

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 10-00384 LEK-01-14
)	
Plaintiff,)	DECLARATION OF COUNSEL
)	
vs.)	
)	
ROGER CUSICK CHRISTIE,	(01))
SHERRYANNE L. ST. CYR,	(02))
SUSANNE LENORE FRIEND,	(03))
TIMOTHY M. MANN,	(04))
RICHARD BRUCE TURPEN,	(05))
WESLEY MARK SUDBURY,	(06))
DONALD JAMES GIBSON,	(07))
ROLAND GREGORY IGNACIO,	(08))
PERRY EMILIO POLICICCHIO,	(09))
JOHN DEBAPTIST BOUEY III,	(10))
MICHAEL B. SHAPIRO,	(11))
also known as "Dewey",)
AARON GEORGE ZEEMAN,	(12))
VICTORIA C. FIORE,	(13))
JESSICA R. WALSH, also	(14))
known as "Jessica Hackman,)
)	
Defendants.)	

DECLARATION OF COUNSEL

MICHAEL K. KAWAHARA, upon penalty of perjury, declares and states as follows:

1. I am an Assistant U.S. Attorney in the District of Hawaii and government counsel of record in the above-captioned criminal case. I make this Declaration of my own personal knowledge.

2. The above-captioned criminal case (involving fourteen defendants) is based upon a Title III wiretap investigation. This court has heretofore designated this case as complex litigation. I have been involved in the instant case

from its inception and for this reason, it would be impossible for the case to be readily transferred to another Assistant U.S. Attorney in my office. Trial is currently set for October 4, 2011.

3. In November 2010, my wife was diagnosed with a life-threatening disease. From January - June 2011, my wife and I have made three separate trips to Los Angeles for the purpose of seeking a second medical opinion and to participate in clinical studies involving various experimental drugs conducted by the UCLA Medical Center.

4. Our most recent trip to Los Angeles commenced on April 20, 2011, and I continuously remained in Los Angeles until June 26, 2011. My wife died in Los Angeles on June 20, 2011. In addition, my father died in Honolulu on June 29, 2011. In order to make the necessary funeral arrangements and to settle their estates/other affairs, I remained on leave until August 16, 2011.

5. In other words, I did not return back to the U.S. Attorney's Office to work full-time until August 17, 2011 and only now have had the opportunity to work on the instant case, as well as other matters and cases on my docket.

6. for the foregoing reasons, I will need additional time for preparation in the instant case and believe that good cause exists under the circumstances for the granting of the

instant motion.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING
IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED: Honolulu, Hawaii, August 25, 2011.

/s/ Michael K. Kawahara

MICHAEL K. KAWAHARA