



**2008 PENNSYLVANIA STATEWIDE  
HIGH SCHOOL MOCK TRIAL COMPETITION**

***Commonwealth of Pennsylvania  
v.  
Jaden Sinclair***

**SPONSORED BY THE YOUNG LAWYERS DIVISION  
OF THE PENNSYLVANIA BAR ASSOCIATION**

*Written by:  
Jon Grode  
Jane Meyer*

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## Problem Questions & Contact Information

Questions concerning these case materials should be sent to David Keller Trevaskis at the Pennsylvania Bar Association (PBA). Case material questions will be answered in cooperation with the Statewide Mock Trial Executive Committee. Questions regarding mock trial procedure, including any questions involving the Rules of Competition or Rules of Evidence (Pennsylvania Mock Trial Version), should be directed to your District or Regional Mock Trial Coordinators.

Answers to legitimate and non-repetitive questions will be posted periodically in a supplemental memo on the mock trial website [www.pabar.org](http://www.pabar.org) under the Young Lawyer's Division (YLD) link (direct access at <http://www.pabar.org/public/yld/meetings/yldstatewidemock.asp>).

You may begin submitting questions anytime. **The deadline for submitting questions is 12:00 noon on January 22, 2008.** The final update to the supplemental memo will be posted no later than **January 25, 2008.** The final memo will become the official supplemental memo and may be used in the competition. Please consult Rule of Competition 3.3 concerning the evidentiary value teams are to give the final official supplemental memo.

Questions must be sent in writing by one of the methods listed below. Please be sure to include return contact information in the event we need to reach you to clarify a question.

**No questions will be considered unless submitted under this procedure.**

E-mail: [david.trevaskis@pabar.org](mailto:david.trevaskis@pabar.org)

Fax: 717.238.7182

Regular Mail:

David Keller Trevaskis  
Pennsylvania Bar Association.  
100 South Street  
PO Box 186  
Harrisburg, PA 17108-0186

Teams without access to the web site can request paper or e-mail copies from Maria Engles at the PBA ([maria.engles@pabar.org](mailto:maria.engles@pabar.org); 800.932.0311 ext. 2223). Please be sure to include your return address.

## Introduction and Acknowledgments

Welcome to the 2008 Pennsylvania Statewide High School Mock Trial Competition - the 24<sup>th</sup> year of one of the top secondary level academic competitions in the commonwealth! The competition, which commenced in 1984, is sponsored by the Young Lawyers Division of the Pennsylvania Bar Association (PBA/YLD). It provides high school students with firsthand experience of the American judicial system. The Mock Trial Competition is one of a series of law-related and civic education programs conducted by the PBA to demystify the law for Pennsylvanians, including Freedom's Answer, I Signed the Constitution, Project PEACE, Law Day and Stepping Out for Seniors.

This year's case, *The Commonwealth of Pennsylvania v. Jaden Sinclair*, is a criminal case involving an alleged kidnapping. The case was written by Jonathan A. Grode, a 4<sup>th</sup> year evening student at Temple University James E. Beasley School of Law, who also adapted and modified the 2007 mock trial problem. Jane E. Meyer, Esq., a prior Mock Trial Committee Chairperson and current member of the National High School Mock Trial Championship Board of Directors, completed the final version of the problem in collaboration with Mr. Grode. Our sincerest thanks go out to Mr. Grode and Attorney Meyer for their tireless and enthusiastic creation and editing of this problem.

Mr. Grode thanks Professor James Shellenberger, Esq. (Temple University James E. Beasley School of Law) for his valuable assistance in editing the problem and assistance in navigating through Pennsylvania Criminal Procedure; Yuah Jessica Choi, Esq. (Goldblum & Hess) and Christopher P. Munden, for reviewing various drafts of the problem, Roberta West (LEAP Program Advisor Temple University) for her ongoing and tireless support; his wife, Caroline Munden, for her love, care and consideration; and the entire YLD of the PBA for their valued assistance, suggestions and guidance.

Thanks also go to Jennifer J. Clark of Lackawanna County, Co-Chair of the Mock Trial Committee and Past Chair of the PBA/YLD, and to District Attorney Bill Higgins of Bedford County, Mock Trial Committee Co-Chair and Chair of the PBA/YLD, for their continued efforts in organizing and implementing the many facets of this competition. The Mock Trial Committee would also like to express its appreciation to Ryan Blazure, Esq, the PBA/YLD Chair-Elect, for his continued support of and valued input into the competition.

The PBA/YLD also extends thanks to attorney volunteers Donna Adelsberger, Amy Niedzalkowski, and Anne Panfil for their review of early versions of the case materials. As usual, the YLD also thanks David Trevaskis, PBA Pro-Bono Coordinator, for his continued involvement and experienced guidance in implementing the 2008 Mock Trial Competition.

Finally, we thank the hundreds of volunteers who annually contribute their time and energy to the overall organization and running of the program, spearheaded by Mock Trial Co-Chair Bill Higgins. Last, but certainly not least, we thank the PBA staff, headed by Executive Director Barry Simpson and Deputy Executive Director Fran O'Rourke, and the many PBA staff members, too numerous to mention, who provide valuable time and talent throughout the mock trial season. Without their assistance, this competition would not be the tremendous success that it is each year. Special thanks to Maria Engles, the YLD Coordinator at the PBA, who serves as the main point of contact for the entire program, beginning to end.

We hope you find these materials interesting, and wish you all the best of luck!

## Statement of Facts

On May 19, 2007, Kiran Taufique, then a senior at the Norman 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 Norman 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 1999 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 PDA, though the PDA was never recovered. The investigation also revealed that Sinclair was having financial difficulties.

Kiran, who had little recollection of the events of May 18 and 19, 2007, 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.

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COMMONWEALTH OF PENNSYLVANIA	:	MAGISTRATE DISTRICT No.: 490
	:	BARRISTER COUNTY, PENNSYLVANIA
	:	
v.	:	Complaint No.: 2007 NT 4562
	:	
JADEN SINCLAIR,	:	
Defendant.	:	Charge: Kidnapping 18 Pa.C.S.A. § 2901

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**CRIMINAL COMPLAINT**

I, Detective Shae Reynolds, Badge 52, Commonwealth of Pennsylvania Division of Missing Persons, Kidnapping and Extortion, do hereby state:

1. I accuse Defendant Jaden Sinclair, who resides at 58 Pitt Lane, New Temple, PA, with violating the penal laws of the Commonwealth of Pennsylvania, specifically with the kidnapping of Kiran Taufique by locking Kiran in the trunk of a vehicle registered to the defendant and subsequently sending a ransom email demanding payment of \$250,000.
2. The date when the accused committed this offense was on (or about) Saturday, May 19, 2007, at Sinclair’s residence, 58 Pitt Lane, New Temple, Pennsylvania.
3. The accused committed these acts against the peace and dignity of the Commonwealth of Pennsylvania and contrary to the Act of Assembly, specially, 18 Pa.C.S.A. § 2901.
4. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information and belief subject to penalties of the Criminal Code, 18 Pa.C.S.A. § 4904, relating to unsworn falsification to authorities.

Date: May 21, 2007

Det. Shae Reynolds  
(signature of the complainant)

AND NOW, on this date, May 21, 2007 I certify the complaint has been properly completed and verify that there is probable cause for the issuance of process.

Judge C.P. Footley, Magistrate D.J.  
Issuing Authority

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<p><b>COMMONWEALTH OF PENNSYLVANIA</b></p> <p style="text-align: center;">v.</p> <p><b>JADEN SINCLAIR,</b> Defendant</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p><b>MAGISTRATE DISTRICT No.: 490</b> <b>BARRISTER COUNTY, PENNSYLVANIA</b></p> <p><b>Complaint No.: 2007 NT 4562</b></p> <p><b>Charge: Kidnapping 18 Pa.C.S.A. § 2901</b></p>
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## Transcript of Proceedings before Issuing Authority

1. Defendant Jaden Sinclair, who resides at 58 Pitt Lane, New Temple, PA, was arrested on May 19, 2007 and charged by complaint with the crime of kidnapping (18 P.S.C.A. §2901).
2. A Preliminary arraignment for Jaden Sinclair was held before the undersigned at 42 Market Street, New Temple, Pennsylvania on May 21.
3. At the preliminary arraignment, defendant was advised of right to apply for assignment of counsel and was given a copy of the complaint.
4. At the preliminary arraignment, bail was set at \$500,000 based on the evidence presented at that time and the complaint previously filed with the court. The request for 10% bail posting made by the defendant was denied.
5. On May 30, 2007, a preliminary hearing was held before undersigned at 42 Market Street, New Temple, Pennsylvania. The defendant was present and was represented by counsel. The Commonwealth was represented by the assigned Assistant District Attorney. Detective Shae Reynolds was sworn and testified for the Commonwealth.
6. At the conclusion of the preliminary hearing on May 30, 2007, defendant was held for court on the charge of kidnapping (18 P.S.C.A. §2901).
7. Bail was continued in the amount of \$500,000.

AND NOW, on this date, May 31, 2007 I certify the transcript of proceedings before issuing authority has been properly completed.

*Judge C.P. Footley, Magistrate D.J.*  
Issuing Authority

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COMMONWEALTH OF PENNSYLVANIA	:	IN THE COURT OF COMMON PLEAS
	:	BARRISTER COUNTY, PENNSYLVANIA
	:	Criminal Action No.: 2007 CR 3401
v.	:	
JADEN SINCLAIR,	:	
Defendant	:	Charge: Kidnapping 18 Pa.C.S.A. § 2901

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**Information**

The charge(s) having been bound over for court by the Magisterial District Judge following a Preliminary Hearing, The District Attorney of Barrister County by this information charges that, on (or about) May 19, 2007, in said County, Jaden Sinclair,

**CHARGE:**

did kidnap Kiran Taufique in violation of 18 Pa.C.S.A. §2901 by unlawfully removing Kiran Taufique by a substantial distance from the place where s/he was found or by unlawfully confining Kiran Taufique for a substantial period of time in isolation with the intent to hold Kiran Taufique for ransom or reward and/or with the intent to inflict bodily injury on or to terrorize the victim.

**All of which are against the Act of Assembly and the Peace and Dignity of the Commonwealth of Pennsylvania.**

/s/  
\_\_\_\_\_  
District Attorney

**Citation(s):** KIDNAPPING – 18 P.S.C.A. §2901



COMMONWEALTH OF PENNSYLVANIA

IN THE COURT OF COMMON PLEAS  
BARRISTER COUNTY, PENNSYLVANIA

v.

Criminal Action No.: 2007 CR 3401

JADEN SINCLAIR,  
Defendant

Charge: Kidnapping 18 Pa.C.S.A. § 2901

## Arraignment

I, Jaden Sinclair, have been advised by the District Attorney of New Temple County, Pennsylvania that I am charged by information with kidnapping (18 Pa.C.S.A. §2901) and I/my attorney have/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 these charges.

I have been advised and fully understand that I/my lawyer have/has the right to request discovery or disclosure from the District Attorney as provided by the Rules of Criminal Procedure within fourteen (14) 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 single omnibus pre-trial motion as provided by the Rules of Criminal 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

February – March 2008 Term of Criminal Court.

Date: June 1, 2007

/s/ Jaden Sinclair  
Defendant

/s/  
Attorney for Defendant

/s/  
Attorney for the Commonwealth



# APPLICABLE LAW

## COMMONWEALTH OF PENNSYLVANIA CRIMES CODE

### 18 Pa.C.S.A. § 2901. Kidnapping

**(a) Offense defined.** -- A person is guilty of kidnapping if he unlawfully removes another a substantial distance under the circumstances from the place where he is found, or if he unlawfully confines another for a substantial period in a place of isolation, with any of the following intentions:

- (1) To hold for ransom or reward, or as a shield or hostage.
- (2) To facilitate commission of any felony or flight thereafter.
- (3) To inflict bodily injury on or to terrorize the victim or another.
- (4) To interfere with the performance by public officials of any governmental or political function.

**(b) Grading.**--Kidnapping is a felony of the first degree.<sup>1</sup>

### 18 Pa.C.S.A. § 1103. Sentence of imprisonment for felony

Except as provided in 42 Pa.C.S. § 9714 (relating to sentences for second and subsequent violent offenses), a person who has been convicted of a felony may be sentenced to imprisonment as follows:

- (1) In the case of a felony of the first degree, for a term which shall be fixed by the court at not more than 20 years.

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<sup>1</sup> Please note that this subsection of 18 Pa.C.S.A. § 2901 has been modified for the purposes of this Mock Trial Problem.

# JURY INSTRUCTIONS

**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. Role of Jury.**

Members of the jury, you have seen and heard all the evidence and the arguments of the lawyers. Now I will instruct you on the law.

You have two duties as a jury. Your first duty is to decide the facts from the evidence that you have heard and seen in court during this trial. That is your job and yours alone. I play no part in finding the facts. You should not take anything I may have said or done during the trial as indicating what I think of the evidence or what I think about what your verdict should be.

Your second duty is to apply the law that I give you to the facts. My role now is to explain to you the legal principles that must guide you in your decisions. You must apply my instructions carefully. Each of the instructions is important, and you must apply all of them. You must not substitute or follow your own notion or opinion about what the law is or ought to be. You must apply the law that I give to you, whether you agree with it or not.

Whatever your verdict, it will have to be unanimous. All of you will have to agree on it or there will be no verdict. In the jury room you will discuss the case among yourselves, but ultimately each of you will have to make up his or her own mind. This is a responsibility that each of you has and that you cannot avoid.

Perform these duties fairly and impartially. Do not allow sympathy, prejudice, fear, or public opinion to influence you. You should also not be influenced by any person's race, color, religion, national ancestry, or gender

## **2. Jury sole judge of facts; sympathy or prejudice not to influence verdict.**

You are the sole judges of the facts in this case. It is your duty to determine the facts from the evidence produced here in court. Your verdict should not be based on speculation, guess or conjecture. Neither sympathy nor prejudice should influence your verdict. You are to apply the law as stated in these instructions to the facts as you find them, and in this way decide the case.

Although the lawyers may have called your attention to certain facts or factual conclusions that they thought were important, what the lawyers said is not evidence and is not binding on you. It is your own recollection and interpretation of the evidence that controls your decision in this case. Also, do not assume from anything I may have done or said during the trial that I have any opinion about any of the issues in this case or about what your verdict should be.

### **3. Credibility of witnesses.**

As I stated in my preliminary instructions at the beginning of the trial, in deciding what the facts are you must decide what testimony you believe and what testimony you do not believe. You are the sole judges of the credibility of the witnesses. Credibility refers to whether a witness is worthy of belief: Was the witness truthful? Was the witness' testimony accurate? You may believe everything a witness says, or only part of it, or none of it.

You may decide whether to believe a witness based on his or her behavior and manner of testifying, the explanations the witness gave, and all the other evidence in the case, just as you would in any important matter where you are trying to decide if a person is truthful, straightforward, and accurate in his or her recollection. In deciding the question of credibility, remember to use your common sense, your good judgment, and your experience.

In deciding what to believe, you may consider a number of factors:

- (1) The opportunity and ability of the witness to see or hear or know the things about which the witness testified;
- (2) The quality of the witness' knowledge, understanding, and memory;
- (3) The witness' appearance, behavior, and manner while testifying;
- (4) Whether the witness has an interest in the outcome of the case or any motive, bias, or prejudice;
- (5) Any relation the witness may have with a party in the case and any effect the verdict may have on the witness;
- (6) Whether the witness said or wrote anything before trial that was different from the witness' testimony in court;
- (7) Whether the witness' testimony was consistent or inconsistent with other evidence that you believe; and
- (8) Any other factors that bear on whether the witness should be believed.

Inconsistencies or discrepancies in a witness' testimony or between the testimony of different witnesses may or may not cause you to disbelieve a witness' testimony. Two or more persons witnessing an event may simply see or hear it differently. Mistaken recollection, like failure to recall, is a common human experience. In weighing the effect of an inconsistency, you should also consider whether it was about a matter of importance or an insignificant detail. You should also consider whether the inconsistency was innocent or intentional.

You are not required to accept testimony even if the testimony was not contradicted and the witness was not impeached. You may decide that the witness is not worthy of belief because of the witness' bearing and demeanor, or because of the inherent improbability of the testimony, or for other reasons that are sufficient to you.

After you make your own judgment about the believability of a witness, you can then attach to that witness' testimony the importance or weight that you think it deserves.

The weight of the evidence to prove a fact does not necessarily depend on the number of witnesses who testified or the quantity of evidence that was presented. What is more important than numbers or quantity is how believable the witnesses were, and how much weight you think their testimony deserves.

#### **4. Presumption of innocence; reasonable doubt; burden of proof.**

The defendant, Jaden Sinclair pleaded not guilty to the offense charged. The Defendant is presumed to be innocent. S/he started the trial with a clean slate, with no evidence against her/him. The presumption of innocence stays with Jaden Sinclair unless and until the government has presented evidence that overcomes that presumption by convincing you that Jaden Sinclair is guilty of the offense charged beyond a reasonable doubt. The presumption of innocence requires that you find Jaden Sinclair not guilty, unless you are satisfied that the government has proved guilt beyond a reasonable doubt.

The presumption of innocence means that Jaden Sinclair has no burden or obligation to present any evidence at all or to prove that s/he is not guilty. The burden or obligation of proof is on the government to prove that Jaden Sinclair is guilty and this burden stays with the government throughout the trial.

In order for you to find Jaden Sinclair guilty of the offense charged, the government must convince you that Jaden Sinclair is guilty beyond a reasonable doubt. That means that the government must prove each and every element of the offense charged beyond a reasonable doubt. A defendant may not be convicted based on suspicion or conjecture, but only on evidence proving guilt beyond a reasonable doubt.

Proof beyond a reasonable doubt does not mean proof beyond all possible doubt or to a mathematical certainty. Possible doubts or doubts based on conjecture, speculation, or hunch are not reasonable doubts. A reasonable doubt is a fair doubt based on reason, logic, common sense, or experience. It is a doubt that an ordinary reasonable person has after carefully weighing all of the evidence, and is a doubt of the sort that would cause him or her to hesitate to act in matters of importance in his or her own life. It may arise from the evidence, or from the lack of evidence, or from the nature of the evidence.

If, having now heard all the evidence, you are convinced that the government proved each and every element of the offense charged beyond a reasonable doubt, you should return a verdict of guilty for that offense. However, if you have a reasonable doubt about one or more of the elements of the offense charged, then you must return a verdict of not guilty of that offense.

#### **5. Nature of the Information**

As you know the Defendant, Jaden Sinclair, is charged in the information with violation of state law, specifically Kidnapping. The information is just the formal way of specifying the exact crime the defendant is accused of committing. As the information is simply a description of the charge(s) against the a defendant. It is an accusation only. An information is not evidence of anything, and you should not give any weight to the fact that Jaden Sinclair has been indicted in making your decision.

#### **6. Kidnapping – Introduction. (Based upon 18 Pa.C.S.A. § 2901)**

The defendant, Jaden Sinclair, by information filed by the District Attorney is charged with kidnapping Kiran Taufique.

**7. Kidnapping - Defined. (Based upon 18 Pa.C.S.A. § 2901)**

To find the defendant guilty of this offense, you must find that the prosecution proved the following elements beyond a reasonable doubt:

that the defendant unlawfully removed Kiran Taufique a substantial distance from the place where Kiran Taufique was found:

OR

that the defendant unlawfully confined Kiran Taufique for a substantial period of time in isolation with any of the following intentions:

- to hold for ransom or reward, or as a shield or hostage, or
- to inflict bodily injury on or to terrorize the victim or another.

The word “unlawfully” as I am using it means removing or confining Kiran Taufique against her/his will, desire or awareness.

**8. Jury must not consider penalty.**

You must not concern yourself with the consequences of your verdict.

**9. Role of Jury – Deliberations; Unanimous Verdict, Duty to consult.**

That concludes my instructions explaining the law regarding the testimony and other evidence, and the offenses charged. Now let me explain some things about your deliberations in the jury room, and your possible verdicts.

*First*, the first thing that you should do in the jury room is choose someone to be your foreperson. This person will speak for the jury here in court. He or she will also preside over your discussions. However, the views and vote of the foreperson are entitled to no greater weight than those of any other juror.

*Second*, I want to remind you that your verdict, whether it is guilty or not guilty, must be unanimous. To find Jaden Sinclair guilty of an offense, every one of you must agree that the government has overcome the presumption of innocence with evidence that proves each element of that offense beyond a reasonable doubt. To find Jaden Sinclair not guilty, every one of you must agree that the government has failed to convince you beyond a reasonable doubt.

*Third*, if you decide that the government has proved Jaden Sinclair guilty, then it will be my responsibility to decide what the appropriate punishment should be. You should never consider the possible punishment in reaching your verdict.

*Fourth*, as I have said before, your verdict must be based only on the evidence received in this case and the law I have given to you. You should not take anything I may have said or done during trial as indicating what I think of the evidence or what I think your verdict should be. What the verdict should be is the exclusive responsibility of the jury.

*Fifth*, now that all the evidence is in, the arguments are completed, and once I have finished these instructions, you are free to talk about the case in the jury room. In fact, it is your duty to talk with each other about the evidence, and to make every reasonable effort you can to reach unanimous agreement. Talk with each other, listen carefully and respectfully to each other's views, and keep an open mind as you listen to what your fellow jurors have to say. Do not hesitate to change your mind if you are convinced that other jurors are right and that your original position was wrong. But do not ever change your mind just because other jurors see things differently, or just to get the case over with. In the end, your vote must be exactly that--your own vote. It is important for you to reach unanimous agreement, but only if you can do so honestly and in good conscience. Listen carefully to what the other jurors have to say, and then decide for yourself if the government has proved the defendant guilty beyond a reasonable doubt.

No one will be allowed to hear your discussions in the jury room, and no record will be made of what you say. You should all feel free to speak your minds.

*Sixth*, once you start deliberating, do not talk about the case to the court officials, or to me, or to anyone else except each other. If you have any questions or messages, your foreperson should write them down on a piece of paper, sign them, and then give them to the court official who will give them to me. I will first talk to the lawyers about what you have asked, and I will respond as soon as I can. In the meantime, if possible, continue with your deliberations on some other subject.

One more thing about messages. Do not ever write down or tell anyone how you or any one else voted. That should stay secret until you have finished your deliberations. If you have occasion to communicate with the court while you are deliberating, do not disclose the number of jurors who have voted to convict or acquit on any offense.



## **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 Commonwealth:**

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

### **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 Drexel Road, New Temple, Pennsylvania. In 1999, 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 JMart 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 Drexel Road 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 Norman 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 JMart.

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 Penn State. 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 Frank Lloyd Wright's Fallingwater in Western PA,  
37 the Mutter Museum in Philadelphia, and the Houdini Museum in Scranton. 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 Norman 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 10, 2007. 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 JMart.  
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, 2007*  
DATE

Signed and Sworn to before me

*Loida Ingrid Vega*

Loida Ingrid Vega  
Notary Public, Commonwealth of Pennsylvania  
My commission expires: **November 18, 2008**

## STATEMENT OF SHAE REYNOLDS

1 My name is Shae Reynolds and I am the Head Detective with a special division of the  
2 Pennsylvania State 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 New Temple Police Commissioner contacted me about a year  
8 ago to head up a new Missing Persons and Kidnapping Division, headquartered in New Temple.  
9

10 On Saturday May 19, 2007, 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 Drexel Road in New Temple 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 Norman 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 Norman 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 openhandemptytree@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 18 and 19, 2007. 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 Pennsylvania 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 PDA owned by and  
169 registered to Sinclair through her/his mobile phone provider. Unfortunately, the PDA 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, 2007, 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, 2007*  
DATE

Signed and Sworn to before me

*Loida Ingrid Vega*

Loida Ingrid Vega  
Notary Public, Commonwealth of Pennsylvania  
My commission expires: **November 18, 2008**

## STATEMENT OF JADEN SINCLAIR

1 My name is Jaden Sinclair. I am 31 years old and I've been a resident of New Temple,  
2 Pennsylvania for the past five years after spending the majority of my life in Ohio. I have really  
3 enjoyed living in New Temple. 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 2003, after I got out of prison, I moved to New Temple 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 Norman 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 2005, 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 2007. 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 19, 2007. 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 Norman 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 PDA, but I did not use the  
129 PDA to send that message. I only used my PDA when I was traveling out of town and needed  
130 to check my email messages. In fact, I hadn't used the PDA for months. It was somewhere in  
131 my house on the night of May 18 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

December 10, 2007

Signature

DATE

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega

Notary Public, Commonwealth of Pennsylvania

My commission expires: **November 18, 2008**



## STATEMENT OF KIRAN TAUFIQUE

1 My name is Kiran Taufique I am 18 years old and a recent graduate of the Norman School.  
2 Currently, I live alone in a small studio apartment at 67 Slippery Rock Street in the New Temple  
3 town center and work as a cashier at the local JMart. 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, 2007*

DATE

Signed and Sworn to before me

*Loida Ingrid Vega*

Loida Ingrid Vega

Notary Public, Commonwealth of Pennsylvania

My commission expires: **November 18, 2008**

## **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 Norman School
- Exhibit 11: Check to The Circle of Hope
- Exhibit 12: TV Schedule

# Exhibit 1


**N-Mail**

Norman Mail

From:	<a href="mailto:openhandedemptytree@kmail.com">openhandedemptytree@kmail.com</a>
To:	<kiran.taufique@normanschool.edu>
Subject:	Sacrifice \$\$\$\$ or Sacrifice Self
Date:	Sat, 19 May 2007 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  
New Temple, Pennsylvania  
55669

New Temple Federal Savings  
4016 Main Street  
New Temple, Pennsylvania  
55650



Consolidated Bank Statement

Date of Statement: 21 May 2007

### Bank Statement for the Period 15 Nov 2006 – May 15 2007

Date	Transaction Description	No. / Type	ATM/Cash	Check	Wire Transfer	Interest	Balance
15-Nov-06	Balance Brought Down						\$303,486.24
17-Nov-06	ATM Withdrawal	3001	<\$500.00>				\$302,986.24
22-Nov-06	Cheque	501		<\$5,600.00>			\$297,386.24
24-Nov-06	ATM Withdrawal	3002	<\$500.00>				\$296,886.24
27-Nov-06	ATM Withdrawal	3003	<\$500.00>				\$296,386.24
29-Nov-06	Wire Transfer	56			<\$7,000.00>		\$289,386.24
30-Nov-06	Interest	INT				\$5,787.73	\$295,173.97
1-Dec-06	Cheque	502		<\$20,000.00>			\$275,173.97
4-Dec-06	ATM Withdrawal	3004	<\$500.00>				\$274,673.97
8-Dec-06	Wire Transfer	57			<\$1,579.00>		\$273,094.97
11-Dec-06	Cheque	503		<\$6,500.00>			\$266,594.97
12-Dec-06	Wire Transfer	58			<\$17,802.02>		\$248,792.95
19-Dec-06	Cheque	504		<\$5,000.00>			\$243,792.95
21-Dec-06	ATM Withdrawal	3005	<\$500.00>				\$243,292.95
27-Dec-06	Cheque	505		<\$1,000.00>			\$242,292.95
1-Jan-07	Interest	INT				\$4,845.86	\$247,138.81
2-Jan-07	Cash Withdrawal	CW	<\$5,000.00>				\$242,138.81
3-Jan-07	Cheque	506		<\$7,600.00>			\$234,538.81
4-Jan-07	ATM Withdrawal	3006	<\$500.00>				\$234,038.81
9-Jan-07	Wire Transfer	59			<\$9,000.00>		\$225,038.81
11-Jan-07	Cheque	507		<\$3,500.00>			\$221,538.81
12-Jan-07	Cash Withdrawal	CW	<\$5,000.00>				\$216,538.81
16-Jan-07	Cash Withdrawal	CW	<\$5,000.00>				\$211,538.81
22-Jan-07	Cash Withdrawal	CW	<\$5,300.00>				\$206,238.81
23-Jan-07	ATM Withdrawal	3007	<\$500.00>				\$205,738.81
26-Jan-07	Check	508		<\$1,356.43>			\$204,382.38
29-Jan-07	Cash Withdrawal	CW	<\$5,000.00>				\$199,382.38
1-Feb-07	Interest	INT				\$3,987.65	\$203,370.03
5-Feb-07	Cash Withdrawal	CW	<\$5,100.00>				\$198,270.03
7-Feb-07	ATM Withdrawal	3008	<\$500.00>				\$197,770.03
12-Feb-07	Wire Transfer	60			<\$1,985.24>		\$195,784.79
13-Feb-07	Cheque	509		<\$1,400.89>			\$194,383.90
16-Feb-07	Cash Withdrawal	CW	<\$5,000.00>				\$189,383.90
19-Feb-07	Cheque	510		<\$1,515.00>			\$187,868.90
22-Feb-07	Cash Withdrawal	CW	<\$5,000.00>				\$182,868.90
23-Feb-07	ATM Withdrawal	3009	<\$500.00>				\$182,368.90
28-Feb-07	Cash Withdrawal	CW	<\$5,000.00>				\$177,368.90



1-Mar-07	Interest	INT				\$3,546.38	\$180,915.28
5-Mar-07	Cash Withdrawal	CW	<\$9,999.00>				\$170,916.28
6-Mar-07	Cash Withdrawal	CW	<\$9,999.00>				\$160,917.28
8-Mar-07	Wire Transfer	61			<\$4,500.00>		\$156,417.28
9-Mar-07	Cash Withdrawal	CW	<\$9,999.00>				\$146,418.28
13-Mar-07	Cash Withdrawal	CW	<\$9,999.00>				\$136,419.28
14-Mar-07	Cheque	511		<\$450.00>			\$135,969.28
16-Mar-07	ATM Withdrawal	3010	<\$500.00>				\$135,469.28
20-Mar-07	Cash Withdrawal	CW	<\$9,999.00>				\$125,470.28
22-Mar-07	Wire Transfer	62			<\$2,000.00>		\$123,470.28
26-Mar-07	Cash Withdrawal	CW	<\$9,999.00>				\$113,471.28
27-Mar-07	ATM Withdrawal	3011	<\$500.00>				\$112,971.28
30-Mar-07	Cheque	512		<\$1,515.00>			\$111,456.28
2-Apr-07	Interest	INT				\$2,229.13	\$113,685.41
4-Apr-07	ATM Withdrawal	3012	<\$500.00>				\$113,185.41
6-Apr-07	Cash Withdrawal	CW	<\$9,999.00>				\$103,186.41
10-Apr-07	ATM Withdrawal	3013	<\$500.00>				\$102,686.41
11-Apr-07	Wire Transfer	63			<\$1,202.00>		\$101,484.41
13-Apr-07	Cash Withdrawal	CW	<\$9,999.00>				\$91,485.41
17-Apr-07	Wire Transfer	64			<\$1,150.00>		\$90,335.41
20-Apr-07	ATM Withdrawal	3014	<\$500.00>				\$89,835.41
24-Apr-07	ATM Withdrawal	3015	<\$500.00>				\$89,335.41
25-Apr-07	ATM Withdrawal	3016	<\$500.00>				\$88,835.41
27-Apr-07	Cash Withdrawal	CW	<\$9,999.00>				\$78,836.41
30-Apr-07	ATM Withdrawal	3017	<\$500.00>				\$78,336.41
1-May-07	Interest	INT				\$1,526.73	\$79,863.14
2-May-07	Cash Withdrawal	CW	<\$9,999.00>				\$69,864.14
3-May-07	Cash Withdrawal	CW	<\$9,999.00>				\$59,865.14
4-May-07	ATM Withdrawal	3018	<\$500.00>				\$59,365.14
7-May-07	Cash Withdrawal	CW	<\$9,999.00>				\$49,366.14
8-May-07	Cash Withdrawal	CW	<\$9,999.00>				\$39,367.14
9-May-07	Wire Transfer	65			<\$15,000.00>		\$24,367.14
10-May-07	Cash Withdrawal	CW	<\$9,999.00>				\$14,368.14
14-May-07	Cash Withdrawal	CW	<\$3,500.00>				\$10,868.14
15-May-07	ATM Withdrawal	3019	<\$500.00>				\$10,368.14
<b>Total Withdrawals</b>	<b>\$315,041.58</b>		<b>\$198,386.00</b>	<b>\$55,437.32</b>	<b>\$61,218.26</b>		
<b>Total Credits</b>						<b>\$21,923.48</b>	
<b>TOTAL BALANCE</b>							<b>\$10,368.14</b>

### Definition of Codes

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



# Exhibit 3



# Exhibit 4

<b>Hospital/ Clinic:</b> Eisenhower Medical Center		<b>Lab no.</b>	6342.92	
		<b>Last Name</b>	Taufique	
<b>Clinical Details (inc. all drugs prescribed)</b>		<b>First Name</b>	Kiran	
N/A		<b>Patient's Address</b> 456 Drexel Road, New Temple, BA 18223		
<b>Date of Specimen</b>	05/19/2007; 14:06 hrs.	<b>DOB</b>	02/25/1989	<b>Age</b> 18
<b>Specimen Type</b>	Police Req. blood and urine	<b>Lab Tech.</b>	J.P. McCullough	
<b>Laboratory Report</b>		<b><u>Blood Drugs of Abuse Screen</u></b>		
Amphetamine	<b>Neg</b>	Opiate Screen	<b>Neg</b>	
Benzodiazpine	<b>Neg</b>	Flunitrazepam	<b>Neg</b>	
Cannabinoids	<b>Neg</b>	Ketamine hydrochloride	<b>Neg</b>	
Cocaine Metabolite	<b>Neg</b>	Codeine	<b>Neg</b>	
Gamma Hydroxybutyrate	<b>Pos</b>			
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				
<b>Date of Report</b>	05/21/2007	<b>Signature</b>	<i>JPM</i>	

## Exhibit 5



# Exhibit 6

## Dr. Simone Démodé, M.D. Ph.D.

56 W. Baylor Street | New Temple, Barrister 69734  
555-1001 (phone) | 555-1002 (fax) | info@psychdemonde.com | www.pyschdemonde.com  
Licensed Clinical Psychiatrist

**PSYCHOLOGICAL EVALUATION: KIRAN TAUFIQUE**

**DATE OF EVALUATION: May 29, 2007**

**DATE OF REPORT: June 4, 2007**

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### **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 The Norman 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  
New Temple, Pennsylvania  
55669

**New Temple Federal Savings**  
4016 Main Street  
New Temple, Pennsylvania  
55650



April 24, 2007

## **NOTICE OF NON PAYMENT**

Dear Jaden Sinclair:

We have not yet received your mortgage payment for February, March or April of 2007. 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, 2007. 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

This form recommended and approved for, but not restricted to use by, the members of the Pennsylvania Association of REALTORS® (PAR)

SELLER'S BUSINESS RELATIONSHIP WITH PA LICENSED BROKER	
BROKER (Company) <u>123 Real Estate, INC</u>	PHONE <u>(215) 555-1212</u>
ADDRESS <u>14 Main Street, New Temple, Barrister 69789</u>	FAX <u>(215) 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 PA LICENSED BROKER	
BROKER (Company) <u>Cloak Realty</u>	PHONE <u>(215) 555-3232</u>
ADDRESS <u>845 Clover Road, New Temple, Barrister 69789</u>	FAX <u>(215) 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, 2007, is between  
2 SELLER(S):  
  
3 Schmode Properties, LLC  
4 called "Seller," and BUYER(S):  
  
5 Jaden Sinclair  
6 called "Buyer."  
7  
8 2. PROPERTY. Seller hereby agrees to sell and convey to Buyer, who hereby agrees to purchase:  
9 ALL THAT CERTAIN lot or piece of ground with buildings and improvements thereon erected, if any, known as:  
10 529 Center Lane  
11  
12 in the Town \_\_\_\_\_ of New Temple,  
13 County of Barrister \_\_\_\_\_ in the Commonwealth of  
14 Pennsylvania, Zip Code 69789  
15 Identification (e.g., Tax ID#; Parcel #; Lot, Block; Deed Book, Page, Recording Date)  
16 310005818

17 3. TERMS (10-01)  
18 (A) Purchase Price TWO HUNDRED AND FIFTY THOUSAND (\$250,000) U.S. Dollars  
19 which will be paid to Seller by Buyer as follows:  
20 (1) Cash or check at signing this Agreement: \$15,000.00 \$ 15,000.00  
21 (2) Cash or check within 0 days of the execution of this Agreement: \_\_\_\_\_ \$ 0.00  
22 (3) \_\_\_\_\_ \$ \_\_\_\_\_  
23 (4) \_\_\_\_\_ \$ \_\_\_\_\_  
24 (5) Cash, cashier's or certified check at time of settlement: \_\_\_\_\_ \$ 235,000.00  
25 **TOTAL** \$ 250,000.00  
26 (B) Deposits paid on account of purchase price to be held by Broker for Seller, unless otherwise stated here:  
27 \_\_\_\_\_  
28 (C) Seller's written approval to be on or before: March 23, 2007  
29 (D) Settlement to be on June 01, 2007, or before if Buyer and Seller agree.  
30 (E) Conveyance from Seller will be by fee simple deed of special warranty unless otherwise stated here:  
31 \_\_\_\_\_  
32 (F) Payment of transfer taxes will be divided equally between Buyer and Seller unless otherwise stated here:  
33 \_\_\_\_\_  
34 (G) At time of settlement, the following will be adjusted pro-rata on a daily basis between Buyer and Seller, reimbursing where applicable:  
35 taxes (see Notices and Information Regarding Tax Proration); rents; interest on mortgage assumptions; condominium fees, if any; water  
36 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:  
37 Seller will pay up to and including the date of settlement; Buyer will pay for all days following settlement, unless otherwise stated here:

Buyer(s) AS

Page 1 of 9  
Seller(s) AS




# Exhibit 9




*JS Saves  
/ Serve*

# Exhibit 10

<b>Jaden Sinclair</b> 58 Pitt Lane New Temple, PA. 55669	0243
	DATE <u>August 19, 2005</u>
PAY TO THE ORDER OF	<u>The Norman School</u> \$ <u>40,000.00</u>
	<u>Forty thousand dollars and zero cents XXX</u> , DOLLARS
 <u>NTFS</u>	
FOR <u>Science Lab</u>	<u>Jaden Sinclair</u>
: 098947218 : 98102340556    : 0243	

# Exhibit 11

<b>Jaden Sinclair</b> 58 Pitt Lane New Temple, PA. 55669		0502
DATE <u>December 1, 2006</u>		
PAY TO THE ORDER OF <u>Circle of Hope</u>		\$20,000.00
<u>Twenty thousand dollars and zero cents XXX</u>		, DOLLARS
 NTFS		
FOR <u>Annual Donation</u>		<u>Jaden Sinclair</u>
: 098947218 : 98102340556    : 0502		

# Exhibit 12

## New Temple Cable Network Night Owl Basic Cable TV Schedule

May 18<sup>th</sup> & 19<sup>th</sup> 2007

Fri May 18<sup>th</sup> Sat May 19<sup>th</sup>

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 FTN	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	New Temple Tonight		New Temple 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		Economy	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	