

Hawaii State Bar Association
Young Lawyers Division
Presents
The Hawaii High School
Mock Trial Competition

**2023 Mock Trial
Criminal Case¹**

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

STATE OF HAWAII,

Prosecution,

vs.

JADEN SINCLAIR,

Defendant.

Case No. 1CPC-22-0001399

NOTE: All characters, names, events, places, and circumstances in this Mock Trial case are fictitious.

Each witness can be portrayed by a student of any gender. Instances where a witness is referred to as only “him” or “her” or only “he” or “she” are inadvertent

¹ With much appreciation to Pennsylvania Bar Association, Young Lawyers Division for permission to adapt their problem and much thanks to the authors of this Problem, Jon Grode and Jane Meyer. Thank you also to the HSBA Young Lawyer’s Division and the Mock Trial Subcommittee for their countless hours and dedication revising this Case for competition.

STATEMENT OF FACTS

On May 21, 2022, Kiran Taufique, then a senior at the Ike School, was kidnapped and held for ransom. In the months leading up to the kidnapping, Kiran had become intensely involved with an after-school club called LEX, which stood for Learning Eternally Extolled. The club was funded by the defendant, Jaden Sinclair.

On the night of the kidnapping, a number of LEX club seniors, including Kiran, met at Jaden Sinclair's home for a party. Kiran had told her/his parent, Cleo Taufique, that s/he was going to the Ike School prom and then to an after-prom party at the home of fellow senior, Morgan Kincaid. Cleo Taufique, who was worried that alcohol would be served at Morgan Kincaid's, drove by that home near midnight only to find no one there. S/he then drove to Jaden Sinclair's home and discovered the party was being held there. Cleo observed the party for an extended period of time through the front window. Cleo, who was very suspicious of Jaden Sinclair's influence over Kiran and who considered LEX to be a cult, claims s/he saw the club members taking part in a strange ritual or ceremony of some sort, led by Sinclair. Shortly after the ritual was over, Cleo saw most of the LEX members leave and assumed Kiran would soon follow. Cleo decided to leave Sinclair's house and wait for Kiran at their home. At some point thereafter, Kiran was tied up, gagged and placed in the trunk of Jaden Sinclair's car, which was parked in a garage on the property. It was later determined that Kiran had been drugged with GHB.

When Cleo awoke the next morning, s/he discovered that Kiran had not returned home and called the police. Shae Reynolds, the lead detective in the case, responded to the call. Cleo apprised Detective Reynolds about LEX and that Kiran had last been seen at Jaden Sinclair's. Detective Reynolds, who had previously investigated Sinclair in 2014 on embezzlement and extortion charges (resulting in a conviction and prison term for Sinclair), discovered that someone had sent an anonymous email to Kiran's school email address, demanding \$250,000 for Kiran's safe return. Detective Reynolds proceeded to Sinclair's home and interviewed Sinclair, who admitted that s/he had held a party in her/his home the night before but assumed Kiran had gotten home safely.

As Detective Reynolds was leaving Sinclair's property, s/he heard a faint cry from Sinclair's garage and shortly thereafter discovered Kiran in the trunk, unhurt. A forensics investigation revealed, among other things, trace amounts of GHB powder in Sinclair's den carpet and that the ransom email had been sent from Sinclair's cell phone, though the cell phone was never recovered. The investigation also revealed that Sinclair was having financial difficulties.

Kiran, who had little recollection of the events of May 20 and 21, 2022, vehemently denies that Sinclair was capable of kidnapping her/him and refused to testify for the prosecution, even though pressured to do so by Detective Reynolds. Kiran suggests Morgan Kincaid might have been the perpetrator as she was jealous over Kiran's relationship with Sinclair. Morgan is currently out of the country, having taken a planned backpacking tour of Europe following graduation.

Defendant Jaden Sinclair maintains that s/he spent most of the evening in the den watching TV

until s/he fell asleep. S/he recalled that Morgan Kincaid was the last person to leave her/his home at around 2 a.m. Sinclair denies that LEX is a cult and defends LEX as contributing to the community.

At trial, Detective Shae Reynolds and Cleo Taufique will testify for the prosecution. Kiran Taufique and the defendant, Jaden Sinclair, will testify for the defense. The defendant has been charged with kidnapping.

BAIL

\$ 100,000

Honorable Judge

District Judge

HPD NO. 22093106-001

JDPC. NO. 22093106-001

District Court of the First Circuit

STATE OF HAWAII

COMPLAINT

Detective Shae Reynolds, first being duly sworn says:

On or about May 21, 2022, in the City and County of Honolulu, State of Hawai'i, JADEN SINCLAIR did intentionally or knowingly restrain Kiran Taufique, with intent to hold Kiran Taufique for ransom or reward, and/or inflict bodily injury upon him/her, and/or or with intent to terrorize him/her, thereby committing the offense of Kidnapping, in violation of Section 707-720(1)(a), 707-720(1)(d) and/or 707-720(1)(e) of the Hawai'i Revised Statutes. Pursuant to Section 707-700 of the Hawai'i Revised Statutes, "restrain" means to restrict a person's movement in such a manner as to interfere substantially with the person's liberty by means of force, threat, or deception. Pursuant to Section 707-700 of the Hawai'i Revised Statutes, "bodily injury" means physical pain, illness, or any impairment of physical condition.

Subscribed and sworn to before me this 24th day

of May, A.D. 2022

Detective Shae Reynolds

Address: C/O 801 S. Beretania Street

Deputy Prosecuting Attorney

City and County of Honolulu

WARRANT OF ARREST

The State of Hawaii:

To the Sheriff of the State of Hawaii, or his Deputy; or the Chief of the Honolulu Police Department, or his Deputy; or any Police Officer in the First Circuit, State of Hawaii:

YOU ARE HEREBY COMMANDED on the information of _____

verified by oath, forthwith to arrest and take the body _____ of _____

accused of violating _____
as in the above complaint more fully set forth, if _____ he _____ can be found, and forthwith have _____
body before said District Court Judge of the First Circuit, at his Court Room in said First Circuit, or at 8:30 a.m. of the next secular day following
the date of service.

And you are also commanded, having arrest the said _____
to summon as witness of accusation _____

Witness the hand of the said Judge this _____ day of _____

Unless authorized in writing, this warrant may not

Be executed between the hours of 10:00 p.m. and

7:00 a.m on premises not open to the public.

Judge of the Above Entitled Court

State of Hawaii

Executed the within warrant on the person of _____

named therein, this _____ day of _____, A.D. _____

Police Officer

District Court of the First Circuit

State of Hawaii

THE STATE OF HAWAII

VS.

WARRANT OF ARREST

RECEIVED AND FILED

_____, A.D. _____

at _____ M.

Clerk, District Court of the First Circuit

Prosecuting Attorney
City and County of Honolulu
1060 Richards Street
Honolulu, HI 96813
Ph: (808) 768-7400
FAX: (808) 768-6546
Email: honpros-ccd2@honolulu.gov
Attorneys for State of Hawai‘i

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAI‘I

STATE OF HAWAI‘I

v.

JADEN SINCLAIR,

Defendant.

CASE NO. 1CPC-22-0001399

KIDNAPPING

(§707-720(1)(d) and/or 707-720(1)(e) HRS)

INDICTMENT

INDICTMENT

The Grand Jury charges:

On or about May 21, 2022, in the City and County of Honolulu, State of Hawai‘i, JADEN SINCLAIR did intentionally or knowingly restrain Kiran Taufique, with intent to hold Kiran Taufique for ransom or reward, and/or inflict bodily injury upon him, and/or or with intent to terrorize him, thereby committing the offense of Kidnapping, in violation of Section 707-720(1)(a), 707-720(1)(d) and/or 707-720(1)(e) of the Hawai‘i Revised Statutes. Pursuant to Section 707-700 of the Hawai‘i Revised Statutes, “restrain” means to restrict a person’s movement in such a manner as to interfere substantially with the person’s liberty by means of force, threat, or deception. Pursuant to Section 707-700 of the Hawai‘i Revised Statutes, “bodily injury” means physical pain, illness, or any impairment of physical condition.

A True Bill found this day: May 24, 2022.

Attorney

Deputy Prosecuting Attorney
City and County of Honolulu

Foreperson

Foreperson of the Grand Jury

Prosecuting Attorney
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1060 Richards Street
Honolulu, HI 96813
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Email: honpros-ccd2@honolulu.gov
Attorneys for State of Hawai'i

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KIDNAPPING

(§707-720(1)(d) and/or 707-720(1)(e) HRS)

ARRAIGNMENT AND PLEA

ARRAIGNMENT AND PLEA

I, Jaden Sinclair, have been advised by the Deputy Prosecuting Attorney, City and County of Honolulu, State of Hawai'i that I am charged by indictment with the offense of Kidnapping, in violation of Section 707-720(1)(a), 707-720(1)(d) and/or 707-720(1)(e) of the Hawai'i Revised Statutes and I/my attorney has received a copy thereof.

I have been advised of my right to have an attorney represent me at all hearings and the trial of this charge.

I have been advised and fully understand that I/my lawyer have/has the right to request discovery or disclosure from the Prosecuting Attorney as provided by the Hawai'i Rules of Penal Procedure within ten (10) days of today's date.

I have been advised and I fully understand that I/my lawyer have/has the right to file with

the Court any pre-trial application for relief in the form of a pre-trial motion as provided by the Hawai'i Rules of Penal Procedure within thirty (30) days of today's arraignment date.

I hereby enter a plea of Not Guilty to the above charges and request a trial by Jury.

Trial is scheduled for the week of: February 13, 2023.

Dated at Honolulu, Hawai'i: June 1, 2022.

By /s/ JADEN SINCLAIR

Defendant

By /s/ ATTORNEY

Attorney for Defendant

By /s/ ATTORNEY

Deputy Prosecuting Attorney
City and County of Honolulu

Prosecuting Attorney
City and County of Honolulu
1060 Richards Street

Honolulu, HI 96813
Ph: (808) 768-7400
FAX: (808) 768-6546
Attorneys for State of Hawai'i

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KIDNAPPING

(§707-720(1)(a), 707-720(1)(d) and/or
707-720(1)(e) HRS)

EVIDENCE STIPULATIONS FOR
PURPOSES OF JURY TRIAL; ORDER

EVIDENCE STIPULATIONS FOR PURPOSES OF JURY TRIAL

IT IS HEREBY STIPULATED AND AGREED by and between the State of Hawai'i, through its Deputy Prosecuting Attorney, Defendant Jaden Sinclair, and Court-Appointed Counsel that the parties stipulate to the following into evidence:

1. All documents, signatures and exhibits, including pre-markings, included in the case materials are authentic and accurate in all respects; no objections to the authenticity of the documents or exhibits will be entertained. The parties reserve the right to dispute any legal or factual conclusions based on these items and to make objections other than to authenticity.
2. Jurisdiction, venue and chain of custody of the evidence are proper.

3. All statements made by witnesses and all physical evidence and exhibits were constitutionally obtained.

4. Exhibit 3 is a photo taken by police May 21, 2022 of the vehicle registered to Jaden Sinclair. It is the vehicle in which Kiran Taufique was found. It was dusted for fingerprints and a match for Jaden Sinclair was discovered as depicted in the photo enhancement.

5. Exhibit 5 is a photo taken by police May 21, 2022 of a portion of the first floor den carpet at 58 Lime Street, Honolulu, HI. The powder substance in the photo was collected May 21, 2022 and later tested positive for GHB.

6. Kiran Taufique waives any psychotherapist/patient privilege that might otherwise be asserted to Exhibit 6.

7. Exhibit 7 is a photo taken by police of an amulet obtained May 21, 2022 from Kiran Taufique's bedroom at 456 Kapua Lane, Honolulu, HI.

Dated at Honolulu, Hawai'i: January 4, 2023.

By /s/ JADEN SINCLAIR
Defendant

By /s/ ATTORNEY
Attorney for Defendant

By /s/ ATTORNEY
Deputy Prosecuting Attorney
City and County of Honolulu

APPROVED AND SO ORDERED:

Judge of the above-entitled court

APPLICABLE LAW

HAWAI‘I REVISED STATUTES

§707-720 Kidnapping.

- (1) A person commits the offense of kidnapping if the person intentionally or knowingly restrains another person with intent to:
 - (a) Hold that person for ransom or reward;
 - (b) Use that person as a shield or hostage;
 - (c) Facilitate the commission of a felony or flight thereafter;
 - (d) Inflict bodily injury upon that person or subject that person to a sexual offense;
 - (e) Terrorize that person or a third person;
 - (f) Interfere with the performance of any governmental or political function; or
 - (g) Unlawfully obtain the labor or services of that person, regardless of whether related to the collection of a debt.
- (2) Except as provided in subsection (3), kidnapping is a class A felony.
- (3) In a prosecution for kidnapping, it is a defense which reduces the offense to a class B felony that the defendant voluntarily released the victim, alive and not suffering from serious or substantial bodily injury, in a safe place prior to trial.

§706-659 Sentence of imprisonment for class A felony.

Notwithstanding part II; sections 706-605, 706-606, 706-606.5, 706-660.1, 706-661, and 706-662; and any other law to the contrary, a person who has been convicted of a class A felony, except class A felonies defined in chapter 712, part IV, or section 707-702, shall be sentenced to an indeterminate term of imprisonment of twenty years without the possibility of suspension of sentence or probation. The minimum length of imprisonment shall be determined by the Hawaii paroling authority in accordance with section 706-669. A person who has been convicted of a class A felony defined in chapter 712, part IV, or section 707-702, may be sentenced to an indeterminate term of imprisonment, except as provided for in section 706-660.1 relating to the use of firearms in certain felony offenses and section 706-606.5 relating to repeat offenders. When ordering such a sentence, the court shall impose the maximum length of imprisonment which shall be twenty years. The minimum length of imprisonment shall be determined by the Hawaii paroling authority in accordance with section 706-669.

LIST OF WITNESSES

The prosecution and defense must call each of their respective witnesses. The defendant is permitted to sit at counsel table. All witnesses can be played by either males or females.

For the State:

- **Cleo Taufique:** Parent of the victim, Kiran Taufique
- **Shae Reynolds:** Detective with the Honolulu Police Department

For the Defendant

- **Jaden Sinclair:** Defendant
- **Kiran Taufique:** Victim of kidnapping

STATEMENT OF CLEO TAUFIQUE

1 My name is Cleo Taufique and I'm Kiran's mother/father. I am 49 years old and reside at 456
2 Kapua Lane, Honolulu, HI. In 2014, my spouse, Sam, died when Kiran was 10
3 years old. Sam was killed when a drunk driver from a delivery company ran into her/him head
4 on. We were very fortunate to eventually win a big settlement from the delivery company, but
5 the lawsuit took years. I was forced to work a second job as a cashier at the local HMart to make
6 ends meet until the settlement came through. When the settlement came through, I quit
7 working, moved into a big home on Kapua Lane and focused all my energy on Kiran. All that
8 we had left was each other. I came to rely on Kiran as much as s/he relied on me. I'm still in
9 shock over the whole episode of Kiran's kidnapping and I pray every day that this nightmare will
10 end and I'll get my Kiran back. I know that s/he was only kidnapped for less than a day, but I
11 still feel like Kiran has never returned.

12

13 Of course, Sam's death really affected Kiran. Kiran didn't want to go out and play or socialize
14 and spent a lot of time alone reading school books, which really made me happy. Having had
15 no siblings, Kiran was comfortable being alone. After Sam died, I pushed Kiran extra hard to
16 succeed in school. After we received the settlement, I enrolled Kiran in the Ike School,
17 which is a top-notch private school. By design, I didn't really let Kiran socialize too much
18 throughout junior high or high school. My theory is that you must focus on academics because
19 it's the only way to protect yourself when life throws you a curveball. I always told Kiran that. I
20 felt this way before Sam died and I felt this way even more so after we were alone. Look at me:
21 I didn't do well in school and ended up at HMart.

22

23 All the recent problems started with what I thought, at the time, was one of the greatest things
24 that ever happened to Kiran and me. In January of her/his senior year, we learned that Kiran
25 was accepted early decision to the honors program at UH Manoa. It seemed that all our hard
26 work had paid off. It's funny how one of your dreams can quickly turn into a nightmare. Kiran
27 was ecstatic. But when we went out for a celebration dinner, Kiran was oddly quiet and began
28 to cry over dessert. Kiran confided to me that s/he was very anxious and scared about going off
29 to college. Kiran was worried that s/he wouldn't fit in and wouldn't make friends. I suggested
30 Kiran join a club at school to practice meeting people. Kiran loved the idea and eventually
31 joined this organization called LEX.

32

33 LEX was an acronym for Lessons Eternally Extolled. To this day, I don't understand what it was
34 about, but it turned out to be some semi-religious New Age cult. The club's cover was it would
35 promote learning outside the classroom. The LEX members took trips to alternative cultural
36 locations and landmarks. I know they visited the MET in New York, Monterey Bay in California
37 the Honolulu Museum of Art, and the Mob Museum in Las Vegas. The kids would meet
38 most days after school to talk about the most recent trip or to prepare for their next adventure. I
39 thought it was odd that Kiran never asked me for money to go on the trips. Kiran said that
40 everything was paid for by the club's benefactor, Jaden Sinclair. We were well-off, but I thought
41 Sinclair must be loaded to afford all those expenses. But Kiran was so excited about it that I
42 thought it really couldn't be so bad.

43

44 In February of Kiran's senior year, just before s/he turned 18, I noticed Kiran's behavior
45 changing. Kiran started coming home later and later in the afternoon. Kiran told me s/he was
46 spending extra time with the LEX President, Morgan Kincaid, a fellow Ike School senior. I
47 knew Morgan from way back before Sam died. Morgan's parents were divorced and Morgan

48 lived with her mother. Rumor was that Morgan's mother took her father to the cleaners in the
49 divorce settlement and that now she stayed around the house and drank all day, barely paying
50 any attention to Morgan. I think Morgan even got into some trouble for shoplifting when she
51 was in junior high. Anyway, Kiran was spending too much time with Morgan, who I felt was a
52 bad influence. The change was subtle at first. Kiran wasn't studying nearly as much and rarely
53 talked about school. It was all about LEX this and LEX that. LEX was consuming Kiran's mind.
54 But I didn't want to be an overbearing parent and harm my relationship with Kiran. So I quietly
55 encouraged Kiran and told her/him that I was proud that s/he was so interested in the club.
56 Plus, Kiran seemed so much happier with her/his new life and seemed to be doing so many
57 good things for the community.

58

59 Sometime in March, I found Kiran in her/his bedroom late at night asleep with what I thought
60 was a textbook. When I picked it up, I discovered it was a LEX book titled *The World and Jaden*
61 *Sinclair*. I read a couple of pages and was shocked by talk of New Age gobbledygook. It was
62 all about how Sinclair had this awakening and knew her/his purpose was to enlighten others and
63 how true meaning can only be found from within. I was so upset that I threw the book in the
64 trash. I never told Kiran what I did and s/he never asked about the book.

65

66 Kiran and I started growing further apart. Our conversations were shorter and I felt like Kiran
67 was hiding something from me. By April, Kiran was staying out until 10 p.m. some nights. Kiran
68 even told me rather nonchalantly that s/he was spending time with Morgan over at that Jaden
69 Sinclair's house, somewhere in a new development on Pitt Lane, and that I shouldn't worry
70 because s/he was with an adult. Kiran didn't say anything to me that didn't have something to
71 do with LEX. S/he was even given a special position as the LEX Chancellor, which Kiran took
72 very seriously. I felt like the club was replacing me in Kiran's life.

73

74 The most alarming LEX episode, outside of the kidnapping, was the senior school photos
75 incident on April 11, 2022. Kiran and I had gone shopping the day before and bought some
76 really nice and expensive clothes for her/him so s/he would look great for the photos. The next
77 morning, Kiran came down to breakfast with a completely shaved head and dressed all in white!
78 All Kiran said was that all of the LEX kids were doing it as a show of solidarity and a way to be
79 remembered. I didn't want to let Kiran leave the house but s/he simply picked up her/his school
80 bag and stormed out. I was dumbfounded. Once I snapped out of it, I marched down to the
81 high school where I spotted about ten LEX kids dressed exactly as Kiran, with shaved heads.
82 Other kids were pointing and laughing at them, referring to them as the "Britney Bunch." But to
83 me this was no laughing matter. I was losing my child to some deranged cult masquerading as
84 an academic club.

85

86 I stormed into the principal's office and demanded answers. The principal informed me that she
87 had already spoken with the club's president, Morgan Kincaid, and that the matter was nothing
88 more than a club prank. The principal told me not to worry. She said that this was all about
89 getting some attention. Plus, she told me that LEX's benefactor had donated \$40,000 to the
90 school for a science lab and that the incident was not worth the fuss. She said she didn't want
91 to upset the wrong people.

92

93 I grounded Kiran for a few weeks over the incident, and as a result, Kiran and I didn't really
94 speak much. Kiran just stayed in her/his room meditating. Kiran did let her/his hair grow back,
95 but still wore that ridiculous white outfit whenever there was a LEX function. I never saw Kiran
96 so miserable. I finally relented and told Kiran that s/he could attend the prom. That was the first
97 time I saw Kiran smile in over a month. The next day Kiran came to me and said that s/he
98 wanted to borrow \$1,500 to rent a limo for the prom. I know it was foolish of me, but I wrote a

99 blank check to Kiran for the entire amount and told her/him to sign it over to the limo company.
100 Kiran also told me that all of the kids were going back to Morgan's house for an after-prom party
101 and that I should not wait up. Kiran left for school that day without even a thank you.

102

103 I was worried all week about the after-prom party since I knew there would be alcohol and that
104 Morgan's mom would not supervise the kids. On the night of the prom, I was a wreck. I couldn't
105 stand waiting around so about midnight, I drove to Morgan's house. No one was there, the
106 lights were dim and no cars were in the driveway. I became really upset. I tried calling Kiran
107 but got no answer. I decided to drive to the development where Sinclair lived even though I
108 didn't know which house was Sinclair's. I strongly suspected that's where Kiran would be.

109

110 I arrived on Pitt Lane a little bit before 1 a.m. and noticed all the cars parked in front of #58. I
111 walked up to a large bay window to the left of the front door and looked in and saw the LEX
112 members, dressed all in white. I didn't want to ring the bell and embarrass Kiran since I thought
113 I was on the brink of losing Kiran for good. So, I just stood there watching, trying not to get
114 noticed. What I saw shocked me. Sitting in a large circle were eight LEX kids holding hands,
115 including Kiran. They were chanting some song that sounded like an incantation. Then Morgan
116 got up and left the room for a second before returning with Sinclair. The two of them went
117 around the circle both handing out some sort of drink in small paper cups and what looked like a
118 piece of candy. To me it seemed like some New Age communion ceremony. They all ate the
119 candy first then drank from the cups. Whatever it was, it was not normal.

120

121 After the ceremony ended, they all got up and it seemed like a normal party again. Sinclair left
122 for a second and came back with a big cake. Kiran ate a piece while talking and laughing with
123 Morgan and Sinclair. Kiran really looked happy. I didn't think Kiran was in any danger at that
124 point even though I did see her/him stumble a bit when walking away from the group and
125 heading for what I assumed was the bathroom. I didn't see any alcohol, so I figured Kiran just
126 tripped. I then saw six LEX members grab their car keys and personal items. I crouched in the
127 bushes and saw all of them leave the house and walk to their cars, leaving only Morgan, Jaden
128 and Kiran inside. I don't remember Kiran returning to the main room before I left, but I did notice
129 Morgan and Sinclair talking in what looked like a whisper in a corner of the room. In hindsight, it
130 seemed like a pretty sinister look on Sinclair's face. But, like I said, all I could think about then
131 was Kiran's smile. Anyway, I assumed the party was ending and decided to go home.

132

133 I fell asleep by 2:30 a.m., thinking Kiran would arrive soon after. Instead, I awoke around 8 a.m.
134 and checked on Kiran, only to discover s/he was not home and neither was her/his car. I was
135 panicked. I called Morgan's house. Morgan picked up and when I told her that Kiran had not
136 come home, Morgan exclaimed, "Really, that's really strange! I thought Kiran left before me,
137 sometime around two." I immediately called the police, who took forever to respond.

138

139 Detective Shae Reynolds arrived almost two hours after I called the police. Detective Reynolds
140 didn't appear too interested in my plight until I told her/him about this cult-like group Kiran was
141 in, that the leader was Jaden Sinclair and that Kiran had last been seen at Sinclair's house.
142 Detective Reynolds switched into another gear and started peppering me with questions about
143 Sinclair. Detective Reynolds told me s/he had arrested Sinclair years before in Ohio for
144 embezzlement and that Sinclair had served three years in prison. Detective Reynolds thought
145 Sinclair should have gotten at least ten years and that Kiran could be mixed up with a really
146 dangerous person. I felt like I had just been punched in the stomach.

147

148 Detective Reynolds then looked around Kiran's room for evidence and found three more of
149 those strange New Age books written by Sinclair. S/he also found an amulet with the bizarre

150 engraving: "J.S. saves, I serve." Detective Reynolds looked at Kiran's computer and opened
151 one new message in Kiran's school email. To my utter horror, the message appeared to be a
152 ransom note seeking \$250,000 or else Kiran would be killed! Detective Reynolds left in a fury. I
153 waited around for what seemed like a lifetime. About an hour and a half later, Detective
154 Reynolds called me and told me to meet Kiran at Eisenhower Hospital. S/he had been found
155 unharmed in the trunk of Jaden Sinclair's car!

156

157 I rushed to the hospital and found Kiran in shock. Her/his face was pale, like the life had been
158 sucked out of it. S/he had a thousand mile stare. Detective Reynolds came by later to get a
159 statement from Kiran but Kiran practically refused to talk. Kiran suffered no physical injuries so
160 s/he was released. The doctor did recommend counseling to treat possible post-traumatic
161 stress syndrome. I feared the problem went far deeper. It was like Kiran had been hypnotized
162 over the past few months hanging out with that felon and I was afraid this ordeal would push
163 Kiran over the edge. We went home and Kiran went straight to her/his room. Kiran began
164 screaming "what gave you the right to go through my stuff?! If I am the victim, why was my
165 room turned upside down by the cops like I committed a crime?!" The screaming did not stop
166 until Kiran exhausted her/himself and fell asleep.

167

168 The next day, Detective Reynolds came by the house and asked Kiran to testify against Sinclair.
169 Kiran got very angry and started screaming that s/he would never turn her/his back on Sinclair
170 and refused to believe Sinclair would do something like this. It was like Kiran was under a spell.
171 I later took her/him for a psychological evaluation. The psychologist diagnosed Kiran with post
172 traumatic stress and prescribed antidepressants, which s/he refused to take.

173

174 Kiran didn't go to her/his graduation because s/he said s/he could not celebrate anything as
175 long as Sinclair was in jail. Kiran also decided to defer college for a year and moved out of the
176 house into some rat-infested apartment. Kiran refused my money and is now working at HMart.
177 After all our hard work, Kiran ended up right where we started when Sam died. I really believe
178 the only way things are going to change is if Sinclair is convicted, then Kiran will be able to see
179 the truth and get out from under this horrible spell. Only then do I have a chance to get Kiran
180 back.

Witness Addendum: I have reviewed this statement, and I have nothing of significance to add.
The material facts are true and correct.

Cleo Taufique

Signature

December 10, 2022

DATE

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega

Notary Public, State of Hawai'i

My commission expires: **November 18, 2023**

STATEMENT OF SHAE REYNOLDS

1 My name is Shae Reynolds and I am the Head Detective with a special division of the
2 Honolulu Police Department that deals exclusively with missing persons, kidnapping
3 and extortion. I have been a police officer since graduating from Columbus State University in
4 Ohio with a Bachelor of Science degree in criminology and a dual minor in psychology and
5 sociology. My senior thesis was titled Victim Abuse and Recovery in Cases of Kidnapping.
6 After graduating from college, I joined the Ohio State Task Force on Kidnapping and Extortion,
7 where I served for 12 years. The Honolulu Police Commissioner contacted me about a year
8 ago to head up a new Missing Persons and Kidnapping Division, headquartered in Honolulu.
9

10 On Saturday May 21, 2022, at 10:30 a.m., I got a call from dispatch that there was a parent who
11 called 911 claiming her/his 18-year-old child, Kiran Taufique, was missing. I drove to the
12 Taufique home at 456 Kapua Lane in Honolulu to meet the parent, Cleo Taufique. Cleo
13 was in a panic and it took me a couple of minutes to calm her/him. I found out that Kiran was
14 supposed to have gone to the Ike School senior prom the night before and then to an after
15 prom party. Kiran never returned home and didn't answer her/his mobile phone. Cleo
16 explained that the after-prom party was supposed to be at the home of Kiran's fiend, Morgan
17 Kincaid, and that after midnight, Cleo drove by that home and found no one there. S/he then
18 drove to the home of Jaden Sinclair. That name piqued my interest, to say the least. I had
19 once arrested a Jaden Sinclair when I worked in Ohio law enforcement. Cleo also explained
20 Kiran's intense involvement with a strange school club called LEX, as well as Kiran's bizarre
21 relationship with Sinclair, who funded the club.
22

23 Cleo informed me that s/he went to the window of Sinclair's home and peeked in and saw about
24 eight LEX members, including Kiran, all dressed in white and engaging in a ritualistic ceremony
25 run by Sinclair. According to Cleo, all of the kids sat in a circle and were forced to consume an
26 unidentified beverage during the ceremony. Cleo saw six LEX members leave sometime
27 between 1:00 and 1:30 a.m. S/he assumed Kiran would soon follow, so s/he decided to leave.
28 Cleo returned to her/his home and went to sleep. S/he awoke the next morning only to discover
29 that Kiran was not there.
30

31 I inquired further into the nature of LEX, which I learned stood for Learning Eternally Extolled.
32 Cleo told me how Kiran didn't have many friends until s/he joined LEX and that LEX became like
33 a family to Kiran. I learned that in the spring, all the LEX members shaved their heads and wore
34 white to school on school photo day. This was highly indicative that LEX was more than just an
35 ordinary club. Having all members of a group alter their appearance, by engaging in activities
36 such as shaving heads and wearing non-descript clothing, is a means of removing individual
37 personalities in a controlled manner. It is the *modus operandi* of a cult. We are not talking
38 about the French Club wearing berets on Bastille Day; this seemed far more serious.
39

40 I have dealt with a number of cases over the years where reported missing persons turned out
41 to be impressionable and isolated youths deceived into joining a collective, leaving their families
42 behind. Cults are infectious. They spread like germs if they are not rooted out quickly. The
43 longer an individual is under the spell of a cult, the harder it becomes to deprogram them.
44 There are over 5,000 cults actively recruiting new members every day in the United States. Not
45 all of them are evil, but a lot of them are. The problem is that as long as the victims are not

46 minors, there is really nothing illegal about it. This is simply the downside of freedom of religion
47 and the right to assemble.

48

49 I was really curious about whether Jaden Sinclair was the same person I had once arrested.
50 How many people named Jaden Sinclair can there be? About eight years ago, I was the lead
51 detective on a case where an Ohio corporation, iBed.com, was receiving communications from
52 an unknown source threatening to divulge iBed's greatest trade secrets unless \$1 million was
53 transferred to a Cayman Islands bank account. iBed.com made some electronic gizmo that
54 supposedly made you sleep better. iBed was worried about losing its newly developed software
55 so they made the payment to the extortionist. We tried to follow the money but the trail went
56 cold.

57

58 We did hire a forensic accountant to review iBed's bank records. Though the accountant didn't
59 find the \$1 million, she did uncover a problem in the accounts receivable department.
60 Apparently, one of iBed's own accountants had been assigning after-the-fact discounts to client
61 purchases and then siphoning off the excess monies into a personal bank account, totaling
62 \$50,000. We easily linked Sinclair to the embezzlement. We also learned Sinclair had been
63 romantically involved with one of iBed's computer programmers and had access to iBed's trade
64 secrets. There was something very sinister about this mild mannered accountant; too charming,
65 too seductive. When we interviewed Sinclair, it was like we weren't even scratching the surface
66 of what s/he had planned. Anyway, since there was little evidence to link Sinclair to the one
67 million, the DA dropped the extortion charge and got Sinclair to plead guilty to theft for
68 embezzling \$50,000. So instead of getting 10 to 15 years in prison, Sinclair got only 2 to 8. I
69 really felt that this was the one who got away. Only 2 to 8 years when you are sitting on a
70 million dollars is not justice. At Sinclair's parole hearing, s/he declared that s/he had a
71 revelation while in jail and understood her/his past mistakes. Parole was granted, Sinclair got
72 out in 3 and paid restitution in full.

73

74 Anyway, I next searched Kiran's room and found a number of odd books on spirituality written
75 and self-published by Sinclair. It appeared that Sinclair had taken on a messianic persona. I
76 also found an amulet on Kiran's bureau with the engraving "J.S. saves, I serve." I looked at
77 Kiran's computer and found one unopened email in her/his school inbox. The message was
78 from an unknown sender, openhandemptytree@kmail.com, and did not have a subject line. It
79 was sent at 11:07 a.m. The message appeared to be a ransom note of some sort, requesting
80 that \$250,000 be prepared for a wire transfer to what had to be an off-shore location. The
81 message promised Kiran would be killed if Cleo did not cooperate. I called dispatch and
82 requested a full crime scene investigation to the Taufique house. I was pretty sure Sinclair was
83 involved; the bit about the wire transfer seemed like Sinclair's M.O. Plus, there is not much
84 difference between extorting money from a business and extorting money from a family.

85

86 I decided to go to Sinclair's residence and arrived there around 1 p.m. The main house was
87 very large, probably 4,000 square feet with a detached three-car garage. Must have cost at
88 least a half mil. I rang the bell and Sinclair appeared at the door within seconds, almost as if
89 s/he was not surprised to see me. I stood on the porch, reacquainted with Sinclair, and asked
90 what s/he was doing in the area. Sinclair said too much happened in Ohio and moving was
91 "part of a rebirth."

92

93 I asked Sinclair if s/he knew Kiran Taufique. Sinclair told me Kiran was in a club Sinclair
94 sponsored at the Ike School. Sinclair wanted to know why I was asking about Kiran, and I
95 told her/him that Kiran had not returned home from the senior prom the night before and was
96 last seen in Sinclair's home. Sinclair's expression immediately changed; s/he looked very

97 nervous. Sinclair then admitted hosting a small party Friday night for LEX seniors. Sinclair told
98 me that s/he didn't get too involved in arranging the party, that it was mostly organized by
99 Morgan Kincaid, the LEX student president. Sinclair did volunteer that s/he purchased two
100 bottles of champagne for the kids to celebrate their "next journey in life" but otherwise stayed
101 away from the kids most of the night watching a Rocky marathon in the den. Sinclair claimed
102 s/he left the kids alone to socialize in the living room area. Sinclair assumed Kiran went home
103 between 1 and 2:00 a.m. In any event, Sinclair recalled that Morgan was the last person to
104 leave, and that was around 2:00 a.m. Sinclair recalled this because Morgan woke Sinclair in the
105 den to tell her/him that she was leaving. Sinclair recalled looking at the clock. I inquired more
106 about LEX but Sinclair would not discuss it other than to say s/he came up with the idea while in
107 prison as a way to pay additional retribution to society. It seemed suspicious to me.

108

109 I decided to leave so I could obtain a search warrant for Sinclair's home. At a minimum, I had
110 her/him for serving alcohol to minors. I didn't reveal that we had discovered a ransom note.
111 Upon walking back to my vehicle, I heard a faint cry coming from the garage. I had a strong
112 feeling that it was Kiran, but I didn't think Sinclair would be so stupid as to leave a kidnapping
113 victim on premises. I immediately returned to Sinclair's door and demanded that s/he open the
114 garage for me to investigate under the probable cause doctrine.

115

116 Sinclair initially refused, insisting that I produce a warrant, but when I threatened to call for
117 backup, Sinclair led me to the garage. The scream became louder and I discovered it was
118 emanating from the trunk of Sinclair's 2005 Panther YK9. I asked Sinclair for the keys, but s/he
119 fumbled searching her/his pockets so I broke open the passenger side window and pushed the
120 trunk release button in the glove box. The trunk popped open and inside was Kiran, hog-tied
121 and gagged, though the gag had come loose, allowing Kiran to scream. I immediately worked
122 to release Kiran. Sinclair went over to comfort Kiran and for a second I was almost duped into
123 believing that Sinclair really cared. Considering that Sinclair had likely done this to Kiran, I
124 placed Sinclair under arrest for kidnapping and read her/him Miranda rights. Kiran was taken to
125 a hospital by ambulance and I took Sinclair to the station for questioning but s/he refused to talk.

126

127 Around 4:00 p.m., I visited Kiran at Eisenhower to take a statement. The attending doctor told
128 me there were no signs that Kiran had been physically or sexually assaulted. Kiran was very
129 removed and reluctant to speak. Kiran's answers were limited to one and two word grunts,
130 especially when I asked about LEX and Sinclair's role within the organization. However, Kiran
131 was forthcoming with details regarding the evening activities. Kiran recalled that the party at
132 Sinclair's was set up at the last minute. Kiran admitted having a few drinks of alcohol and some
133 cake, but then everything went black and s/he must have passed out. The next thing Kiran
134 remembered was waking up in the trunk of the car. When I asked Kiran who did this, s/he
135 replied, "I don't know who did this to me, but it was not Sinclair. Sinclair is a savior not a
136 captor." I tried to convince Kiran that Sinclair denied knowing who Kiran was in order to get
137 her/him to talk about LEX, but s/he didn't believe me. In addition, Kiran had no knowledge of the
138 email address openhandedemptytree@kmail.com and refused to answer any more questions.
139 Kiran told me s/he would never participate in a witch-hunt.

140

141 I returned to the Taufique house the following day and asked if Kiran would be willing to testify
142 against Jaden Sinclair. Unfortunately, Kiran adamantly refused to talk. I threatened to charge
143 Kiran with conspiracy if s/he didn't cooperate, but even that didn't work. I think Kiran was
144 suffering from Stockholm Syndrome, where the victim of a kidnapping identifies with the
145 kidnapper. In my opinion, Kiran's kidnapping really took place months before s/he ended up in
146 the trunk. S/He was clearly brainwashed and in need of serious psychological counseling.

147

148 Over the next few weeks, I questioned the seven senior LEX members who were at Sinclair's
149 house on May 20 and 21, 2022. They were all minimally cooperative. It was as if they were
150 programmed not to speak to anyone outside LEX. They all had robotic answers which were
151 essentially: "We went to the prom, then to Jaden's house for a celebration. Kiran left with us
152 after midnight. I didn't see anything suspicious." They all said that they couldn't believe Sinclair
153 would harm anyone and that Sinclair was a great wo/man. Sinclair's hold over the group was
154 obviously strong. Since no one was willing to give me details, I moved on to Morgan Kincaid
155

156 Morgan provided a bit more. She said that none of the LEX members actually attended the
157 prom but spent the entire evening at Sinclair's. I later confirmed this. Morgan also expressed
158 frustration with the fact the party was held at Sinclair's rather than at her home, as had been
159 initially planned. Morgan also told me that when she left that evening around 2 a.m., Kiran was
160 still there, having passed out on Sinclair's couch. I was supposed to have another meeting with
161 Morgan in June but unfortunately, I was unable to get in touch with her before she left
162 for a planned backpacking tour around Europe. Despite our best efforts, we have
163 been unable to contact Morgan, who is believed to be in Budapest. Kincaid's mother has been
164 completely unhelpful.

165

166 Our forensics investigation produced significant incriminating evidence against Sinclair. We
167 found no fingerprints on the trunk of the Panther other than those of Jaden Sinclair. We also
168 connected the anonymous ransom email to Sinclair; it was traced to a cell phone owned by and
169 registered to Sinclair through her/his mobile phone provider. Unfortunately, the phone itself was
170 not recovered from the crime scene and has not been found. We determined that the kmail
171 account was created on May 17, 2022, but that the registration was fraudulent and there was no
172 evidence as to the identity of its registrar. We recovered Sinclair's car keys from the house, but
173 the remote opening device was missing.

174

175 The toxicology report showed Kiran had high levels of a drug called GHB in her/his system as
176 well as a blood alcohol level of .01. We also found trace amounts of GHB powder in the den
177 carpet of Sinclair's house. GHB is a common "date rape drug" usually found in liquid or power
178 form. It is odorless and tasteless and causes drowsiness and a dream-like feeling within 15 to
179 30 minutes after consumption. It creates a feeling very much like being drunk and the victim
180 often experiences a black out of 6 to 10 hours. The majority of victims wake up with memory
181 loss. Other side-effects include slurred speech, loss of coordination, dizziness and confusion.

182
183 We reviewed Sinclair's bank statements with New Temple Federal Savings and discovered
184 her/his funds had been dwindling rapidly. Sinclair had spent close to \$300,000 in the past six
185 months and incurred close to \$70,000 of credit card debt. There was no explanation for the
186 source of Sinclair's funds but I personally felt it was part of the \$1 million Sinclair extorted from
187 iBed. Sinclair was also in default on her/his home mortgage and the bank was threatening
188 foreclosure. We did find the check for \$1,500 that Cleo Taufique had given to Kiran. It was
189 written out to Jaden, but it hadn't been endorsed. We also discovered Sinclair was trying to buy
190 a commercial property in the town center for \$250,000. The sales agreement listed Sinclair as
191 buyer and stated that s/he had deposited \$15,000.

192

193 The evidence against Sinclair is pretty overwhelming. Sinclair clearly had a motive to try to get
194 a ransom and knew Cleo could be a source of funds. In fact, the judge at the bail hearing felt
195 the same and set bail at \$500,000, and even refused to allow Sinclair to post the usual 10%.
196 Sinclair hasn't met bail and is sitting in the county jail where Kiran, sadly, visits her/him
197 regularly.

Witness Addendum: I have reviewed this statement, and I have nothing of significance to add.
The material facts are true and correct.

Sgt. Shae Reynolds

Signature

December 10, 2022

DATE

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega

Notary Public, State of Hawai'i

My commission expires: **November 18, 2023**

STATEMENT OF JADEN SINCLAIR

1 My name is Jaden Sinclair. I am 31 years old and I've been a resident of Honolulu,
2 Hawaii for the past five years after spending the majority of my life in Ohio. I have really
3 enjoyed living in Honolulu. I know my reputation has been seriously damaged and a lot of
4 the things I worked so hard to accomplish here have been ruined, but I know that once I am
5 cleared, I will pick up right where I left off. I want the world to know that I had nothing to do with
6 this. All I have ever wanted for Kiran is for her/him to see the potential that exists inside. Why
7 would I want to sacrifice all that Kiran has accomplished over the past year by trapping her/him
8 inside of my car after s/he had been trapped for so long?

9

10 I once believed success in school was all that mattered, just like Kiran once believed. I was
11 good at numbers and lacking imagination, I became an accountant. Right out of college I was
12 hired by a big dotcom corporation in Ohio, iBed.com, in their accounts receivable department.
13 But I wasn't ready for the real world. I cracked under the pressure and made a terrible mistake.
14 I was trying to live big and couldn't handle paying back my student loans. I saw a short cut by
15 skimming money from the company. No one noticed at first, but it eventually caught up with me.
16 I was so stupid then. But, I paid for my errors. I was convicted of embezzlement and went to
17 prison for three years. I was also charged with extortion, but was cleared of that. Most people
18 would be reluctant to even speak of their criminal past, but prison changed my life for the better.
19 I had a lot of time to think while I was in prison and I had an epiphany: I came to understand my
20 role in life would be to lead others and teach them not to fall victim to the same fate I had. Since
21 my release, I have focused my life on educating our youth about the importance of real life
22 lessons, not just those of the classroom. It is my way of atoning for my past errors.

23

24 In 2017, after I got out of prison, I moved to Honolulu to start over. While I was in prison, my
25 stock market investments did unbelievably well and, when I was released, I cashed them out
26 intending to give some of it back to society. The dotcom rally really turned out to be a boon for
27 me. I wanted to help with an after-school program at a local high school. I decided to partner
28 with the Ike School since, as a private school, it could be more flexible with funding from
29 members of the public. None of the clubs there seemed to convey the message I wanted to
30 relay so I approached the principal about starting a new club. It would be called LEX, an
31 acronym for Learning Eternally Extolled. The main idea was to take the kids on trips outside of
32 school to experience life and the lessons that it could teach. I proposed taking students to
33 unusual but important historical and cultural sites throughout the region as well as places like
34 food banks. I promised to cover all expenses and even go on an annual trip to the local
35 homeless shelter, Circle of Hope, with kids because I knew the woman that ran the place from
36 giving them charitable donations.

37

38 The school board unanimously agreed to sanction LEX in 2020, especially after I agreed to
39 donate \$40,000 for a new science lab. The club was an instant success. Many of the students
40 reminded me of myself when I was in high school. These were kids no one else really wanted
41 to hang around with; kids who were smart but somehow lost. Most of them came from single
42 parent homes and had experienced trauma earlier in their lives, like divorce or losing a parent.
43 The name LEX really said everything I wanted it to about the organization. It was about how
44 experience alone can provide lessons that last a lifetime. I know people in town think I set up
45 LEX as a guise to spread my own spiritual message. I guess that is true, if you consider
46 learning about yourself a spiritual experience.

47

48 I first met Kiran Taufique in March 2022. I often asked the club's President, Morgan Kincaid, to
49 bring around LEX members s/he thought were really promising. Morgan felt that Kiran fit the bill

50 and was someone I would want to meet. Morgan was an excellent President and held the
51 position for two years, right from the genesis of LEX. I trusted Morgan implicitly. Morgan had a
52 tough childhood and LEX allowed her to escape and experience life for what it was. Through
53 LEX, Morgan blossomed into a true leader.

54

55 When I met Kiran, I knew I could shift my attention away from Morgan and focus on helping
56 Kiran learn the lessons that LEX could teach. Kiran was an injured soul who had been coddled
57 by her/his parent. To be honest, Kiran and I did become quite close though I rarely met with
58 Kiran personally because I felt it inappropriate. We spoke on the phone occasionally though. At
59 some point I gave Kiran an amulet as a symbol of her/his transformation and to give her/him
60 strength, but it didn't have an engraving on it. I bought it from a novelty gift store in the mall. I
61 also gave Kiran some books I had written on self-expression to aid in her/his development.
62 With my guidance, LEX helped Kiran discover who s/he was. Kiran developed so much that at
63 some point in April, I suggested that Morgan give Kiran the title of Chancellor of LEX. I thought
64 that given this additional responsibility, Kiran would more quickly emerge from her/his shell.
65 Looking back, I should've noticed that Morgan was becoming a bit jealous over the additional
66 attention I was paying to Kiran.

67

68 Now, about the alleged kidnapping, I must say I was absolutely shocked when Shae Reynolds
69 knocked on my door Saturday morning May 21, 2022. This was the very same detective who
70 locked me up in Ohio, and there s/he was, standing at my door! I froze. It was like my past
71 coming back to haunt me. I know Reynolds thought I got off easy. S/he thought I was guilty of
72 extorting a million dollars and treated me like the white whale s/he could never catch. After I got
73 some composure back, Reynolds asked me if I knew Kiran Taufique. I could tell from Detective
74 Reynolds' tone that something bad happened to Kiran. It quickly occurred to me Kiran might
75 have gotten in an accident driving home and I was reluctant, in my panic, to admit to holding a
76 party in my home. I did volunteer that Kiran was in the club I sponsored at the Ike School.
77 Reynolds then asked if I knew where Kiran was because Kiran had last been seen in my house
78 and had not returned home. I was floored by this information and terrified for Kiran. I was
79 willing to help out in any way I could.

80

81 I then admitted hosting a small party Friday night for the LEX seniors that Morgan Kincaid had
82 organized. I said the eight LEX seniors showed up at my house around 9 p.m. I gave Reynolds
83 the names of all the attendees, but s/he never wrote them down. I admitted that I had
84 purchased two bottles of champagne for the kids, which was only enough for a round of toasts,
85 but not enough for anyone to get drunk. At some point during the evening I brought out a
86 celebratory cake that I bought for the LEX members. They sat in a circle right there on the living
87 room floor, as if around a camp fire, while they ate the cake and told stories about their senior
88 year. That was about the extent of my interaction with them. This was their night and I didn't
89 want to interfere, I just wanted them to have fun in a safe environment.

90

91 I told Reynolds I retreated to my den and watched a Rocky marathon all night. I fell asleep
92 watching TV and recall that around 2 a.m., Morgan came in and said good night and told me
93 everyone had gone home, after which I heard the front door close. I didn't suspect that anything
94 was wrong with Kiran and fell back asleep. In fact, Morgan and I had talked earlier that evening
95 in front of the entire group about Kiran and all that s/he had accomplished and how s/he was the
96 perfect LEX member. Indeed, Kiran seemed so happy that night and that was the greatest gift
97 anyone could have given me. Reynolds inquired about LEX but I couldn't figure out why that
98 was pertinent to Kiran's disappearance and I refused to go into that. All I said was that I came
99 up with the idea in prison and wanted to pay additional retribution to society. Reynolds seemed
100 satisfied and left. I told her/him to contact me as soon as there was word about Kiran.

101

102 I was shocked, once again, when Officer Reynolds appeared at my door a minute later. S/he
103 wanted to search my house and garage. I refused, since in my mind I hadn't done anything
104 wrong and couldn't imagine why a search was necessary. Had I known Kiran was trapped
105 inside the trunk of my car, I most certainly would have let Reynolds anywhere s/he wanted to
106 go, if only to save Kiran a few less minutes of torture. When I realized Kiran was in the trunk, I
107 was so distraught that I couldn't even find my keys. Officer Reynolds had to break the
108 passenger window to pop open the trunk from the inside. I tried to help Kiran out of the car and
109 comfort her/him, but Detective Reynolds tore me away from her/him. I didn't even realize that
110 Officer Reynolds' gaze had turned towards me, I was so focused on Kiran's welfare. Before I
111 knew it, Reynolds had me handcuffed. I was so upset that someone had apparently set me up
112 after I had spent so much energy and money trying to give back to society.

113

114 With respect to my alleged involvement with the kidnapping, I know the police found my
115 fingerprints on the trunk of my car, but it was my car. But, the police also discovered the car's
116 remote entry device was missing from my key chain and it was never found. It was one of those
117 remotes where when you pushed the button, the trunk would fly open. I was in the habit of
118 always locking the car, even when it was parked in my garage, so the remote was the only way
119 to access the trunk other than the keys. I don't remember the last time I used the remote, but I
120 know I never noticed it missing. Also, police said they found trace amounts of GHB in my den
121 area. Frankly, I don't have a clue what that drug is used for and I still have no idea how you go
122 about finding it. I would have never given that stuff to Kiran.

123

124 The most outrageous accusation is that I sent a ransom email to Kiran. I don't even have a
125 kmail account and never heard of the email address openhandemptytree@kmail.com. The only
126 email account I have is through my internet service provider and my address is simply
127 jadensinclair@roncast.com. I didn't know Kiran's email address either. We only ever
128 communicated by phone. I know they traced the ransom email to my cell, but I did not use the
129 cell to send that message. I only used my cell when I was traveling out of town and needed
130 to check my email messages. In fact, I hadn't used the cell for months. It was somewhere in
131 my house on the night of May 20 but now the police can't even find it. It's like they are trying to
132 accuse me of murder without having actually found the murder weapon. How could I have
133 committed the kidnapping if I had no idea where Kiran was being held and didn't send the
134 ransom note?

135

136 I also know that a big deal has been made out of my financial status as a motive to seek a
137 ransom. But really, I was in the process of moving assets around and making additional
138 property investments. I was planning on opening a new public community center in the town
139 center for LEX members so we would not have to use my home to meet. Just prior to this
140 incident, I had signed a sales agreement for this great piece of property. It was a major
141 investment, nearly \$250,000. So I was gathering cash incrementally over time to make a lump
142 sum payment at settlement. I meant to open a separate bank account for the community center
143 and register it as a non-profit, but never got around to it. I was just really busy, which was why I
144 was late on my mortgage payments. It may seem like I was hemorrhaging money, but I had big
145 house and car payments as well as LEX trip expenses and I was making charitable donations.
146 Plus, whenever I need to, I can do accounting work on the side. I even turned down a \$1,500
147 check that Kiran tried to give me, which is why police found it in my house. Things got so busy
148 that week that I never got around to shredding it. I never solicited donations from any of the
149 club members. There was no need.

150

151 I need to set one misconception straight. The idea for the LEX kids to shave their heads and
152 dress the same for the school photo was not mine. It was Morgan's. I did not condone it or
153 support it financially. Unified isolation was not the way I wanted LEX to function at all. I regret
154 that it happened because I think that, more than anything, that incident raised the suspicions of
155 some of the parents, and made me a target.

156

157 I pride myself on providing help and guidance to these kids, not traumatizing them. I always
158 saw a lot of myself in Kiran and knew exactly what s/he needed to realize her/his full potential.
159 The last thing in the world I wanted was for Kiran to experience pain. There is no reason I
160 would risk everything by doing something so heinous and irresponsible. I don't know why or
161 who set me up, but that is what must have happened. I really didn't think I had enemies in New
162 Temple. You can ask any of the LEX members and they will all tell you that I didn't have
163 anything to do with this, Kiran included. Don't you think it is odd that the even Kiran, the true
164 victim, is not testifying for the prosecution? In fact, Kiran visits me regularly in the prison and
165 has tried to console me and alleviate my fears and concerns, just as I had done for Kiran.

166

167 The only thing I can think of is that someone was jealous of my accomplishments and couldn't
168 stand to see LEX succeed. Maybe it was one of the kid's parents. Maybe it was the police.
169 Detective Reynolds has had it out for me for years. I seriously doubt Morgan was involved.
170 Even though Morgan was a bit upset on the night of the prom because we moved her party to
171 my house, she eventually came around and agreed that it was a good idea and thanked me for
172 thinking about her safety, since Morgan's mother never did. Morgan had come so far and I was
173 really proud that she was taking a year off from college to travel around Europe and take
174 learning outside the classroom in true LEX fashion. Anyway, throughout this whole ordeal, I
175 have tried to maintain my faith and trust that the justice system will restore my good name.

Witness Addendum: I have reviewed this statement, and I have nothing of significance to add.
The material facts are true and correct.

Jaden Sinclair

Signature

December 10, 2022

DATE

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega

Notary Public, State of Hawai'i

My commission expires: **November 18, 2023**

STATEMENT OF KIRAN TAUFIQUE

1 My name is Kiran Taufique I am 18 years old and a recent graduate of the Ike School.

2 Currently, I live alone in a small studio apartment at 1320 Aala Street in the Waena

3 Apartments and work as a cashier at the local HMart. I was supposed to go to college on an
4 academic scholarship but I'm not thinking too much about that right now.

5

6 This whole thing is about far more than me being abducted; it's really all about what has

7 happened to Jaden and the fact that LEX is no longer in existence. People just have it all wrong

8 about Jaden. I can't say it any more simply than Jaden is the single greatest thing that has

9 happened not only to me, but to dozens of kids in this community. Jaden is a hero, not a felon.

10 I visit Jaden regularly in prison. I could never abandon the person who has made me realize the

11 true meaning of life and what is really important. Jaden also provides me comfort from the

12 nightmares and panic attacks I still suffer from.

13

14 For most of my life I was just going through the motions. Losing my parent Sam when I was ten

15 can do that. I know Cleo tried, but being raised in a household with one parent and no siblings

16 is lonely. Plus, Cleo worked two jobs the first couple of years after the accident, just to make

17 ends meet. Sometimes, I felt like I didn't even exist, like I was just some robot made to go to

18 school and take tests. I think the reason why I spent all of my time studying was because I was

19 afraid to take a look at who I really was. Cleo - I cannot even refer to that person as mom/dad

20 anymore - Cleo told me that the only key to happiness was a high SAT score. Cleo discouraged

21 me from having friends and so even though I always did well on tests and exams, I just felt

22 empty. And when I was accepted to college, I felt even emptier. It was then it dawned on me

23 that I needed to reach out and meet people to save myself. I could not deal with the isolation

24 imposed by Cleo.

25

26 I didn't have a clue how to make friends so I thought I'd join an after-school club. The only club

27 willing to speak to me that late in the school year was LEX. LEX stands for Learning Eternally

28 Extolled, and I can honestly say that the lessons I learned from LEX will remain with me forever.

29 It was a new club at school, only about two years old, with about 30 members. The main

30 function was to go on trips to cool places you would never otherwise get to visit. Anyway, when

31 I walked into their meeting, I was instantly welcomed, like I had always belonged. They just

32 took me for who I was. I was amazed when club President Morgan Kincaid personally spoke to

33 me after the meeting. I knew Morgan from when we were younger, but Morgan never spoke to

34 me then. Morgan always was seen as some sort of rebel, you know getting in trouble all of the

35 time. Morgan told me I was welcome to attend the next LEX excursion. We went to see this

36 play where the main character was dying and regretted the fact that she didn't accomplish

37 anything in her life. It was kind of depressing, but it felt like a revelation; I promised myself that I

38 would no longer go through life like I didn't exist. For weeks after the play, me and the rest of

39 the LEX members had these really cool in-depth discussions about the play. We even took turns

40 acting out alternative endings or discussing how the main character could have done things

41 differently to make her life more rewarding and meaningful.

42

43 I started spending all of my free time doing LEX activities and hanging with the members and

44 less time at home. In fact, Cleo was becoming overbearing, like s/he resented the fact that I

45 was happy. Morgan and I were spending lots of time together working on club activities. I felt

46 like I finally had made a best friend for the first time in my life. I was naturally drawn to Morgan,

47 I guess because we were both from single parent homes even though our parents were

48 complete opposites. Cleo lived through me while Morgan's mom didn't care what Morgan was

49 up to. It was after being in the club for about two months that Morgan told me I was ready to

50 meet the club's benefactor. The benefactor was the person who funded all of our activities and
51 made LEX possible. I was thrilled. I felt so honored. I felt so alive.

52

53 One day in early March, Morgan took me to Jaden's house. When I met Jaden for the first time
54 I felt like I had known her/him my entire life. Jaden welcomed me with open arms. Jaden told
55 me that Morgan had reported that I had made tremendous strides since joining LEX. Jaden
56 said I had taken the first steps to truly understanding who I was and of the power I had inside.
57 Before we left Jaden's house, we exchanged cell phone numbers. Jaden also gave me this
58 amulet I will treasure all my life. Jaden said it would give me strength to find answers when life
59 made me feel weary or confused. Jaden also gave me some books s/he wrote to help me
60 discover who I was. Jaden instructed that I only discuss the books with LEX members. I
61 devoured the books. They were more engaging than any text I ever read. I read them late into
62 the night, over and over. They were about finding strength from within and the power that can
63 be found in trusting those who have survived life's greatest traumas.

64

65 Jaden and I started talking a lot on the phone and I would even go to Jaden's house by myself
66 from time to time, and we'd just relax and talk about philosophy, religion and all kinds of things.
67 I also helped Morgan and Jaden come up with ideas for LEX activities. The trip to the Mutter
68 Museum in Philadelphia was my idea. I thought it would be really cool to check out medical
69 oddities so we could better appreciate how blessed we all really were. I also arranged the
70 annual trip to the Circle of Hope homeless shelter that spring. I can never forget how happy all
71 of the homeless people were to see Jaden when we arrived there. S/he spoke to them like they
72 were equals and even gave out crisp \$20 bills to all people there, including the staff. Jaden
73 really was the most compassionate person I have ever met. Jaden often told me that doing all
74 of this was going to help me become the person I was supposed to be. It was also around this
75 time that Jaden gave me the special position of Chancellor of LEX to reflect all of the time and
76 dedication I gave to LEX. I felt ten times happier about this than getting into college. In
77 hindsight, I think Morgan was a bit jealous of how well I got along with Jaden and how fast I had
78 become a leading LEX member.

79

80 Regarding the school picture, it was Morgan's idea to shave our heads and wear white clothes
81 for the club photo and yearbook portraits. Morgan told us that it would give us something to
82 look back upon and see how we stood together. I thought it was a great idea to show our
83 uniqueness and I took pride in shaving all the hair on my head that night before picture day. It
84 was also that night that I carved into the amulet the inscription "J.S. Saves, I serve." I just felt
85 like doing it, like adding my own touch to it. I was a bit disappointed when some LEX members,
86 including Morgan, didn't shave their heads. I felt humiliated at first, but when the kids around
87 school started calling us the Britney Bunch, it turned into a joke and we laughed it off. Cleo,
88 however, was furious and tried to ground me, but I snuck out of the house most nights and
89 when I did stay home, I'd just light a candle and meditate in my room. Cleo and I rarely ever
90 spoke to each other at this point.

91

92 Sometime after the photo incident, I had a meeting with Morgan and Jaden, and Jaden
93 mentioned almost in passing that some of the LEX trips would have to be cut back. When
94 Morgan and I pressed Jaden for the reason, Jaden wouldn't say anything further. I told Jaden
95 that if it was a money issue, I would try to help out. I ended up telling her/him all about the
96 settlement we received after the big car accident.

97

98 On the Monday before the prom, Cleo decided it was time to make peace with me. Cleo
99 couldn't stand to see me so miserable and permitted me to go to the big event. I was surprised
100 since Cleo always tried to keep me from social activities. I smiled and said I would have gone

101 regardless. However, I had no intention of ever going to the prom. Instead, all the LEX kids
102 planned on spending that special night together as a group. The plan was to meet at Morgan's
103 house since her mom wouldn't really care. She was still a disinterested drunk as far as I could
104 tell.

105

106 I don't know what gave me the idea, but the next morning over breakfast, on Tuesday, I asked
107 Cleo if I could have \$1,500 to rent a limo for my friends. I was still very upset that Cleo didn't
108 see the good things happening to me so I intentionally pushed the envelope. I thought that
109 would be a good way to give some money to LEX so our trips wouldn't be cut back. I didn't
110 think Cleo would go for it, but s/he wrote me a blank check on the spot for the entire amount. I
111 told Cleo not to wait up for me on prom night because we were going to Morgan's afterwards.
112 Cleo bought the whole story, but things were so strained between us, I guess s/he really didn't
113 have a clue as to what was going on with me. I was really breaking free. I gave the check to
114 Jaden and told her/him that it was for LEX and that money wasn't really a big deal to Cleo.
115 Jaden was surprised and after a moment said, "I can't take your money" and told me s/he'd tear
116 it up.

117

118 Right after I gave Jaden the check, I told her/him about Morgan's party for the eight LEX
119 seniors. Jaden got kind of stern and said that s/he didn't think it was a good idea to have a
120 party without any supervision. Jaden strongly encouraged that the party be at her/his house
121 instead. I thought it was a great way to celebrate. I was beaming when I told the LEX seniors.
122 I know I should have discussed this development with Morgan first, but I was just so excited.
123 Morgan did seem a bit upset since she had no doubt spent time planning for the party at her
124 house.

125

126 Anyway, about "prom night," I remember very little because I was apparently drugged with GHB.
127 I do recall that when we got there by 9 p.m., Jaden was not home but left a note on the door to
128 come in. Jaden had been running errands and came in soon after with a cake. I do recall that
129 the cake said "Now Begins Your True Journey." It was so perfect. I also hazily recall that Jaden
130 brought out a couple of bottles of champagne. I know we were minors, but it seemed mature to
131 have champagne on this night. I actually had never had alcohol before. I remember Jaden
132 toasted to our transformation and we toasted Jaden for her/his leadership and hospitality. I
133 know I was having the time of my life; it was great being there with all the people who meant the
134 most to me. The only other thing I recall is that after the toasts, Jaden retreated to the den and
135 pretty much stayed out of our way. That's all I remembered until I woke up in a very dark space
136 with my hands tied and my mouth gagged.

137

138 I thought I had been buried alive. I was in a panic and thrashed around for a while and was able
139 to loosen the gag. I started to scream as loud as I could. It seemed like I was yelling forever.
140 But, just when I was about to give up all hope, I heard the garage door open and a voice telling
141 me to calm down. I heard glass shatter and when the trunk popped open, Jaden was standing
142 there with a very concerned look on her/his face along with Detective Reynolds. I was so upset,
143 I couldn't even speak. Jaden tried to help me out of the trunk and to comfort me, but Detective
144 Reynolds wouldn't allow Jaden near me. Detective Reynolds untied me and immediately turned
145 to Jaden and said something like "looks like I finally got you!" I next remember being wrapped
146 in a blanket and taken away in an ambulance.

147

148 Cleo met me at the hospital and was relieved to see I was okay. I had to endure a couple hours
149 of laying there trying to ignore Cleo asking: "Are you okay honey?" "Why did Sinclair do this to
150 you?" "Why did you hang out with that felon?" Detective Reynolds' appearance, initially, was a
151 welcomed break. I was honest about what I knew. I admitted we had a party and there was a

152 little bit of drinking. I became really upset though when Reynolds told me that earlier that day,
153 Jaden had denied knowing who I was. I refused to talk to Detective Reynolds after that,
154 including her/his questions about the inner workings of LEX. I could sense that this cop had
155 already pegged Jaden based on her/his earlier comment. I just sat there silently and refused to
156 answer until I couldn't take it any more and blurted out something like, "Jaden is the one who
157 saved me!" This really angered Detective Reynolds and s/he persisted with the questions. I
158 just kept repeating over and over that I would not participate in a witch hunt.

159

160 Believe it or not, the next day, Detective Reynolds came to my house and asked if I would testify
161 about what happened. I flat out refused to speak to her/him since s/he had tried to manipulate
162 me by lying to me at the hospital when s/he told me that Jaden claimed not to know me. I don't
163 know who did this to me, but it was not Jaden. It was Jaden who helped me discover who I am
164 and has made me a better person. Jaden would not harm me. I have had months to think
165 about it all and I guess it must have been another LEX member, most likely Morgan, though
166 Jaden won't ever believe that. Jaden thinks that Morgan was saved. But Morgan was upset
167 about the party and resented me for getting so close to Jaden. Why else would Morgan
168 disappear to Transylvania, or wherever she is? Why didn't that cop go after Morgan?

169

170 Like I said before, I didn't want to testify here today, or at least not for the prosecution. But
171 Jaden told me to follow my heart and that testifying could really help her/him, so I am giving this
172 statement and plan to testify at trial. Jaden told me that if I did testify, all I had to do was speak
173 the truth and everything would be okay. I hope so. LEX no longer exists. I miss LEX terribly.
174 Everything that matters to me has been ruined. Right after I was kidnapped and before I finally
175 decided to move out, Cleo took me to expert after expert trying to figure out what was wrong
176 with me. They keep giving me anti-depressants to make me feel better. What they don't
177 understand is that I don't need pills, I need LEX. LEX is what I believe in. How can I move
178 forward and be content with my life, if I let this horrible thing go unresolved?

179

Witness Addendum: I have reviewed this statement, and I have nothing of significance to add.
The material facts are true and correct.

Kiran Taufique

Signature

December 10, 2022

DATE

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega

Notary Public, State of Hawai'i

My commission expires: **November 18, 2023**

JURY INSTRUCTIONS

COMPENDIUM OF THE HAWAII PATTERN JURY INSTRUCTIONS - CRIMINAL

At the conclusion of a jury trial, the judge will instruct the jury how to apply the law to the evidence. Hypothetically, if the judge in your mock trial case were to provide instructions to the jury, they would look something like the following:

[Please note: A copy of these instructions may not be used as an exhibit during the mock trial competition; however, students may use these concepts in fashioning their case and making arguments to the jury.]

1.01 Preliminary Instructions to the Jury

Members of the jury, now that you have been selected as jurors in this case, the court will give you some preliminary instructions about this trial so that you may have a better understanding of how this trial will be conducted and your responsibilities as jurors.

It will be helpful to understand the order in which a criminal trial proceeds. First, each lawyer will have an opportunity to give you an opening statement. The defense may decide not to give an opening statement, or it may give its opening statement either before or after the prosecution presents its case. An opening statement is not evidence. Its only purpose is to give you an overview of what the lawyers expect the evidence will show.

Next, the prosecution will present its evidence. Evidence usually includes the sworn testimony of witnesses and exhibits, such as photographs or documents. After the prosecution presents its evidence, the defense may choose to present evidence but is not required to do so. If the defense presents evidence, the prosecution may then present rebuttal evidence.

After all the evidence has been presented, I will instruct you on the law you must apply in this case.

The lawyers will then make their final arguments in which they talk about what facts have been or have not been proven by the evidence. Closing arguments are not evidence. The prosecution makes its closing argument first. The defense may then give a closing argument, and the prosecutor may give a rebuttal argument.

After closing arguments, you will go to the jury room to begin your deliberations.

As the judge in this case, I have three main duties: (1) I will make sure that the court proceedings are kept orderly; (2) I will determine what evidence may be received during this trial; and (3) I will instruct you on the law that you must apply in this case.

You will be the judges of the facts. You will decide what facts have been proven by the evidence. A very important part of your job will be deciding whether a witness is truthful, whether the witness' testimony is accurate, and how much weight or importance to give to the testimony.

Let me explain to you what is and is not evidence. The evidence in this case will come from the sworn testimony of witnesses and any exhibits received into evidence. A question asked by a lawyer is not evidence. Objections made by a lawyer are not evidence. Questions asked and responses of jurors given during voir dire are not evidence. Opening statements and closing arguments of lawyers are not evidence. In addition, testimony I have excluded or stricken is not evidence.

During the course of this trial you may hear the lawyers make objections. It is a lawyer's duty to object when he or she believes it is appropriate or necessary. Objections help the court to keep out matters that are not relevant to the issues in this trial.

I will rule on objections according to the law. When I rule on objections or motions do not be concerned with the reasons for my rulings. If I sustain an objection to a question and do not allow it to be answered, you must not speculate about what the answer might have been, nor draw any conclusion from the question itself. An unanswered question is not evidence.

At times you may be excused from the courtroom so that the lawyers can discuss legal matters with me. Under the law, some matters must be heard outside of your presence. At other times, the lawyers may approach me at the bench and hold a whispered discussion about legal matters. This is called a bench conference. Please do not be offended by our whispering and do not guess or speculate about the reasons for having the bench conference.

During this trial, you must not discuss this case with anyone, not even your friends, co-workers, family or household members. Do not allow anyone to discuss this case with you. If anyone asks you about this case, tell that person that you cannot discuss it. Do not talk to the defendant(s), the lawyers, the witnesses or anyone else connected with this case.

Throughout the course of this trial, including recesses during the day and when you are excused at the end of each day of trial, do not share information, opinions, or anything else about this case with others, personally or in writing, or through computers, cell phone messaging, personal electronic and media devices, or other forms of wireless communications. This includes, for example, communicating about this case through email, instant messaging, text messaging, posting or looking at information about this case on a blog, forum, social network site, chat room, discussion board, or using the Internet or any electronic means in any other way.

You must not discuss this case, even among yourselves, until I instruct you to begin your deliberations. During your deliberations, you may discuss the case only in the jury room, and only when all jurors are present.

You must not investigate the case in any way. This means that you must not visit any places mentioned during this trial, conduct experiments, consult any dictionaries, encyclopedias, or other reference materials.

Also, do not read, listen to, or watch anything about this case from any source, such as a television or radio broadcast, newspaper article or internet transmission. Your decision must be based only on the evidence you receive in this courtroom and the court's instructions on the law.

If you receive any information about this case from any source outside of this trial, even unintentionally, do not share that information with any other juror. If you do receive such information, or if anyone tries to influence you or any other juror, you must immediately tell the bailiff.

Keep an open mind throughout this trial. Do not make up your mind about the verdict or about any issue until after you have discussed the case with the other jurors during deliberations. Do not conclude from my rulings or from anything that I say or do during this trial that I favor one side over the other.

Each one of us has biases about or certain perceptions or stereotypes of other people. We may be aware of some of our biases, though we may not share them with others. We may not be fully aware of some of our other biases.

Our biases often affect how we act, favorably or unfavorably, toward someone. Bias can affect our thoughts, what we see, hear and remember, whom we believe or disbelieve, and how we make important decisions.

As jurors you are being asked to make very important decisions in this case. You must not let bias, prejudice, or public opinion influence your decision. You must not be biased in favor of or against any party or witness because of the person's actual or perceived race, color, ancestry, national origin, ethnicity, sex, gender, gender identity, sexual orientation, marital status, age, disability, religion, socioeconomic status, or political affiliation.

Your verdict must be based solely on the evidence presented. You must carefully evaluate the evidence and resist any urge to reach a verdict that is influenced by bias for or against any party or witness.

If you have a cell phone or other electronic device, keep it turned off while you are in the courtroom. Turned off means that the phone or other device is actually off and not in a silent or vibrating mode. After each recess, please double check to make sure your device is turned off. If someone needs to contact you in an emergency, the court can receive messages and deliver them to you without delay. The court's phone number will be provided to you. It is important that you do not use your cell phone or other device in the courtroom during these proceedings.

3.03 Consider Only the Evidence

You must consider only the evidence that has been presented to you in this case and inferences drawn from the evidence which are justified by reason and common sense.

The indictment is a mere formal accusation, and it is not evidence of the defendant's guilt. You must not be influenced at all because the defendant has been charged with an offense.

Trial procedures are governed by rules. When a lawyer believes that the rules require it, it is his or her duty to raise an objection. It is my responsibility to rule on such objections. You must not consider objections made by lawyers in your deliberations.

Statements or arguments made by lawyers are not evidence. You should consider their arguments to you, but you are not bound by their memory or interpretation of the evidence.

If I have said or done anything that has suggested to you that I favor either side, or if any of my statements or facial expressions has seemed to indicate an opinion as to which witnesses are, or are not, worthy of belief or what facts are or are not proved, or what inferences should be drawn from the evidence, I instruct you to disregard it. You must also disregard any remark I may have made, unless the remark was an instruction to you.

You must not be influenced by pity for the defendant or by passion or prejudice against the defendant. Both the prosecution and the defendant have a right to demand, and they do demand and expect, that you will carefully and impartially consider and weigh all of the evidence and follow these instructions, and that you will reach a just verdict.

3.09 Credibility and Weight of Testimony

It is your exclusive right to determine whether and to what extent a witness should be believed and to give weight to his or her testimony accordingly. In evaluating the weight and credibility of a witness's testimony, you may consider the witness's appearance and demeanor; the witness's manner of testifying; the witness's intelligence; the witness's candor or frankness, or lack thereof; the witness's interest, if any, in the result of this case; the witness's relation, if any, to a party; the witness's temper, feeling, or bias, if any has been shown; the witness's means and opportunity of acquiring information; the probability or improbability of the witness's testimony; the extent to which the witness is supported or contradicted by other evidence; the

extent to which the witness has made contradictory statements, whether in trial or at other times; and all other circumstances surrounding the witness and bearing upon his or her credibility.

Inconsistencies or discrepancies in the testimony of a witness, or between the testimony of different witnesses, may or may not cause you to discredit such testimony. In weighing the effect of inconsistencies or discrepancies, whether they occur within one witness's testimony or as between different witnesses, consider whether they concern matters of importance or only matters of unimportant detail, and whether they result from innocent error or deliberate falsehood.

3.02 Presumption of Innocence; Reasonable Doubt

You must presume the defendant is innocent of the charge against him. This presumption remains with the defendant throughout the trial of the case, unless and until the prosecution proves the defendant guilty beyond a reasonable doubt.

The presumption of innocence is not a mere slogan but an essential part of the law that is binding upon you. It places upon the prosecution the duty of proving every material element of the offense charged against the defendant beyond a reasonable doubt.

You must not find the defendant guilty upon mere suspicion or upon evidence which only shows that the defendant is probably guilty. What the law requires before the defendant can be found guilty is not suspicion, not probabilities, but proof of the defendant's guilt beyond a reasonable doubt.

What is a reasonable doubt?

It is a doubt in your mind about the defendant's guilt which arises from the evidence presented or from the lack of evidence and which is based upon reason and common sense.

Each of you must decide, individually, whether there is or is not such a doubt in your mind after careful and impartial consideration of the evidence.

Be mindful, however, that a doubt which has no basis in the evidence presented, or the lack of evidence, or reasonable inferences therefrom, or a doubt which is based upon imagination, suspicion or mere speculation or guesswork is not a reasonable doubt.

What is proof beyond a reasonable doubt?

If, after consideration of the evidence and the law, you have a reasonable doubt of the defendant's guilt, then the prosecution has not proved the defendant's guilt beyond a reasonable doubt and it is your duty to find the defendant not guilty.

If, after consideration of the evidence and the law, you do not have a reasonable doubt of the defendant's guilt, then the prosecution has proved the defendant's guilt beyond a reasonable doubt and it is your duty to find the defendant guilty.

9.34, 9.35, 9.36 Kidnapping (as modified)

The Defendant, Jaden Sinclair, is charged with the offense of Kidnapping. A person commits the offense of Kidnapping if he intentionally or knowingly restrains another person with intent to inflict bodily injury upon that person. There are three material elements of the offense of Kidnapping, each of which the prosecution must prove beyond a reasonable doubt. These three elements are:

1. That, on or about May 21, 2022, in the City and County of Honolulu, the Defendant restrained Kiran Taufique; and

2. That the Defendant did so intentionally or knowingly; and
3. That the Defendant did so with the intent to inflict bodily injury upon Kiran Taufique, or with the intent to terrorize Kiran Taufique, or with the intent to hold Kiran Taufique for ransom or reward.

“Restrain” means to restrict a person’s movement in such a manner as to interfere substantially with the person’s liberty: (1) by means of force, threat, or deception; or (2) if the person is under the age of eighteen or incompetent, without the consent of the relative, person, or institution having lawful custody of the person.

8.01 Penalty or Punishment Not to be Discussed

You must not discuss or consider the subject of penalty or punishment in your deliberations of this case.

8.02A Unanimous Verdict

A verdict must represent the considered judgment of each juror, and in order to reach a verdict, it is necessary that each juror agree thereto. In other words, your verdict must be unanimous.

Each of you must decide the case for yourself, but it is your duty to consult with one another and to deliberate with a view to reaching an agreement, if you can do so without violating your individual judgment. In the course of your deliberations, do not hesitate to re-examine your own views and change your opinion if convinced it is erroneous. But do not surrender your honest belief as to the weight or effect of evidence for the mere purpose of returning a verdict.

8.03 Conduct of Deliberations

Upon retiring to the jury room, elect one of your members as foreperson to preside over your deliberations and be your spokesperson in court.

You may take such time as you feel is necessary for your deliberations. You may inform the court if you have any questions about or do not understand the court’s instructions.

When you reach a verdict, the foreperson is to sign and date the verdict, appropriate forms for which will be given to you.

Until you are through with your consideration of this case or you are otherwise excused by the court, it is necessary from this time that you remain together as a body. A bailiff will be sworn to attend you and take care of any personal problems you may have and see to your comfort. If you need to communicate with the court, send a note through the bailiff. Please do not attempt to communicate with the court except in writing.

During the course of the trial, you have received all of the evidence you may consider to decide the case. You must not attempt to gather any information on your own which you think might be helpful. Do not engage in any outside reading on any matter having anything to do with this case. Do not refer to dictionaries or other outside sources. Do not visit any places mentioned in the case. Do not in any other way try to learn about the case outside the courtroom.

During your recesses from deliberations, when you are released to go home in the evening, you must not discuss this case with anyone or permit anyone to discuss this case with

you. You must not read or listen to news accounts about this case, if there are any.

You must not discuss this case with any person other than your fellow jurors. You must not reveal to the court or to any other person how the jury stands, numerically or otherwise, until you have reached a unanimous verdict and it has been received by the court.

Exhibit List

- Exhibit 1: Ransom Email
- Exhibit 2: Sinclair Bank Statement
- Exhibit 3: Trunk with Fingerprints
- Exhibit 4: Toxicology Report
- Exhibit 5: Den Carpet with GHB Powder
- Exhibit 6: Psychological Report
- Exhibit 7: Notice of Non Payment on Mortgage Letter
- Exhibit 8: Commercial Sales Agreement
- Exhibit 9: Amulet with Inscription
- Exhibit 10: Check to The Ike School
- Exhibit 11: Check to The Circle of Hope
- Exhibit 12: TV Schedule

Exhibit 1




Mail

Ike Mail

From:	openhandedemptytree@kmail.com
To:	<kiran.taufique@ikeschool.edu>
Subject:	Sacrifice \$\$\$\$ or Sacrifice Self
Date:	Sat, 21 May 2022 11:04:23 a.m.

Kiran will be sacrificed if you and the police do not cooperate fully with our demands. Once we know you are listening, we will provide further instruction. \$250,000 to be wired off-shore or s/he will be off'd. No games or Kiran will be blamed.

Exhibit 2

Jaden Sinclair
58 Pitt Lane
Honolulu, Hawaii

New Temple Federal Savings
4016 Main Street
Honolulu, Hawaii



Consolidated Bank Statement

Date of Statement: 21 May 2022

Bank Statement for the Period 15 Nov 2021 – May 15 2022

Date	Transaction Description	No. / Type	ATM/Cash	Check	Wire Transfer	Interest	Balance
15-Nov-21	Balance Brought Down						\$303,486.24
17-Nov-21	ATM Withdrawal	3001	<\$500.00>				\$302,986.24
22-Nov-21	Cheque	501		<\$5,600.00>			\$297,386.24
24-Nov-21	ATM Withdrawal	3002	<\$500.00>				\$296,886.24
27-Nov-21	ATM Withdrawal	3003	<\$500.00>				\$296,386.24
29-Nov-21	Wire Transfer	56			<\$7,000.00>		\$289,386.24
30-Nov-21	Interest	INT				\$5,787.73	\$295,173.97
1-Dec-21	Cheque	502		<\$20,000.00>			\$275,173.97
4-Dec-21	ATM Withdrawal	3004	<\$500.00>				\$274,673.97
8-Dec-21	Wire Transfer	57			<\$1,579.00>		\$273,094.97
11-Dec-21	Cheque	503		<\$6,500.00>			\$266,594.97
12-Dec-21	Wire Transfer	58			<\$17,802.02>		\$248,792.95
19-Dec-21	Cheque	504		<\$5,000.00>			\$243,792.95
21-Dec-21	ATM Withdrawal	3005	<\$500.00>				\$243,292.95
27-Dec-21	Cheque	505		<\$1,000.00>			\$242,292.95
1-Jan-22	Interest	INT				\$4,845.86	\$247,138.81
2-Jan-22	Cash Withdrawal	CW	<\$5,000.00>				\$242,138.81
3-Jan-22	Cheque	506		<\$7,600.00>			\$234,538.81
4-Jan-22	ATM Withdrawal	3006	<\$500.00>				\$234,038.81
9-Jan-22	Wire Transfer	59			<\$9,000.00>		\$225,038.81
11-Jan-22	Cheque	507		<\$3,500.00>			\$221,538.81
12-Jan-22	Cash Withdrawal	CW	<\$5,000.00>				\$216,538.81
16-Jan-22	Cash Withdrawal	CW	<\$5,000.00>				\$211,538.81
22-Jan-22	Cash Withdrawal	CW	<\$5,300.00>				\$206,238.81
23-Jan-22	ATM Withdrawal	3007	<\$500.00>				\$205,738.81
26-Jan-22	Check	508		<\$1,356.43>			\$204,382.38
29-Jan-22	Cash Withdrawal	CW	<\$5,000.00>				\$199,382.38
1-Feb-22	Interest	INT				\$3,987.65	\$203,370.03
5-Feb-22	Cash Withdrawal	CW	<\$5,100.00>				\$198,270.03
7-Feb-22	ATM Withdrawal	3008	<\$500.00>				\$197,770.03
12-Feb-22	Wire Transfer	60			<\$1,985.24>		\$195,784.79
13-Feb-22	Cheque	509		<\$1,400.89>			\$194,383.90
16-Feb-22	Cash Withdrawal	CW	<\$5,000.00>				\$189,383.90
19-Feb-22	Cheque	510		<\$1,515.00>			\$187,868.90
22-Feb-22	Cash Withdrawal	CW	<\$5,000.00>				\$182,868.90
23-Feb-22	ATM Withdrawal	3009	<\$500.00>				\$182,368.90
28-Feb-22	Cash Withdrawal	CW	<\$5,000.00>				\$177,368.90

1-Mar-22	Interest	INT				\$3,546.38	\$180,915.28
5-Mar-22	Cash Withdrawal	CW	<\$9,999.00>				\$170,916.28
6-Mar-22	Cash Withdrawal	CW	<\$9,999.00>				\$160,917.28
8-Mar-22	Wire Transfer	61			<\$4,500.00>		\$156,417.28
9-Mar-22	Cash Withdrawal	CW	<\$9,999.00>				\$146,418.28
13-Mar-22	Cash Withdrawal	CW	<\$9,999.00>				\$136,419.28
14-Mar-22	Cheque	511		<\$450.00>			\$135,969.28
16-Mar-22	ATM Withdrawal	3010	<\$500.00>				\$135,469.28
20-Mar-22	Cash Withdrawal	CW	<\$9,999.00>				\$125,470.28
22-Mar-22	Wire Transfer	62			<\$2,000.00>		\$123,470.28
26-Mar-22	Cash Withdrawal	CW	<\$9,999.00>				\$113,471.28
27-Mar-22	ATM Withdrawal	3011	<\$500.00>				\$112,971.28
30-Mar-22	Cheque	512		<\$1,515.00>			\$111,456.28
2-Apr-22	Interest	INT				\$2,229.13	\$113,685.41
4-Apr-22	ATM Withdrawal	3012	<\$500.00>				\$113,185.41
6-Apr-22	Cash Withdrawal	CW	<\$9,999.00>				\$103,186.41
10-Apr-22	ATM Withdrawal	3013	<\$500.00>				\$102,686.41
11-Apr-22	Wire Transfer	63			<\$1,202.00>		\$101,484.41
13-Apr-22	Cash Withdrawal	CW	<\$9,999.00>				\$91,485.41
17-Apr-22	Wire Transfer	64			<\$1,150.00>		\$90,335.41
20-Apr-22	ATM Withdrawal	3014	<\$500.00>				\$89,835.41
24-Apr-22	ATM Withdrawal	3015	<\$500.00>				\$89,335.41
25-Apr-22	ATM Withdrawal	3016	<\$500.00>				\$88,835.41
27-Apr-22	Cash Withdrawal	CW	<\$9,999.00>				\$78,836.41
30-Apr-22	ATM Withdrawal	3017	<\$500.00>				\$78,336.41
1-May-22	Interest	INT				\$1,526.73	\$79,863.14
2-May-22	Cash Withdrawal	CW	<\$9,999.00>				\$69,864.14
3-May-22	Cash Withdrawal	CW	<\$9,999.00>				\$59,865.14
4-May-22	ATM Withdrawal	3018	<\$500.00>				\$59,365.14
7-May-22	Cash Withdrawal	CW	<\$9,999.00>				\$49,366.14
8-May-22	Cash Withdrawal	CW	<\$9,999.00>				\$39,367.14
9-May-22	Wire Transfer	65			<\$15,000.00>		\$24,367.14
10-May-22	Cash Withdrawal	CW	<\$9,999.00>				\$14,368.14
14-May-22	Cash Withdrawal	CW	<\$3,500.00>				\$10,868.14
15-May-22	ATM Withdrawal	3019	<\$500.00>				\$10,368.14
Total Withdrawals	\$315,041.58		\$198,386.00	\$55,437.32	\$61,218.26		
Total Credits						\$21,923.48	
TOTAL BALANCE							\$10,368.14

Definition of Codes

CD Cash Deposit
 CW Cash Withdrawal
 INT Interest
 SF Service Fee
 CO Commission



Exhibit 3



Exhibit 4

Hospital/ Clinic: Eisenhower Medical Center		Lab no.	6342.92	
		Last Name	Taufique	
Clinical Details (inc. all drugs prescribed)		First Name	Kiran	
N/A		Patient's Address 456 Kapua Lane		
Date of Specimen	05/21/2022; 14:06 hrs.	DOB	02/25/2004	Age 18
Specimen Type	Police Req. blood and urine	Lab Tech.	J.P. McCullough	
Laboratory Report		<u>Blood Drugs of Abuse Screen</u>		
Amphetamine	Neg	Opiate Screen	Neg	
Benzodiazpine	Neg	Flunitrazepam	Neg	
Cannabinoids	Neg	Ketamine hydrochloride	Neg	
Cocaine Metabolite	Neg	Codeine	Neg	
Gamma Hydroxybutyrate	Pos			
Blood Alcohol Content	.01			

GHB concentration found in urine of 95 mg/L correlates to heavy dosage in 12 hours prior to sample, probably in range for deep sleep / anesthetic induction when used legally				
Date of Report	05/22/2022	Signature	<i>JPM</i>	

Exhibit 5



Exhibit 6

Dr. Simone Démodé, M.D. Ph.D.

56 Bishop Street | Honolulu, HI
555-1001 (phone) | 555-1002 (fax) | info@psychdemonde.com | www.pyschdemonde.com
Licensed Clinical Psychiatrist

PSYCHOLOGICAL EVALUATION: KIRAN TAUFIQUE

DATE OF EVALUATION: May 29, 2022

DATE OF REPORT: June 4, 2022

1. PURPOSE OF EVALUATION

At the request of Parent, Cleo Taufique, a complete psychological evaluation was completed for Kiran Taufique, age 18. As an adult, Kiran was required to sign a waiver regarding the disclosure of this diagnosis to Cleo Taufique. A copy of this waiver is available upon request and a copy has been given to the subject. The purpose of this evaluation is to determine the effect Kiran's kidnapping has had on her/his mental well being.

2. SYMPTOMS & BRIEF DIAGNOSIS

According to Cleo Taufique, since the kidnapping, Kiran has been extremely distant, anti-social and irritable. Cleo also expressed a belief that these symptoms manifested themselves not only because of the kidnapping incident, but also as a result of Kiran's interaction with a club at Ike High School, "LEX", and her/his interaction with the accused kidnapper, Jaden Sinclair. However, Kiran did not display any of these symptoms during the evaluation when discussing the incident, but only in reference to questions regarding her/his relationship with Cleo Taufique.

Kiran does display some of the classic symptoms of post-traumatic stress disorder, specifically depression and limited but acute anxiety disorder. In addition, although completely lucid, Kiran appears to be suffering from some form of mild delusion regarding her/him interpretation of Jaden Sinclair.

3. MENTAL EXAMINATION FINDINGS

Kiran, absent the kidnapping incident, appeared to be struggling with general issues of self-identity and body image to a greater extent than those in her/his age group. Kiran explained in detail her/his interaction with LEX and how s/he feels and appreciates the dramatic effect such interaction has had on her/his perception of the world. Kiran attributes a great deal of praise towards Jaden Sinclair for fostering this realization. Kiran's attraction to Jaden Sinclair is maternalistic/paternalistic and may be a result of Kiran losing a parent at such a young age. Kiran placed this organization and Jaden Sinclair unusually high on a test that was used to identify mental alliances. Kiran displays strong feelings of resentment towards Cleo Taufique. Kiran blames Cleo for her/his years of social isolation during pubescent development.

Kiran did score quite high on mental lucidity and reasoning exams. Kiran displays a keen intellect and a strong ability to diagnose her/his environment and societal interaction. In addition, and although apparently recently formed, Kiran's new found self-image is strong and unwavering.

With specific reference to the kidnapping incident, Kiran only displays some of the symptoms normally associated with such an event. Kiran has displaced her/his feelings of victimization towards Jaden Sinclair. Kiran's depression stems from guilt associated with a feeling that s/he is responsible for Jaden Sinclair's arrest and charges of kidnapping. Kiran only displayed symptoms of anxiety disorder when discussing the potential outcome of these criminal proceedings and the effect Jaden Sinclair's absence would have on her/his future. Kiran's desire to have the kidnapper convicted is based on proving Jaden Sinclair's innocence and is only tangentially related to creating personal closure of the trauma.

This symptomatic identification with the accused kidnapper is a hallmark of Stockholm Syndrome, but as Kiran was unconscious for the majority of the ordeal and did not interact with anyone during the kidnapping, such a comparison is not warranted. Instead, Kiran's strong identification with Jaden Sinclair stems from months of interaction and should be potentially analyzed from a perspective of socialized programming.

4. DIAGNOSIS & TREATMENT

Kiran is suffering from a form of post traumatic stress disorder and should begin treatment for depression immediately. I have prescribed Kiran the selective serotonin reuptake inhibitor, Lamaprox. Furthermore, Kiran's condition should be monitored closely and undergo constant psychological monitoring at least and until the criminal proceedings involving Jaden Sinclair are resolved. Intensive therapy is strongly recommended in order to ascertain a better understanding of the effects Kiran's interaction with LEX and Jaden Sinclair have had on her/his self-perception and world view.

Simone Démodé

Dr. Simone Démodé, M.D. Ph.D.

Exhibit 7

Jaden Sinclair
58 Pitt Lane
Honolulu, Hawaii

New Temple Federal Savings
4016 Main Street
Honolulu, Hawaii



April 24, 2022

NOTICE OF NON PAYMENT

Dear Jaden Sinclair:

We have not yet received your mortgage payment for February, March or April of 2022. These payments have been due, under the terms of your mortgage, on the first of each respective month. If you have not yet made both your current and past due mortgage payments, please do so immediately.

You are (or soon will be) in default of your mortgage agreement with New Temple Federal Savings. This letter serves as notice that you must correct this default by making your mortgage payments current no later than June 1, 2022. If you fail to comply with this request, we will seek to have the property foreclosed by judicial proceeding. You do possess the right to claim in the foreclosure proceeding that you are not in default of the terms and conditions of your mortgage agreement as well as any other permissible defense.

If you are unable to make the mortgage payments outlined above, please seek assistance from a qualified attorney. You are a valued customer with New Temple Federal Savings and we hope that we can resolve this matter without the need to use the legal rights afforded to us.

Thank you for your time and attention to this matter.

Very truly yours,

Pat Stanford

PAT STANFORD
Bank Manager

Exhibit 8

AGREEMENT FOR THE SALE OF COMMERCIAL REAL ESTATE

A/S-C

SELLER'S BUSINESS RELATIONSHIP WITH LICENSED BROKER	
BROKER (Company) <u>123-Real-Estate, INC</u>	PHONE <u>(808) 555-1212</u>
ADDRESS <u>14 Main Street, HanaJulu, Hawaii 96813</u>	FAX <u>(808) 555-1232</u>
BROKER IS THE AGENT FOR SELLER. Designated Agent(s) for Seller, if applicable: _____	
OR	
Broker is NOT the Agent for Seller and is a/an: <input type="checkbox"/> AGENT FOR BUYER <input type="checkbox"/> TRANSACTION LICENSEE	

BUYER'S BUSINESS RELATIONSHIP WITH LICENSED BROKER	
BROKER (Company) <u>Cloak Realty</u>	PHONE <u>(808) 555-3232</u>
ADDRESS <u>845 Clover Road, HanaJulu, Hawaii 96813</u>	FAX <u>(808) 555-4545</u>
BROKER IS THE AGENT FOR BUYER. Designated Agent(s) for Buyer, if applicable: _____	
OR	
Broker is NOT the Agent for Buyer and is a/an: <input type="checkbox"/> AGENT FOR SELLER <input type="checkbox"/> SUBAGENT FOR SELLER <input type="checkbox"/> TRANSACTION LICENSEE	

When the same Broker is Agent for Seller and Agent for Buyer, Broker is a Dual Agent. All of Broker's licensees are also Dual Agents UNLESS there are separate Designated Agent(s) for Buyer and Seller. If the same Licensee is designated for Seller and Buyer, the Licensee is a Dual Agent.

1 1. This Agreement, dated March 22, 2022 ("Effective Date"), is by and between
2 SELLER:

3 Schmode Properties, LLC

BUYER:

4 Jaden Sinclair

5 2. Seller hereby agrees to sell and Buyer hereby agrees to purchase
6 ALL THAT CERTAIN lot or piece of ground with buildings and improvements thereon erected, if any, known as:

7
8 529 Center Lane, Honolulu, Hawaii 96816, bearing Tax Map Key No. 1-2-003-004:000.

9
10
11
12 **TERMS (10-01)**

(A) Purchase Price ~~TWO HUNDRED AND FIFTY THOUSAND~~ (\$250,000)

13 3. Which shall be paid to Seller by Buyer as follows:

14 (1) An initial deposit in the amount of \$15,000.00, due within 5 business days of the Effective Date

15 (2) The balance of the purchase price shall be placed in Escrow, defined below, within 2 business days of the scheduled
16 closing date

17
18
19
20
21 (B) All deposits and amounts shall be held in an interest-bearing escrow account ("Escrow"), to be opened by Seller within
22 two business days of the Effective Date.

23 (C) Seller's written approval to be on or before: March 23, 2022

24 (D) Closing shall take place on or before June 1, 2022 ("Scheduled Closing Date")

25 (E) Conveyance from Seller will be by fee simple deed of special warranty unless otherwise stated here:

26
27 (F) Payment of transfer taxes will be divided equally between Buyer and Seller unless otherwise stated here:

28
29 (G) At time of settlement, the following will be adjusted pro-rata on a daily basis between Buyer and Seller, reimbursing where applicable:
30 taxes (see Notices and Information Regarding Tax Proration); rents; interest on mortgage assumptions; condominium fees, if any; water
31 and/or sewer fees, if any; together with any other lienable municipal service. The charges are to be pro-rated for the period(s) covered.
32 Seller will pay up to and including the date of settlement; Buyer will pay for all days following settlement, unless otherwise stated here:
33

Buyer(s) JS

Page 1 of 9
Seller(s) MS

Exhibit 9



Exhibit 10


Jaden Sinclair 58 Pitt Lane Honolulu, HI	0243
	DATE <i>August 19, 2020</i>
PAY TO THE ORDER OF	<u><i>The Ike School</i></u> \$ <u><i>40,000.00</i></u>
	<u><i>Forty thousand dollars and zero cents XXX</i></u> DOLLARS
 <u>NTFS</u>	
FOR <u><i>Science Lab</i></u>	<u><i>Jaden Sinclair</i></u>
: 098947218 : 98102340556 : 0243	

Exhibit 11


Jaden Sinclair 58 Pitt Lane Honolulu, HI	0502
	DATE <i>December 1, 2021</i>
PAY TO THE ORDER OF <u><i>Circle of Hope</i></u>	\$20,000.00
<u><i>Twenty thousand dollars and zero cents XXX</i></u>	, DOLLARS
 <u>NTFS</u>	
FOR <u><i>Annual Donation</i></u>	<u><i>Jaden Sinclair</i></u>
: 098947218 : 98102340556 : 0502	

Exhibit 12

Honolulu Cable Network Night Owl Basic Cable TV Schedule

May 20th & 21st 2022

May 20th

May 21st

Station/Time	11:30pm	12:00am	12:30am	1:00am	1:30am	2:00am	2:30am	3:00am	3:30am	4:00am	4:30am	5:00am
1 TLS	TV Listing Station - * SEE WHAT'S ON *											
2 SNET	New Temple at San Francisco			Post Game			New Temple at San Francisco Replay					
3 RTC	Late Ne	World R	Late Film: Fluffy Goes to Park				Hey Ph	Harrisb	Sunshine Report		Wake U	
4 ACTION	Time Sweeper		War List	CPM the NiteOwl		Informational Advertising						
5 ETN	Friday Night Live			Late Action Hour		Show Time After Prime Time			Northpark	Highway	Travel	
6 MOVY	Rocky				Rocky II				Rocky III			
7 WEATH	Storm Tales			Local Weather					Fishing Report			
8 NTB	Honolulu Tonight	Honolulu Council Meeting				Eye on New Tem		Off Air			New	
9 H SHP	Items to Better the Home			Jewelry Hour		Bargain Hunter			Fisher's Delight			
10 MUSIC	Music Videos			Best of the Week		Hot Hot	Hot Hot	Music Videos				
11 WORLD	World	View	News	News	Travel to Europe			News	News	World Market Report		
12 MEAL	Cooking with Mr. B		Barristers' Chest		Food	N.Y. Cook		Cooking with Mr.		Steel Chef US	Food	
13 SPAN	Market Street		Home I	Tech	Make it	House Finders		Property Manage		Home I	House Finder	
14 FASH	Fashion	Fashion	Worldwide Runway		Models US		Trends	Worldwide Runwa		Trends	Shoes S	Wardro
15 SNET 2	Baseball Report		Bowling	Tennis	Tennis World Championships Replay						Tennis	Baseball
16 NWS	News	News	Night Report		Economv	News	News	Local Report		News	News	Economy
17 MOV 2	Movie Awards Repeat			Nice Illusion				Bugs Run Amuck				Movie
18 SAM	Power H	Strength	Fitness	Gym Diaries		Strength	Fitness	Power Hour		Cardio Studio		Fitness
19 STORY	World War II		Civil War Parts I & II				1812 Revisited		Sea	Air	World War II	
20 LAUGH	Comic	Comic	Stand up Hour		Comic	Comic	Team Mascots		Philly Fiction		Stand up Hour	
21 FiSi	Invader Lands II			Power that Be		TimeRun	Jupiter Landing		TimeRun	AlphaBeta Universe		
22 HWOOD	Starz	Starz	Pads	Pads	Starz	Starz	Hollywood Tales		Insider Report		Awards Recap	