2013 or so, but don't hold me to that.

3 I can't quite remember.

4 Q. Cynthia Remash --

5 A. Yes.

6 Q. -- who is that?

7 A. She worked for Mr. Nelson in the kitchen at

8 Edna's.

9 Q. Edna's is a restaurant?

10 A. Yep.

11 Q. And do you know what Mr. Nelson's capacity
12 was regarding the restaurant?

13 A. He was the owner.

14 Q. Okay. Was he the manager?

15 A. I don't know.

16 Q. How do you know Cynthia?

17 A. I worked for her briefly in a cafe in 2008.

18 Q. She was your supervisor?

19 A. Yep.

20 Q. Which cafe was that?

21 A. It was called the Blue Ocean Cafe.

22 Q. The Blue what?

23 A. Blue Ocean Cafe.

24 Q. Okay. And you had conversations with her
25 about Mr. Nelson?

1 A. Yep, because she had said she worked at
2 Edna's.

3 Q. And what did she say?

4 A. That Mr. Nelson had been very inappropriate
5 to a young woman at the -- at the workplace and
6 mentioned something about him being inappropriate
7 towards the daughter of one of his workers.

8 Q. Did she say in what capacity?

9 A. Touching.

10 Q. How?

11 A. I don't know.

12 Q. Just simply touching?

13 A. Yeah.

14 Q. So we don't know how he touched her?

15 A. Well, we'd have to ask Cynthia.

16 Q. You didn't ask her?

17 A. Not specifically, no.

18 Q. Was this a onetime conversation?

19 A. Yes.

20 Q. And when did that take place?

21 A. Last winter. She came into the restaurant.

22 Q. And then offered this information to you?

23 A. Yeah. Because I asked -- because that was
24 after Mr. Nelson filed suit, and she came in, and I
25 asked her about her time at Edna's and if Nelson had

1 ever done anything inappropriate.

2 Q. Did you get her contact information?

3 A. No.

4 Q. Have you tried to?

5 A. No. Don't know how to contact her.

6 Q. Why is that?

7 A. Because I don't know where she lives or her
8 phone number or her email.

9 Q. Melissa Bryant --

10 A. Yes.

11 Q. -- who's that?

12 A. That's Mr. Nelson's ex-girlfriend. We talked
13 about her.

14 Q. And how do you know her?

15 A. Just because she approached me at the
16 restaurant.

17 Q. Which restaurant?

18 A. Bruciato.

19 Q. Bruciato? And when was that?

20 A. Sometime last winter.

21 Q. And you're -- what's her -- what's her
22 knowledge about Mr. Nelson?

23 A. She had claimed that Nelson had abused her,
24 that --

25 Q. Did she say how?

1 A. No, because Mr. Du Wors threatened my mother,
2 and it's not coming down. It will stay up forever until
3 he changes his ways.

4 Q. Who is Tracy Lang?

5 A. Tracy Lang is the business owner of the
6 tattoo shop above Mr. Nelson's business.

7 Q. Which business is this?

8 A. Ryderville Ink.

9 Q. And how do you know Tracy?

10 A. Originally via online, and we met in person.

11 Q. How many times have you met Tracy in person?

12 A. A couple times at the restaurant, and one
13 time I went to Ryderville Ink because she gave us
14 temporary tattoos for a Halloween costume.

15 Q. Who's "us"?

16 A. Myself and my friend. We dressed as
17 Roller Derby girls.

18 Q. What's the other person?

19 A. It was with Nick Heppenstall.

20 Q. When was this?

21 A. 2016?

22 Q. And you had a conversation with Tracy?

23 A. Online underneath -- she's the one who
24 originally asked who was this person who raped the woman
25 who committed suicide.

1 And I said, "It was Bill Nelson."

2 And she said, "Oh, Bill Nelson has the
3 business below me, and he's a really terrible neighbor."

4 Q. Did she say anything beyond that?

5 A. That he calls her, makes angry phone calls,
6 and puts notes on everyone's cars.

7 Q. Anything beyond that?

8 A. No.

9 Q. Was that -- and that was posted online?

10 A. Yep.

11 Q. Did you have any conversations with her?

12 A. About that specifically? No.

13 Q. About Mr. Nelson?

14 A. No.

15 Q. Have you provided her contact information?

16 A. Just that -- I think I provided the
17 Ryderville Ink website.

18 Q. Have you -- have you tried to get her phone
19 number and -- and address, though?

20 A. No.

21 Q. Who is Julie Meyers?

22 A. Julie Meyers is a real estate -- a Realtor on
23 the island.

24 Q. How do you know her?

25 A. Our dogs became friends at the dog park.

1 Q. And -- and how does she know Mr. Nelson?

2 A. She was Mr. Nelson's neighbor in Wing Point.

3 Q. Where?

4 A. In Wing Point.

5 Q. Wing Point?

6 A. Yes.

7 Q. And what did she say?

8 A. That he's really mean.

9 Q. And beyond that?

10 A. He would come over and yell at her and her
11 children.

12 Q. Say anything else?

13 A. No. Oh, one time he was really creepy to her
14 at San Carlos.

15 Q. He was really creepy what?

16 A. Creepy to her at San Carlos.

17 Q. How so?

18 A. I don't know. You'll have to ask her.

19 Q. And when did all this take place?

20 A. I'm not sure.

21 Q. When did you have this conversation with her?

22 A. Sometime this past winter.

23 Q. This was done in person?

24 A. Yep.

25 Q. And do you have her contact information?

1 A. Nope. I know what house she lives in. I
2 could probably get her address from that.

3 Q. Have you tried getting it yet?

4 A. No.

5 Q. What about her phone number?

6 A. I don't know her phone number.

7 Q. You haven't tried getting it either?

8 A. No.

9 Q. Chris Cannon, who's that?

10 A. He is a man I know from the Pub, kind of a
11 stay-at-home dad, I guess, but he had worked on some
12 volunteer project and had a run-in with Mr. Nelson where
13 Mr. Nelson was quite angry, and as a result, Mr. Cannon
14 does not like Mr. Nelson.

15 Q. What was the project?

16 A. I don't know.

17 Q. Do you know when this took place?

18 A. Nope.

19 Q. Did he say what Mr. Nelson did?

20 A. Just that he seemed to lose control
21 constantly to everyone that was involved.

22 Q. But he didn't say what the reason was?

23 A. No.

24 Q. Did he say when this took place?

25 A. No.

1 Q. Did he say where this took place?

2 A. No.

3 Q. Did he say what this was in regards to?

4 A. No. Just that he had worked on some sort of
5 community project.

6 Q. When did he tell you this?

7 A. At Bruciato sometime this winter.

8 Q. Did he say anything else?

9 A. No.

10 Q. And what's his contact information?

11 A. I don't -- I just have his Facebook, I
12 believe.

13 Q. Okay. Did you try to get his address or
14 phone number?

15 A. No.

16 Q. Jonathan Evison --

17 A. Yes.

18 Q. -- who is that?

19 A. He's a best-selling author.

20 Q. And what's your connection to him?

21 A. We played baseball together, and he knows all
22 about The Chicken Coop and Bill Blakely and the underage
23 girls that were brought there and victimized.

24 Q. Have you had conversations with him?

25 A. Yes, in person.

1 Q. When was the last one?

2 A. It was on a ferry boat sometime this summer.

3 Q. How many conversations have you had with him
4 about The Chicken Coop?

5 A. One, and then he mentioned it once online on
6 Bainbridge Islanders.

7 Q. And has he spoken to you about Mr. Nelson?

8 A. Yes.

9 Q. What did he say about Mr. Nelson?

10 A. Didn't like him.

11 Q. Anything beyond that?

12 A. I think that he was involved also with The
13 Chicken Coop, but I can't remember exactly.

14 Q. So you don't remember what he said about
15 Mr. Nelson?

16 A. No.

17 Q. Do you have his contact information?

18 A. I -- just his -- or his -- his Facebook.

19 Q. Have you tried to get his address and phone
20 number?

21 A. No.

22 Q. Michelle Chapman --

23 A. Yes.

24 Q. -- who is Michelle Chapman?

25 A. She's a porn star.

1 Q. Okay. And how do you know her?

2 A. I don't know her.

3 Q. Okay.

4 A. But I was told that she got her start at The
5 Chicken Coop as an underage performer.

6 Q. Okay. And have you had any conversations
7 with her?

8 A. I reached out to her on Twitter to try and
9 get her to talk to me, but I've not heard back.

10 Q. Okay. So you have -- you don't know what she
11 knows?

12 A. I don't.

13 Q. You don't know if she has any prior
14 interaction or observations of Mr. Nelson?

15 A. I don't.

16 Q. Okay.

17 A. Just that she could probably confirm The
18 Chicken Coop's goings-on.

19 Q. Okay. And when did you reach out to her?

20 A. This summer.

21 Q. Okay. And I'm assuming you don't have her
22 contact information either?

23 A. No. I just tried her Twitter and then her --
24 the Facebook that I believe is hers.

25 Q. Okay. Lisa Marie Presti --

1 A. Yes.

2 Q. -- who is that?

3 A. She is a nurse that lives on Bainbridge.

4 Q. How do you know her?

5 A. Through working in restaurants.

6 Q. And what's -- what has she spoken to you
7 about regarding Mr. Nelson?

8 A. That, when she moved here, she was told
9 specifically to stay away from Mr. Nelson.

10 Q. When was that?

11 A. Whenever she moved here.

12 Q. When did she tell you this?

13 A. This summer.

14 Q. And did she say anything else about
15 Mr. Nelson?

16 A. No.

17 Q. Did she ever say she had any interactions
18 with Mr. Nelson?

19 A. Not that I know of.

20 Q. Did she say who told her this?

21 A. I can't remember if she did or not.

22 Q. Do you have her contact information?

23 A. Just her Facebook, but --

24 Q. Have you tried to obtain her address and
25 phone number?

1 A. If I see her again, I will try to get it from
2 her.

3 Q. But have you tried to yet?

4 A. No.

5 Q. Okay. Jennifer Hayner Boynton --

6 A. Boynton.

7 Q. -- do you know who that is?

8 A. Yes.

9 Q. Okay. And who is she?

10 A. She's the mother of Lesley Boynton, who I'll
11 be adding to -- that's the other one I couldn't
12 remember. Lesley Boynton's going to be added to the
13 list I'll give to you.

14 Q. So let's talk about, first, Jennifer.

15 A. Yes.

16 Q. So who's Jennifer?

17 A. She's the mother of Lesley Boynton, and she
18 told me about how Lee Jorgensen molested her daughter
19 when she worked for him.

20 Q. Lee Jorgensen?

21 A. Yep.

22 Q. Who's --

23 A. Lee Jorgensen is Bill Nelson's friend, who
24 also wrote a statement in support of him and threatened
25 Dean Gellert, the owner of San Carlos, that, if he

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KITSAP COUNTY CLERK

2021 MAY 24 PM 12:08

ALISON H. SONNTAG

18-2-03205-18
NTASCC 57
Notice of Association of Counsel
10365980



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

v.

HOUSTON WADE,

Defendants.

NO. 18-2-03205-18

NOTICE OF ASSOCIATION OF
COUNSEL

TO: THE CLERK OF THE COURT
AND TO: ALL COUNSEL OF RECORD

PLEASE BE ADVISED that DAVID P. HORTON of KITSAP LAW GROUP hereby
associate as co-counsel for the Plaintiff, WILLIAM NELSON, with ALEXANDER SAVOJNI
of RHODES LEGAL GROUP, PLLC, and copies of all further notices, pleadings, and papers in
this matter, except original process, should be served upon the KITSAP LAW GROUP and
RHODES LEGAL GROUP, PLLC at the following addresses:

Kitsap Law Group
3212 NW Byron Street, Suite 101
Silverdale, WA 98383

DATED this 21 day of May, 2021.

KITSAP LAW GROUP

David P. Horton, WSBA 27123
Co-Counsel for Plaintiff William Nelson

RHODES LEGAL GROUP, PLLC

Alexander F. Savojni, WSBA 37010
Co-Counsel for Plaintiff William Nelson

FILED
KITSAP COUNTY CLERK
2021 MAY 24 PM 12:08
ALISON H. SONNTAG

18-2-03205-18
AFSR 58
Affidavit Declaration Certificate Confirmation of
10365984



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

vs.

HOUSTON WADE,

Defendant,

NO. 18-2-03205-18

CERTIFICATE OF SERVICE

I, Tracey Hamilton-Oril, declare that I am employed by Kitsap Law Group, a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On May 21, 2021, I caused a true and correct copy of the Notice of Association of Counsel and this Certificate of Service to be served on the person(s) listed below in the manner indicated:

Houston Wade C/O Bruciato 236 Winslow Way E Bainbridge Island, WA 98110	Via U.S. Mail
--	---------------

Dated this 21st day of May 2021.

TRACEY HAMILTON-ORIL

FILED
KITSAP COUNTY CLERK

2021 SEP 10 PM 12:15

ALISON H. SONNTAG

18-2-03205-18
MT 59
Motion
11008546



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

v.

HOUSTON WADE,

Defendants.

NO. 18-2-03205-18

MOTION FOR ENTRY OF
JUDGMENT

Introduction

Houston Wade was defaulted by the Court. The only issues are the remedy available to Mr. Nelson. Because Mr. Wade is liable for defamation *per se*, a judgment should be entered to make Mr. Nelson whole. And to prevent the defendant from continuing to try to ruin Mr. Nelson's reputation the Court should enter a narrowly tailored restraining order preventing Mr. Wade from repeating the same false allegations for which he has been held liable.

Facts¹

Mr. Nelson has lived and worked on Bainbridge Island for his entire life, over 62 years. He has lifelong friendships. He has worked as a contractor his entire career and relies on his reputation to obtain business for his contracting company. He started his business in 1987.

¹ See the Declaration of William Nelson filed with this motion, his declaration filed on November 30, 2018, and the complaint on which Mr. Wade was defaulted.

1 In October 2018 Mr. Wade began publishing defamatory statements about Mr. Nelson.

2 These statements included:

- 3 a. Allegations that he raped a woman in Fort Ward on Bainbridge Island and
4 engaged in a coverup with the Bainbridge Police Department.
- 5 b. Allegations that a “victim” of his, Elizabeth Kaltreider, committed suicide as a
6 result of his actions, four years after the “alleged” rape.
- 7 c. Allegations that he engaged in illegal conduct, in conjunction with the Bainbridge
8 Island Police and Fire Departments, with underage women at a “speakeasy” called
9 the “Chicken Coop,” including paying money, liquor, and drugs in exchange for
10 illegal and immoral conduct, including rape and child abuse; and claims the FBI is
11 investigating.
- 12 d. Allegations that he conspired with the Bainbridge Island Police Department to
13 cover up the alleged crimes defendant accuses Mr. Nelson of, such as running a
14 child sex ring.
- 15 e. Allegations that he committed domestic violence against his former spouse.
- 16 f. Allegations that he has “beaten the shit out of” his step-children.
- 17 g. That he is a “coke” head.
- 18 h. That he has stalked defendant and tried to kill him several times.

19 The allegations were all false. Defendant’s purpose in doing these things was to “run Mr.
20 Nelson off the island”.

21 Mr. Nelson’s clients and friends have seen these posts and also received letters in the mail of
22 letters cut out of magazines glued to paper and copied and sent warning the recipients of the
23

1 dangers of my reputation. Mr. Nelson's reputation has been injured and he fears future injury if
2 these exact lies are continued to be repeated.

3 After these posts and publications came to light, he lived in constant fear that there would be
4 vigilante retribution, that the threats Mr. Nelson saw on social media would be carried out. He
5 was always afraid that people he knew and saw regularly would think less of him when he saw
6 them in town.

7 He was afraid he would lose jobs. He did lose business. He was dropped from the BISD
8 Small Works Roster because of these allegations.

9 He suffered from emotional distress because of these allegations. Bainbridge Island is a small
10 community, and he was in constant fear that someone was looking at him to do harm— thinking
11 these allegations were true.

12 He lost substantial income. He believes he lost over \$200,000.00 in income in 2018 and
13 2019 due to the allegations Mr. Wade made.

14 He lives in constant fear that he will again start making these wild allegations that have no
15 basis in reality.

16 After this action was filed Mr. Nelson tried to do discovery. But Mr. Wade obstructed that
17 process.

18 On April 6, 2020 the Court entered an order finding Mr. Wade in default for failure to
19 comply with the discovery rules.

20 **Argument**

21 The Court should:

- 22 1. Enter judgment against Mr. Wade for Mr. Nelson's damages as set out in his declaration,
23 and for his attorney's fees awarded under the April 6, 2020 order.
24

1 2. Enter a narrowly tailored permanent injunction preventing Mr. Wade from making the
2 same allegations he is being held liable for here.

3 MR. NELSON'S DAMAGES ARE IRREFUTABLE

4 Because Mr. Wade's defamatory publications are defamatory *per se*, no proof of damages
5 is required. Nevertheless, Mr. Nelson's damages are well laid out in his declaration. He was
6 accused in these publications of the most heinous acts a man can be accused of – rape, child abuse,
7 and domestic violence – and of conspiring with authorities to hide his alleged misdeeds.

8 Damages are presumed when there is defamation *per se*. “When a statement is defamatory
9 per se, “damage to the plaintiff is said to be “presumed,” and the jury, without any further data,
10 is at liberty to assess substantial damages, upon the assumption that the plaintiff's reputation has
11 been injured and his feelings wounded.”² And a trial court has discretion to award substantial
12 presumed damages.³

13 Here on the record presented the Court should award substantial damages of \$500,000.00
14 based on Mr. Nelson's sworn testimony and actual losses.

15 THE COURT SHOULD ENJOIN MR. WADE FROM MAKING THE SAME
16 DEFAMATORY STATEMENTS

17 “To be valid, a prior restraint on defamation requires “certainty” that the court order will
18 restrain defamatory speech, as opposed to speech that is insulting or imprecise.”⁴ “Mere labels do
19
20
21

22 _____
23 ² *Canfield v. Clark*, 385 P.3d 156 (2016) citing *Arnold v. Nat'l Union of Marine Cooks &*
24 *Stewards*, 44 Wn.2d 183, 187, 265 P.2d 1051 (1954), quoting Charles T. McCormick, Handbook
25 on the Law of Damages § 116, at 423 (1935).

³ *Maison de France v. Mais Oui!*, 126 Wn. App. 34, 37, 108 P.3d 787, 790 (2005).

⁴ *In re Marriage of Suggs*, 152 Wn.2d 74 (2004).

1 not work in this context.”⁵. Instead, a prior restraint order must be narrowly worded in a way that
2 does not chill protected speech.”⁶

3 Here the Court can prohibit Mr. Wade precisely from making or publishing statements
4 about Mr. Nelson that he has made in the past. Specifically, the Court should restrain Mr. Wade
5 from stating:

- 6 a. Mr. Nelson raped a woman in Fort Ward community
- 7 b. Mr. Nelson engaged in a coverup with the Bainbridge Fire Department of said rape.
- 8 c. A “victim” of Mr. Nelson, Elizabeth Kaltreider, committed suicide as a result of his
9 actions.
- 10 d. Mr. Nelson engaged in illegal conduct at a “speakeasy” called the “Chicken Coop,”
11 including paying money and liquor and drugs in exchange for illegal and immoral
12 conduct including rape and child abuse.
- 13 e. Said illegal conduct at the “Chicken Coop” was done in conjunction with the
14 Bainbridge Island Police and Fire Department.
- 15 f. Mr. Nelson conspired with the Bainbridge Island Police Department to cover up the
16 alleged crimes defendant accuses Nelson of, such as running a child sex ring.
- 17 g. Mr. Nelson committed domestic violence against his former spouse.
- 18 h. Mr. Nelson has “beaten the shit out of” his step-children and abuses children.
- 19 i. Mr. Nelson is a “coke” head.
- 20 j. Mr. Nelson stalked Wade and tried to kill him several times.

24 ⁵ *Id.*

25 ⁶ *Id.*

1 This order is necessary because Mr. Wade has shown a complete disregard for the Court
2 process. He has continued to publish false information – for example stating that this lawsuit is
3 being dismissed because of an investigation by the FBI, and that this case was dismissed.⁷

4 While the Court cannot issue a prior restraint that will prevent all future defamation, it can
5 and should issue a narrow order preventing the same lies Mr. Wade has published in the past.
6

7
8 DATED this 7th day of Sept August, 2021.

9 KITSAP LAW GROUP

RHODES LEGAL GROUP, PLLC

10
11 
12 David P. Horton, WSBA 27123
Co-Counsel for Plaintiff William Nelson

13
14 
15 Alexander F. Savojni, WSBA 37010
16 Co-Counsel for Plaintiff William Nelson
17
18
19
20
21
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23

24 ⁷ See Horton Declaration at ¶ 2; Exhibits A & B.

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2021 SEP 10 PM 12:15

ALISON H. SONNTAG

18-2-03205-18
DCLR 60
Declaration Affidavit
11008559



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

v.

HOUSTON WADE,

Defendants.

NO. 18-2-03205-18

DECLARATION OF DAVID P.
HORTON REGARDING MOTION
FOR ENTRY OF JUDGMENT

David P. Horton declares as follows:

1. I am the attorney plaintiff herein. I am over 18 years of age, competent to testify, and make this declaration from personal knowledge.
2. Attached as Exhibits A and B are true and correct copies of Twitter posts from Defendant.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge and ability.

Dated 9/7/21 at Silverdale, Washington.


David P. Horton, WSBA#27123

EXHIBIT A

Replying to @treysmustache and @PickBattles

Yes, I still stand by it.

You'll notice Rick will never post the arrest records for the guys who sued me where they beat women and kids. You know, attempted murder, the declarations affirming rapes, child trafficking, etc...

9:14 PM · 05 Sep 21 · Twitter for Android

1 Like



RockGod @TheWouston · 9h



Replying to @TheWouston
@treysmustache and @PickBattles



federal prison thanks to me. Two more decided to sue me for defamation and both cases were dismissed.

9:34 PM · Aug 16, 2021 · Twitter for Android



RockGod @TheWouston · Aug 16

Replying to @TheWouston and @munchinbamboo

One of the dismissed cases, the one Rick keeps claiming I lost, was dismissed because the guy who sued me is now under investigation by the FBI for child trafficking.



RockGod @TheWouston · Aug 16

Notice how Rick never posts the parts of the case detailing how these men raped, abused. And trafficked girls? Notice how he does post the ATTEMPTED MURDER of one of the men? Notice how he doesn't mention that he offered his lawyer to one of the men to sue me?



Show replies

Search Twitter

Sign up with Apple

Sign up with phone or email

By signing up, you agree to the Terms of Service and Privacy Policy, including Cookie Use.

Relevant people

- RockGod** @TheWouston Follow
Houston Wade's twitter about Rocks, Space, Markets, and learning the hard way that one cannot make jokes about the literal translation of "puttanesca"
- panda** @munchinbamboo Follow
can't stop, won't stop

What's happening

Weather · LIVE
President Biden to visit Northeast after Ida's destruction, while Hurricane Larry churns over the Atlantic

San Francisco Chron · 1 hour ago
As Tahoe residents fled the Caldor Fire, the bears moved in — and pigged out

The Globe and Mail · 2 hours ago
Canada aims to permanently block Chelsea Manning from entering the country

Trending in United States
JUST ANNOUNCED
27.3K Tweets

World news · Last night
El Salvador becomes the first country to adopt Bitcoin as official currency
Trending with El Salvador, #Bitcoin

Show more

2021 SEP 10 PM 12:15

ALISON H. SONNTAG

18-2-03205-18
DCLR 61
Declaration Affidavit
11008566



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

v.

HOUSTON WADE,

Defendants.

NO. 18-2-03205-18

DECLARATION OF WILLIAM
NELSON REGARDING MOTION
FOR ENTRY OF JUDGMENT

William Nelson declares as follows:

1. I am the plaintiff herein. I am over 18 years of age, competent to testify, and make this declaration from personal knowledge.
2. I have lived and worked on Bainbridge Island for my entire life, over 62 years. I have lifelong friendships. I have worked as a contractor my entire career and rely on my reputation to obtain business for my contracting company. I started my business in 1987.
3. Starting in 2018, as set out in the Complaint, Mr. Wade began publishing defamatory statements about me. These statements included:
 - a. Allegations that I raped a woman in Fort Ward and engaged in a coverup with the Bainbridge Fire Department.
 - b. Allegations that a "victim" of mine, Elizabeth Kaltreider, committed suicide as a result of my actions.

- 1 c. Allegations that I engaged in illegal conduct, in conjunction with the Bainbridge
2 Island Police and Fire Departments, with underage women at a "speakeasy" called
3 the "Chicken Coop," including paying money and liquor and drugs in exchange
4 for illegal and immoral conduct, including rape and child abuse.
- 5 d. Allegations that I conspired with the Bainbridge Island Police Department to
6 cover up the alleged crimes defendant accuses me of such as running a child sex
7 ring.
- 8 e. Allegations that I committed domestic violence against my former spouse.
- 9 f. Allegations that I have "beaten the shit out of" my step children.
- 10 g. That I am a "coke" head.
- 11 h. That I have stalked defendant and tried to kill him several times. (See also
12 Declaration in Support of Motion for Temporary Restraining Order filed
13 12/30/18.

14 4. These allegations were all false.

15 5. Defendant's purpose in doing these things was to "run me off the island."

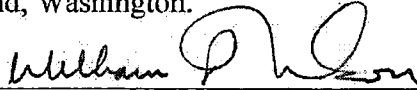
16 6. My clients and friends have seen these posts and also received letters with their content.
17 My reputation has been injured and I fear future injury if these exact lies are continued to
18 be repeated.

19 7. After these posts and publications came to light, I lived in constant fear that there would
20 be vigilante retribution, that the threats I saw on social media would be carried out. I was
21 always afraid that people I knew and saw regularly would think less of me when I saw
22 them in town.

- 1 8. I was afraid I would lose jobs, and unfortunately, I did lose business. I was dropped from
2 the BISD Small Works Roster because of these allegations. Looking at my business's
3 profit and loss statements I lost substantial income. I estimate I lost over \$200,000 in
4 income in 2018 and 2019 due to Mr. Wade's allegations.
- 5 9. I suffered from emotional distress because of these allegations. Bainbridge Island is a
6 small community and I was in constant fear that someone was looking at me – thinking
7 these allegations were true.
- 8 10. I live in constant fear that he will again start making these wild allegations that have no
9 basis in reality.
- 10 11. I ask that the Court order a narrow restraining order prohibiting Mr. Wade from making
11 the allegations he made that are subject of this lawsuit, and enter judgment against him
12 for \$500,000.00 for the monetary, and non-monetary losses I have suffered as a result of
13 his wrongful actions.

14 I declare under penalty of perjury that the above is true and correct to the best of my
15 knowledge and ability.

16 Dated this 3 day of ^{SEPT}~~August~~ at Bainbridge Island, Washington.

17 
18 William Nelson
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FILED
KITSAP COUNTY CLERK

2021 SEP 10 PM 12:15

ALISON H. SONNTAG

18-2-03205-18
NTHG 62
Notice of Hearing
11008577



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KITSAP

WILLIAM NELSON,

Plaintiff,

v.

HOUSTON WADE,

Defendant.

No. 18-2-03205-18

NOTE FOR HEARING

*(Clerk's Action Required – Note on
Judge Houser's Departmental Calendar)*

TO: THE CLERK OF THE ABOVE-ENTITLED COURT; and
TO: Houston Wade, Defendant Pro Se

Please take notice that the undersigned will bring on for hearing:

NATURE OF MOTION: Motion for Entry of Judgment

The hearing is to be held:

DATE/TIME: September 24, 2021/1:30 p.m.

PLACE: Kitsap County Superior Courthouse

Judge Houser's Departmental Calendar, Courtroom TBD

* Hearing will be held remotely by Zoom application found at www.zoom.com, and you may appear for hearing by video and audio, or audio only if that is all that is accessible to you.

The ZOOM Meeting ID for this hearing is TBD.

You can confirm this meeting ID at the end of the business day before the hearing by clicking on **"Today's Calendar"** at the following link: <https://www.kitsapgov.com/sc/Pages/default.aspx>.

You should only appear at the physical courthouse if you are unable to use the Zoom remote-connection described above.

You can find more information about how to appear for remote-access hearing at: <https://www.kitsapgov.com/sc/Pages/remoteppearance.aspx>

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COURT REPORTER REQUESTED: YES NO
ELECTRONIC RECORDER ACCEPTABLE: YES NO
COURT COMMISSIONER MAY HEAR THIS MOTION: YES NO

DATED: September 8, 2021

KITSAP LAW GROUP



David P. Horton, WSBA #2712
Attorney for Plaintiff

FILED
KITSAP COUNTY CLERK

2021 SEP 10 PM 4:29

ALISON H. SONNTAG

18-2-03205-18
AFSR 63
Affidavit Declaration Certificate Confirmation of
11008613



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

WILLIAM NELSON,

Plaintiff,

vs.

HOUSTON WADE,

Defendant,

NO. 18-2-03205-18

CERTIFICATE OF SERVICE

I, Tracey Hamilton-Oril, declare that I am employed by Kitsap Law Group, a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On September 9, 2021, I caused a true and correct copy of the Note for Hearing; Motion for Entry of Judgment; Declaration of William Nelson Regarding Motion for Entry of Judgment; Declaration of David P. Horton Regarding Motion for Entry of Judgment and Proposed Findings of Fact, Conclusions of Law, Judgment and Permanent Injunction to be served on the person(s) listed below in the manner indicated:

Houston Wade
C/O Bruciato
236 Winslow Way E
Bainbridge Island, WA 98110

Via U.S. Mail

Dated this 9th day of September 2021.

TRACEY HAMILTON-ORIL

SUPERIOR COURT OF WASHINGTON
COUNTY OF KITSAP

NELSON, WILLIAM P

vs

DOES I THROUGH XX; WADE, HOUSTON

Hon./Comm. Houser, William C
Reporter Court Reporter, FTR
Courtroom Courtroom 271
Court Clerk Schonauer, Ken
Date 09/24/2021
No. 18-2-03205-18

Pet/Pl^a appeared Yes By Zoom through/with Counsel Horton/Sarojini By Zoom
Pet/Pl^a appeared _____ By Zoom/through/with Counsel _____ By Zoom
Resp/Def appeared No By Zoom/through/with Counsel _____ By Zoom
Resp/Def appeared _____ By Zoom/through/with Counsel _____ By Zoom
Guardian Ad Litem appeared _____ By Zoom State / Other appeared _____ By Zoom

THE MATTER BEFORE THE COURT Show Cause re: _____
 Motion for default / to compel / Motion for Entry of Judgment
 Unlawful Detainer Minor Settlement Summary Judgment Supplemental Exam
 Entry of Order Status/Review Settlement on the Record

Testimony taken: Court has questions re: judgment

Mr. Horton addresses pain + suffering, loss of reputation from Mr. Wade's actions and has come up with a monetary amount based on suffering, difficult to quantify. Plaintiff's business has dropped off following Mr. Wade's exploitation.

Court swears in Mr. Nelson. Mr. Horton conducts inquiry re profit/loss statements.

Court takes matter under advisement. Mr. Horton to submit order to Mr. Gallagher.

Courtroom polled for _____ No response Time _____
 Default Granted Writ Granted Judgment Approved
 The Court grants/denies motion. The Court takes the matter under advisement.
 Order signed as presented. Order to be presented.
 This matter stricken/continued. Court Scheduler advised
 Court sets _____ hearing at _____ am/pm on _____
 Pleadings/File taken from this hearing by _____

