

1 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

2 IN AND FOR THE COUNTY OF KING

3 _____

4 PATRICK JONES, individually,)
5 Plaintiff,)
6 vs.) No. 16-2-22028-2SEA
7 BELLEVUE SCHOOL DISTRICT 405, 14A)
8 public school district; WASHINGTON)
9 INTERSCHOLASTIC ACTIVITIES)
10 ASSOCIATION, a nonprofit corporation;))
11 KINGCO CONFERENCE, a nonprofit)
12 corporation; and SEA-KING DISTRICT 2)
13 OF THE WIAA, a nonprofit corporation;))
14 YARMUTH & WILDSON, PLLC, a Washington)
15 Professional Limited Liability)
16 Company, BOB WESTINGHOUSE and)
17 CARL BLACKSTONE, in their individual)
18 capacities,)
19 Defendants.)

20 _____
21 Deposition Upon Oral Examination of

22 CARL BLACKSTONE

23 _____

24 Taken at [REDACTED]
25 Bellevue, Washington
26 Wednesday, April 19, 2017

27 Atkinson-Baker, Inc.
28 Court Reporters
29 www.depo.com

30 REPORTED BY: Mindy L. Suurs, CSR No. 2195

31 File No. AB03B71

1 Shawn Flood report.
2 He told us that [REDACTED] was living with
3 Marissa Spooner-LeDuff. That was corroborated by Marissa
4 Spooner-LeDuff. He told us that Coach Goncharoff had paid
5 him money on two occasions. That was corroborated by the
6 Bellevue School District self-report, and Coach Goncharoff
7 himself admitted to giving money to Mr. Dyles. There was a
8 dispute as to the amount of the money, but he admitted that
9 he paid him, I think he said \$300.
10 **Q. But wasn't the dispute -- didn't that dispute**
11 **come down to Goncharoff said 300 and Dyles said like 1200**
12 **or something like that?**
13 A. Correct.
14 **Q. But how did you determine who was telling the**
15 **truth with respect to that issue?**
16 A. Well, the truth was he paid money, and that was
17 what was important to us. And what we were -- we didn't
18 know what the amount was -- we had reason to believe
19 Mr. Dyles -- but the mere fact that the coach was paying
20 money was corroborated by him. That was the important
21 piece of the puzzle.
22 **Q. But the \$300 had already been punished by a**
23 **previous self-report after the Flood investigation by Coach**
24 **Goncharoff and he had sat out two games, and so that wasn't**
25 **part of your investigation -- correct? -- because that had**

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1 **already been --**
2 MR. CALFO: I need to interject. I'm going to
3 object to the form, but also, you interrupted the witness
4 while he was answering the question of how was [REDACTED] Dyles
5 corroborated, and you didn't let him finish.
6 MS. JONES: Yeah. We'll get to all of it. I
7 just wanted --
8 MR. CALFO: I just want to make sure it's clear
9 that he didn't finish.
10 A. Yeah, I do have more things to say about that.
11 MS. JONES: Yeah, we'll get to all of that. I
12 just wanted to ask about that one --
13 A. It was part of the investigation in the sense
14 that we felt Bellevue had failed to self-report the amount
15 of money, we felt that when they did their initial
16 self-report in, I think it was June 2015, they only put in
17 the report Coach Goncharoff's side of the story, and they
18 only told the committee that Goncharoff said it was \$300.
19 And we were of the view -- and I think KingCo
20 agreed with us -- that it was significant the amount of
21 money and that they should have been told that, by the way,
22 the father said he was paid on two occasions with money
23 stuffed into an envelope to the tune of about \$1,200 each
24 time. And the fact that that information wasn't disclosed
25 to KingCo we felt was a violation of the self-reporting

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1 requirement. The schools had an obligation to be palms up,
2 tell KingCo everything they know, and let KingCo make a
3 decision.
4 So we felt that that was a violation of the
5 self-report rule. So that issue was an issue for us to
6 look at.
7 **Q. But how was the \$1,200 stuffed in an envelope two**
8 **times corroborated?**
9 A. It was corroborated by Butch Goncharoff said he
10 paid the money, \$300, and the father said it was 1,200. So
11 what was corroborated was that the coach paid money. If he
12 denied paying the money, that would have been a different
13 story, but he paid the money.
14 And we now see in the Shawn Flood second report,
15 which was not given to us at the time, and in that report I
16 believe Goncharoff told Shawn Flood he didn't know how much
17 money he had paid to Dyles. It was only six months later
18 when he was being interviewed by Jeff Lowell that he came
19 up with the \$300 amount. I wish we'd known that.
20 **Q. Okay. What else was corroborated?**
21 A. The -- Mr. Dyles told us he received a \$3,000
22 gift from Dan Cerrillo, who was an assistant coach. That
23 was corroborated by Mr. Cerrillo. He initially told the
24 investigator, Shawn Flood, that the money was a gift, and
25 then when he realized there was going to be a self-report,

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1 he changed his story and said, "I was being sarcastic. It
2 really was a loan."
3 So we found that the payment was corroborated and
4 we found that the fact that Cerrillo said it was a gift and
5 changed his story corroborated what we heard from
6 Mr. Dyles.
7 **Q. Did you know Ahmad Dyles prior to this**
8 **investigation?**
9 A. The first time I met him was in September of
10 2015. I did not know him.
11 **Q. Did you know about any of his criminal history?**
12 A. I learned about it at about that time.
13 **Q. How did you know about his criminal history?**
14 A. I was told that by a former FBI agent who was a
15 friend of Mr. Dyles.
16 **Q. Who?**
17 A. Rich Conte.
18 **Q. Can you spell the last name?**
19 A. C-o-n-t-e.
20 **Q. And this person is a friend of Mr. Dyles?**
21 A. He'd known Mr. Dyles, he had been involved in the
22 prosecution of Mr. Dyles, and he told us about his criminal
23 history.
24 **Q. Did you have any connection with any of his**
25 **criminal cases?**

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1 A. I didn't believe I did until I saw this exhibit
2 last week and I saw that I signed an indictment in December
3 of 2014 in my capacity as a supervisor at the US Attorney's
4 office. But I had no memory of Mr. Dyles, I had no memory
5 of the indictment, and I still have no memory of it.
6 **Q. You said 2014.**
7 A. I'm sorry, 2004. I apologize. December of 2004.
8 (Exhibit No. 29 marked for
9 identification.)
10 BY MR. KELLER:
11 **Q. Is this the Indictment that you're referring to?**
12 MR. KELLER: That's one hour, so I'll let you ask
13 another question or two, and we'll wrap it up.
14 MS. JONES: Thank you.
15 A. Yep, this is the indictment.
16 **Q. Okay. And you didn't check to see that you had**
17 **had this criminal knowledge of Mr. Dyles when he became a**
18 **witness in this investigation?**
19 A. No, I --
20 MR. CALFO: Object to the form.
21 A. As I told you, I knew in September of 2015 that
22 Mr. Dyles had a prior conviction for an old drug
23 conviction. So I did know that. Mr. Conte told me that.
24 BY MS. JONES:
25 **Q. What about any arms dealing indictments?**

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1 A. I think he told us that he'd been charged with
2 being a felon in possession of a firearm, but the charge
3 had been dismissed.
4 **Q. And he didn't have any -- relate any connection**
5 **with you at all in that case?**
6 A. No.
7 **Q. Did he let you know that he was -- how he was**
8 **released from that case?**
9 MR. CALFO: Object to the form.
10 A. He told me why the case was dismissed. I don't
11 feel comfortable sharing that information in a public
12 forum. If we put it under a protective order, I'd be happy
13 to tell you what he told me, but I'm concerned that if it's
14 publicized like it is now, it -- it may not be in
15 Mr. Dyles' best interest. So if you can put it under the
16 protective order, I'd be happy to share what Mr. Conte told
17 me.
18 MR. KELLER: I think we've reached our stop
19 point.
20 MS. JONES: Okay, let me just ask one more thing.
21 **Q. Did you tell anyone at the Bellevue School**
22 **District about this connection that you had with Mr. Dyles,**
23 **or at the WIAA?**
24 MR. CALFO: Object to form.
25 A. The connection meeting I signed an indictment in

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1 2004?
2 BY MS. JONES:
3 **Q. Yes.**
4 A. I had no memory of signing the indictment.
5 **Q. So the answer is no, you didn't tell anybody?**
6 A. No, because I didn't know about it until last
7 week.
8 **Q. Thank you.**
9 A. Thank you.
10
11 (The deposition concluded at
12 11:00 a.m.)
13 (Signature was reserved.)
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1 AFFIDAVIT
2
3 STATE OF WASHINGTON)
4)SS.
5 COUNTY OF KING)
6
7 I have read my within deposition, taken on
8 Wednesday, April 19, 2017, and the same is true
9 and correct save and except for changes and/or corrections
10 if any, as indicated by me on the "CORRECTIONS" flyleaf
11 page hereof.
12
13
14 _____
15 CARL BLACKSTONE
16
17 SUBSCRIBED AND SWORN to before me this
18 _____ day of _____, 2017.
19
20
21
22 _____
23 NOTARY PUBLIC in and for the
24 State of Washington, residing
25 at _____

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Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in The U.S. DISTRICT COURT at Seattle, Washington.

December 1, 2004
BRUCE RIFKIN, Clerk
By H. Brent Zschaw Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

AHMAD ABDUL SALAAM AS-SADIQ a/k/a
CANNON RICO DYLES a/k/a
RICO DYLES CANNON,

Defendant.

CRO4 0523P
INDICTMENT



04-CR-00523-INDI

The Grand Jury charges that:

COUNT ONE

(Felony in Possession of a Firearm)

On or about November 18, 2004, at Federal Way, within the Western District of Washington, AHMAD ABDUL SALAAM AS-SADIQ a/k/a CANNON RICO DYLES a/k/a RICO DYLES CANNON, having been convicted of crimes punishable by imprisonment for a term exceeding one year in the Superior Court of the State of Washington, Pierce County, that is:

1. Unlawful Possession of a Controlled Substance, cause number 88-1-02070-3; on August 2, 1988, in the name of CANNON RICO DYLES; and
2. Attempted Possession of a Controlled Substance, cause number 88-1-03731-2, January 4, 1989, in the name of RICO DYLES CANNON;

1 did knowingly possess in and affecting commerce a firearm, to wit: one Astra, model A-
2 100, 9mm semiautomatic pistol, which had been shipped and transported in interstate
3 commerce.

4 All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

5 A TRUE BILL:

6 DATED: 1 DECEMBER 2004

7 Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of
8 the United States.

9
10
11 
12 JOHN MCKAY
United States Attorney

13 
14 CARL BLACKSTONE
Assistant United States Attorney

15
16 
17 WILLIAM H. REDDY, JR.
Assistant United States Attorney