

The Honorable Thomas S. Zilly

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

BRANDON BUSSEY and HEIDI BUSSEY,  
individually and as guardians of minor, H.B.,

Plaintiffs,

vs.

THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, PAYDAN BUSSEY,  
THAYNE LYMAN, PHILIP BUSSEY,  
CATHY BUSSEY, and DOES 1-100,  
INCLUSIVE,

Defendants.

) **CASE NO. 2:25-cv-00197-TSZ**

) **DECLARATION OF HEATHER M.**

) **COVER IN SUPPORT OF**

) **PLAINTIFFS' RESPONSE IN**

) **OPPOSITION TO DEFENDANT THE**

) **CHURCH OF JESUS CHRIST OF**

) **LATTER-DAY SAINTS' MOTION TO**

) **TRANSFER**

I, Heather M. Cover, hereby declare as follows:

1. I am one of the counsel of record for Plaintiffs in the above-captioned action. I am over the age of 18, and competent to testify. I make this declaration based on my personal knowledge and declare under penalty of perjury under the laws of the State of Washington that the following is true and correct.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the King County Sheriff's Office's investigation reports regarding Defendant Paydan Bussey's sexual abuse of the minors that occurred in or about January 2024. Copies of these reports were produced to

1 defendants as part of Plaintiffs’ initial disclosures in this action. The redactions reflected in the  
2 reports were made by the King County Sheriff’s Office when the records were produced to my  
3 office, and my office further redacted additional information to be in compliance with the local  
4 rules.

5 3. Attached hereto as **Exhibit 2** is a true and correct copy of an email from  
6 Defendants Philip and Cathy Bussey, dated April 13, 2013, a copy of which was produced to  
7 defendants as part of Plaintiffs’ initial disclosures in this action.

8 4. Attached hereto as **Exhibit 3** is a true and correct copy of an email from  
9 Defendants Philip Bussey, Cathy Bussey and Padan Bussey to the “Support Team,” dated July  
10 11, 2015, a copy of which was produced to defendants as part of Plaintiffs’ initial disclosures  
11 in this action.

12 5. Attached hereto as **Exhibit 4** is a true and correct copy of the document titled  
13 “JRA Commitment Dispositional Report to Court,” my office received from the King County  
14 Superior Court in response to a public records request on September 25, 2025. This document  
15 was produced with redactions.

16 6. Attached hereto as **Exhibit 5** are true and correct copies of Plaintiffs’  
17 Declarations of Domicile filed in the Florida Hillsborough County Circuit Court.

18 7. Attached hereto as **Exhibit 6** is a true and correct copy of Defendants The  
19 Church of Jesus Christ of Latter-day Saints and Thayne Lyman’s Initial Disclosures, dated June  
20 16, 2025.

21 8. Attached hereto as **Exhibit 7** is a true and correct copy of Plaintiffs’ Initial  
22 Disclosures served on defendants in this matter on June 16, 2025. Out of an abundance of  
23 caution, redactions were made by my office to the names of several witnesses who were minors

1 at the time of Defendant Paydan Bussey's sexual abuse in 2012.

2 DATED this 1<sup>st</sup> day of October, 2025, in Hawthorne, California.

3 ROGERS & COVER, PLLC

4 s/ Heather M. Cover  
5 Heather Cover, WSBA #52146  
6 Attorneys for Plaintiffs  
7 705 Second Avenue, Suite 1500  
8 Seattle, WA 98104  
9 Telephone: (206) 621-8525  
10 E-mail: [heather@jsrogerslaw.com](mailto:heather@jsrogerslaw.com)

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# **EXHIBIT 1**

King County Sheriff's Office

**Case # C24002867 - Summary Report**

|                                          |                                                                                                                                |                                                                                             |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| REPORT DATE / TIME<br>Jan 25, 2024 16:52 | AGENCY / DISTRICT / REPORTING AREA / SUBDIVISION 4 / SUBDIVISION 5<br>Agency UNC KING CO / District C2 / Reporting Area C02009 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 24, 2024 16:00 |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|

REPORT AUTHOR  
Amy Crawford #000108643

REPORT TAKEN LOCATION  
32440 SE 54TH ST, FALL CITY, WA 98024

IS TRANSIT?  
 YES  NO

- EVENT STATISTICS
- |                                                            |                                                                      |
|------------------------------------------------------------|----------------------------------------------------------------------|
| <input type="checkbox"/> 6 - Problem Solving Related       | <input type="checkbox"/> 8 - Pursuit Involved                        |
| <input type="checkbox"/> CC - Use of Force                 | <input type="checkbox"/> CC - Suicidal                               |
| <input type="checkbox"/> 9 - Domestic Violence             | <input checked="" type="checkbox"/> Juvenile Involved                |
| <input type="checkbox"/> Drugs Involved                    | <input type="checkbox"/> 3 - Deputy Assaulted - No Weapon            |
| <input type="checkbox"/> 1 - Hazard Existed                | <input type="checkbox"/> Alcohol Involved                            |
| <input type="checkbox"/> 4 - Deputy Assaulted - Weapon     | <input type="checkbox"/> 2 - Gang Related                            |
| <input type="checkbox"/> CC - Crisis Call                  | <input type="checkbox"/> Aid Required                                |
| <input type="checkbox"/> 5 - Hate Crime                    | <input type="checkbox"/> Weapons Involved                            |
| <input type="checkbox"/> 7 - Anti-Harrassment, Non-DV Only | <input type="checkbox"/> CC - Mental Health Related                  |
| <input type="checkbox"/> 0 - No Apparent Hazard            | <input type="checkbox"/> King County Parks                           |
| <input type="checkbox"/> N - Follow-up Over Phone          | <input type="checkbox"/> COVID                                       |
| <input type="checkbox"/> GVRU                              | <input type="checkbox"/> Note 2 - Anti-Harassment/DVs require report |
| <input type="checkbox"/> Eluding No Pursuits               |                                                                      |

**NARRATIVE**

RP called to report that her 6 y/o son was touched in appropriately by her friend while at his parents house (residence). Report taken.

**REPORTING PARTY-1**

|                                               |                               |                                                   |                                             |
|-----------------------------------------------|-------------------------------|---------------------------------------------------|---------------------------------------------|
| REPORTING PARTY-1 (PERSON)<br>R-1 <b>3C</b>   |                               | DOB / ESTIMATED AGE RANGE<br>1980- <b>3C</b>      |                                             |
| SEX<br>Female                                 | RACE / ETHNICITY<br>White (W) | PHONE NUMBER<br><b>3C</b> (primary, Mobile Phone) | EMAIL ADDRESS<br><b>3C</b> (Personal Email) |
| HOME ADDRESS<br><b>3C</b> , REDMOND, WA 98053 |                               |                                                   | BEEN AT LOCATION SINCE<br>Jan 1, 2024       |
| REPORTING PARTY SIGNATURE                     |                               |                                                   |                                             |

**OFFENSE-1**

|                                                                                                |                                                                                          |
|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Amy Crawford #000108643 Jan 25, 2024 19:09 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Andrew Shears #000074885 Jan 26, 2024 20:40 (e-signature) |
| PRINT NAME<br>Amy Crawford #000108643                                                          | PRINT NAME<br>Andrew Shears #000074885                                                   |

OFFENSE CODE

140 - CHILD MOLESTATION

OFFENSE START DATE

Jan 24, 2024 16:30

OFFENSE END DATE

Jan 24, 2024 16:40

OFFENSE COMPLETION

COMPLETED  
 ATTEMPTED

SUSPECTED HATE CRIME

YES  NO

SUSPECTED COMPUTER/ HANDHELD DEVICE USE

YES  NO

SUSPECTED ALCOHOL CONSUMPTION

YES  NO

SUSPECTED DRUG USE

YES  NO

DOMESTIC VIOLENCE

YES  NO

WEAPON / FORCE INVOLVED

Unknown

GANG INFORMATION

None/Unknown

INCLUDES CARGO THEFT

YES  NO

OFFENSE LOCATION

LOCATION NAME / STREET ADDRESS/LOCATION NAME / APT, UNIT, STE / DESCRIPTION

32440 SE 54TH ST

CITY

FALL CITY

STATE

WA

ZIP

98024

COUNTRY CODE

US

LOCATION CATEGORY

Residence/ Home / Apartment

AGENCY / DISTRICT / REPORTING AREA / SUBDIVISION 4 / SUBDIVISION 5

Agency UNC KING CO / District C2 / Reporting Area C02009

VICTIMS-1

VICTIMS-1 NAME (LAST, FIRST MIDDLE)

V-1 3C

DOB / ESTIMATED AGE RANGE

2017- (juvenile)

SEX

Male

RACE / ETHNICITY

White (W)

PHONE NUMBER

3C (primary, Mobile Phone)

HOME ADDRESS

3C UNION HILL-NOVELTY HILL, WA 98053

VICTIM IS OFFICER

YES  NO

SUSPECTS-1

SUSPECTS-1 NAME (LAST, FIRST MIDDLE)

S-1 BUSSEY, PAYDAN Gregory

DOB / ESTIMATED AGE RANGE

1998-

SEX

Male

RACE / ETHNICITY

White (W)

PHONE NUMBER

(425) 222-3771 (Mobile Phone), (425) 395-5708 (primary, Mobile Phone), (425) 392-0683 (Home Phone)

HOME ADDRESS

32440 SE 54 ST, FALL CITY, WA 98024

VEHICLE / PROPERTY & ITEMS SUMMARY

DESCRIPTION / MAKE / MODEL / COLOR

Suspect Photo / Multi Colored

STATUS / DATE / REASON FOR CUSTODY

Evidence / Jan 24, 2024 / Evidence

VIN # / SERIAL #

QTY.

TOTAL (\$) VALUE

UNKNOWN

RELATIONSHIPS ADDENDUM

NAME

3C

RELATIONSHIP

ENEMY OF

SUBJECT

PAYDAN Gregory BUSSEY

NAME

3C

RELATIONSHIP

FRIEND OF

SUBJECT

PAYDAN Gregory BUSSEY

NAME

3C

RELATIONSHIP

CHILD OF

SUBJECT

3C

NAME

3C

RELATIONSHIP

PLAYS WITH

SUBJECT

PAYDAN Gregory BUSSEY

PROPERTY & ITEMS ADDENDUM

REPORTING OFFICER SIGNATURE / DATE

Amy Crawford #000108643 Jan 25, 2024 19:09 (e-signature)

PRINT NAME

Amy Crawford #000108643

SUPERVISOR SIGNATURE / DATE

Andrew Shears #000074885 Jan 26, 2024 20:40 (e-signature)

PRINT NAME

Andrew Shears #000074885

**C24002867-1 OTHER ITEM - SUSPECT PHOTO**

## ITEM CATEGORY

Digital Evidence (for Evidence.com)

## DESCRIPTION

Suspect Photo

## COLOR

Multi Colored

## STATUS

Evidence

## STATUS DATE

Jan 24, 2024

## TOTAL (\$) VALUE

UNKNOWN

## IN POLICE CUSTODY

Yes

## REASON FOR POLICE CUSTODY

Evidence

## RECOVERING OFFICER / ID # / PERSON

Amy Crawford #000108643

## STORAGE LOCATION / PERSON / DESTINATION / INTAKE PERSON

Evidence.com &gt; Evidence.com

## RECOVERED LOCATION

3C [REDACTED] UNION HILL-NOVELTY HILL, WA 98053

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

## ELECTRONICALLY SIGNED

Amy Crawford

## DATE

01/25/2024

## PLACE

King County, WA

## REPORTING OFFICER SIGNATURE / DATE

Amy Crawford #000108643 Jan 25, 2024 19:09 (e-signature)

## PRINT NAME

Amy Crawford #000108643

## SUPERVISOR SIGNATURE / DATE

Andrew Shears #000074885 Jan 26, 2024 20:40 (e-signature)

## PRINT NAME

Andrew Shears #000074885

**Case # C24002867 - Custodial Property Summary Report****VEHICLE / PROPERTY & ITEMS SUMMARY**

| DESCRIPTION / MAKE / MODEL / COLOR | STATUS / DATE / REASON FOR CUSTODY | VIN # / SERIAL # | QTY. | TOTAL (\$) VALUE |
|------------------------------------|------------------------------------|------------------|------|------------------|
| Suspect Photo / Multi Colored      | Evidence / Jan 24, 2024 / Evidence |                  |      | UNKNOWN          |
| thumb drive with 2 F1's / Black    | Evidence / Feb 5, 2024 / Evidence  |                  | 1    | UNKNOWN          |

**PROPERTY & ITEMS ADDENDUM****C24002867-1 OTHER ITEM - SUSPECT PHOTO**

## ITEM CATEGORY

Digital Evidence (for Evidence.com)

## DESCRIPTION

Suspect Photo

## COLOR

Multi Colored

## STATUS

Evidence

## STATUS DATE

Jan 24, 2024

## TOTAL (\$) VALUE

UNKNOWN

## IN POLICE CUSTODY

Yes

## REASON FOR POLICE CUSTODY

Evidence

## RECOVERING OFFICER / ID # / PERSON

Amy Crawford #000108643

## STORAGE LOCATION / PERSON / DESTINATION / INTAKE PERSON

Evidence.com &gt; Evidence.com

## RECOVERED LOCATION

3C [REDACTED], UNION HILL-NOVELTY HILL, WA 98053

**C24002867-2 OTHER ITEM - THUMB DRIVE WITH 2 F1'S**

## ITEM CATEGORY

Computer Hardware/ Software (Includes desktops/laptops, thumb drives, external hard drives, video games &amp; consoles)

## DESCRIPTION

thumb drive with 2 F1's

## COLOR

Black

## STATUS

Evidence

## STATUS DATE

Feb 5, 2024

## TOTAL (\$) VALUE

UNKNOWN

## QUANTITY

1

## IN POLICE CUSTODY

Yes

## REASON FOR POLICE CUSTODY

Evidence

## RECOVERING OFFICER / ID # / PERSON

Alexis Pearlstein #000109528

## STORAGE LOCATION / PERSON / DESTINATION / INTAKE PERSON

CID &gt; CID EVIDENCE ROOM

## RECOVERED LOCATION

1211 E ALDER ST, 12TH AVE &amp; ACCESS RD, SEATTLE, WA 98122

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

## ELECTRONICALLY SIGNED

Amy Crawford

## DATE

01/25/2024

## PLACE

King County, WA

**Case # C24002867 - Supplement - 1 Report**

|                                          |                                                                                             |                                          |
|------------------------------------------|---------------------------------------------------------------------------------------------|------------------------------------------|
| REPORT DATE / TIME<br>Jan 25, 2024 17:16 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 24, 2024 16:00 | REPORT AUTHOR<br>Amy Crawford #000108643 |
|------------------------------------------|---------------------------------------------------------------------------------------------|------------------------------------------|

REPORT DESCRIPTION  
Primary Incident Report

SUPPLEMENT TYPE - ONLY SELECT ONE  
Primary Incident Report

**NARRATIVE**

On January 24, 2024 at about 1830 hrs., I was dispatched to a report of a sexual assault which occurred at 32440 SE 54th Street in Fall City. I contacted the RP [3C] (DOB [3C]/80) at her residence located at: [3C]

Upon arrival, [3C] initially met me outside in the driveway. She stated that her two young children were inside and had never met police before. [3C] appeared nervous and scared. I reassured her that I was friendly and would not "scare" her boys. She felt comfortable enough to let me inside so we could speak further. I introduced myself to the boys who were laying on the floor with pillows and oversized stuffies watching tv. They jumped up and were excited, smiling and appeared happy. I walked past them and sat down at the dining room table with [3C]

[3C] sat down with me. She took a second to compose herself. I could see her hands were slightly shaking and she appeared stressed out, pulling her hair back and rubbing her eyes.

From speaking with her I was able to ascertain the following:

[3C] and her two young boys recently moved into the house in unincorporated Redmond at the beginning of January. She works at the Redmond Costco as a front end employee. She is separated from her husband who is now living in the family residence also located in unincorporated Redmond.

[3C] befriended a co-worker who also is an employee at the Redmond Costco and works in the tire center, named Payden G. Bussey (DOB [3C] 1998). The two became friends, but [3C] was adamant it was only a friendship and never anything on a romantic level. She often would meet up with him outside of work. Bussey is aware that [3C] has two young children. He had not met them until about January 5.

Around January 5, [3C] asked Bussey if he could help her with moving into the house she just rented [3C]. Bussey helped with the moving in process as well as meeting her kids. She recalls nothing out of the ordinary happening on this day.

On January 24, Bussey came over to [3C] house at about 1500 hrs. He suggested to her that they all should go back to his house so the kids could play on the playground that he has in his backyard. [3C] did not object to his, however with the time of day, she wanted to stop at the store first and pick up some items for the kids to eat and drink.

All four of them then drove down to Albertson's located at about the 23600 block of Redmond Fall City Road. Bussey drove them in his car. They then proceeded out to Fall City and to Bussey's house located at: 32440 SE 54th Street.

Once there, [3C] stated she unpacked the groceries and placed them into a refrigerator in the garage. They all entered into the house. The older sibling, identified as: [3C], ran downstairs to the daylight basement and out the back door to the playset out back. [3C] went out there with him to monitor. She noted the time was about 1620 hrs. At about 1630 hrs., she began to wonder where her other child was, [3C]. At 1631 hrs., she called Bussey's phone telling him to come outside with [3C]. [3C] also confirmed that there was no one else at the house, just the four of them, albeit the house is actually owned by Philip and Cathy Bussey per public records and presumed the parents of Payden.

Upon ending the call, she saw [3C] running out to the playset. A few minutes later, it started to rain, so they all went back inside. [3C] mentioned to [3C] that he needed to use the bathroom. [3C] went with him. While using the bathroom, [3C] told [3C] "Payden touched my privates." [3C] said nothing to [3C]. He finished using the bathroom and they both exited.

[3C] stated that Bussey was listening and had heard [3C] tell her about Bussey's actions when they came out of the bathroom. Without her prompting, Bussey stated to [3C] "Can I talk to you?" [3C] told him a direct tone, "no, drive me home."

[3C] then told him that they were no longer friends anymore. He responded to her, telling her, "there is something wrong with me" and that he became "horny" after touching him (presumed in reference to [3C]) and that he was "sorry". Further he told her, "I understand if we are not friends anymore."

|                                                                                                |                                                                                          |
|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Amy Crawford #000108643 Jan 25, 2024 19:09 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Andrew Shears #000074885 Jan 26, 2024 20:40 (e-signature) |
| PRINT NAME<br>Amy Crawford #000108643                                                          | PRINT NAME<br>Andrew Shears #000074885                                                   |

Per 3C Bussey did drive all of them home without incident. Once she arrived home, she settled the boys in, called a friend, and then called police to report the incident.

I asked 3C if she had any pictures of Bussey. She showed me her phone of the contact photo she has set for him. It is a picture of her and Bussey sitting at table. I took a picture of this photo and uploaded it to evidence.com. I made no mention or asked if she was aware that Bussey is a registered sex offender as to risk upsetting her more knowing that this detail would be discussed in due time with detectives.

I provided 3C a DVPA and noted some resources on it for her. I also suggested she contact the EAP through her employer for more assistance. She told me that she was on some kind of emergency leave as she does not want to go back to work knowing that Bussey is there also. I suggested she also contact her human resources department, however, she was firm that she did not want them to know what was going on. I provided her a business card with the business line for the Special Assault Unit.

On January 25, I called 3C and suggested she take 3C to Children's Hospital and request a SANE exam for 3C. This was completed and the Special Assault Unit was notified.

This concludes my involvement in this incident.

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

|                       |            |                 |
|-----------------------|------------|-----------------|
| ELECTRONICALLY SIGNED | DATE       | PLACE           |
| Amy Crawford          | 01/25/2024 | King County, WA |

REPORTING OFFICER SIGNATURE / DATE  
 Amy Crawford #000108643 Jan 25, 2024 19:09 (e-signature)  
 PRINT NAME  
 Amy Crawford #000108643

SUPERVISOR SIGNATURE / DATE  
 Andrew Shears #000074885 Jan 26, 2024 20:40 (e-signature)  
 PRINT NAME  
 Andrew Shears #000074885

**Case # C24002867 - Supplement - 2 Report**

|                                          |                                                                                                     |                                               |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------------|
| REPORT DATE / TIME<br>Jan 29, 2024 17:43 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 24, 2024 16:20 - 16:30 | REPORT AUTHOR<br>Alexis Pearlstein #000109528 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------------|

## REPORT DESCRIPTION

Follow-Up Lead: Pearlstein

## SUPPLEMENT TYPE - ONLY SELECT ONE

Follow-up - Lead

**NARRATIVE**

**Case Summary:** On January 24, 2024, 3C and her children went over to co-worker Paydan Bussey (DOB 1998)'s parents house located in Fall City: 32440 SE 54th St., Fall City, WA. While 3C and one of her children were in the yard playing, she noticed that her other son, 3C (DOB /2017) and Bussey had been gone for a while. When Bussey and 3C re-emerged from wherever they were, 3C told 3C that Bussey had touched his private parts. Bussey overheard 3C tell 3C this, and he admitted to her that there is something wrong with him and that he became "horny" after touching 3C. Bussey then drove 3C and her children home.

**KCSARC:** Yes, referral made.

**CPS Intake:** No.

**Suspect Contacted:** Yes. No statement made, has an attorney.

**Recorded Statements:** 3C and 3C forensic interviews.

**Case Status:** Cleared by Arrest.

**January 29, 2024**

I was assigned as the Detective for this case and read Deputy Crawford's report. After reading the report, I called 3C mother, 3C to introduce myself and ask her about availability for a forensic interview for 3C. 3C told me she was available all day on Wednesday (1/31), Monday (2/5) and Tuesday (2/6). I told 3C I would contact the forensic interviewer and ask about her availability on those days. When I asked 3C about advocacy for her son 3C she said yes, and that she would appreciate a referral to KCSARC.

At 1718 hours, I emailed child forensic interviewer Shana Macleod asking about her availability for the above dates 3C requested.

At 1740 hours, I sent an email to the KCSARC intake line with a referral for 3C.

**January 30, 2024**

I received an email from Shana Macleod at 0809 hours with her interview availability. Shana advised she didn't have any availability tomorrow, but was available on Monday (2/5) at 11:30am or Tuesday (2/6) at 1:30pm. I contacted 3C and shared with her the information that Shana had shared with me. 3C agreed that the best time for the forensic interview would be Monday (2/5) at 11:30am. I told 3C I would let Shana know and I sent her the location and directions for how to get to the forensic interview on Monday. I emailed Shana and she confirmed that we were set for Monday at 11:30am.

**February 5, 2024**

I arrived at 1211 E Alder St. Seattle, WA at approximately 1115 hours. When I arrived, I met with KCSARC advocate Katie Yamamoto and forensic interviewer Shana Macleod before the interview. We discussed the case briefly and made the decision to interview 3C twin brother, since 3C provided some further information. 3C said 3C said something to her about Bussey mentioning "sucking it", and she didn't know what he was talking about. 3C was worried that something might have happened to 3C as well so she asked if he could be interviewed, and Macleod said she had time for it.

Macleod started with 3C interview. I watched 3C interview from a computer monitor in Macleod's office, while she and 3C were in a separate interview room. The following is a summary of 3C interview and is not intended to be a verbatim transcription:

3C promised to tell the truth during his interview with Macleod.

|                                                                                                     |                                                                                          |
|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Alexis Pearlstein #000109528 Feb 15, 2024 11:10 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 15, 2024 11:55 (e-signature) |
| PRINT NAME<br>Alexis Pearlstein #000109528                                                          | PRINT NAME<br>Jason Escobar #000064937                                                   |

Macleod asked 3C to tell her what he came there to talk about today. 3C said he didn't know. Macleod asked 3C if there was something his mom said he should talk about, and he said no. Macleod asked 3C if there was anything he wanted to talk about and he said not really. Macleod told 3C she heard he had a problem with someone, and 3C started saying he had a problem with his brother. Macleod told 3C she wasn't talking about his brother, and said she heard the problem might have been with a friend of his mom. 3C said he couldn't remember the person's name and didn't know what he called him. 3C then said his mom's friend told him to try and eat his private parts.

Macleod asked 3C to tell her about the last time he was with the person who asked him to do that. 3C said they were playing 'boomerang' (unknown exact word), where he hides, and the friend tries to 'boom' them with a stick and it's so much fun. 3C said after they played that game they took a break, and it was not a good break. 3C said he had to eat his mom's friend's private parts like food, and it made his stomach upset. 3C said after this happened the Police gave a note to his mom saying he could never ever do it again. Macleod asked 3C where they were playing, and he said at his home. Macleod asked 3C where he ate his mom's friend's private parts like food, and he said it was in his room. 3C said it was just him and his mom's friend in the room. Macleod asked 3C what his mom's friend did before that, and 3C said he asked him to eat his private parts like food and that's it. 3C said the man asked him, "do you want to eat my private parts?", and he responded by saying he wasn't sure and then he said he ate them.

Macleod asked 3C what it tasted like when he ate the private parts, and 3C said it tasted like nothing. Macleod asked 3C what it looked like and where the man's clothes were when this happened. 3C said the man rolled his pants and underwear down. When asked about the man's hands, 3C said they were lifting them up, but didn't explain what 'them' was. Macleod asked 3C if he could show her with his body how the man's body was. 3C said the man was sitting "Criss cross applesauce on the floor". When Macleod asked 3C what happened next, he said that he just wanted to die. Macleod asked 3C what parts of his body touched the man's body, and he said his mouth touched the man's body. 3C said that the man's body touched his mouth. Macleod asked 3C if he touched other parts of the man's body, and he said no. When Macleod asked 3C what made it stop, he said he ate 'it' all day long until he was tired and then he went downstairs and vomited in the toilet.

Macleod asked 3C what he was thinking while this was happening, and he said he was thinking that he'd never do it again. 3C then said his mom fired her friend. Macleod asked 3C if the man said anything to him about telling other people and he said no. Macleod asked 3C about another time this happened, and 3C said they went to the man's house, and he did it to him again. Macleod asked 3C to tell her everything that happened that time. 3C said the man had a playground nearby his house. 3C was reluctant to tell Macleod what happened and was lying on the floor by the door of the interview room. Again, Macleod asked 3C to tell her what happened at the man's house. 3C said he ate the man's private parts and went on the slide. Then 3C said the man also ate his private parts. 3C said the man did it for the past few days and then he let the secret out to his mother.

Macleod asked 3C where this happened, and he told her it happened in the man's room. Macleod asked 3C who all was there, and he said it was just him and the man. Macleod asked 3C how his private parts felt, and he said they felt bad. 3C said he was lying down when this happened. 3C said he had clothes on, but he rolled down his pants and then rolled them back up. 3C made a comment about it not being magic, when asked about his pants came down then back up again. 3C said this also happened at his house "over and over and over again". Macleod asked 3C how come no one ever saw what happened, and 3C said that his brother 3C saw. Macleod asked 3C to tell her everything about that, and 3C said he didn't want to. 3C said, "I'm just sick of it and telling this". Macleod asked 3C if something happened with his brother, and he said no.

Macleod then asked 3C how his brother 3C knew that this happened to him, and 3C said his brother knew because he saw it happen at their house. Macleod asked 3C how he felt talking about what happened, and 3C said he felt frustrated talking about it all over again. 3C said he talked to his mom about it, to the man about it and to his brother about it, but that he didn't tell any of his friends. Macleod asked 3C what he told the man who did this to him, and 3C said he told the man it made him feel frustrated. This concluded Macleod's interview with 3C and no further questions were asked.

After 3C interview, he was walked back to the waiting room to be with his mom, dad and the advocate while Macleod spoke with 3C. The following is a summary of 3C interview and is not intended to be a verbatim transcription:

Macleod asked 3C what his name is and what he likes to be called, and 3C said he wasn't telling her about his name. 3C briefly spoke about two family dogs they have, Tinkerbelle and Carrot. 3C also promised to tell the truth during his interview with Macleod. Macleod asked 3C what he had come to talk to her about, and asked if there was a problem, he had with someone who wasn't his family. Initially 3C brought up an issue he was having with a classmate at school. Macleod told 3C she heard something happened with a friend of the family. 3C said he loves the adult friend so much and he helps them play their favorite game. 3C said he didn't know the adult friend's name, but he said he did so many good things with the adult friend. 3C said the adult friend let them download his favorite games, but he can't play them anymore because he can't come to the house anymore.

Macleod asked 3C why the adult friend couldn't come to the house anymore, and 3C said he couldn't tell because it was something inappropriate, very inappropriate. 3C said he didn't want to say what it was because he's too shy. Macleod asked 3C if he would rather write about it and he said no, it would be too weird, but he also doesn't want to talk about it. Macleod asked 3C if he could tell her more about it. 3C said he wanted to walk down the hall and ask his mom if he could talk about the inappropriate stuff. Macleod and 3C walked

|                                                               |                                                           |
|---------------------------------------------------------------|-----------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE                            | SUPERVISOR SIGNATURE / DATE                               |
| Alexis Pearlstein #000109528 Feb 15, 2024 11:10 (e-signature) | Jason Escobar #000064937 Feb 15, 2024 11:55 (e-signature) |
| PRINT NAME                                                    | PRINT NAME                                                |
| Alexis Pearlstein #000109528                                  | Jason Escobar #000064937                                  |

down the hall and came back just a minute later. Macleod and 3C talked about how his parents told him it was ok to talk about the inappropriate stuff. Macleod asked 3C again what happened.

3C said a secret was let out by his brother, 3C by mistake. Macleod asked 3C what he did with his 'favorite friend', which is how 3C referred to his mom's friend. 3C said he went to Target and got a Minecraft toy. Macleod asked 3C about the secret that 3C told. 3C said that she should ask his brother. 3C said 3C was crying because he had told the secret. Macleod asked 3C if there was anything inappropriate happening with him. 3C just wanted to talk about drawing pictures and Minecraft. Macleod asked 3C about what happened with the secret, and 3C said 3C let the secret out by mistake. 3C said 3C told him he forgot to not let the secret out and that was why he was crying. 3C then said, "he's still my favorite friend" when talking about his mom's friend. 3C said his mom fired his favorite friend because of the secret, and that it's so inappropriate. Again, Macleod asked 3C to tell her about it, and 3C said he didn't want to tell because he was too shy.

Macleod asked 3C if he saw something inappropriate happen with 3C and his favorite friend. 3C said his brother got brave and did 'those things', and he didn't want to because what his brother was doing was "so bad". 3C said, "I was watching him do those things. It was so inappropriate I didn't want to do them". Macleod asked 3C what the things were that he was talking about. 3C told Macleod that she should ask his brother. 3C was asked about where this happened at, and he said it happened upstairs in his new house in his brother's bedroom. 3C again said that 3C was doing the inappropriate things, and he was doing one 'not very inappropriate thing'. 3C said his favorite friend was asking him to do it, and his favorite friend was telling him to do it. Macleod asked 3C what words his favorite friend was saying, but he didn't provide an answer. 3C was asked where else he saw inappropriate stuff, and he said nowhere, then said sometimes while playing in his room. Macleod asked 3C if he and 3C talked about the inappropriate things that happened and he said no. Macleod asked 3C how come he didn't want to do the inappropriate things with his favorite friend, and he said it's because he's too shy. This concluded 3C forensic interview.

For clarity, 3C and 3C mom's friend, and the one 3C refers to as his "favorite friend" is Paydan Bussey (DOB [REDACTED] 1998).

After the interviews I spoke with 3C and 3C parents and told them about the disclosures made in the forensic interviews. I asked 3C about Bussey's schedule at Costco Redmond, and she said he works Saturday through Wednesday from about noon to 9PM at the tire center and has Thursday-Friday off. The parents told me they were interested in obtaining a protection order against Bussey for their children, so I had advocate Katie Yamamoto come speak with them about the process. I then left the interview office.

**February 12, 2024**

I attempted to contact Bussey at Costco in Redmond where he works, along with other Detectives. We were advised by a manager that Bussey was sick and not at work today.

**February 14, 2024**

At approximately 1500 hours, other Detectives and I arrived at Costco Redmond in an attempt to contact and arrest Bussey. Bussey was led to a back office inside the Costco, and I advised him he was under arrest. I placed handcuffs on Bussey, checking them for proper fit and double locking them in place so they wouldn't tighten on his wrists. Once Bussey was handcuffed, he sat down in a chair, and I advised him of his Miranda Rights verbatim from my King County Sheriffs Office issued Miranda card. Before I read Bussey his rights, he advised that he had an attorney and would like to speak with him. I told Bussey I heard him and wouldn't be asking him any questions, but still wanted to advise him of his rights. Bussey asked if I could call his mother to let her know where he would be going. Bussey provided me with his mom's phone number, and I put her on speaker phone so he could hear our conversation. Bussey told me that I could tell his mom everything, but I opted to just tell her that he would be booked into the King County Jail and that in a couple hours once he was booked, she could call the jail to get more information. She provided me with Bussey's attorney's name and number (Ed Braff 801-322-5678), and I wrote it on a sticky note so Bussey could take it with him to jail.

Once the conversation with Bussey's mom was complete, we escorted Bussey out the side entrance of Costco and to the patrol car waiting at the back of the store. The patrol Deputies searched Bussey and transported him to the King County Jail (see their reports for more information).

Not long after Bussey was arrested, I got a call from Ed Braff, Bussey's attorney. Braff asked me what Bussey was being charged with and inquired about whether or not they were regarding his juvenile cases (KCOS cases:12-163842, 12-149219 & 12-146825). I told Braff this arrest was for new charges, and he said that was all he needed to know and thanked me for my time.

Bussey was booked into the King County Jail for Rape of a Child First Degree (RCW 9A.44.073) due to the fact that 3C disclosed in his interview that Bussey performed oral sex on him, and also made him perform oral sex on Bussey. Bussey (25yo.) is 19 years older than 3C (6yo.).

**VEHICLE / PROPERTY & ITEMS SUMMARY**

|                                                                                                     |                                                                                          |
|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Alexis Pearlstein #000109528 Feb 15, 2024 11:10 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 15, 2024 11:55 (e-signature) |
| PRINT NAME<br>Alexis Pearlstein #000109528                                                          | PRINT NAME<br>Jason Escobar #000064937                                                   |

| DESCRIPTION / MAKE / MODEL / COLOR | STATUS / DATE / REASON FOR CUSTODY | VIN # / SERIAL # | QTY. | TOTAL (\$) VALUE |
|------------------------------------|------------------------------------|------------------|------|------------------|
| thumb drive with 2 FI's / Black    | Evidence / Feb 5, 2024 / Evidence  |                  | 1    | UNKNOWN          |

**PROPERTY & ITEMS ADDENDUM**

C24002867-2 OTHER ITEM - THUMB DRIVE WITH 2 FI'S

ITEM CATEGORY

Computer Hardware/ Software (Includes desktops/laptops, thumb drives, external hard drives, video games &amp; consoles)

DESCRIPTION

thumb drive with 2 FI's

COLOR

Black

| STATUS   | STATUS DATE | TOTAL (\$) VALUE | QUANTITY |
|----------|-------------|------------------|----------|
| Evidence | Feb 5, 2024 | UNKNOWN          | 1        |

IN POLICE CUSTODY

Yes

REASON FOR POLICE CUSTODY

Evidence

RECOVERING OFFICER / ID # / PERSON

Alexis Pearlstein #000109528

STORAGE LOCATION / PERSON / DESTINATION / INTAKE PERSON

CID &gt; CID EVIDENCE ROOM

RECOVERED LOCATION

1211 E ALDER ST, 12TH AVE &amp; ACCESS RD, SEATTLE, WA 98122

**ATTACHMENTS ADDENDUM**

| FILE NAME                    | UPLOAD DATE/TIME   | UPLOADED BY              |
|------------------------------|--------------------|--------------------------|
| ED MD Note 1.25.24.pdf       | Jan 31, 2024 08:45 | A. Pearlstein #000109528 |
| Ortho 1.25.24.pdf            | Jan 31, 2024 08:45 | A. Pearlstein #000109528 |
| SCAN Note 1.25.24.pdf        | Jan 31, 2024 08:45 | A. Pearlstein #000109528 |
| SW SA Assessment 1.25.24.pdf | Jan 31, 2024 08:45 | A. Pearlstein #000109528 |

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

| ELECTRONICALLY SIGNED | DATE       | PLACE           |
|-----------------------|------------|-----------------|
| Alexis Pearlstein     | 02/15/2024 | King County, WA |

| REPORTING OFFICER SIGNATURE / DATE                            | SUPERVISOR SIGNATURE / DATE                               |
|---------------------------------------------------------------|-----------------------------------------------------------|
| Alexis Pearlstein #000109528 Feb 15, 2024 11:10 (e-signature) | Jason Escobar #000064937 Feb 15, 2024 11:55 (e-signature) |
| PRINT NAME                                                    | PRINT NAME                                                |
| Alexis Pearlstein #000109528                                  | Jason Escobar #000064937                                  |

**Case # C24002867 - Supplement - 3 Report**

|                                          |                                                                                                     |                                           |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------|
| REPORT DATE / TIME<br>Feb 14, 2024 16:22 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 24, 2024 16:20 - 16:30 | REPORT AUTHOR<br>Paul Thompson #000098273 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------|

## REPORT DESCRIPTION

OWS: Paul Thompson

## SUPPLEMENT TYPE - ONLY SELECT ONE

Officer Witness Report

**NARRATIVE**

On 02/14/2024 I attended an arrest operation briefing at Redmond Fire Station 16 of NE 185th St in Redmond. Detective Pearlstein had probable cause to arrest Paydan Bussey for rape of a child 1st degree. Bussey works at Costco in Redmond at the Tire Center. My role in the operation was to assist in the interview of Bussey once taken into custody.

We drove to Costco and Sergeant Escobar spoke to a manager to get an office for the interview and a discreet arrest as to not interfere with business at the store. We were provided an office to take Bussey into custody.

Bussey was brought to the office by another employee and he was immediately taken into custody. I advised Bussey he was being recorded on a Star Witness interviewer and on Deputy body cameras. After being placed into handcuffs, Bussey stated he wanted to speak with an attorney. Detective Pearlstein read Bussey his constitutional rights and did not ask any investigatory questions.

Bussey said he wanted his parents notified. Detective Pearlstein called Bussey's mother and advised her that Bussey was going to King County Jail. She did not sound concerned or surprised. Bussey opted to have his wallet left in his work locker but took his phone and headphones with him.

Bussey was brought out a back door and placed into a patrol car where he was then transported to King County Jail.

This ends my involvement in this case.

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

|                                        |                    |                          |
|----------------------------------------|--------------------|--------------------------|
| ELECTRONICALLY SIGNED<br>Paul Thompson | DATE<br>02/14/2024 | PLACE<br>King County, WA |
|----------------------------------------|--------------------|--------------------------|

|                                                                                                                                           |                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Paul Thompson #000098273 Feb 14, 2024 16:35 (e-signature)<br>PRINT NAME<br>Paul Thompson #000098273 | SUPERVISOR SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 15, 2024 07:32 (e-signature)<br>PRINT NAME<br>Jason Escobar #000064937 |
|-------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|

**Case # C24002867 - Supplement - 4 Report**

|                                          |                                                                                                     |                                               |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------------|
| REPORT DATE / TIME<br>Feb 14, 2024 18:43 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 24, 2024 16:20 - 16:30 | REPORT AUTHOR<br>Christopher Terry #000113851 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------------|

## REPORT DESCRIPTION

OWS: Christopher Terry

## SUPPLEMENT TYPE - ONLY SELECT ONE

Officer Witness Report

**NARRATIVE**

On 02-14-2024 At approximately 1435 hours I dispatched myself as back up in a marked patrol unit to assist SAU on a follow up to arrest a subject for Child Rape in the First Degree at Costco tire center located at 7725 188th Ave. NE Redmond, WA. 98052.

Prior to my arrival Deputy Weisberg and I met with SAU detectives at Redmond Fire Station 16 located at 6502 185th Ave SE Redmond, WA. 98052.

Together we drove to the Costco to locate and arrest the subject who was identified as (A) Paydan G. Bussey (██████████ 1998). I followed SAU to a back-office room as Costco management brought Bussey to be interviewed by detectives. Once Bussey entered the room detectives arrested him and began their interview. Deputy Weisberg and I relocated our marked patrol unit to a directed location and waited for detectives to bring Bussey to us. Detectives brought Bussey to an emergency side exit. I searched Bussey's person and removed all items from his pockets and placed him in the back of our patrol unit for transfer to the King County Jail.

Deputy Weisberg and I transported Bussey to KCJ and booked him without incident. During the transport Bussey mentioned that the handcuffs were "a little tight" but he was okay.

Nothing further.

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

|                                            |                    |                          |
|--------------------------------------------|--------------------|--------------------------|
| ELECTRONICALLY SIGNED<br>Christopher Terry | DATE<br>02/14/2024 | PLACE<br>King County, WA |
|--------------------------------------------|--------------------|--------------------------|

|                                                                                                     |                                                                                          |
|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Christopher Terry #000113851 Feb 14, 2024 20:44 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 15, 2024 11:56 (e-signature) |
| PRINT NAME<br>Christopher Terry #000113851                                                          | PRINT NAME<br>Jason Escobar #000064937                                                   |

**Case # C24002867 - Supplement - 5 Report**

|                                          |                                                                                                     |                                              |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------------------|
| REPORT DATE / TIME<br>Feb 14, 2024 20:15 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 24, 2024 16:20 - 16:30 | REPORT AUTHOR<br>William Weisberg #000106265 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------------------|

## REPORT DESCRIPTION

Weisberg - OWS

## SUPPLEMENT TYPE - ONLY SELECT ONE

Officer Witness Report

**NARRATIVE**

On 02/14/2024 at approximately 1439 hours I dispatched myself as back-up as the marked patrol unit, to an SAU Follow-up, located at 7725 188<sup>th</sup> AVE NE, Redmond, WA, 98052. SAU detectives were executing an arrest warrant for a subject who was employed at the Costco Tire Center.

Prior to our arrival Deputy Terry and I met with the SAU detectives at the Redmond Fire Station, located at 6502 185<sup>th</sup> AVE NE, Redmond, WA, 98052.

Together we then drove to the aforementioned Costco in an attempt to locate and arrest the subject of the warrant, who was identified as (A) Paydan G. Bussey (██████ 1998). I accompanied SAU detectives into the Costco and later into a room in the back offices, provided by Costco staff to wait for Bussey. Bussey was brought to the backroom where SAU detectives were waiting and placed under arrest without incident. I was asked by detectives to move my patrol vehicle to a back door in order to remove Bussey from the business without interrupting it's operations. Deputy Terry and I left the interview room and moved the vehicle.

A short time later, detectives emerged from the designated emergency exit, as instructed by Costco staff. Bussey was in their custody and remained in handcuffs. Deputy Terry searched Bussey and he was placed into the back of my patrol car.

Deputy Terry and I transported Bussey to King County Jail where he was booked without incident. During the transport Bussey did not make any statements regarding the case.

I wore a body worn camera during this incident. I de-activated the camera whilst waiting for detectives to bring Bussey to my patrol vehicle. I forgot to activate the camera during the search of Bussey by Deputy Terry. I activated my body worn camera as soon as I remembered when we began the transport to King County Jail. These videos have been uploaded to evidence.com.

Nothing further.

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

|                                           |                    |                          |
|-------------------------------------------|--------------------|--------------------------|
| ELECTRONICALLY SIGNED<br>William Weisberg | DATE<br>02/14/2024 | PLACE<br>King County, WA |
|-------------------------------------------|--------------------|--------------------------|

|                                                                                                    |                                                                                          |
|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>William Weisberg #000106265 Feb 14, 2024 20:41 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 15, 2024 11:56 (e-signature) |
| PRINT NAME<br>William Weisberg #000106265                                                          | PRINT NAME<br>Jason Escobar #000064937                                                   |

**Case # C24002867 - Supplement - 6 Report**

|                                          |                                                                                                     |                                           |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------|
| REPORT DATE / TIME<br>Feb 15, 2024 07:32 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 24, 2024 16:20 - 16:30 | REPORT AUTHOR<br>Jason Escobar #000064937 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------|

## REPORT DESCRIPTION

Escobar OWS

## SUPPLEMENT TYPE - ONLY SELECT ONE

Officer Witness Report

**NARRATIVE**

On 02/14/2024, I attended an arrest operation briefing, which was led by Detective Pearlstein. Detective Pearlstein developed PC to arrest Paydan Bussey for Rape of a Child. Bussey is employed by the Redmond Costco and was on duty on this day.

My role was to supervise and contact an on-duty manager to facilitate the arrest and utilize one of their rooms. Our team consisted of Detectives Pearlstein, Thompson, Anderson and two patrol officers. Detectives and patrol were fully marked in Sheriff attire. I was in plain clothes.

We arrived at the Redmond Costco at approx. 1500 HRS. I contacted a manager at the Tire Center, where Bussey works, and he led me to his bosses office. I explained why we were here and requested to use a room and have Bussey's manager lead him to us. Detectives and Patrol waited in the office for Bussey to arrive, and when he did he was placed into custody without incident.

Detectives attempted to interview Bussey, but he requested his lawyer. We escorted Bussey out of Costco and into a patrol vehicle for this transport to KCJ.

This concluded my involvement.

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

|                                        |                    |                          |
|----------------------------------------|--------------------|--------------------------|
| ELECTRONICALLY SIGNED<br>Jason Escobar | DATE<br>02/15/2024 | PLACE<br>King County, WA |
|----------------------------------------|--------------------|--------------------------|

|                                                                                                 |                                                                                         |
|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 15, 2024 11:54 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Bradley Turi #000066380 Feb 15, 2024 12:13 (e-signature) |
| PRINT NAME<br>Jason Escobar #000064937                                                          | PRINT NAME<br>Bradley Turi #000066380                                                   |

### Case # C24002867 - Arrest Report

|                                          |                                                                                                                                |                                                                                                                 |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| REPORT DATE / TIME<br>Feb 15, 2024 11:11 | AGENCY / DISTRICT / REPORTING AREA / SUBDIVISION 4 / SUBDIVISION 5<br>Agency UNC KING CO / District C2 / Reporting Area C02009 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 5, 2024 16:00 - Jan 24, 2024 16:00 |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|

|                                               |                                |
|-----------------------------------------------|--------------------------------|
| REPORT AUTHOR<br>Alexis Pearlstein #000109528 | WEATHER<br>Clear/Partly Cloudy |
|-----------------------------------------------|--------------------------------|

REPORT TAKEN LOCATION  
32440 SE 54TH ST, FALL CITY, WA 98024

|                                                                                    |                                                                                 |                                                                                                                |
|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| IS TRANSIT?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | SHOOTING<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | EMS / FIRE / OTHER LE AGENCIES ON SCENE<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|

EVENT STATISTICS

|                                                            |                                                                      |
|------------------------------------------------------------|----------------------------------------------------------------------|
| <input type="checkbox"/> 6 - Problem Solving Related       | <input type="checkbox"/> 8 - Pursuit Involved                        |
| <input type="checkbox"/> CC - Use of Force                 | <input type="checkbox"/> CC - Suicidal                               |
| <input type="checkbox"/> 9 - Domestic Violence             | <input checked="" type="checkbox"/> Juvenile Involved                |
| <input type="checkbox"/> Drugs Involved                    | <input type="checkbox"/> 3 - Deputy Assaulted - No Weapon            |
| <input type="checkbox"/> 1 - Hazard Existed                | <input type="checkbox"/> Alcohol Involved                            |
| <input type="checkbox"/> 4 - Deputy Assaulted - Weapon     | <input type="checkbox"/> 2 - Gang Related                            |
| <input type="checkbox"/> CC - Crisis Call                  | <input type="checkbox"/> Aid Required                                |
| <input type="checkbox"/> 5 - Hate Crime                    | <input type="checkbox"/> Weapons Involved                            |
| <input type="checkbox"/> 7 - Anti-Harrassment, Non-DV Only | <input type="checkbox"/> CC - Mental Health Related                  |
| <input type="checkbox"/> 0 - No Apparent Hazard            | <input type="checkbox"/> King County Parks                           |
| <input type="checkbox"/> N - Follow-up Over Phone          | <input type="checkbox"/> COVID                                       |
| <input type="checkbox"/> GVRU                              | <input type="checkbox"/> Note 2 - Anti-Harassment/DVs require report |
| <input type="checkbox"/> Eluding No Pursuits               |                                                                      |

### ARREST NARRATIVE

See attached signed PC cert.

#### REPORTING PARTY-1

|                                       |                               |                                            |                                       |
|---------------------------------------|-------------------------------|--------------------------------------------|---------------------------------------|
| REPORTING PARTY-1 (PERSON)<br>R-1 3C  |                               | DOB / ESTIMATED AGE RANGE<br>1980          |                                       |
| SEX<br>Female                         | RACE / ETHNICITY<br>White (W) | PHONE NUMBER<br>3C (primary, Mobile Phone) | EMAIL ADDRESS<br>3C (Personal Email)  |
| HOME ADDRESS<br>3C, REDMOND, WA 98053 |                               |                                            | BEEN AT LOCATION SINCE<br>Jan 1, 2024 |

### ARREST #24-001111 (BOOKED AT TIME OF INCIDENT)

|                                                   |                                       |                                           |
|---------------------------------------------------|---------------------------------------|-------------------------------------------|
| ARREST DATE / TIME<br>Feb 14, 2024 15:00          | ARRESTING ORGANIZATION<br>KCSO - KCSO | ARREST TYPE<br>Booked at Time of Incident |
| ARRESTING OFFICER<br>Alexis Pearlstein #000109528 | TACTICS USED<br>Dispatch Call         |                                           |

|                                                                                                     |                                                                                          |
|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Alexis Pearlstein #000109528 Feb 15, 2024 11:15 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 15, 2024 11:41 (e-signature) |
| PRINT NAME<br>Alexis Pearlstein #000109528                                                          | PRINT NAME<br>Jason Escobar #000064937                                                   |

DEFENDANT



|                                                                                                                  |                                      |                    |
|------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------|
| DEFENDANT NAME (LAST, FIRST MIDDLE)<br><b>D-1 BUSSEY, PAYDAN Gregory</b>                                         |                                      | SEX<br><b>Male</b> |
| DOB / ESTIMATED AGE RANGE<br><b>1998-██████</b>                                                                  | RACE / ETHNICITY<br><b>White (W)</b> |                    |
| PHONE NUMBER<br><b>(425) 395-5708 (Mobile Phone), (425) 222-3771 (Mobile Phone), (425) 392-0683 (Home Phone)</b> | EMAIL ADDRESS                        |                    |
| HOME ADDRESS                                                                                                     |                                      |                    |

DEFENDANT WAS ARMED WITH

Not Applicable

ARREST LOCATION

LOCATION NAME / STREET ADDRESS/LOCATION NAME / APT, UNIT, STE / DESCRIPTION

7725 188TH AVE NE

|                                                  |                                                                                                                                   |                     |                                   |
|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|---------------------|-----------------------------------|
| CITY<br><b>REDMOND</b>                           | STATE<br><b>WA</b>                                                                                                                | ZIP<br><b>98053</b> | COUNTRY CODE<br><b>US</b>         |
| LOCATION CATEGORY<br><b>Grocery/ Supermarket</b> | AGENCY / DISTRICT / REPORTING AREA / SUBDIVISION 4 / SUBDIVISION 5<br><b>Agency REDMOND / District R5 / Reporting Area R05001</b> |                     | PUBLIC / PRIVATE<br><b>Public</b> |

CHARGES

|                                                            |                                                |                                                 |                                               |
|------------------------------------------------------------|------------------------------------------------|-------------------------------------------------|-----------------------------------------------|
| CHARGES - 1<br><b>9A.44.073 - RAPE OF CHILD 1ST DEGREE</b> |                                                |                                                 | COUNT<br><b>1</b>                             |
| ORIGINAL FILE #<br><b>C24002867</b>                        | OFFENSE CODE<br><b>140 - CHILD MOLESTATION</b> | OFFENSE START DATE<br><b>Jan 24, 2024 16:30</b> | OFFENSE END DATE<br><b>Jan 24, 2024 16:40</b> |

ARREST DISPOSITION DATE / TIME

Feb 14, 2024 16:00

ARREST DISPOSITION

- ROR Parents
- Release Own Recognizance
- Lockup
- Citation Release
- Release on Bail

RELATIONSHIPS ADDENDUM

|                              |                                        |                                         |
|------------------------------|----------------------------------------|-----------------------------------------|
| NAME<br><b>3C ██████████</b> | RELATIONSHIP<br><b>ACQUAINTANCE OF</b> | SUBJECT<br><b>PAYDAN Gregory BUSSEY</b> |
|------------------------------|----------------------------------------|-----------------------------------------|

ATTACHMENTS ADDENDUM

|                                                           |                                               |                                                |
|-----------------------------------------------------------|-----------------------------------------------|------------------------------------------------|
| FILE NAME<br><b>C24002867_Pearlstein_BusseypCCert.pdf</b> | UPLOAD DATE/TIME<br><b>Feb 15, 2024 11:14</b> | UPLOADED BY<br><b>A. Pearlstein #000109528</b> |
|-----------------------------------------------------------|-----------------------------------------------|------------------------------------------------|

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

|                                                   |                           |                                 |
|---------------------------------------------------|---------------------------|---------------------------------|
| ELECTRONICALLY SIGNED<br><b>Alexis Pearlstein</b> | DATE<br><b>02/15/2024</b> | PLACE<br><b>King County, WA</b> |
|---------------------------------------------------|---------------------------|---------------------------------|

|                                                                                                            |                                                                                                 |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br><b>Alexis Pearlstein #000109528 Feb 15, 2024 11:15 (e-signature)</b> | SUPERVISOR SIGNATURE / DATE<br><b>Jason Escobar #000064937 Feb 15, 2024 11:41 (e-signature)</b> |
| PRINT NAME<br><b>Alexis Pearlstein #000109528</b>                                                          | PRINT NAME<br><b>Jason Escobar #000064937</b>                                                   |

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CAUSE NO.

CERTIFICATION FOR DETERMINATION OF PROBABLE CAUSE

That Alexis Pearlstein is a (n) Detective with the King County Sheriff's Office and has reviewed the investigation conducted in the King County Sheriff's case number (s) C24002867;

There is probable cause to believe that Paydan G. Bussey (DOB [REDACTED] 1998) committed the crimes (s) of Rape of a Child First Degree (RCW 9A.44.073).

This belief is predicated on the following facts and circumstances: Suspect/ Paydan G. Bussey (DOB [REDACTED] 1998) befriended 3C [REDACTED] who has two young twin boys, 3C [REDACTED] and 3C [REDACTED] (DOB [REDACTED] 2017) who are six years old. 3C [REDACTED] and Bussey hung out numerous times throughout their friendship, and 3C [REDACTED] admitted that she had left Bussey alone with her young sons multiple times as well, between January 5th and January 24th, 2024. On January 24, 2024, 3C [REDACTED] her sons 3C [REDACTED] and 3C [REDACTED] and Bussey, went to Bussey's parents' house in Fall City; 32440 SE 54th St. for a playdate. Once there, 3C [REDACTED] and her son 3C [REDACTED] were outside playing, and she noticed that Bussey and her other son 3C [REDACTED] had been gone for approximately ten minutes. 3C [REDACTED] then called Bussey and told him to come outside with 3C [REDACTED]. After 3C [REDACTED] returned to 3C [REDACTED] and they played outside for a few minutes, it started to rain so they went back inside Bussey's house. Once inside 3C [REDACTED] told his mom 3C [REDACTED] that he needed to use the bathroom. While in the bathroom, 3C [REDACTED] told 3C [REDACTED] that, "Paydan touched my privates". Apparently Bussey was listening outside the bathroom door, and heard with 3C [REDACTED] had told 3C [REDACTED] Bussey asked 3C [REDACTED] if he could talk to her and she said no, and asked him to drive her and her sons home immediately. When 3C [REDACTED] told Bussey that they were no longer friends, he said to her, "there is something wrong with me", and that he became "horny" after touching her son, 3C [REDACTED]. Once Bussey dropped them off, 3C [REDACTED] reported this incident to the Police. On February 5, 2024, 3C [REDACTED] and 3C [REDACTED] were brought in for forensic interviews to find out more about what happened with Bussey. During 3C [REDACTED] child forensic interview, he stated that his mom's friend (Bussey) told him to try and eat his private parts. 3C [REDACTED] said he had to eat his mom's friend (Bussey)'s private parts like food, and it made his stomach upset. 3C [REDACTED] said Bussey asked him, "do you want to eat my private parts?", and he responded by saying he wasn't sure and then he said he ate them. 3C [REDACTED] said he was in his room at his house 3C [REDACTED] (Redmond, WA) when this happened. 3C [REDACTED] said Bussey was sitting "Criss cross applesauce on the floor". When asked what happened next, 3C [REDACTED] said that he just wanted to die. The child interviewer asked 3C [REDACTED] what parts of his body touched Bussey's body, and he said his mouth touched Bussey's body. 3C [REDACTED] said that Bussey's body touched his mouth as well. When 3C [REDACTED] was asked about what made it all stop, 3C [REDACTED] said he ate 'it' all day long until he was tired, and then he went downstairs and vomited in the toilet. 3C [REDACTED] was asked what he was thinking when this was happening, and he told the child interviewer that he was thinking he'd never do it again. 3C [REDACTED] was asked about another time this happened, and 3C [REDACTED] said they went to Bussey's house, and he did it to him again. 3C [REDACTED] said Bussey had a playground nearby his house, and he said he ate Bussey's private parts and went on the slide. 3C [REDACTED] again stated that Bussey also ate his private parts. 3C [REDACTED] said Bussey did it for the past few days and then he finally let the secret out to his mother. 3C [REDACTED] said this happened in Bussey's room and it made his private parts feel bad. 3C [REDACTED] said he was lying down when this happened, and that he had clothes on, but

Certification for Determination of Probable Cause

Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000

1 Bussey rolled down his pants and then rolled them back up. When 3C was asked  
 2 about anyone else seeing what happened to him, he said his brother 3C saw it.  
 3 When 3C was interviewed after 3C, 3C said he couldn't tell about what  
 4 happened to 3C because it was "something inappropriate, very inappropriate".  
 5 3C said he didn't want to say what it was because he's too shy. 3C said 3C  
 6 let out a secret to their mom. 3C was asked if he saw something inappropriate  
 7 happen with 3C and Bussey. 3C said 3C got brave and did 'those things' to  
 8 Bussey, and he didn't want to do it because what his brother was doing was  
 9 "so bad". 3C said, "I was watching him do those things. It was so  
 10 inappropriate I didn't want to do them". 3C was asked about what the 'things'  
 11 were that he was talking about. 3C told the interviewer that she should ask  
 12 his brother, 3C. 3C was asked about where this happened at, and he said it  
 13 happened upstairs in his new house (Redmond address) in his brother's  
 14 bedroom. 3C said that 3C was doing the inappropriate things, and he was doing  
 15 one 'not very inappropriate thing'. 3C said Bussey was asking him to do it  
 16 too. 3C was asked about why he didn't want to do the 'things' with Bussey,  
 17 who he referred to as his 'favorite friend', and 3C said it's because he's  
 18 too shy to do it.

9 Based on the disclosure made by 3C stating that his mouth was on Bussey's  
 10 penis and Bussey's mouth was on his penis, there is probable cause that  
 11 Bussey committed Rape of a Child First Degree (RCW 9A.44.073).

11 On February 14, 2024, Bussey was arrested. Bussey advised that he already had  
 12 an attorney and didn't want to make any statements.

13 Under penalty of perjury under the laws of the State of Washington,  
 14 I certify that the foregoing is true and correct. Signed and dated by me  
 15 this 15th day of February, 2024, at King County, Washington.

16  109528

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**Case # C24002867 - Supplement - 7 Report**

|                                          |                                                                                                                 |                                              |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| REPORT DATE / TIME<br>Feb 21, 2024 09:18 | OFFENSE/INCIDENT START DATE / TIME - OFFENSE/INCIDENT END DATE / TIME<br>Jan 5, 2024 16:00 - Jan 24, 2024 16:00 | REPORT AUTHOR<br>Kedrick Anderson #000107954 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------|

## REPORT DESCRIPTION

OWS - Anderson

## SUPPLEMENT TYPE - ONLY SELECT ONE

Officer Witness Report

**NARRATIVE****02/14/2024**

*1445 hours:* I attended an arrest operation briefing at 6502 185th AVE NE, in Redmond (Redmond Fire Station). Lead Detective Pearlstein briefed me on this case and that she had probable cause to arrest Paydan Bussey for the rape of a child in the first degree. Det. Pearlstein advised me that Paydan works at the Costco Tire Center in Redmond. I was assigned the role of Arrest team.

Shortly after, we arrived at the Costco, and I parked near the Costco Tire Center exit bay and doors. I held my position until I was advised that Paydan was taken into custody.

After Paydan was taken into custody. I departed the scene.

This concludes my involvement with this case.

This report was generated in Mark43 and the e-signature was affixed using the undersigned officer's unique login and password. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

|                                           |                    |                          |
|-------------------------------------------|--------------------|--------------------------|
| ELECTRONICALLY SIGNED<br>Kedrick Anderson | DATE<br>02/21/2024 | PLACE<br>King County, WA |
|-------------------------------------------|--------------------|--------------------------|

|                                                                                                    |                                                                                          |
|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| REPORTING OFFICER SIGNATURE / DATE<br>Kedrick Anderson #000107954 Feb 21, 2024 09:28 (e-signature) | SUPERVISOR SIGNATURE / DATE<br>Jason Escobar #000064937 Feb 21, 2024 10:57 (e-signature) |
| PRINT NAME<br>Kedrick Anderson #000107954                                                          | PRINT NAME<br>Jason Escobar #000064937                                                   |

# **EXHIBIT 2**



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## Paydan

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**Bussey Family** <busseyfamily@comcast.net>

Sat, Apr 13, 2013 at 10:32 AM

To: Amanda Jones <amandajones85@gmail.com>, joneschristopherk@gmail.com, brandon@bbussey.com, hcbussey@gmail.com, Carolyn Hafen <buttongirl2003@yahoo.com>, David Hafen <davidhafen1023@yahoo.com>, Anne Christenson <grandma\_anne@presto.com>

Cc: pkbussey@comcast.net

Good Morning,

We wanted to let you all know that we are at a critical point in everything for Paydan. We wanted to ask you to join with us in praying for him. We are not sure if it is your Fast Sunday's tomorrow, but if so we would truly appreciate you adding him to your fasting purposes. We recognize that there are many needs in our families at this time and we will be adding each of those known and unknown to our Fast tomorrow. There is a power that comes from praying and fasting as a family. We love each of you and our extended family and will ask for Heavenly Father's hand to direct in each situation as needed.

We met with the attorney the other day to go over the legal issues for Paydan. His evaluation is now completed and our attorney will be turning it into the Prosecutor this week. This will then move Paydan's legal process forward. Unfortunately things do not look very promising in Paydan's behalf. The legal system is very difficult to navigate with these particular issues in young boys. There is a 90% success for treatment with adolescents. The state knows that, but hasn't adapted the legal process to accommodate for this and tends to put them in the same system as adults. Much also depends on the prosecutor and what his case load and attitude is at the time. For that reason we are going to call on the "Powers of Heaven" to be poured out upon all involved in Paydan's case and his future. Paydan is paying a huge price and trying so hard to do his part. He recognizes that the consequences must be met for his actions. We are just asking that miracles will take place in his behalf to have hearts touched to make decisions that will be fair and just and that Paydan will not pay a bigger price than necessary. Paydan has so much potential. We recognize that Heavenly Father loves him and knows him better than we do. As with each of us He will help Paydan through all of this. We are praying that the miracles that Heavenly Father knows are best will transpire over these next months.

Paydan could also use some extra prayers right now for him. He has been so brave and strong during these past weeks. He is working so hard, but there are days that everything can seem pretty discouraging and lonely as a 14 year old trying to stay on top of it all. He has a resilient spirit but could really use our prayers and support right now to help him have the courage and faith needed to make it through the difficult tasks that lie ahead. He is trying his hardest to do all he can to come back healthy and whole to our family. He needs to know that we are there for him and that we love and support him. Encouragement through letters and prayers in this regard would be so great.

We love each one of you and are so thankful for you continued love and support in our lives. We pray that each of you will also be blessed with ALL that you stand in need of at this time. We are so blessed to have the Gospel in our lives that gives us the truth of knowing we have a loving Heavenly Father and Savior who are there to help us each step of the way on our journey's back home to them.

Love you all,

Cathy & Phil

# **EXHIBIT 3**



## Paydan's Support Team

**Cathy's Account** <busseyfamily1@gmail.com>

Sat, Jul 11, 2015 at 5:49 PM

To: buttongirl2003@yahoo.com, davidhafen1023@yahoo.com, grandma\_anne@presto.com, brandon@bbussey.com, amandajones85@gmail.com, Brad Hafen <bhafen19@gmail.com>, ddhafen@pocketinet.com, Kristen Jorgensen <kristen.jorgensen@me.com>, Cosette Rae <cosette.rae@restartlife.com>, shirleyromans <shirleyromans@comcast.net>, Nikol Hafen <nikolhafen@hotmail.com>, Thayne Lyman <bishoplyman@hotmail.com>, Leslie Hancock <leslie@lesliehancock.com>

Cc: pkbussey@gmail.com, busseyfamily1@gmail.com

Dear Support Team,

It has been over 3 ½ months since we last sent an email. Many of you have asked for updates on Paydan. We are so appreciative of your continued love, support and prayers in our behalf. Thanks for your willingness to read our updates and hang in to support us to the end of this process. We are at another critical time in Paydan's legal process, so we thought this would be a good time to send updates and request your prayers in his behalf. During the past months Paydan has done many positive things which have brought great growth for him. He continues to try hard in all areas of his life despite the hard things he keeps facing. His resilient spirit keeps teaching us many lessons. He is doing well in his school. The small private school we found has been a positive choice for him. He continues to attend 3 days of classes during the summer to make sure all the credits from his school in Utah and the requirements for Washington are all lined up to keep him on track. He has been working with a physical trainer at a gym close by to complete his PE credits. In addition to that he trained and participated in a ½ marathon in June and is now doing a month long rigorous Crew/Rowing program. He has been able to participate in some great church events these past few weeks. We all participated in our Stake's Pioneer Trek and Paydan was he was a leader at a Regional Camp Helaman involving 300 16-18 year old boys. These were both catalysts for amazing personal growth as well as positive peer connections. He continues to work hard in his therapy and we see amazing growth in so many areas of his life.

Since court he has moved forward in a positive direction working with his probation officer in fulfilling the requirements and making positive changes in his life. The last part of the legal process has been the registration part. We have been waiting for the final outcome of this process to unfold. This has been the part that has brought the greatest concern through this whole process. Many states have done away with this step as research has shown that it has not increased safety in the community and has only added negative labels for these young people to overcome in their process for positive change. In Washington they use very outdated assessment tools for the process of determining what level they will be registered as. The system uses a rigid form which doesn't allow any room to look at the progress the individuals have made throughout their treatment and healing process. We were hoping they would be able to look at Paydan's unique journey as he has invested so much time and effort in intense therapy. His work will end up being over 4 years of very intense treatment which is above and beyond the typical 2 years of just regular treatment. Because his legal process unfolded so slowly it allowed him the chance to get more treatment before his legal proceedings began than most have even at the end of their probation terms. We were hoping that they would be able to look at this and allow Paydan to be at the Level 1 which doesn't require any online public notification. We have worked closely with the Sheriff Dept. who does all the leveling process. They recognized and praised Paydan for all his work but because of the system they feel like they are caught and have to use the standard form which leveled him at a 2, requiring online notification and some other very tough requirements. After hearing this news our therapist, probation officer and attorney all felt that this was not the level Paydan needed to be. After lots of prayer and careful consideration we decided to move forward to follow the advice of our team and approach the possibility of contesting his level. The doors just keep opening and we felt that after all we have done in this whole process for the past 2 years we at least needed to continue to try ALL we can to allow Paydan the best possible outcomes for his future. Throughout our process the Lord has directed us to the best individuals to be on our team. Our therapist is one of the leading experts in all of this and is highly respected for his work. He knows the legal process very well and has been a part of the research that started the registration laws and has since found them to be very ineffective and unfair. Unfortunately Paydan is caught in a system that doesn't allow the work he's done and the changes he has made to be rewarded.

With that background we ask now for your prayers in this final stage of our process. We were directed to an attorney who has experience in this specific issue. She is respected by the Sheriff's Dept. of King County as she has worked on many things over the past years. Since 1990 when this registration process has been put into effect no one in King County has done a formal contesting since it is a long and tedious process. In some of the surrounding counties this has been done, but we will be the first to attempt in this county. So far the Sheriff Dept. has been willing to work with us and they granted us time to put together our formal contest. Our attorney has worked with Paydan's therapist. They feel we are justified to move and see if we can make a difference in Paydan's outcome. This also may help move things in a good direction for others in similar situations and hopefully be a step forward to helping Washington State move towards a better rehabilitation process allowing for positive changes to be given merit and allow better futures for those involved.

So this is the process from here that we would welcome your prayers and support. Monday our attorney will turn in our plea with the reasons they feel justified for contesting the Level 2 and asking that they allow us a hearing to have it re-considered and be changed to a Level 1 protecting Paydan's future that he has worked so hard to secure up until this point. If granted we will proceed forward to prepare for a hearing. At that hearing we will have Paydan's therapist work with the attorney to present Paydan's case. We need prayers that we will be granted the opportunity for a hearing and if this is given that we can get a judge who will look fairly at Paydan's situation and be willing to grant him the Level 1. Since this is unique and uncharted territory if this happens we may find that they would want to appeal the decision and it would go further down the legal battle. It might be a long road, but we have been given advice from so many, as well as feeling direction from Heavenly Father to proceed forward in this. Our prayers will be that we can make a positive difference in Paydan's situation and possibly a difference for others in the future as well. We are hoping for the best in this process, but also recognize that we could still end right back where we are now when it is finished. We know that regardless of the outcome, if we stay close to the Lord and take it a step at a time He will continue to lift and help us along the way. With each day we gain experience leading us to refining and life changing growth opportunities.

Words can't begin to express our appreciate to each of you during this long journey. We could never have made it with our team of prayer angels. We have felt the power of your prayers in our life. Please continue to know we pray for each of you as well in all that you face. We know that there is a connection to Heaven and if we keep it open we can find blessings from above to help us along our pathways through this life.

May you each be blessed for all that you do.

Love,  
Cathy, Phil & Paydan

# **EXHIBIT 4**

SCANNED

**CONFIDENTIAL**

DATE: 3.20.15

Court Room: IV

JCN: 241093

**JRA COMMITMENT DISPOSITIONAL REPORT TO COURT**

**NAME: Paydan Bussey**

**L.N.:14-8-01592-7**

**DOB/AGE: 9/17/98 / 16.6**

**DATE/TIME OF HEARING: 3/20/15 @ 1pm**

Parent/Guardian: Cathy and Phillip Bussey  
 Attorney: Timothy Leary  
 Juvenile Probation Counselor: Kiersten Knutson  
 DPA: Emily Petersen  
 Victim(s) and Family are expected to attend

**STANDARD RANGE SENTENCE**

L.N./Offense Date: 14-8-01538-7 / 6/21/12

| COUNT | OFFENSE NAME | COMMUNITY SUPERVISION | COMMUNITY SERVICE | FINE | DETENTION/JRA |
|-------|--------------|-----------------------|-------------------|------|---------------|
| I     | Attempt CM 1 |                       |                   | VAP  | 15-36 weeks   |

L.N./Offense Date: 14-8-01538-7 / 6/21/12

| COUNT | OFFENSE NAME | COMMUNITY SUPERVISION | COMMUNITY SERVICE | FINE | DETENTION/JRA |
|-------|--------------|-----------------------|-------------------|------|---------------|
| I     | Attempt CM 1 |                       |                   |      | 15-36 weeks   |

L.N./Offense Date: 14-8-01538-7 / 7/10/12

| COUNT | OFFENSE NAME | COMMUNITY SUPERVISION | COMMUNITY SERVICE | FINE | DETENTION/JRA |
|-------|--------------|-----------------------|-------------------|------|---------------|
| I     | CM 1         |                       |                   |      | 15-36 weeks   |

**PROBATION COUNSELOR RECOMMENDATION:**

L.N./Offense Date: 14-8-01538-7 / 6/21/12

| COUNT | OFFENSE NAME | COMMUNITY SUPERVISION | COMMUNITY SERVICE | FINE | DETENTION/JRA |
|-------|--------------|-----------------------|-------------------|------|---------------|
| I     | Attempt CM 1 | 8 months              | 14 hours          | VAP  | *36 weeks     |

L.N./Offense Date: 14-8-01538-7 / 6/21/12

| COUNT | OFFENSE NAME | COMMUNITY SUPERVISION | COMMUNITY SERVICE | FINE | DETENTION/JRA |
|-------|--------------|-----------------------|-------------------|------|---------------|
| I     | Attempt CM 1 | 8 months              | 14 hours          |      | *36 weeks     |

Bussey, Paydan

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L.N.: 14-8-01592-7

L.N./Offense Date: 14-8-01538-7 / 7/10/12

| COUNT | OFFENSE NAME | COMMUNITY SUPERVISION | COMMUNITY SERVICE | FINE | DETENTION/JRA |
|-------|--------------|-----------------------|-------------------|------|---------------|
| I     | CM 1         | 8 months              | 14 hours          |      | *36 weeks     |

**It is recommended that the period of commitment be suspended under:**

**\*SSODA XX**

Respondent has served 0 days in detention.

**RESTITUTION/VAP/FINE:**

**Restitution: \$ JPC has not yet received restitution requests/amounts**

**VAP: \$ 100.00**

**FINE: \$ 0.00**

- Payable at the rate of \$ 10.00 per month, with the first payment due 5/20/15.

**MITIGATING AND AGGRAVATING FACTORS:**

**Mitigating Factors:**

- The respondent's conduct neither caused nor threatened serious bodily injury or the respondent did not contemplate that his/her conduct would cause or threaten serious bodily injury.

The victims did not report any injuries.

- There has been at least one year between the respondent's current offense and any prior criminal offense.

Paydan has no criminal offense history.

**Aggravating Factors:**

- The victim or victims were particularly vulnerable.

Paydan was 13 at the time he offended against the victims, who were aged between four and six years.

- The current offense included a finding of sexual motivation.

**Summary:** Kiersten Knutson, in preparing this report, reviewed the following: Certification for Determination of Probable Cause for each count and accompanying reports provided by the King County Sheriff's Office. A Sexual Behavior and Risk Assessment dated 4/3/13 and completed by William Meyer, CSOTP was reviewed. A 12/8/14 Addendum to this 4/3/13 Evaluation also was reviewed. Phone contact was made with William Meyer as well. The Bussey family provided this JPC

with a full packet of Paydan's therapy assignments that he completed over the course of his near-19-month inpatient (residential) treatment at Birdseye Residential Treatment Center (RTC) in Utah. This packet and a "Home Contract" created by the Bussey family during Paydan's transition home from Utah were reviewed. Two items provided by the Birdseye therapist (Jared Rockwood, LCSW) were reviewed: a letter to the Court dated 12/11/14, detailing Paydan's treatment experience at Birdseye, and a "Recap of Sexual Behavior Risk Assessment", dated 11/4/14. Phone contact was made with Paydan's current CSOTP, Dr. Richard Packard. A letter detailing Paydan's treatment status with Dr. Packard dated 3/15/15 was reviewed. Numerous e-mails and phone conversations took place with Cathy Bussey. An in-person interview with both Paydan and his parents was conducted.

**Attachments:**

Certification for Determination of Probable Cause for each count  
 Sexual Behavior and Risk Assessment Evaluation (4/3/13)  
 Addendum to April 3, 2013 Sexual Behavior Risk Assessment (12/8/14)  
 Recap of Sexual Behavior Risk Assessment (11/4/14)  
 Letter to the Court from Birdseye therapist Jared Rockwood (12/11/14)  
 Letter from Cathy and Phil Bussey (January 2015)  
 Paydan Bussey's Notes for Court Remarks on 3-20-15  
 Letter of treatment activities from Richard Packard, Ph.D. (3/15/15)  
 Letter and e-mail correspondence from Glen Lutz (12/30/14 and 3/18/15)

**OFFENSE DESCRIPTION:**

**Count I:** Per CDPC # 12-146825, the mother of victim 3B (06) noticed on 6/24/12 that 3B had been touching his penis frequently, which caused her concern. She asked 3B about this behavior, and why he thought he was doing it. 3B disclosed to his mother that Paydan (three days earlier during a swim meet) had approached him on a basketball court where both were playing; the court was located outside of the Klahanie Pool in Issaquah, WA. Paydan is reported to have asked 3B to touch his penis, and also requested that 3B go with him into the woods to touch each other. 3B refused to go to the woods and refused Paydan's request that 3B touch Paydan's penis. Paydan was identified by 3B after viewing a poster of the swim team with which Paydan participated.

**Count II:** Per CDPC # 12-149219, the mother of victim 3B (06), reported to law enforcement that 3B had been lured into the woods at the same location in count I (Klahanie Pool) by an older boy. She had spoken to 3B mother (Count I) on 6/21/12. 3B mother informed her that an older boy had attempted to take 3B to the woods that day. 3B identified Paydan when shown the same swim team poster mentioned above. 3B eventually disclosed that Paydan asked him to pull down his pants, and to "touch the things (Paydan's genitals) that were weird." 3B reported that he became scared and ran out of the woods.

**Count III:** Per CDPC #12-1634842, victim 3B (08) was at the Klahanie Pool on 7/10/12. 3B mother was supervising 3B while he played on the same basketball court (Counts I and II). 3B mother saw Paydan talking to 3B with his (Paydan's) back facing her. She witnessed Paydan move his hands down to the front of his shorts, as if showing 3B something. She went on to report that she saw Paydan grab 3B hand and pull it toward his (Paydan's) shorts. After some discussion with her husband, both parents approached 3B to ask what happened. 3B was reluctant to discuss the incident,

but eventually told his parents that Paydan had grabbed his hand and made him touch his (Paydan's) "balls".

**FAMILY STATEMENT:**

Paydan currently resides in Fall City with his adoptive parents, Cathy and Phillip Bussey. Ms. Bussey is a home-maker, and Mr. Bussey is employed with Puget Sound Power as the Chief Customer Officer of Corporate Affairs. They have been married since 1979. Mr. and Ms. Bussey relocated to Fall City from Issaquah while Paydan was receiving residential treatment in Utah for his sexual behavior and trauma issues. The Busseys adopted Paydan at his age of two from an orphanage in Russia. Early on, the Busseys were tasked to seek and provide numerous interventions for Paydan, who experienced challenges with academics, speech development, and social skills. Services also were sought and provided to Paydan for ADHD and Executive Functioning issues (See Mental/Physical Health below).

Mr. and Ms. Bussey have two adult children, Brandon (31), and Amanda (29). Brandon and his wife Heidi reside in Bothell, WA, with their 3-year old daughter. Amanda and her husband Chris, currently live in Huntington Beach, CA.

The Bussey family's religious faith is that of LDS, and they are actively involved with their church, "Duthie Hill Congregation for the LDS". Their church bishop, Thayne Lyman, is aware of Paydan's offense behavior and has been approved as a chaperone during the 24/7 supervision phase. Paydan participates in their youth group activities with supervision. Paydan reports that he is making some friends through his involvement with youth group, and would like more opportunities to engage with peer-aged individuals.

Paydan describes his relationship with his parents as positive. His mother is very attentive, and has been the primary supervising adult during the pre-disposition period where 24/7 supervision is required. Ms. Bussey and Paydan agree that this can be challenging, though both explain that they have been able to cope and use techniques to minimize stress around too much "togetherness."

The Busseys require Paydan to stay very busy, and they appear to provide excellent structure in their home. Paydan attends early morning bible study from 6-7am Monday through Friday. He and his mother have been going to the gym together for his P.E. credit. Paydan participates in his church's youth group and in Scouts. He has a relationship with the church bishop, whom he visits with each Wednesday night.

**EDUCATION/EMPLOYMENT:**

A sophomore in high school, Paydan currently attends Brightmont Academy in Bellevue. This program provides one-to-one instruction for its students. Paydan is one of 12-15 full time students at Brightmont. Paydan reports that he enjoys school and that he is earning A's and B's. Please find attached a letter dated 12/30/14 provided by Glen Lutz, Director, as well as a 3/18/15 e-mail correspondence and update from Mr. Lutz.

Paydan attended K-5 at Challenger Elementary School. Paydan's kindergarten teachers suspected attention-deficits, though this was finally diagnosed when Paydan was in the second grade. An IEP was written to accommodate Paydan's ADHD at that time. He attended Beaver Lake Middle School for grades 6-7, and most of grade 8 until he entered Birdseye RTC. There, his school was an on-line

curriculum call the "Discovery Academy". Enrollment with this program spanned from March 2013 (grades 8-part of 10) until his discharge in November 2014. Paydan is finishing up one course with Discovery Academy while attending Brightmont.

Paydan and his parents report no history of suspensions or expulsions from school. Paydan reports he would like to attend college in the future. He is performing well at this time in his college-prep classes.

**MENTAL/PHYSICAL HEALTH ISSUES:**

As previously noted, Paydan was diagnosed with ADHD in the second grade. At the same time, he was diagnosed with EDF (Executive Functioning Disorder). He was prescribed Focalin at the time, which remains his current and only medication.

Dr. Packard writes in his attached letter that Paydan currently meets the diagnostic criteria for:

Attention-Deficit/Hyperactivity Disorder, Combined presentation  
Adjustment Disorder, with mixed disturbance of emotions and conduct

Paydan and his parents both report no major physical health issues or obstacles. Paydan is a healthy and active adolescent who participates in sports. He reports he is interested in training for a marathon.

**DRUG/ALCOHOL ISSUES OR CONCERNS**

Paydan denies any use or experimentation with drugs or alcohol.

**PRIOR PROBATION/PAROLE/SERVICES PROVIDED**

Paydan's only probation supervision has been pre-disposition monitoring of his compliance with SOU Conditions set at arraignment. This JPC's impression is that the Bussey family has been highly vigilant in their supervision of Paydan to make sure he complies with all conditions.

**DETENTION ADJUSTMENT:**

Paydan has not served any detention time.

**TREATMENT and TREATMENT PROGRESSION:**

Upon learning of Paydan's offending behavior in June 2012, his parents sought a Sexual Behavior Evaluation and Risk Assessment. Attached is the evaluation dated 4/3/13 provided by William Meyer, CSOTP, who collected information for this evaluation from 7/23/12-4/3/12. In tandem with this evaluation, Paydan began outpatient Sexual Behavior treatment (individual and group) with Timothy Kahn, CSOTP. Treatment with Mr. Kahn occurred from August 2012 to March 2013. Mr. Kahn communicated with Mr. Meyer throughout this treatment, which served to provide further disclosures of deviant sexual behavior on Paydan's part, including similar offending behavior with another boy at a different pool, and with a 5-year old male cousin, 3B. According to Ms. Bussey, Paydan struggled to fully disclose his behaviors and feelings in this setting due to fears of rejection by family members. It was decided that Paydan's treatment needs far exceeded that which outpatient could provide. It should be noted that Paydan's behavior was disclosed to 3B parents (Ms. Bussey's 3B) once Paydan disclosed. 3B was placed in counseling, and 3B along with his parents, worked with Jared Rockwood via Skype to address this incident therapeutically.

Mr. Meyer's 4/3/13 evaluation assessed Paydan's risk for sexual re-offense as **moderate to high**.

The Bussey family enrolled Paydan in an inpatient (residential) treatment facility called "Birdseye Residential Treatment Center" located in Spanish Fork, Utah on 3/20/13. Paydan spent nearly 19 months at this facility, and his therapist was Jared Rockwood, LCSW. This lengthy period of treatment was highly necessary, since Paydan continued to struggle to control his sexual impulses in this setting. Thankfully, and as noted in Mr. Rockwood's 12/11/14 letter to the Court, Paydan was able to demonstrate control over these impulses during the final ten months of his stay at Birdseye. Mr. Rockwood reports in his letter that Paydan graduated "...in good standing from the program..." on 10/14/14. Upon discharge, Mr. Rockwood assessed Paydan's risk for sexual re-offense as "**moderate-low**".

Paydan was re-assessed by William Meyer after discharge from Birdseye. Mr. Meyer's 12/8/14 Addendum assesses Paydan as "**moderate-low**", consistent with the risk assessment completed by Mr. Rockwood.

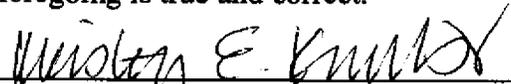
Prior to his discharge from Birdseye, Paydan was allowed passes home to attend court and to spend time at home with his parents. The Busseys used this time to connect with Paydan's current CSOTP, Dr. Richard Packard. Please find attached a letter dated 3/15/15 provided by Dr. Packard, detailing Paydan's treatment history with him, as well as an update on Paydan's current treatment focus and progress.

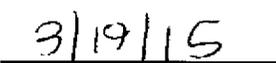
**SUMMARY:**

It is this JPC's impression that Paydan is a good candidate for SSODA supervision. This is based on review of the numerous assessments and re-assessments, review of his treatment work and the intake interview conducted with Paydan and his family. Paydan's family has demonstrated to this JPC they are capable of careful supervision of their son. It appears that Paydan and his family have a healthy respect for the rules of treatment and supervision designed to keep Paydan accountable, safe, and able to move forward in treatment to continue to lower his risk for sexual re-offense. Recommended SSODA conditions are attached.

The family would like to continue treatment with Dr. Packard, who is a CSOTP, but who does not provide group treatment. While Mr. Meyer's 12/8/14 Addendum does not specify group treatment, and because he specifically referred this family to Dr. Packard, this JPC requests that the Court authorize therapist discretion on group treatment while on SSODA.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

  
 \_\_\_\_\_  
 Juvenile Probation Counselor (Signature)

  
 \_\_\_\_\_  
 Date

Bussey, Paydan L.N.: 14-8-01592-7

  
\_\_\_\_\_  
Juvenile Probation Counselor Supervisor (Signature)

3/18/15  
Date

**THIS DOCUMENT IS CONFIDENTIAL AND IS NOT TO BE DISTRIBUTED TO MEMBERS OF THE GENERAL PUBLIC.**

# **EXHIBIT 5**



## Electronically Certified Official Record

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### Document information

|                                    |                                                     |
|------------------------------------|-----------------------------------------------------|
| <b>Agency Name:</b>                | Hillsborough Clerk of Circuit Court and Comptroller |
| <b>Clerk of the Circuit Court:</b> | The Honorable Victor D. Crist                       |
| <b>Date Issued:</b>                | 9/15/2025 11:06:55 AM                               |
| <b>Unique Reference Number:</b>    | BAA-FBB-BCAFH-HCIEDDIDGBHFDBJBBFAE-FGDHJJ-A         |
| <b>Certification ID:</b>           | 72843383617531911504                                |
| <b>Requesting Party Code:</b>      | 511                                                 |
| <b>Requesting Party Reference:</b> | 16338047                                            |

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### CERTIFICATION

Pursuant to Sections 90.955(1) and 90.902(1), Florida Statutes, and Federal Rules of Evidence 901(a), 901(b)(7), and 902(1), the attached document is electronically certified by The Honorable Victor D. Crist, Hillsborough County Clerk of the Circuit Court and Comptroller, to be a true and correct copy of an official record or document authorized by law to be recorded or filed and actually recorded or filed in the office of the Hillsborough County Clerk of the Circuit Court. The document may have redactions as required by law.

### HOW TO VERIFY THIS DOCUMENT

This document contains a Unique Reference Number for identification purposes and a tamper-evident seal to indicate if the document has been tampered with. To view the tamper-evident seal and verify the certifier's digital signature, open this document with Adobe Reader software. You can also verify this document by scanning the QR code or visiting <https://www.Clerkecertify.com/VerifyImage>.

\*\*The web address shown above contains an embedded link to the verification page for this particular document.

\*If you are a person with a disability who needs an accommodation, you are entitled, at no cost to you, to the provision of certain assistance. To request such an accommodation please contact the Clerk's ADA Coordinator within seven working days of the date the service is needed; if you are hearing or voice impaired, call 711.

Clerk of Court & Comptroller's Office ADA Coordinator

601 E. Kennedy Blvd., Tampa, FL 33602

Phone: (813) 276-8100, extension 4347

Email: [recording@hillsclerk.com](mailto:recording@hillsclerk.com)



Unique Code : BAA-FBB-BCAFH-HCIEDDIDGBHFDBJBBAE-FGDHJU-A Page 1 of 1

**DECLARATION OF DOMICILE**

To the Clerk of the Circuit Court (County Comptroller) Hillsborough County, Florida.

This is my declaration of domicile in the State of Florida that I am filing this day in accordance and in conformity with Section 222.17, Florida Statutes.

**FOR DOMICILIARIES OF THE STATE OF FLORIDA:**

I hereby declare that I reside in and maintain a place of abode at:

7245 Gennaker Drive  
(Street and number)  
Tampa Hillsborough, Florida 33607  
(City and County)

which place of abode I recognize and intend to maintain as my permanent home and, if I maintain another place or places of abode in some other state or states, I hereby declare that my above-described residence and abode in the State of Florida constitutes my predominant and principal home, and I intend to continue it permanently as such. I am, at the time of making this declaration, a bona-fide resident of the State of Florida residing at:

7245 Gennaker Drive  
(Street and number)  
Tampa Hillsborough, Florida 33607  
(City and County)

I formerly resided at:

1133 N Temple Dr  
(Street and number)  
Provo, UTAH, Utah 84604  
(City and county)

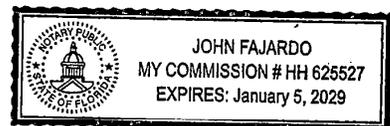
and the place or places where I maintain another or other place or places of abode are as follows:  
(Here list street address, city, county and state of any other place or places of abode.)

[Signature] Brandon Bussey  
(Signature) (Print Name)

Sworn to and subscribed before me this 5<sup>th</sup> day of September, 2025

[Signature]  
(Signature of Notary Public,  
State of Florida)  
John Fajardo  
(Print, type or stamp commissioned  
Name of Notary Public)  
Personally known  or Produced Identification   
(Check One)

Type of Identification Produced: FWL-8634-837-60-100-0



**DECLARATION OF DOMICILE**

To the Clerk of the Circuit Court (County Comptroller) Hillsborough County, Florida.

This is my declaration of domicile in the State of Florida that I am filing this day in accordance and in conformity with Section 222.17, Florida Statutes.

**FOR DOMICILIARIES OF THE STATE OF FLORIDA:**

I hereby declare that I reside in and maintain a place of abode at:

7245 Gennaker Drive  
(Street and number)  
Tampa Hillsborough, Florida 33607  
(City and County)

which place of abode I recognize and intend to maintain as my permanent home and, if I maintain another place or places of abode in some other state or states, I hereby declare that my above-described residence and abode in the State of Florida constitutes my predominant and principal home, and I intend to continue it permanently as such. I am, at the time of making this declaration, a bona-fide resident of the State of Florida residing at:

7245 Gennaker Drive  
(Street and number)  
Tampa Hillsborough, Florida  
(City and County) 33607

I formerly resided at:

1133 N Temple Dr  
(Street and number)  
Provo Utah, Utah 84604  
(City and county)

and the place or places where I maintain another or other place or places of abode are as follows:  
(Here list street address, city, county and state of any other place or places of abode.)

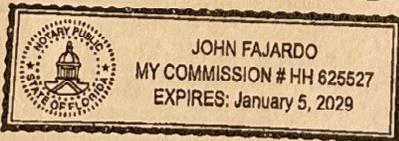
Heidi Bussey  
(Signature)

Heidi Bussey  
(Print Name)

Sworn to and subscribed before me this 8<sup>th</sup> day of September, 20 25.

[Signature]  
(Signature of Notary Public,  
State of Florida)

John Fajardo  
(Print, type or stamp commissioned  
Name of Notary Public)  
Personally known  or Produced Identification   
(Check One)



Type of Identification Produced: FDL-BG25-649-35-100-0

STATE OF FLORIDA  
(COUNTY OF HILLSBOROUGH)

THIS IS TO CERTIFY THAT THE FOREGOING IS A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE IN MY OFFICE. WITNESS MY HAND AND OFFICIAL SEAL THIS 9 DAY OF September, 2025

Victor D. Crist, Clerk of the Circuit Court  
Hillsborough County, Florida

BY Victor D. Crist  
Deputy Clerk

# **EXHIBIT 6**

THE HONORABLE THOMAS S. ZILLY

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BRANDON BUSSEY and HEIDI  
BUSSEY, individually and as guardians of  
minor, H.B.,

Plaintiffs,

v.

THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, PAYDAN  
BUSSEY, THAYNE LYMAN, PHILLIP  
BUSSEY, CATHY BUSSEY, and DOES  
1-100, INCLUSIVE,

Defendants.

No. 2:25-cv-00197-TSZ

DEFENDANTS THE CHURCH OF JESUS  
CHRIST OF LATTER-DAY SAINTS AND  
THAYNE LYMAN’S INITIAL  
DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendants The Church of Jesus Christ of Latter-day Saints, a Utah corporation sole (“the Church”) and Thayne Lyman (“Mr. Lyman”), through their attorneys, respectfully make the following initial disclosures based on information presently available to them. These disclosures are preliminary and based solely on information reasonably available to the Church and Mr. Lyman at this time. The Church and Mr. Lyman reserve the right to disclose additional information regarding any of their claims or defenses or to otherwise revise or supplement these disclosures. Further, these disclosures are made without prejudice to the Church and Mr. Lyman’s right to use or rely on at any time,

1 including at trial, subsequently discovered information, or any information omitted from these  
2 disclosures by inadvertence, mistake, or otherwise. The Church and Mr. Lyman will reveal  
3 relevant, identifying details of Church members, including those listed below, only upon entry of  
4 an appropriate Protective Order.  
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9 Subject to and without waiving the foregoing reservations, the Church and Mr. Lyman  
10 make the following disclosures:  
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12  
13 **A. Witnesses (Rule 26(a)(1)(A)(i))**

14  
15 The below-listed individuals are likely to have discoverable information that the Church  
16 and Mr. Lyman may use to support their claims or defenses relating to the allegations in the  
17 Complaint.  
18  
19

20  
21 **1. H.B., Plaintiff**

22 c/o Rogers & Cover, PLLC  
23 705 Second Avenue, Suite 1500  
24 Seattle, WA 98104  
25 (206) 621-8525  
26

27 Andrews & Thornton  
28 4701 Von Karman Ave., Suite 300  
29 Newport Beach, CA 92660  
30 (949) 748-1000  
31

32 Watts Law Firm LLP  
33 811 Barton Springs Road # 725  
34 Austin, TX 78704  
35 (888) 889-2887  
36

37 Plaintiff H.B. is likely to have discoverable information concerning Plaintiffs' allegations.  
38

39 **2. Brandon Bussey**

40 c/o Rogers & Cover, PLLC  
41 705 Second Avenue, Suite 1500  
42 Seattle, WA 98104  
43 (206) 621-8525  
44

45 Andrews & Thornton  
46 4701 Von Karman Ave., Suite 300  
47 Newport Beach, CA 92660  
48 (949) 748-1000  
49

50 Watts Law Firm LLP  
51 811 Barton Springs Road # 725

Austin, TX 78704  
(888) 889-2887

Mr. Bussey is Plaintiff H.B.'s father. He is likely to have discoverable information concerning Plaintiffs' allegations.

3. **Heidi Bussey**  
c/o Rogers & Cover, PLLC  
705 Second Avenue, Suite 1500  
Seattle, WA 98104  
(206) 621-8525

Andrews & Thornton  
4701 Von Karman Ave., Suite 300  
Newport Beach, CA 92660  
(949) 748-1000

Watts Law Firm LLP  
811 Barton Springs Road # 725  
Austin, TX 78704  
(888) 889-2887

Mrs. Bussey is Plaintiff H.B.'s mother. She is likely to have discoverable information concerning Plaintiffs' allegations.

4. **Philip Bussey**  
Gordon Tilden Thomas & Cordell LLP  
600 University Street, Suite 2915  
Seattle, WA 98101  
(206) 467-6477

Mr. Bussey is Plaintiff H.B.'s grandfather. He is likely to have discoverable information concerning Plaintiffs' allegations.

5. **Cathy Bussey**  
Gordon Tilden Thomas & Cordell LLP  
600 University Street, Suite 2915  
Seattle, WA 98101  
(206) 467-6477

Mrs. Bussey is Plaintiff H.B.'s grandmother. She is likely to have discoverable information concerning Plaintiffs' allegations.

6. **Paydan Bussey**  
Floyd | Pflueger, Kearns, Nedderman & Gress, P.S.  
3101 Western Ave., Suite 400  
Seattle, WA 98121

1 (206) 441-4455

2 Mr. Bussey is Plaintiff H.B.'s uncle. He is likely to have discoverable information  
3 concerning Plaintiffs' allegations.  
4

5  
6  
7 7. **Thayne Lyman**  
8 c/o Perkins Coie LLP  
9 1301 Second Avenue, Suite 4200  
10 Seattle, WA 98101-3804  
11 (206) 359-8000

12 Mr. Lyman is a former lay bishop in the Church's Duthie Hill Ward. He may have  
13 discoverable information regarding Plaintiffs' allegations. He lives in Arizona. He may be  
14 contacted through his counsel.  
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17  
18 The foregoing represents the witnesses that the Church and Mr. Lyman currently believe  
19 may have knowledge and/or information that the Church and Mr. Lyman may use to support their  
20 claims or defenses. The Church and Mr. Lyman reserve the right to identify additional information  
21 and/or additional individuals from whom they subsequently determine are likely to have  
22 discoverable information that the Church and Mr. Lyman may use to support their claims or  
23 defenses.  
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30  
31 **B. Documents (Rule 26(a)(1)(A)(ii))**

32 The Church and Mr. Lyman identify the following categories of documents, electronically  
33 stored information, and tangible things in their possession, custody, or control that may be used to  
34 support the Church and Mr. Lyman's claims or defenses, with the exception of documents that  
35 would be used solely for impeachment.  
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- 40  
41 1. 2010 General Handbook of Instructions, published by The Church of Jesus Christ  
42 of Latter-day Saints  
43  
44 2. 2019 General Handbook of Instructions Book 2, published by The Church of Jesus  
45 Christ of Latter-day Saints  
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47 3. 2020 General Handbook of Instructions, published by The Church of Jesus Christ  
48 of Latter-day Saints  
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- 1 4. Church conference materials, articles, trainings, documents, and manuals regarding
- 2 abuse and the treatment of children, published by The Church of Jesus Christ of
- 3 Latter-day Saints during the period 2012-2021
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- 7 5. Membership Record of Plaintiff H.B.
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- 9 6. Membership Record of Brandon Bussey
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- 11 7. Membership Record of Heidi Bussey
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- 13 8. Membership Record of Philip Bussey
- 14
- 15 9. Membership Record of Cathy Bussey
- 16
- 17 10. Membership Record of Thayne Lyman
- 18
- 19 11. Membership Record of Paydan Bussey
- 20
- 21 12. Leadership summary of Philip Bussey
- 22
- 23 13. <https://www.churchofjesuschrist.org/study/life-help/abuse?lang=eng>
- 24
- 25 14. [https://www.churchofjesuschrist.org/callings/safety/protecting-children-and-](https://www.churchofjesuschrist.org/callings/safety/protecting-children-and-youth?lang=eng)
- 26 [youth?lang=eng](https://www.churchofjesuschrist.org/callings/safety/protecting-children-and-youth?lang=eng)
- 27
- 28
- 29 15. <https://www.churchofjesuschrist.org/study/manual/general-handbook?lang=eng>
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31 The Church and Mr. Lyman reserve the right to identify additional documents, electronically  
32 stored information, and tangible things that they may use to support their claims or defenses.

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34 **C. Damages (Rule 26(a)(1)(a)(iii))**

35  
36 The Church and Mr. Lyman are not seeking damages at this time. The Church and Mr.  
37  
38 Lyman reserve the right to supplement this disclosure as the action proceeds.

39  
40 **D. Insurance (Rule 26(a)(1)(a)(iv))**

41  
42 The Church and Mr. Lyman are not currently aware of any insurance agreements under  
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44 which any person carrying on an insurance business may be liable to satisfy part or all of a  
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1 judgment which may be entered in the action or to indemnify or reimburse for payments made to  
2 satisfy the judgment.  
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4  
5 DATED this 16th day of June, 2025.  
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7

8 **PERKINS COIE LLP**

9  
10  
11 By:   
12 \_\_\_\_\_  
13 Harry H. Schneider, Jr., Bar No. 9404  
14 Meeghan Dooley, Bar No. 61735  
15 Perkins Coie LLP  
16 1301 Second Avenue, Suite 4200  
17 Seattle, Washington 98101-3804  
18 Telephone: +1.206.359.8000  
19 Facsimile: +1.206.359.9000  
20 HSchneider@perkinscoie.com  
21 MDooley@perkinscoie.com

22 *Attorneys for Defendants The Church of Jesus*  
23 *Christ of Latter-day Saints and Thayne Lyman*  
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**CERTIFICATE OF SERVICE**

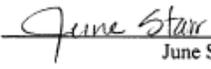
I certify under penalty of perjury that on June 16, 2025, I caused the following attorneys of record to be served the foregoing DEFENDANTS THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS AND THAYNE LYMAN’S INITIAL DISCLOSURE STATEMENT by the method(s) indicated:

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                            |
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| <p>James S. Rogers<br/>                 Heather M. Cover<br/>                 ROGERS &amp; COVER, PLLC<br/>                 705 Second Avenue, Suite 1500<br/>                 Seattle, WA 98104<br/>                 E-mail: <a href="mailto:jsr@jsrogerslaw.com">jsr@jsrogerslaw.com</a><br/>                 E-mail: <a href="mailto:heather@jsrogerslaw.com">heather@jsrogerslaw.com</a></p> <p>Kimberly DeGonia<br/>                 Ryan McIntosh<br/>                 Brittany Emsais<br/>                 David Kao<br/>                 ANDREWS &amp; THORNTON<br/>                 4701 Von Karman Ave., Suite 300<br/>                 Newport Beach, CA 92660<br/>                 E-mail: <a href="mailto:kdegonia@andrewsthornton.com">kdegonia@andrewsthornton.com</a><br/>                 E-mail: <a href="mailto:rmcintosh@andrewsthornton.com">rmcintosh@andrewsthornton.com</a><br/>                 E-mail: <a href="mailto:bemsais@andrewsthornton.com">bemsais@andrewsthornton.com</a><br/>                 E-mail: <a href="mailto:dkao@andrewsthornton.com">dkao@andrewsthornton.com</a></p> <p>Damon Singleton<br/>                 WATTS LAW FIRM LLP<br/>                 811 Barton Springs Road # 725<br/>                 Austin, TX 78704<br/>                 E-mail: <a href="mailto:damon@wattslp.com">damon@wattslp.com</a></p> <p><i>Attorneys for Plaintiffs</i></p> | <p> <input type="checkbox"/> Via hand delivery<br/> <input type="checkbox"/> Via U.S. Mail, 1st Class, Postage Prepaid<br/> <input type="checkbox"/> Via Overnight Delivery<br/> <input type="checkbox"/> Via Facsimile<br/> <input checked="" type="checkbox"/> Via Email<br/> <input type="checkbox"/> Other: _____                 </p> |
| <p>Francis S. Floyd<br/>                 Danielle P. Smith<br/>                 FLOYD   PFLUEGER, KEARNS,<br/>                 NEDDERMAN &amp; GRESS, P.S.<br/>                 3101 Western Ave., Suite 400<br/>                 Seattle, WA 98121<br/>                 E-mail: <a href="mailto:ffloyd@nwtrialattorneys.com">ffloyd@nwtrialattorneys.com</a><br/>                 E-mail: <a href="mailto:dsmith@nwtrialattorneys.com">dsmith@nwtrialattorneys.com</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p> <input type="checkbox"/> Via hand delivery<br/> <input type="checkbox"/> Via U.S. Mail, 1st Class, Postage Prepaid<br/> <input type="checkbox"/> Via Overnight Delivery<br/> <input type="checkbox"/> Via Facsimile<br/> <input checked="" type="checkbox"/> Via Email<br/> <input type="checkbox"/> Other: _____                 </p> |

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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><i>Attorneys for Defendant Paydan Bussey</i></p>                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                 |
| <p>Michael Rosenberger<br/>Katherine S. Wan<br/>GORDON TILDEN THOMAS &amp; CORDELL<br/>LLP<br/>600 University Street, Suite 2915<br/>Seattle, WA 98101<br/>E-mail: <a href="mailto:mrosenberger@gordontilden.com">mrosenberger@gordontilden.com</a><br/>E-mail: <a href="mailto:kwang@gordontilden.com">kwang@gordontilden.com</a></p> <p><i>Attorneys for Defendants Philip and Cathy<br/>Bussey</i></p> | <p>___ Via hand delivery<br/>___ Via U.S. Mail, 1st Class, Postage Prepaid<br/>___ Via Overnight Delivery<br/>___ Via Facsimile<br/><u>X</u> Via Email<br/>___ Other: _____</p> |

DATED this 16th day of June, 2025.

  
June Starr

# **EXHIBIT 7**

The Honorable Thomas S. Zilly

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

BRANDON BUSSEY and HEIDI BUSSEY,  
individually and as guardians of minor, H.B.,

Plaintiffs,

vs.

THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, PAYDAN  
BUSSEY, THAYNE LYMAN, PHILIP  
BUSSEY, CATHY BUSSEY, and DOES 1-  
100, INCLUSIVE,

Defendants.

**CASE NO. 2:25-cv-00197-TSZ**

**PLAINTIFFS' INITIAL  
DISCLOSURES PURSUANT TO  
FRCP 26(a)(1)**

COME NOW Plaintiffs, and by and through their undersigned counsel serve these Initial

Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) as follows:

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

Plaintiffs preliminarily identify the following individuals who are likely to have discoverable information and/or non-privileged personal knowledge that may be used to support their claims:

1. **Brandon Bussey and Heidi Bussey**  
c/o Rogers & Cover, PLLC  
705 2<sup>nd</sup> Avenue, Suite 1500  
Seattle, WA 98104  
(206) 621-8525

1 Andrews & Thornton  
4701 Von Karman Ave., Suite 300  
2 Newport Beach, CA 92660  
(949) 748-1000

3  
4 Watts Law Firm  
811 Barton Springs Road, # 725  
Austin, TX 78704  
5 (888) 889-2887

6 Brandon and Heidi Bussey are Plaintiffs and the minor Plaintiff, H.B.'s father and  
7 mother. They will testify regarding matters at issue in this litigation, including but not limited  
8 to, damages, the effects of the sexual abuse on H.B. and his family, the claims contained in the  
9 First Amended Complaint, including facts pertaining to Defendants' liability.

10  
11 2. **Philip Bussey and Cathy Bussey**  
c/o Gordon Tilden Thomas & Cordell LLP  
600 University Street, Suite 2915  
Seattle, WA 98101  
(206) 467-6477

12 Philip and Cathy Bussey are Defendants in this matter. They are H.B.'s grandfather and  
13 grandmother. They likely have knowledge of matters related to: (1) the policies, procedures,  
14 and/or practices of The Church of Jesus Christ of Latter-Day Saints (hereinafter referred to as  
15 the "Church") regarding the reporting and handling of sexual abuse incidents involving its  
16 members, including the Helpline in question; (2) the Church's knowledge of the sexual abuse on  
17 H.B.; (3) the Church's and/or Defendant Thayne Lyman's knowledge of, and involvement in the  
18 sexual abuse of minors other than H.B. by Defendant Paydan Bussey; (4) communications  
19 between and/or among the Church, Philip Bussey, Cathy Bussey, Thyane Lyman, and/or other  
20 members of the Church regarding Paydan Bussey's sexual abuse of minors, including criminal  
21 cases filed against Paydan Bussey; (5) information, documents, and/or communications  
22 concerning the counseling and treatment Paydan Bussey received as a result of the sexual abuse  
23 incidents; and (6) all other facts and/or documents relating to the Church's and other defendants'  
liability.

3. Members of **Defendant The Church of Jesus Christ of Latter-Day Saints**, including, but not limited to, **Defendant Thayne Lyman** and the Area Seventies, General Authority Seventies, Quorum of the Twelve Apostles, bishops, bishopric counselors, high councilors, mission presidents, stake presidents, and/or stake presidency counselors of the Church.

c/o Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
(206) 359-8000

1 Defendant **Thayne Lyman** and other members of the Church (including **Brandon**  
2 **Winder, Mark Sanelli, Henry Eyring, Russell Nelson, Dallin Harris Oaks, Dieter F.**  
3 **Uchtdorf, and Jamie Vanhoose Steele**) likely have knowledge of matters related to: (1) the  
4 Church’s policies, procedures, and/or practices regarding the reporting and handling of sexual  
5 abuse incidents involving its members, including the Helpline in question; (2) the Church’s  
6 knowledge of the sexual abuse on H.B.; (3) the Church’s and/or Defendant Thayne Lyman’s  
7 knowledge of, and involvement in the sexual abuse of minors other than H.B. by Defendant  
8 Paydan Bussey; (4) communications between and/or among the Church, Philip Bussey, Cathy  
9 Bussey, Thyane Lyman, and/or other members of the Church regarding Paydan Bussey’s sexual  
10 abuse of minors, including criminal cases filed against Paydan Bussey; (5) information,  
11 documents, and/or communications concerning the counseling and treatment Paydan Bussey  
12 received as a result of the sexual abuse incidents; and (6) all other facts and/or documents relating  
13 to the Church’s and other defendants’ liability.

8 4. **Paydan Bussey**  
9 c/o Floyd | Pflueger, Kearns, Nedderman & Gress, P.S.  
10 3101 Western Ave., Suite 400  
11 Seattle, WA 98121  
12 (206) 441-4455

11 Paydan Bussey is a defendant in this matter. He likely has knowledge of matters related  
12 to: (1) his sexual abuse of H.B. and other minors, including investigations and criminal cases  
13 relating thereto; (2) the Church’s knowledge of, and involvement in his sexual abuse of H.B. and  
14 other minors; (3) his communications with Defendant Thayne Lyman and/or other members of  
15 the Church, Philip Bussey, and/or Cathy Bussey regarding his sexual abuse of minors, including  
16 criminal cases filed against him; (4) information, documents, and/or communications pertaining  
17 to the counseling and treatment he received as a result of his sexual abuse of H.B. and other  
18 minors; and (5) all other facts and/or documents relating to Defendants’ liability.

15 5. 2012 sexual abuse victims, including, but not limited to:

16 5.a. [REDACTED] (then 6 years old)  
17 and his mother, **Jamie Glennon**  
18 Addresses and telephone numbers to be supplemented

18 5.b. [REDACTED] (then 6 years old)  
19 and his mother, **Lynn Thomas**  
20 Addresses and telephone numbers to be supplemented

20 5.c. [REDACTED] (then 4 years old) and his mother, **Kathi G.**  
21 Address and telephone number to be supplemented

22 Upon information and belief, Defendant Paydan Bussey was investigated by the King  
23 County Sheriff’s Office in 2012 and charged with child molestation, among other offenses,  
involving members of the 2012 Klahanie Swim Team, including, but not limited to, Taven  
Gurren, Ellington Fruehling, and S.G. (currently minor).

6. 2024 sexual abuse victims, including, but not limited to:

**W.L. and R.L.** (then 6 years old) and their mother, **Ievgeniia Litus**  
Address and telephone number to be supplemented

Upon information and belief, Defendant Paydan Bussey was investigated by the King County Sheriff’s Office in 2024 and charged with rape of a child in the first degree, among other offenses, involving W.L. and R.L.

7. **L.H.**  
Address and telephone number to be supplemented

Upon information and belief, L.H. is Defendant Paydan Bussey’s cousin who was sexually abused by Paydan Bussey in the summer and December of 2012. Upon further information, Paydan Bussey failed to disclose this crime during the 2012 investigation period; however, the offense was revealed when he failed a polygraph test administered in February 2013.

8. **King County Sheriff’s Office**  
516 Third Avenue, Room W-116  
Seattle, WA 98104  
(206) 296-4155

Upon information and belief, the following officers and detectives were involved in the investigations of Defendant Paydan Bussey’s child molestation and child rape incidents in 2012 and in 2024:

- 2012 child molestation:
  - Casey Johnson
  - Santos (first name to be supplemented)
- 2024 child rape:
  - Amy Crawford
  - Jason Escobar
  - Alexis Pearlstein
  - Andrew Shears
  - Christopher Terry
  - Paul Thompson
  - William Weisberg
  - Shana Macleod (forensic interviewer)

9. **K. Knutson**  
King County Juvenile Court Services  
1211 East Alder Street  
Seattle, WA 98122

1 Upon information and belief, Mr. Knutson served as Defendant Paydan Bussey's  
2 probation officer in connection with Paydan Bussey's 2012 child molestation charge.

3 10. **Richard L. Packard, Ph.D.**  
4 Brain Health Northwest, LLC  
5 219 – 1<sup>st</sup> Ave. S., Suite 310  
6 Seattle, WA 98104  
7 (206) 456-5454

8 Upon information and belief, Dr. Packard is a psychologist and certified sex offender  
9 treatment provider who assisted Defendants in successfully sealing Paydan Bussey's criminal  
10 records in Washington and terminating his sex offender registration in 2017.

11 11. **Timothy Kahn, M.S.W.**  
12 11747 N.E. 1<sup>st</sup> Street, Suite 330  
13 Bellevue, WA 98005  
14 (425) 462-9333

15 Upon information and belief, Mr. Kahn was Paydan Bussey's mental health counselor  
16 and sex offender treatment provider in 2012.

17 12. **Dore E. Frances, Ph.D.**  
18 Horizon Family Solutions, LLC  
19 4450 Arapahoe Ave., Suite 100  
20 Boulder, CO 80303  
21 (303) 448-8803

22 Upon information and belief, Dr. Frances was Defendant Paydan Bussey's  
23 educational/therapeutic consultant and assisted with Paydan Bussey's admission to Wasatch  
Academy in Utah in 2016.

13. **Kevin O'Keefe, Ph.D.**  
Santa Clara, UT

Upon information and belief, Dr. O'Keefe performed psychological testing on Defendant  
Paydan Bussey for Dr. Frances in 2016.

14. **J. Trevor Allen, CMHC**  
Spring City, UT

Upon information and belief, Mr. Allen was Defendant Paydan Bussey's therapist/mental  
counselor during the time Paydan Bussey attended Wasatch Academy in Utah.

15. **William Meyer, MSW**  
Chicago, IL

1 Upon information and belief, Dr. Meyer is a psychologist who conducted a forensic  
2 evaluation for Defendant Paydan Bussey's disposition, including a risk assessment and  
psychosocial evaluation, in connection with the 2012 child molestation charge.

3 16. **Rockwood** (first name to be supplemented)  
4 **Birdseye Boy Ranch**  
Fairview, UT

5 Upon information, Birdseye Boy Ranch is a residential treatment center that provides  
6 services to youth struggling with mental health or educational challenges. Upon further  
information, Mr. Rockwood provided treatment to Defendant Paydan Bussey following his  
admission to the facility in March 2013.

7 17. **Brightmont Academy**  
8 7345 164<sup>th</sup> Avenue NE, Suite I-135  
9 Redmond, WA 98052  
(425) 373-0800

10 Upon information and belief, Defendant Paydan Bussey attended Brightmont Academy  
11 in Bellevue, where the principal and teachers were notified of the 2012 child molestation charge.

12 18. **Ty Kennedy**  
13 **Erin Nester**  
14 **Tresa Cook**  
15 **Kara Loftin**  
Wasatch Academy  
120 South 100 West  
Mt. Pleasant, UT 84647  
(435) 462-1400

16 Upon information, Wasatch Academy is a college preparatory boarding school. Upon  
17 further information, Defendant Paydan Bussey attended the school in 2016 and 2017. Mr.  
Kennedy (Dean of Students/Dean of Residential Life), Mr. Nester (Director of Domestic  
18 Admission), Ms. Cook and Ms. Loftin (academic advisors) are believed to have submitted  
19 materials to the King County Superior Court in support of efforts by Defendants to seal Paydan  
Bussey's Washington criminal records relating to the 2012 child molestation charge and to  
terminate his sex offender registration in 2017.

20 19. **Costco Wholesale**, including, but not limited to,  
21 Defendant Paydan Bussey's supervisors and co-workers  
22 7725 188<sup>th</sup> Ave. NE  
Redmond, WA 98052  
(425) 406-5382

23 Upon information, Defendant Paydan Bussey was employed at the Tire Center of the  
Costco store located in Redmond, Washington, at the time of the 2024 child rape charge.

1  
2                   20.     **Cosette Rae (aka Cosette Simmons)**  
                          Bellevue, WA

3                   Upon information, Ms. Rae was Defendant Cathy Bussey’s therapist and is likely to have  
4 information concerning Defendant Paydan Bussey’s sexual abuse of minors and related criminal  
5 charges. She is believed to have been one of the individuals who regularly received emails from  
6 Defendant Cathy Bussey regarding matters related to Defendant Paydan Bussey’s 2012 criminal  
7 cases.

8                   21.     **Ashley White**  
                          Washington

9                   Ms. White is the mother of H.B.’s friend who, in or about September 2024, contacted  
10 H.B.’s parents regarding Defendant Paydan Bussey’s solicitation of inappropriate things toward  
11 her son. As a result, H.B.’s parents discovered Paydan Bussey’s sexual abuse of their son, H.B.  
12 and immediately contacted the Provo Police Department in Utah. Upon information and belief,  
13 Paydan Bussey also attempted to groom Ms. White’s son. The resulting criminal proceeding is  
14 currently pending in the Fourth Judicial District – Provo District Court in Utah under Case No.  
15 241403253. The charges against Defendant Paydan Bussey include Sodomy on a Child and  
16 Aggravated Sexual Abuse of a Child.

17                   22.     **Provo Police Department**  
                          445 W. Center St.  
                          Provo, UT 84601  
                          (801) 852-6210

18                   Upon information, Officer **Scott Nielsen** and other officers from the Provo Police  
19 Department investigated the sexual abuse on H.B. by Defendant Paydan Bussey when H.B.’s  
20 parents contacted the Police Department in or about September 2024.

21                   23.     **Karson and Dawson**  
                          Last names, addresses, and telephone numbers to be supplemented

22                   Upon information, Defendant Paydan Bussey was in a relationship with Karson and  
23 Dawson when he was attending his school in Utah.

                          24.     **Kyle Parry**  
                          Sixth Judicial District  
                          Sanpete County Courthouse  
                          160 North Main  
                          P.O. Box 219  
                          Manti, UT 84642  
                          (435) 835-2121

1 Upon information, Mr. Parry served as Defendant Paydan Bussey’s Utah probation  
2 officer when Paydan Bussey was attending Wasatch Academy in 2016, during the pendency of  
his Washington criminal case.

3 25. Family Members, Friends, and “Support Team”

4 The following individuals<sup>1</sup> are family members, friends, and/or fellow Church members  
5 of the Plaintiffs and/or Defendants Philip Bussey, Cathy Bussey, and/or Paydan Bussey. Upon  
6 information and belief, Defendants Philip Bussey and Cathy Bussey regularly shared information  
7 with many of these individuals concerning the charges against Defendant Paydan Bussey and  
the related criminal proceedings from 2012 and 2017, during which Defendants successfully  
sealed the criminal records and terminated his sex offender registration:

- Baird, Dirk
- Bennett, Guy, St. George, UT
- Binning, Kent
- Bishop, Steve
- Brinkerhoff, Mary
- Burnham, Jeff
- Calderon, Maricel
- Capener, Anders, Walnut Creek, CA
- Capener, Bailey
- Capener, Kelen
- Capener, Merit, Rexburg, ID
- Capener, Mike, Concord, CA
- Capener, Tee, Concord, CA
- Christenson, Anne, Bellevue, WA (Defendant Paydan Bussey’s grandmother)
- Dance, Alan
- Daniels-Brown, Stephen
- Duce, David W., Everett, WA
- Fairbanks, Thomas, Pullman, WA
- Gehrett, Kristen
- Ghoreishi, Etel
- Hadfield, Glen
- Hadfield, Sherrol, Sandy, UT
- Hafen, Alyssa
- Hafen, Brad
- Hafen, Carolyn, Walla Walla, WA (Cathy Bussey’s mother)
- Hafen, David, Walla Walla, WA (Cathy Bussey’s father)
- Hafen, Deirdre Dee Dee
- Hafen, Floyd, College Place, WA
- Hafen, Jacob

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<sup>1</sup> These individuals are listed in alphabetical order, regardless of their relationships.

1 Hafen, Kim  
Hafen, Ky, West Richland, WA  
2 Hafen, Lura, Walla Walla, WA  
Hafen, Nellie  
3 Hafen, Nikol  
Hafen, Rob, Walla Walla, WA  
4 Hafen, Tambri  
Hafen, Trent  
5 Hafen, Zach, College Place, WA  
Hamilton, Kim, Vineyard, UT  
6 Hancock, Leslie, Sammamish, WA (Paydan Bussey's Sunday class  
teacher)  
7 Hansen, Lori  
Hartman, Rick  
8 Heather, Ciscon  
Hudner, Brett  
9 Hudner, Janne, Vienna, VA  
Hudner, Mary  
10 Jones, Amanda (Phil and Cathy Bussey's daughter)  
Jones, Christopher (Phil and Cathy Bussey's son-in-law)  
11 Jones, Debbie  
Jones, Jannelle  
12 Jones, Kristy  
Jorgensen, Kristen, Highland Park, IL  
13 Latimer, Matt  
Larsen, Brooks, Nashville, TN  
14 Lee, James  
Kearon, Patrick  
15 King, Mike, WA  
King, Debbie, WA  
16 Krueger, Carr  
Krueger, Lori  
17 Mackay, Greg  
Marcusen, Mackenzie  
18 McCombs, Ron  
McCombs, Troy  
19 McMullin, Phil  
Merrell, Bruce  
20 Mullen, Donald  
Nelson, Kim  
21 Nicholes, Aaron  
Nielsen, Katie  
22 Oldham, Anita  
Oldham, Troy, North Logan, UT  
23 Oliver, Julie  
Olson, Thomas

- 1 Palmer, Brent
- Pugh, Don
- 2 Pugmire, Kenneth
- Ralph, Kim
- 3 Ralph, Mackenzie
- Ralph, Mike
- 4 Rodarte, Frank, Auburn, WA
- Rodriguez, Tim
- 5 Romas, Shirley
- Sass, Steve
- 6 Shoeman, Evie
- Stevenson, Larry
- 7 Taggart, Bruce, American Fork, UT
- Tanner, Robert, Issaquah, WA
- 8 Taylor, Madie
- Thorpe, Lucy, Kaysville, UT
- 9 Turner, Mark
- Wagstaff, Frank E.
- 10 Wallace, Marni, Fall City, WA
- Weaver, Brett
- 11 Webb, Dennis
- Webb, Randy
- 12 Webster, Russell
- Wilkey, David
- 13 Wilkey, Lorelee

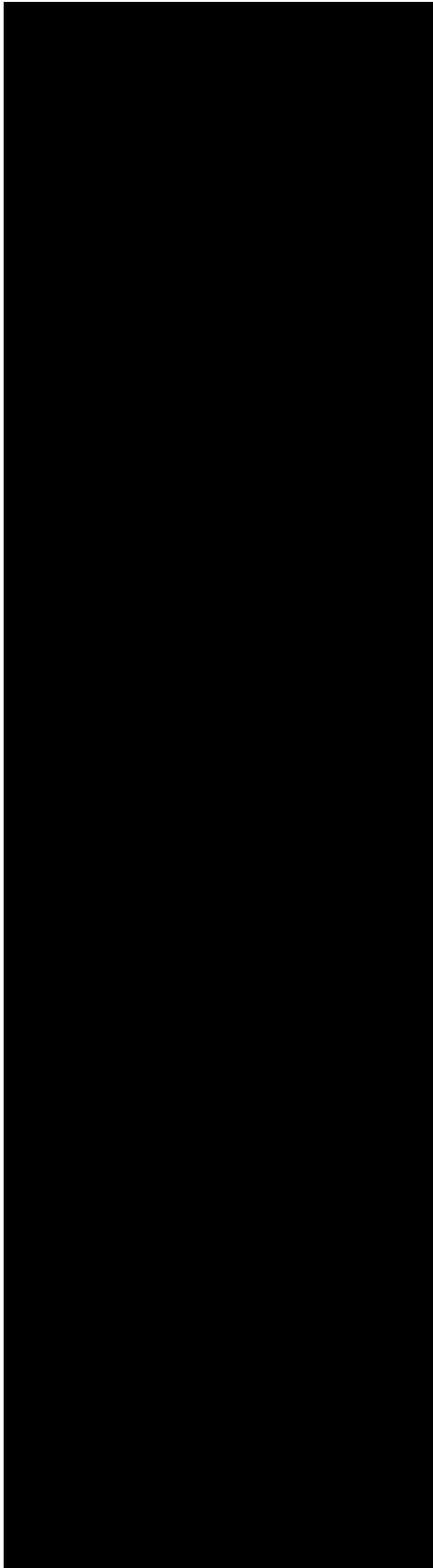
14 The addresses and telephone numbers of the above-listed individuals may be  
15 supplemented.

16 26. Defendant Paydan Bussey’s Swim Teams in 2012

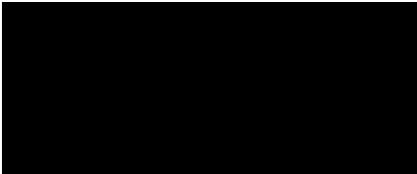
17 Klahanie Swim Team

- 18 [REDACTED] 102<sup>nd</sup> Pl. SE, Bellevue, WA
- [REDACTED] N. State St., Apt. # 205, Bellingham, WA
- 19 [REDACTED] n, UT
- [REDACTED] h Pl. SE, Sammamish, WA
- [REDACTED] 4<sup>th</sup> Pl. SE, Sammamish, WA
- [REDACTED] l., Sammamish, WA
- 20 [REDACTED] Northwest Ave., Apt. 241, Bellingham, WA
- [REDACTED] ngton Ave., Apt. #207, Fayetteville, AR
- 21 [REDACTED] Monrie Ln., Apt. # 208, Charlottesville, VA
- [REDACTED] ane, Carrboro, NC
- 22 [REDACTED] E 42<sup>nd</sup> St., Sammamish, WA
- [REDACTED] 40<sup>th</sup> St., Sammamish, WA
- 23 [REDACTED] 00 SE 40<sup>th</sup> Dr., Sammamish, WA
- [REDACTED] 3956 262<sup>nd</sup> Ave. SE, Sammamish, WA

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, Sammamish, WA  
6<sup>th</sup> St., Clyde Hill, WA  
. NE, Apt. # 202, Kirkland, WA  
Ave. SE, Bellevue, WA  
268<sup>th</sup> Pl. SE, Sammamish, WA  
0<sup>th</sup> Ave. NE, Bellevue, WA  
Sammamish, WA  
r. SW, Seattle, WA 98116  
East, Seattle, WA  
E 31<sup>st</sup> St., Bellevue, WA  
arnes Rd., Apt. # 239, Portland, OR  
ay NE, Apt. # 335, Bellevue, WA  
Bellevue, WA  
E, Bellevue, WA  
gard Dr., Houston, TX  
d St., Apt. #2, Tuscaloosa, AL  
t., Clyde Hill, WA  
e St., Seattle, WA  
gden, UT  
SE, Bellevue, WA  
ammamish, WA  
l. SE, Sammamish, WA  
, Unit C, Seattle, WA  
St., Sammamish, WA  
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ham Rd., Sarasota Springs, NY  
, Bellevue, WA  
e St., Bozeman, MT 59718  
ve. NE, Medina, WA  
ve. SE, Sammamish, WA  
E, Shoreline, WA  
Ave. SE, Bellevue, WA  
E 27<sup>th</sup> St., Sammamish, WA  
t., Bellevue, WA  
, Bellevue, WA  
pt. #224, Chandler, AZ  
Way SE, Renton, WA  
t., Apt. # 4, Seattle, WA  
St., Sammamish, WA  
verlake Dr. SE, Sammamish, WA



. SE, Bellevue, WA  
Pl. SE, Sammamish, WA 98029  
09<sup>th</sup> Ave. SE, Bellevue, WA  
4027 262<sup>nd</sup> Ave. SE, Sammamish, WA

Pine Lake Club Swim Team (12/2012)  
**Kelsey Mark**, coach  
Columbia Athletic Clubs  
2930 228th Ave. SE  
Sammamish, WA 98075  
(425) 313-0123

II. DOCUMENTS THAT MAY BE USED

Plaintiffs are in possession, custody, and control of the following documents that may be used to support their claims:

- 1. Emails from Defendant Philip Bussey and/or Cathy Bussey.
- 2. *State of Washington v. Paydan Bussey*, King County Superior Court records filed in Case No. 14-8-01592-7.
- 3. Washington King County Sheriff’s Office’s file relating to its sexual abuse investigation of Paydan Bussey in 2024 (Case # C24002867).
- 4. Information filed in *State of Utah v. Paydan Georgy Bussey*, Utah Fourth Judicial District Court Case No. 241403253.

III. COMPUTATION OF DAMAGES

Plaintiffs have not determined all damages at this time. Plaintiffs will supplement their damage claims as discovery proceeds in this matter, and in accordance with the Court’s pretrial schedules. Please see also the Prayer for Relief asserted in Plaintiffs’ Second Amended Complaint for Damages.

///  
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1 IV. INSURANCE COVERAGE

2 Plaintiffs have no information on Defendants' insurance agreement(s) under which  
3 coverage for liability may be available at this time.

4 DATED this 16<sup>th</sup> day of June, 2025.

5 ROGERS & COVER, PLLC

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7 \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2025, I served the foregoing with the attached documents **via email** upon the following counsel:

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Pro Hac Vice Counsel for Plaintiffs</b><br/> <b>ANDREWS &amp; THORNTON</b><br/> Kimberly DeGonia, CA Bar # 256989<br/> Ryan McIntosh, CA Bar # 328042<br/> Brittany Emsais, CA Bar # 352332<br/> David Kao, CA Bar # 261117<br/> 4701 Von Karman Ave., Suite 300<br/> Newport Beach, CA 92660<br/> Telephone: (949) 748-1000<br/> E-mail: <a href="mailto:kdegonia@andrewsthornton.com">kdegonia@andrewsthornton.com</a><br/> E-mail: <a href="mailto:rmcintosh@andrewsthornton.com">rmcintosh@andrewsthornton.com</a><br/> E-mail: <a href="mailto:bemsais@andrewsthornton.com">bemsais@andrewsthornton.com</a><br/> E-mail: <a href="mailto:dkao@andrewsthornton.com">dkao@andrewsthornton.com</a></p> <p><b>WATTS LAW FIRM</b><br/> Damon Singleton, AR Bar # 2010132<br/> 811 Barton Springs Road, # 725<br/> Austin, TX 78704<br/> Telephone: (888) 889-2887<br/> E-mail: <a href="mailto:damon@wattsllp.com">damon@wattsllp.com</a></p> | <p><b>Attorneys for Defendants The Church of Jesus Chris of Latter-Day Saints and Thayne Lyman</b><br/> Harry H. Schneider, Jr., WSBA #9404<br/> Meeghan Dooley, WSBA #61735<br/> <b>PERKINS COIE LLP</b><br/> 1201 Third Avenue, Suite 4900<br/> Seattle, WA 98101-3099<br/> Telephone: (206) 359-8000<br/> E-mail: <a href="mailto:HSchneider@perkinscoie.com">HSchneider@perkinscoie.com</a><br/> E-mail: <a href="mailto:MDooley@perkinscoie.com">MDooley@perkinscoie.com</a></p> |
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DATED this 16<sup>th</sup> day of June, 2025 in Seattle, Washington.

ROGERS & COVER, PLLC

*Leehwa McFadden*

Leehwa McFadden, Paralegal