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1. That attached hereto and marked as Exhibit "1" is a true and accurate copy of excerpts of the deposition of Michael Darland.

2. That attached hereto and marked as Exhibit "2" is a true and accurate copy of excerpts of the deposition of Charles Meinema.

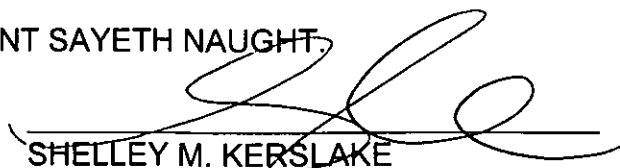
3. That attached hereto and marked as Exhibit "3" is a true and accurate copy of excerpts of the deposition of William Woodard.

4. That attached hereto and marked as Exhibit "4" is a true and accurate copy of Plaintiffs' Request for Admission to Defendant City of Tacoma Dated 9/10/01 and Plaintiffs' Interrogatories and Request for Production Re: Request for Admission Dated 9/10/01.

5. That attached hereto and marked as Exhibit "5" is a true and accurate copy of the correspondence dated February 26, 2001 addressed to Jeffrey H. Sadler.

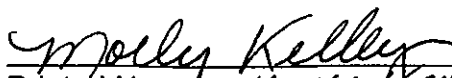
6. That attached hereto and marked as Exhibit "6" is a true and accurate copy of the correspondence from the Office of the Kitsap County Prosecuting Attorney's Office dated August 17, 1998.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


SHELLEY M. KERSLAKE

SUBSCRIBED and SWORN to before me this 13th day of September, 2001.




Printed Name: Molly Kelley
NOTARY PUBLIC in and for the State of Washington, residing at Tacoma
My commission expires: 10/25/02

/

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

JOSEPH J. KIRBY and DEBORAH A.)
KIRBY, husband and wife,)
)
Plaintiffs,)

vs.)

No. C00-5332 FDB)

THE CITY OF TACOMA, a municipal)
corporation; RAY CORPUZ and "JANE)
DOE" CORPUZ, husband and wife;)
PHILIP ARREOLA and "JANE DOE")
ARREOLA, husband and wife; WILLIAM)
WOODARD and CATHERINE WOODARD,)
husband and wife; RAYMOND ROBERTS)
and "JANE DOE" ROBERTS, husband and)
wife; DAVID BRAME and "JANE DOE")
BRAME, husband and wife; and JAMES)
HAIRSTON and "JANE DOE" HAIRSTON,)
husband and wife,)
)
Defendants.)

DEPOSITION OF MICHAEL J. DARLAND
Wednesday, February 7, 2001

APPEARANCES

For Plaintiffs: JEFFREY H. SADLER
Messina Bulzomi
5316 Orchard Street West
Tacoma, Washington 98467

For Defendants: SHELLEY M. KERSLAKE
Tacoma City Attorney
Civil Division
747 Market Street, Room 1120
Tacoma, Washington 98402

Also present: Joseph J. Kirby

Reported by: Cindy Sanderson, RMR, CRR
License No. 299-06

1 now.

2 Q If that were said in that setting, do you think that
3 was an appropriate comment for that setting?

4 MS. KERSLAKE: Objection. Lack of
5 foundation. Calls for speculation. Here he says he
6 doesn't recall that being said.

7 Q You can go ahead and answer.

8 A Again, you know, it might have been an attempt at
9 humor. But given the nature of what was going on, it
10 probably would not be the smartest thing to do, or
11 appropriate.

12 Q In your observations, during the time of Chief
13 Arreola's tenure, did he use disciplinary action as a
14 form of intimidation? And that could be formal
15 discipline or the threat of discipline.

16 A I don't know if I could, you know, authoritatively
17 answer that.

18 The chief was, I think, easily disturbed if
19 someone appeared to be, you know, in opposition to him.
20 If he saw something he didn't like, he was quick to
21 want it investigated or look at it as a rule violation.
22 I'm not sure -- I'm not sure that he was intentionally
23 trying to intimidate anybody. I think that might have
24 been the outcome, whether it was his intent or not.

25 Q Are you aware of an investigation involving an alleged

1 Safeco Insurance fraud with Ray Corpuz?

2 A Just kind of peripherally. I wasn't directly involved
3 in that.

4 Q What is your understanding of what occurred?

5 A Well, I know the department was contacted by, I believe
6 it was, Safeco Insurance, concerned about a claim that
7 had been filed by Linda Corpuz. And the detectives
8 notified their chain of command, and it came to the
9 chief, and the department was taking a look at that.
10 And there was some concern within the department,
11 because Chief Arreola notified his boss, which was Ray
12 Corpuz, Linda Corpuz's husband.

13 Q Do you recall the general consensus among the officers
14 regarding Chief Arreola's disclosure of the allegations
15 to his boss, which in term was a suspect?

16 A At the time, I don't believe that, you know, the way it
17 came across was that Ray Corpuz was a suspect. The
18 focus at that time was on Linda Corpuz.

19 The feeling of the department was that it was ill
20 advised to notify the potential suspect's husband that
21 there was an investigation going on, that it would just
22 create kind of a conflict for the manager.

23 The chief felt that it was his boss and it
24 wasn't -- it didn't directly involve him and so it was
25 okay to tell him.

1 Q Is it common practice for a chief to inform Ray Corpuz
2 about every criminal investigation that comes in to the
3 police department?

4 A It's common practice for the chief to keep the city
5 manager informed about investigations, cases, incidents
6 that are -- can be -- have some notoriety or if it
7 involves a city employee.

8 It's -- you know, on a daily or weekly basis, is
9 it normal to notify the city manager about every
10 investigation that's going on? No, it's not.

11 Q Do you feel that Chief Arreola's actions in disclosing
12 this information further alienated the union?

13 MS. KERSLAKE: Objection. Lack of
14 foundation.

15 A I don't know specifically it did the union. I know it
16 made a lot of people who were in the union unhappy.

17 Q You mentioned earlier some of the captains or some of
18 the individuals that had recently retired. My
19 understanding is that's Dave Olsen, Lieutenant Chuck
20 Howard, and Lieutenant Gary Weigand [sic].

21 A Weigand.

22 Q Do you know the reasons why those individuals retired?

23 A Well, I know that Weigand retired on stress and Chuck
24 Howard retired on stress.

25 I know Weigand expressed that he just, you know,

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

JOSEPH J. KIRBY and DEBORAH)
A. KIRBY, husband and wife,)
)
Plaintiffs,)
)
vs.)
)
THE CITY OF TACOMA, a)
municipal corporation; RAY)
CORPUZ and "JANE DOE" CORPUZ,)
husband and wife; PHILIP)
ARREOLA and "JANE DOE")
ARREOLA, husband and wife;)
WILLIAM WOODARD and CATHERINE)
WOODARD, husband and wife;)
RAYMOND ROBERTS and "JANE DOE")
ROBERTS, husband and wife;)
DAVID BRAME and "JANE DOE")
BRAME, husband and wife; and)
JAMES HAIRSTON and "JANE DOE")
HAIRSTON, husband and wife,)
)
Defendants.)

No. C00-5332FDB

C O P Y

RECEIVED

JAN 31 2001

TACOMA CITY ATTORNEY
CIVIL DIVISION

DEPOSITION OF CHARLES MEINEMA
Thursday, January 18, 2001

APPEARANCES

For Plaintiffs: JOHN L. MESSINA
Messina Bulzomi
Attorneys at Law
5316 Orchard Street West
Tacoma, Washington 98467-3633

For Defendants: SHELLEY M. KERSLAKE
Assistant City Attorney
747 Market Street, Room 1120
Tacoma, Washington 98402

Reported by: Fay J. Holme, CSR-RPR
License No. HOLMEFJ374P6

EXAMINATION (Continuing)

1
2 BY MR. MESSINA:

3 Q Captain Meinema, back on the record now.

4 I'd like to ask you if you were aware of a Safeco
5 insurance investigation alleging wrongdoing by city
6 manager Ray Corpuz and/or Chief Arreola.

7 A Yes.

8 Q What's your understanding of the general sequence of
9 events that led to the involvement of the Tacoma Police
10 Department?

11 A The general sequence of events was, there was a
12 reported burglary at Mr. Corpuz's residence in Tacoma.

13 At the burglary, Chief Arreola personally
14 responded and ordered a sergeant to get an
15 investigative forensics team up there. The sergeant
16 noted the only one on duty was at a home invasion
17 robbery at a very serious crime scene.

18 The chief reminded the sergeant that he was the
19 chief and told him to get them up there now, so he did.
20 So it wasn't photographed, fingerprint, the whole nine
21 yards.

22 Subsequent investigation didn't produce an arrest.
23 However, subsequently an investigation, I guess, by the
24 insurance company -- I don't know, but another agency
25 anyway indicated a concern that perhaps the items

1 reported weren't, in fact, taken, and this led to an
2 investigation of possible fraud which came back to the
3 Tacoma Police Department in some manner.

4 Chief -- then chief, Mr. Arreola, being advised
5 immediately, went and told Mr. Corpuz that he was the
6 subject of criminal investigation.

7 Q Is that common, that a suspect is informed?

8 A No, no. Actually, it tends to fall under the grounds
9 of obstructing a criminal investigation.

10 Q Was that the sentiment of the officers that you knew?

11 A Not altogether unsure it wasn't the sentiment of some
12 of the prosecutors as well, but that prosecutor said if
13 one of his assistants had done that, they would be
14 looking for work, at the least. That was a quote in
15 the paper.

16 Q Are you aware of any other instances where members of
17 the Corpuz family have been given preferential
18 treatment by the police department?

19 A Well, yes.

20 Q Will you elaborate, please?

21 A Mr. Corpuz has a son named Dito.

22 Q Dito?

23 A Dito. I believe it's D-i-t-o, but I won't swear to
24 that. Dito has a fairly long track record of
25 involvement in the criminal justice system, and at one

3

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

JOSEPH J. KIRBY and DEBORAH A.
KIRBY, husband and wife,

Plaintiffs,

vs.

No. C00-5332 FDB

THE CITY OF TACOMA, a municipal
corporation; RAY CORPUZ and "JANE
DOE" CORPUZ, husband and wife;
PHILIP ARREOLA and "JANE DOE"
ARREOLA, husband and wife; WILLIAM
WOODARD and CATHERINE WOODARD,
husband and wife; RAYMOND ROBERTS
and "JANE DOE" ROBERTS, husband and
wife; DAVID BRAME and "JANE DOE"
BRAME, husband and wife; and JAMES
HAIRSTON and "JANE DOE" HAIRSTON,
husband and wife,

Defendants.

DEPOSITION OF WILLIAM R. WOODARD
Thursday, March 15, 2001

APPEARANCES

For Plaintiffs:

JEFFREY H. SADLER
Messina Bulzomi
5316 Orchard Street West
Tacoma, Washington 98467

For Defendants:

SHELLEY M. KERSLAKE
Tacoma City Attorney
Civil Division
747 Market Street, Room 1120
Tacoma, Washington 98402

Also present:

Joseph J. Kirby

Reported by: Cindy Sanderson, RMR, CRR
License No. 299-06

1 A I never asked for a reason.

2 Q Do you have an understanding of why that didn't occur?

3 A No.

4 Q Are you aware of the named defendants that are in this
5 case, the Kirby case?

6 A Yes.

7 Q You've had a chance to review the caption?

8 A Yes.

9 Q Are you aware of any investigations into any of those
10 named defendants for felony charges, possible felony
11 charges?

12 A I would -- there's a situation involving city manager
13 Ray Corpuz that I became aware of.

14 Q Any others?

15 A No.

16 Q What situation was that, that you're referring to
17 involving Ray Corpuz?

18 A That grew out of a reported burglary at their
19 residence.

20 Q What's your understanding of what the allegations were?

21 A The burglary investigation was conducted. The
22 insurance company had concerns regarding the loss, and
23 that matter was eventually investigated by an outside
24 police agency.

25 Q Did you have any involvement in the initial

1 investigation?

2 A No.

3 Q Did you have any involvement in the initial happenings,
4 factual happenings of that?

5 A At the burglary scene at the home?

6 Q At the burglary scene at the home.

7 A No. There were several police personnel that went to
8 the home and were involved in the investigation. I was
9 not. I didn't go to the scene.

10 Q Did you have any involvement in the report or
11 interactions with the insurance company regarding the
12 allegations?

13 A We became -- I think we became aware, that the
14 insurance company was looking at this, through some of
15 our subordinates had conversation with some of their
16 insurance company staff, maybe on a different
17 situation. And they then brought that information to a
18 supervisor, who took it to a lieutenant, who brought it
19 to the captain, who brought it to my attention.

20 Q When it was brought to your attention, what did you do?

21 A I asked the captain to contact a supervisor or a
22 manager at the insurance company and try to find out
23 what -- you know, was there anything to what we were
24 hearing and what the situation was.

25 Q What report back did you receive?

1 A As I recall, we had some difficulty initially
2 establishing a contact with them. And then what we
3 eventually were told was that they had some concerns
4 regarding the claimed loss and that they were in the
5 process of discussing this or dealing with the issues
6 with the Corpuz family, and that they were having
7 difficulty because they couldn't get Mrs. Corpuz to
8 answer the door or answer the phone.

9 Q Who was the captain that brought it to your attention,
10 if you recall?

11 A That was Dave Brame. I think he -- I think Lieutenant
12 McCrea may have been the one that actually made the
13 contacts with the insurance company.

14 Q McCrea. How do you spell that, if you know?

15 A M-c capital C-r-e-a.

16 And I think the meat of it was, their question,
17 what they wanted to know from us was, should this
18 proceed to the point of a criminal matter, would our
19 agency undertake the investigation, given the status of
20 the people involved?

21 Q When you received the information, what did you then
22 do? Did you report this to a supervisor?

23 A Met amongst my staff and we discussed it. And it was
24 clearly a policy decision that we weren't -- wasn't our
25 duty to make, so I informed the chief.

1 Q Who was the chief at that time?

2 A Philip Arreola.

3 Q Do you know what the chief did with that information?

4 A Do I know firsthand what he did with that information?

5 Q Yes.

6 A No.

7 Q Do you know from -- do you have an understanding of
8 what he did with that information?

9 A My understanding is that he mentioned it to the city
10 manager.

11 Q And the city manager was who?

12 A Ray Corpuz.

13 Q The husband of --

14 A Linda Corpuz.

15 Q -- Linda Corpuz.

16 And potentially one of the suspects, would you
17 agree?

18 A At the point this took place, there wasn't a criminal
19 investigation that I was aware of. It was an inquiry
20 by the insurance company questioning the loss, and they
21 were having difficulty communicating with -- with the
22 family.

23 Our primary issue in this was if it got to the
24 point of them requesting a police investigation, would
25 our agency do that? And my recommendation was no; and

1 the chief confirmed that, no, we would not do that.

2 Q I think my question was more simple than that.

3 If the allegations that you had heard were in fact
4 true and a criminal investigation had to be conducted,
5 would you agree with me that Ray Corpuz would have been
6 a potential suspect or could have been a potential
7 suspect?

8 A My recollection of the event was that the burglary was
9 reported by his wife, and that the insurance company's
10 comments to us was that she was not being communicative
11 or that she wasn't being responsive to the inquiries.
12 So my feeling was that she would be the primary person,
13 that if she made the report and was the one that had
14 made the claim, was the one the insurance company was
15 trying to deal with, that if there was a suspect in the
16 case, that she would be probably the primary suspect.

17 Q A couple of different scenarios.

18 First, would you agree with me that your opinion
19 on that may change if you in fact knew that Ray Corpuz
20 had signed the insurance claim form?

21 A As a matter of course in this state, community property
22 state, many situations require the signatures of both
23 parties, and it doesn't necessarily imply that one has
24 criminal knowledge or criminal intent. That would be
25 my opinion.

1 Q Let's --

2 A In any event, our response to the insurance company was
3 that we wouldn't handle the investigation; it wouldn't
4 be proper for us to handle the investigation.

5 Q Let me give you a hypothetical situation here.

6 If you were brought information that a murder had
7 occurred and one of the suspects was Mrs. John Doe, do
8 you think it's proper police procedure to inform
9 Mr. John Doe that the wife may be a potential suspect?

10 MS. KERSLAKE: Object to the form of the
11 question.

12 You can answer.

13 A We know we have -- clearly have a homicide? It's a
14 criminal event?

15 Q Yes.

16 A Yeah, police procedure in most instances would be not
17 to divulge information to people who are suspects or
18 allies of possible suspects. But there have been
19 occasions when family members are the ones who tell us
20 that the murder has occurred or name suspects for us or
21 provide firsthand information or point us in the
22 direction of evidence. So I wouldn't say that in every
23 instance you would never speak to a spouse about a
24 potential crime. In many crimes involving children and
25 domestic violence, we speak with the spouse or family

1 members to get information to support the case.

2 Q Have you, in your experience as a police officer in the
3 33 years, I believe you mentioned, ever investigated
4 any allegations of criminal fraud?

5 A Personally?

6 Q Yes.

7 A I'm sure that I have. I couldn't give you the dates,
8 the names of the victims, or the case numbers, but I
9 know I probably have.

10 Q Have you ever investigated any instances of insurance
11 claim fraud that you recall?

12 A I know I've been involved with those investigations in
13 managerial and supervisor roles. It's been a long time
14 since I was an officer, so I can't say for certain that
15 I have.

16 Q In general, in those investigations, is it general
17 police work that you don't divulge suspicions to
18 potential suspects?

19 MS. KERSLAKE: Objection. Relevance.

20 Q You can go ahead and answer.

21 A No. In many cases of fraud, the person that you're --
22 the only person who really knows and has the
23 information and the records is the person that you're
24 going to talk to. So you may schedule a preliminary
25 interview and show that person information and say, can

1 you explain this to us? Do you have the records to
2 support this?

3 And in corporate situations, in many instances,
4 the company auditors and company attorneys have already
5 met with employees who have been involved in these
6 substantial thefts. They, in fact, prepare much of the
7 information that supports our prosecutions. They come
8 to us. We file the case. We interview the suspect.
9 Take the evidence. Take it to the prosecutor's office.

10 Q In that incident involving the Corpuz family, how long
11 after the information was brought to you did you relay
12 it to Chief Arreola?

13 MS. KERSLAKE: Jeff, if I could, I think I'm
14 just going to insert a standard objection to this line
15 of questioning, and then I won't have to object every
16 time.

17 MR. SADLER: That's fine.

18 MS. KERSLAKE: Okay.

19 A It may have been a couple of days in the beginning when
20 we first got wind of this.

21 And when things like this come to you that are
22 kind of like rumor between people at the lower levels,
23 the first thing you want to do is try to confirm it and
24 get a real handle on what's going on, so it may have
25 been several days before we were able to talk to the

1 insurance people. And probably then shortly
2 thereafter, I probably had a discussion with the chief
3 about it.

4 The information that was given to the chief was
5 fairly narrow. We didn't have -- we didn't get into,
6 well, what do you know about what's going on? Or, what
7 do you suspect is going on? Because we were not going
8 to handle the investigation, we didn't need to know
9 that. We just needed to know, what was their inquiry;
10 what was the issue they had? And the issue was, would
11 we handle the case? The answer was, no, we wouldn't
12 handle the case.

13 Q I believe you just stated that when these types of
14 allegations, inter-departmental or inter-city
15 allegations of misconduct come up to, say, a captain or
16 a lieutenant, oftentimes it's just come through the
17 rumor mill? Do you agree with that?

18 A I would say in normal practice what would have happened
19 in a case like this, based on some of the experiences
20 I've had in the past, is a representative from the
21 insurance company would call someone at my level and
22 say, we have an anonymous victim and an anonymous crime
23 and we have suspicions and the person is somewhat of
24 influence. Would your agency normally handle this
25 investigation? And my response would be no. And, who

1 might we go to? Prosecutor, Pierce County Sheriff's,
2 depending on the jurisdictional issues.

3 Q I understand that --

4 A In that situation, then, no one has any firsthand
5 knowledge about anything.

6 Q Let's talk about the situation that occurred here where
7 it was brought up from subordinates.

8 Would you agree with me that the appropriate thing
9 to do in that type of a situation is for you or a
10 lieutenant or a captain to do a preliminary
11 investigation into the evidence?

12 A No.

13 Q You don't think that would be appropriate, to try to
14 find out if these allegations had any truth to them at
15 all?

16 A Well, you would make -- like I said, you made the
17 administrative contact with the insurance company to
18 find out if there's -- if there was something like this
19 going on. And part of what we had heard is they were
20 concerned about whether our agency would handle it or
21 not: Was this in fact an issue with the insurance
22 company? Were they in fact considering getting
23 involved in an investigation, and did they really want
24 to know whether we would be involved in it or not? And
25 the answers to those things were provided to us, and we

4

HON. KAREN STROMBOM

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CERTIFICATION

I hereby certify that on 9/10/01 I deposited in the mails of the United States of America and/or placed with Legal Messengers and/or faxed a copy of the document to which this certificate is attached, for delivery to all counsel of record.

[Signature]
Messina Law Firm

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

JOSEPH J. KIRBY and DEBORAH A.)
KIRBY, husband and wife,)

No. 99 2 13911 4

Plaintiffs,)

vs.)

PLAINTIFFS' REQUEST FOR
ADMISSION TO DEFENDANT
CITY OF TACOMA
DATED 9/10/01

THE CITY OF TACOMA, a municipal)
corporation; RAY CORPUZ and)
"JANE DOE" CORPUZ, husband and)
wife; PHILIP ARREOLA and "JANE)
DOE" ARREOLA, husband and)
wife; WILLIAM WOODARD and)
CATHERINE WOODARD, husband and)
wife; RAYMOND ROBERTS and "JANE)
DOE" ROBERTS, husband and wife;)
DAVID BRAME and "JANE DOE")
BRAME, husband and wife; and)
JAMES HAIRSTON and "JANE DOE")
HAIRSTON, husband and wife,)

Defendants.)

TO: CITY OF TACOMA,
AND TO: Its attorney of record.

MESSINA • BULZOMI
5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

1 Plaintiffs hereby require you to respond to the following
2 Requests for Admission separately and fully, in writing, under
3 oath, within 30 days after service of the Requests for
4 Admission and pursuant to Rules 26 and 36(a) of the Rules of
5 Civil Procedure, for Superior Court.

6 If any of the following Requests for Admission cannot be
7 answered in full, after discussion with your attorney or his
8 agents or employees concerning whatever information they may
9 have obtained in the preparation of this case, please answer to
10 the fullest extent possible, specifying the reasons for your
11 inability to answer the remainder and stating whatever informa-
12 tion or knowledge you, your attorney, or the agents or
13 employees of either of you have concerning the unanswered
14 portion.

15 1. Attached hereto as exhibit A is a true and correct copy
16 of a Safeco proof of loss - property form dated February
17 12, 1997.

18 ANSWER:

19 2. Exhibit A is an authentic document for purposes of
20 admission into evidence at trial.

21 ANSWER:

22 3. Exhibit A is a proof of loss - property form regarding
23 Safeco Policy # OH458795.

24 ANSWER:

25 4. Ray E. Corpuz Jr. And Lynda A Corpuz were the policy
holders for Safeco Policy #OH458795.

MESSINA • BULZOMI

5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

1 ANSWER:

2

3 5. The Corpuzes resided at 2701 No Starr, Tacoma WA on
4 January 7, 1997.

4

5 ANSWER:

5

6 6. Exhibit A proof of loss - property form is in regard to
7 a January 7, 1997 theft loss at the Corpuz residence.

7

8 ANSWER:

8

9 7. Exhibit A was submitted to Safeco Insurance for payment
10 of building and property loss.

10

11 ANSWER:

11

12 8. The claimants on Exhibit A were Ray E. Corpuz and Lynda
13 A Corpuz.

13

14 ANSWER:

14

15 9. Exhibit A requested payment be made to Ray and Lynda
16 Corpuz.

16

17 ANSWER:

17

18 10. The claimants referenced in Exhibit A claimed \$3,000.00
19 building damage and \$12,000.00 content damages.

19

20 ANSWER:

20

21 11. Exhibit A contains the signature of Ray E. Corpuz.

21

22 ANSWER:

22

23 12. Exhibit A was signed by Ray Corpuz on February 13, 1997.

24

25 ANSWER:

25

MESSINA • BULZOMI

5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

- 1 13. The signature of Ray E. Corpuz on exhibit A is authentic.
2 ANSWER:
3
- 4 14. Exhibit A contains the signature of Lynda A. Corpuz.
5 ANSWER:
6
- 7 15. Exhibit A was signed by Lynda A. Corpuz on February 13,
8 1997.
9 ANSWER:
10
- 11 16. The signature of Lynda A. Corpuz on exhibit A is
12 authentic.
13 ANSWER:
14
- 15 17. Ray E. Corpuz voluntarily signed Exhibit A.
16 ANSWER:
17
- 18 18. The signatures on Exhibit A were notarized.
19 ANSWER:
20
- 21 19. Laura M. Newsham was the notary public verifying the
22 signatures on Exhibit A.
23 ANSWER:
24
- 25 20. Ray E. Corpuz signed Exhibit A in the presence of the
notary public.
ANSWER:
21
- 22 21. Lynda A. Corpuz signed Exhibit A in the presence of the
notary public.
23 ANSWER:
24
25

MESSINA • BULZOMI

5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

1 22. The actual loss regarding the January 7, 1997 loss was
2 less than the claimed amount of \$15,000.00

3 ANSWER:

4 23. The Pierce County Prosecutor's office investigated the
5 filing of Exhibit A for potential fraud.

6 ANSWER:

7 24. Attached as Exhibit B is a true and correct copy of an
8 inventory list dated January 22, 1997 depicting items
9 alleged to have been stolen in the January 7, 1997
10 burglary of the Corpuz home.

11 ANSWER:

12 25. Exhibit B was prepared by Lynda Corpuz.

13 ANSWER:

14 26. Exhibit B was prepared by Ray Corpuz.

15 ANSWER:

16 27. Exhibit B was submitted on behalf of Ray and Lynda
17 Corpuz.

18 ANSWER:

19 28. Kitsap County Prosecutors' office investigated a claim of
20 insurance fraud against Lynda Corpuz.

21 ANSWER:

22 29. Kitsap County concluded that Lynda Corpuz committed
23 insurance fraud.

24 ANSWER:
25

MESSINA • BULZOMI

5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

1 30. Ray Corpuz was not investigated for insurance fraud by
2 any police agency related to the claim in Exhibit A.


3 ANSWER:

4 31. Ray Corpuz was not investigated by Tacoma Police
5 Department for insurance fraud related to the claim in
6 Exhibit A.

7 ANSWER:

8 MESSINA BULZOMI

9 DATED: 9/6/01

By 
10 JEFFREY H. SADLER 27136
Attorneys for Plaintiffs

11 ANSWERS DATED this _____ day of _____ 2001.

12 _____
13 Attorney for Defendant City of
14 Tacoma

15 STATE OF WASHINGTON)
16 : ss.
County of Pierce)

17 _____, being first duly sworn upon
oath, deposes and says:

18 That he/she is the _____ of Defendant City
19 of Tacoma; that he/she has read the foregoing Requests for
Admission, knows the contents thereof and believes the same to
20 be true.

21 Signed and sworn to before me on the ___ day of _____,
22 2001, by _____.

23 _____
24 Notary Public in and for the
State of Washington, residing
at Tacoma.
25 My appointment expires _____

MESSINA • BULZOMI
5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

PROOF OF LOSS - PROPERTY

EXHIBIT# A

| | | | |
|---|------------------------|--|--|
| DATE February 12, 1997 | | NAME OF POLICYHOLDER RAY E CORPUZ JR LYNDA A CORPUZ | |
| POLICY NUMBER OH458795 | | ADDRESS WHERE LOSS OCCURRED 2701 NO STARR TACOMA WA | |
| DATE OF LOSS January 7, 1997 | CAUSE OF LOSS Theft | | |
| LEGAL OWNER OF PROPERTY AT TIME OF LOSS Ray & Lynda Corpuz | | | |
| MORTGAGEE OR LOSS PAYEE AT TIME OF LOSS 1ST INTERSTATE MORTGAGE CO ITS SUCCESSORS &/OR ASSIGNS | | | |
| POLICY LIMITS Building - \$256,000 Contents - \$123,000 Loss of Use - 12 months Other - \$ | | | |

Are there any other insurance policies that cover this property? Yes No
 (If "Yes", identify the insurance company, policy number, and coverage limits on the back of this form.)

State the amount claimed for damages:
 Building \$ 3,000 Contents \$ 12,000.⁰⁰ Loss of Use _____ Other \$ _____

I request payment to be made to: Ray & Lynda Corpuz

In consideration of payment of this claim, I give the company my rights of recovery up to the amount paid, and will execute all documents required of me and cooperate with the company in prosecuting all actions to effect recovery. The company is authorized to commence and prosecute any action or proceeding in my name, or in its own, or in the name of any person or persons to whom it may assign its claims hereunder, for the purpose of affecting collection of the amount mentioned above.

Any information that may be required will be furnished upon request and considered a part of these proofs.

It is expressly understood and agreed, that the furnishings of this blank form to the insured or the preparing of proofs by an adjuster, or any agent of the company named herein is not a waiver of any rights of said company.

Date 2-13-97 Signed Ray Corpuz
Lynda A. Corpuz

Any person who knowingly and with intent to defraud an insurance company or other person, files a statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact material to the claim may be subject to a civil suit seeking the return of any payments and other costs and may be subject to criminal prosecution.

NOTARY SIGNATURE REQUIRED ON ALL CLAIMS OF \$10,000 OR MORE
 State of Washington County of Pierce

Personally appeared before me, the day and date above written signer of foregoing statement, who make solemn oath to the truth of same, that no material fact is withheld of which the said insurance company should be advised.

Laura M. Newsham (Seal)
 Notary Public

JAN 24 1997

EXHIBIT#

B

1-22-97

Ray E. Corpuz, Jr.
Lynna A. Corpuz

CLAIM#: 210970080490

Dear Ms. Palumbo,

Enclosed list AND receipts for burglarly
at our home on 1-7-97. Rather than
trying to explain everything in this letter,
I'll wait for you to call to explain more
in detail.

I look forward to hearing from you
soon. Thank you for your quick response
and Mr. Bob Croft's help regarding our
claim.

Sincerely,

Ray & Lynna Corpuz
206-572-2801

COTRIZ, Ray & Lynda
CLAIM # QDPT00 80490

1-22-97

| <u>ACQUIRED</u> | <u>LIST OF ITEMS STOLEN:</u> | <u>COST</u> |
|-----------------|---|--|
| GIFT | MENS RINGS - GOLD BAND WITH JADE WEDDING BAND - | \$300. ⁰⁰ 200. ⁰⁰ |
| 1-90 | MEN'S MOVADO WATCH - Frederick & Nelsons | \$400. ⁰⁰ |
| 1-87 | " Seiko watch - | \$250. ⁰⁰ |
| 5-91-95 | " 3 SETS CUFF LINKS & BUTTONS - Nordstrom - | \$200. ⁰⁰ |
| 1989 | WOMEN'S PEARL RING WITH GOLD BAND - (Frederick & Nelsons) | \$600. ⁰⁰ |
| 1-80 | RUBY RINGS - BAN MARCHÉ | \$200. ⁰⁰ |
| 1985 | OPAL RING & STICK PIN - Frederick & Nelsons | \$250. ⁰⁰ |
| 1987 | GOLD BANGLE BRACELET - GIFT SHOW | \$450. ⁰⁰ |
| 1987 | GOLD CHAIN NECKLACE 18' - Seattle | \$500. ⁰⁰ |
| 1991 | WOMEN'S Seiko watch - Costco | \$50. ⁰⁰ |
| 1990 | GOLD STICKPIN WITH DIAMONDS - wine like auction - Seattle | \$350. ⁰⁰ |
| 1983 | WEDDING RING WITH 1 CT. DIAMOND - Frederick & Nelsons - Seattle | \$2,000. ⁰⁰ |
| 1994 | Liz Claiborne wallet - Nordstrom CASH - \$175. ⁰⁰ | \$28. ⁰⁰ |
| - | 2 - FIFTHS OF BOOZE - rum & VODKA | \$10 |

COTPUZ, Ray & Lynda

1-22-97

WATERFORD CLAIM # 210970080490

ITEMS STOLEN:

COST

1983 RARE COIN COLLECTION - \$6,000.⁰⁰
 INHERITED FROM DECEASED BROTHER

1990 MINOLTA BINOCULARS - KITS CAMERA - \$199.⁰⁰

1983 WATERFORD CRYSTAL - WEDDING & SHOWER GIFTS
 LARGE OVERTURE CLOCK - WOODEN BOOK ENDS - ? \$500
 OCTAGONAL BOX - SEAHORSE - WHALE ?
 MARTHA WASHINGTON VASE ?

1980-1996 2 MONT. BIANC FOUNTAIN PENS - GIFTS ?
 BURGANDY & BLACK \$400.⁰⁰
 5 WATERMAN FOUNTAIN PENS GIFTS
 BURGANDY - BLACK, BLUE - GOLD - GREEN
 3 ROLLER BALL WATERMAN INK PENS - GIFTS
 BLUE - BLACK - BURGANDY

1990-DEC. SUPER NINTENDO & GAMES \$129.⁰⁰
 GAMES: SUPER MARIO, MARIO KART, \$49.⁰⁰/EA
 YOSHI'S ISLAND, F-ZERO, MARIO GIFTS?
 PAINT, JOHN MADDEN FOOT BALL GIFTS?

CORPUZ, Ray & Lynda
CLAIM # 240900080490

PURCHASED

ITEMS

COST

NIKKEN CAMRY BAG & PRODUCTS (SEE ATTACHED LIST) \$ 2,321.⁰⁰

| | | |
|----------|---|--------------------------------|
| 1980 | MINOLTA CAMERA WITH ZOOM LENSES & CARRYING CASE | \$500. ⁰⁰ |
| 1990 | OLYMPUS 35MM CAMERA - AUTO MATIC ZOOM & FOCUS - KITS CAMERA | \$350. ⁰⁰ |
| 1993 | Polaroid Captiva Camera - BESTS - | \$129. ⁰⁰ |
| 1994- | SONY C.D. CAR DISK player - GOOD GUYS | \$150. ⁰⁰ |
| 1990 | Sony Camcorder w/View SCREEN - GOOD GUYS - | \$899. ⁰⁰ |
| 1993 | POSS ORGANIZER / PERSONAL PLANNER - GOOD GUYS | \$500. ⁰⁰ |
| 1994 | AWIWA HEADPHONES AM/FM - MAGNOLIA HI-FI - | \$99 |
| 1992 | SONY TAPE PLAYER w/AM-FM CASSETTE | \$99. ⁰⁰ (STAFF) |
| 12-10-91 | GAMEBOY VIDEO GAME | 91. ⁰⁰ |

COTPUZ, Ray & Lynn
CLAIM # 210970080490

| <u>ACQUIRED</u> | <u>ITEMS</u> | <u>COST</u> |
|-----------------|--|-----------------------|
| 11-21-96 | NINENTENDO 64 - TOYS-R-US | \$ 215.99 |
| | SUPERMARIO GAME - INCREDIBLE UNIV. - | 69. ⁰⁰ |
| 12-25-96 | WAVE RIDES GAME - (GIFT) | 79. ⁰⁰ |
| 7-13-96 | SUITCASE & CARRY ON BAG - BIAGIO | 286.18 |
| 3-92 | KEN GRIFFEY BASEBALL - AUTOGRAPHED PURCHASED AT Tacoma Symphony Auction | \$275. ⁰⁰ |
| 8-2-93 | AUTOGRAPHED KEN GRIFFEY ROOKIE BASEBALL CARDS - 10 - GIFTS | ? |
| 8-2-93 | S - MICHAEL JORDAN ROOKIE CARDS - GIFTS | ? |
| 11-9-85 | HITACHI VCR - WEIRS | \$ 499. ⁰⁰ |
| 12-21-95 | mitsubishi VCR - GOOD buys | \$449.99 |
| 1973 | Sony T.V. (18 ¹⁹ " in. - Low marks | \$299. ⁰⁰ |
| 3-31-91 | 2 - BOS SPEAKERS - MAGNOLIA Hi-Fi | 172.45 |
| 12-3-90 | Sony HEADPHONES - MAGNOLIA Hi-Fi | 97.50 |

CORPUZ, Ray & Lynda
CLAIM # 21D 970080490

| PURCHASED | ITEMS | COST |
|-----------|--|-------------------------|
| 1-23-90 | DENON 5 DISK PLAYER - MAG. - HI-FI - | \$ 279.97 |
| | DENON TAPE PLAYER | 297.97 |
| | DENON RECEIVER | 237.97 |
| | 2 BOSTON SPEAKERS & SUB | 499.97 |
| 10-23-86 | BUNNY TRUMPET - HIGHLAND HILL MUSIC CTR. | 399.5 |
| 1-30-94 | GOLF CLUBS - BAG & CART - PRO GOLF - | 966.7 |
| 8-2-93 | ECO - EAGLEMAN MASK (HAND CARVED) | \$ 1,200. ⁰⁰ |
| 12-20-90 | EAGLE MASK | 1,000. ⁰⁰ |
| 6-13-93 | HAND DRUMS - HANDMADE | 500. ⁰⁰ |
| 7-91 | 5 CUSTOM SUITS - TACOMA CUSTOM | \$ 1415.20 |
| 1-93 | CLOTHIER | |
| 1-7-97 | LOCKSMITH - CORCORAN'S | 43.20 |
| 1-22-97 | " " | 58.05 |
| 92 | MEN'S RAY BAN SUNGLASSES - COSTCO | 89. ⁰⁰ |

COTPUZ, E. Lynn
CLAIM# 216910080490

Nikken Products in CARTY BAG

| ITEM | # | COST |
|-------------------|---|---------|
| CARTYING BAG | 1 | \$45.00 |
| MAS CREATOR | 1 | 132.00 |
| KENKOTHERM QUILT | 1 | 290.00 |
| DEMO PAD | 1 | 312.00 |
| SOLITERS UNIT | 1 | 196.00 |
| KENKO RELAX PAK | 2 | 400.00 |
| KENKOTHERM SEAT | 1 | 120.00 |
| KENKO PILLOW | 1 | 96.00 |
| KENKO SEAT KING | 1 | 96.00 |
| BACK BELT - LG | 1 | 84.00 |
| BACK BELT - MED. | 1 | 84.00 |
| MAS BAYS | 3 | 144.00 |
| WRIST WRAPS MED. | 2 | 32.00 |
| MEG STEPS - WOMEN | 3 | 144.00 |
| MEG STEPS - MEN | 2 | 96.00 |
| TESTER REV. | 1 | 45.00 |
| NEW MAGNO - VIEW | 1 | 5.00 |

TOTAL \$2,321.00

HON. KAREN STROMBOM

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CERTIFICATION

I hereby certify that on 4/10/01 I deposited in the mails of the United States of America and/or placed with Legal Messengers and/or faxed a copy of the document to which this certificate is attached, for delivery to all counsel of record.

William A. De Franco
Messina Law Firm

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

JOSEPH J. KIRBY and DEBORAH A.)
KIRBY, husband and wife,)

No. 99 2 13911 4

Plaintiffs,)

PLAINTIFFS'
INTERROGATORIES AND
REQUEST FOR PRODUCTION
RE: REQUEST FOR ADMISSION
DATED 9/10/01

vs.)

THE CITY OF TACOMA, a municipal)
corporation; RAY CORPUZ and)
"JANE DOE" CORPUZ, husband and)
wife; PHILIP ARREOLA and "JANE)
DOE" ARREOLA, husband and)
wife; WILLIAM WOODARD and)
CATHERINE WOODARD, husband and)
wife; RAYMOND ROBERTS and "JANE)
DOE" ROBERTS, husband and wife;)
DAVID BRAME and "JANE DOE")
BRAME, husband and wife; and)
JAMES HAIRSTON and "JANE DOE")
HAIRSTON, husband and wife,)

Defendants.)

TO: CITY OF TACOMA,
AND TO: Its Attorney of Record.

MESSINA • BULZOMI
5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

1 In accordance with Washington Civil Rules 26 and 33, you
 2 are to answer, in writing under oath, each of the following
 3 interrogatories fully, serve a complete set of the interroga-
 4 tories and answers upon the undersigned attorneys and file the
 5 original of the interrogatories and answers within 30 days from
 6 the date of service of these interrogatories upon you. You are
 7 to use the blank spaces provided, inserting additional pages
 8 where necessary, and verify your answers on the form provided
 9 after the last interrogatory. These interrogatories are
 10 continuing in nature until the time of trial and plaintiffs
 11 request that amended answers to said interrogatories be served
 12 promptly at any later date that additional information may be
 13 available to you which would make incorrect or misleading any
 14 answers given and any information not supplied will be objected
 15 to at the time of trial.

16 Each interrogatory is required to be answered on the
 17 basis of the entire knowledge of the defendant, including all
 18 information in the possession of such defendant's agents,
 19 representatives and attorneys. If any of the following
 20 interrogatories cannot be answered in full, please answer to
 21 the extent possible, specifying the reason for your inability
 22 to answer the remainder, and stating whatever information or
 23 knowledge you have concerning the unanswered portion. If your
 24 answer is qualified in any particular, please set forth the
 25 details of such qualification.

MESSINA • BULZOMI
 5316 Orchard St. W.
 Tacoma, WA 98467-3633
 (253) 472-6000

1 If your response to any of the requests for admission to
2 which these interrogatories are attached is anything other than
3 an unqualified admission, separately, for each such request so
4 answered:

5 (a) State in detail the factual or opinion basis of
6 such responses or denials.

7 ANSWER:

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14 (b) Identify all persons who can or will support such
15 responses or denials.

16 ANSWER:

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23 Request for Production No. 1: Pursuant to CR 34, produce
24 a copy of any authoritative paper, treatise or text which
25 supports such responses or denials.

ANSWER:

MESSINA • BULZOMI

5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

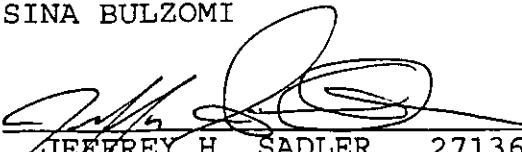
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The purpose of the interrogatory is to have you reveal everything presently known by you that bears on your refusal to admit or your qualification of your admission.

The propounding parties at the time of trial will move the court for an order excluding from evidence all tangible or intangible things known to you at the time of your responses to the requests for admission to which these interrogatories are attached and interrogatories not disclosed in your responses thereto.

DATED this 6th day of September 2001.

MESSINA BULZOMI

By 
JEFFREY H. SADLER 27136
Attorneys for Plaintiffs

MESSINA • BULZOMI

5316 Orchard St. W.
Tacoma, WA 98467-3633
(253) 472-6000

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1



City of Tacoma
Office of the City Attorney

February 26, 2001

Jeffrey H. Sadler
Attorney at Law
5316 Orchard Street West
Tacoma, WA 98467

FAX: (253) 475-7886

Re: Kirby, et. al. v. City of Tacoma, et. al.
Pierce County Superior Court Cause No. 99-2-13911-4

Dear Mr. Sadler:

At several depositions, you have inquired as to Ray Corpuz's involvement in a Safeco Insurance fraud investigation. Then, at Mr. Kirby's deposition, he indicated that he intends to introduce evidence/testimony regarding Ray Corpuz's involvement in that incident, and your client's belief that, although not charged, he was actually guilty of a felony.

This line of questioning is neither relevant, nor calculated to lead to admissible evidence. Thus, in an effort to avoid court intervention, I am proposing a protective order be entered. I have attached a proposed stipulated order for your review. If it meets with your approval, please sign the same and return to me by Thursday, March 1, 2001, otherwise, I will have no choice but to seek an order from the court.

Very truly yours,

SHELLEY M. KERSLAKE
Assistant City Attorney

SMK/jhy
Enclosure

cc: Ray E. Corpuz, Jr.

f:\emps\smk\99-059\Sadler-ltr24.doc

HONORABLE FRANKLIN D. BURGESS

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOSEPH J. KIRBY and DEBORAH A.
KIRBY, husband and wife,

Plaintiffs,

v.

THE CITY OF TACOMA, a municipal
corporation; RAY CORPUZ and "JANE
DOE" CORPUZ, husband and wife; PHILIP
ARREOLA and "JANE DOE" ARREOLA,
husband and wife; WILLIAM WOODARD
and CATHERINE WOODARD, husband and
wife; RAYMOND ROBERTS and "JANE
DOE" ROBERTS, husband and wife; DAVID
BRAME and "JANE DOE" BRAME, husband
and wife; and JAMES HAIRSTON and
"JANE DOE" HAIRSTON, husband and wife,

Defendants.

No. C00-5332 FDB

STIPULATION AND
PROTECTIVE ORDER

STIPULATION

COMES NOW the defendants by and through their attorney, Shelley M.
Kerslake, and the plaintiff, by and through his attorney, John L. Messina, and
stipulate that a protective order will be entered by the court in this matter.

This order is required to protect information sought by the plaintiff which if disclosed, or inquired about, will annoy and embarrass a named party, and has no relevance to this case, nor is calculated to lead to any admissible evidence.

MESSINA BULZOMI

ROBIN S. JENKINSON, City Attorney
ELIZABETH A. PAULI, Ch. Asst. City Atty.

By: _____
JOHN L. MESSINA
WSBA# 4440
Attorney for Plaintiffs

By: _____
SHELLEY M. KERSLAKE
WSBA# 21820
Attorney for Defendants

ORDER

Based upon the foregoing stipulation, the court hereby enters an order precluding further inquiry, mentioning in front of a jury or further discovery into Ray E. Corpuz's involvement in a Safeco Insurance fraud investigation, which was never charged in a criminal court.

Furthermore, any information received to date on this subject will be restricted from public dissemination by any party to this action.

DATED this _____ day of _____, 2001.

HONORABLE FRANKLIN D. BURGESS

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Presented by:

ROBIN S. JENKINSON, City Attorney
ELIZABETH A. PAULI, Ch. Asst. City Atty.

By:

SHELLEY M. KERSLAKE
WSBA# 21820
Assistant City Attorney
Attorney for Defendants

Approved as to form; Notice of
Presentment Waived:

MESSINA BULZOMI

By:

JOHN L. MESSINA
WSBA# 4440
Attorney for Plaintiff

6

OFFICE OF THE
KITSAP COUNTY PROSECUTING ATTORNEY
Russell D. Hauge, Prosecuting Attorney

Criminal & Administrative Divisions
Kitsap County Courthouse, 614 Division Street, MS-35
Port Orchard, Washington 98366-4681

(360) 876-7174
Fax (360) 895-4949

August 17, 1998

Eileen O'Brien
Pierce County Prosecutor's Office
930 Tacoma Ave. S., Room 946
Tacoma, WA 98402-2171

Re: Referral of Lynda Corpuz to Pierce County's El Cid Program

Dear Ms. O'Brien:

This letter follows up on our telephone conversation earlier this morning concerning the Corpuz matter. To avoid the appearance of a conflict of interest, my office was asked to investigate allegations that Ray and/or Lynda Corpuz, the Tacoma City Manager and his wife, may have made false claims for insurance coverage after a burglary of their home in 1997. Our investigation is now complete. It has revealed that Mrs. Corpuz did indeed falsify their insurance claim in an amount exceeding \$1500.00. In my opinion she is guilty of a violation of RCW 48.30.230, Filing a False Insurance Claim, an unranked class C felony.

Mrs. Corpuz has no record of any criminal offense. Given that lack of history and the non-violent nature of her crime, she is, as I understand the entrance criteria, a candidate for Pierce County's El Cid Program. As it has been explained to me, El Cid is a felony diversion program offering first time, non-violent felony offenders the opportunity to avoid the stigma of a conviction if they admit their crime, make restitution, undergo a period of probation-like supervision in the community, and pay the costs associated with the program. If the offender fails the program, he or she is prosecuted for the underlying offense. This prosecution is accomplished via the admission and waivers given by the defendant upon acceptance into the program--there is no jury trial, nor is there a speedy trial problem. If Mrs. Corpuz had been prosecuted by Pierce County directly, it appears as if she would have been offered this option. Although Kitsap County has no such program, this is still a Pierce County case. Therefore, I think in fairness she should be considered for the program.

With this letter you will find copies of the relevant documents and a statement of probable cause to file the charge. The documents are identified by a letter written on the upper right hand corner and organized as follows:

- A. A summary letter from Safeco referring the case to the Pierce County Prosecutor's

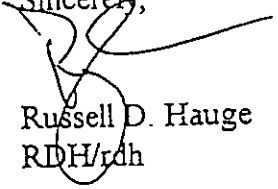
Office.

- B. Selections from Safeco's investigation file documenting investigation into the fraudulent claim for replacement value for stereo and camera gear.
- C. A summary of the Safeco witness statements.
- D. The initial police reports and subsequent report of property loss.
- E. Reports of interviews with the Tacoma Police Officers who responded to the report of the burglary.
- F. Report of the investigation into the matter of the fraudulent claim for the loss of golf clubs.
- G. Report of our follow-up investigation into the false receipt submitted for replacement value of stereo and camera gear.
- H. The results of our criminal history check on Lynda Corpuz.

The contact at Safeco is Karen Cobb, Special Investigator. She can be reached at Safeco Insurance Co., 4904 156th Ave. NE, Redmond, WA 98502, (425) 881-4946. Regarding restitution for Safeco, Ms. Cobb has told me that at this time Safeco will probably proceed with its current efforts to enforce the terms of its policy against the Corpuz family. The policy provides that in the event of fraudulent acts by an insured, Safeco is entitled to reimbursement of all amounts paid and an award of attorneys' fees and costs. If you need further restitution information, I suggest you contact her directly.

My understanding is that upon review of these materials you will call Mrs. Corpuz in for an interview. If Mrs. Corpuz is offered the program after your review and interview, you will obtain the necessary admission and waivers directly from her or her counsel. You will notify us upon her acceptance. If she should not enter the program, or fail the program, the matter will be referred back to my office for prosecution. Should that become necessary, or if you need more information, please contact me directly. I can be reached at (360) 895-8944. Thank you for your assistance in this matter.

Sincerely,



Russell D. Hauge
RDH/rdh

cc: Vern Harkins, Counsel for Lynda Corpuz; Karen Cobb, Special Investigator, Safeco Ins. Co.