

EXHIBIT 3

UNITED STATES BANKRUPTCY COURT

WESTERN DISTRICT OF WASHINGTON

IN RE:)

HOUSTON CURRY WADE,)

Debtor)

Case No. 22-10852-TWD

WILLIAM NELSON,)

Plaintiff,)

v.)

HOUSTON CURRY WADE,)

Defendant.)

VIDEOCONFERENCE DEPOSITION OF HOUSTON CURRY WADE

June 28, 2023

11:04 AM

13355 North Madison Avenue Northeast

Bainbridge Island, Washington

REPORTED BY:

Anna Marcus

CCR No. 7718

1 APPEARANCES:

2
3 For Plaintiff/Creditor William Nelson:

4 Allison Booker
5 Williams, Kastner & Gibbs, PLLC
6 601 Union Street
7 Suite 1400
8 Seattle, Washington 98101
9 (206) 628-6600
10 abooker@williamskastner.com

11
12 For Defendant/Debtor Houston Curry Wade:

13 Erin Lane
14 Washington Law Group, PLLC
15 2319 North 45th Street
16 Suite 215A
17 Seattle, Washington 98103
18 (206) 686-6054
19 erinl@washingtonstateattorneys.com
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX TO EXAMINATION
HOUSTON CURRY WADE
William Nelson vs. Houston Curry Wade
June 28, 2023
Anna Marcus, CCR No. 7718

EXAMINATION	PAGE
Ms. Booker	5
Ms. Lane	44
Ms. Booker	47
Ms. Lane	48

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX TO EXHIBITS
HOUSTON CURRY WADE
William Nelson vs. Houston Curry Wade
Wednesday, June 28, 2023
Anna Marcus, CCR No. 7718

MARKED	DESCRIPTION	PAGE
Exhibit 1	Request for Admissions	25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BAINBRIDGE ISLAND, WASHINGTON;

Wednesday, June 28, 2023, 11:04 AM

HOUSTON CURRY WADE,

having been first duly sworn, was examined

and testified follows:

EXAMINATION

BY MS. BOOKER:

Q. Good afternoon, Mr. Wade. My name is Allison Booker. I represent William Nelson in this litigation. I wanted to thank you for coming out today.

I'm going to start by having you spell your name for the record.

A. My first name is Houston, H-o-u-s-t-o-n. My last named is Wade, W-a-d-e.

Q. Okay. And where are you taking this deposition from today?

A. My home.

Q. Okay. And so the address you provided to the court reporter earlier was your home address?

A. Yes.

Q. Okay. Have you ever had your deposition taken before?

A. Yes.

1 Q. In what kind of case have you had your
2 deposition taken before?

3 A. The original case this pertains to.

4 Q. Okay. Is that the only time you've had your
5 deposition taken?

6 MS. BOOKER: Can we go off the record for a
7 second?

8 Is that okay, Ms. Lane?

9 MS. LANE: Yes.

10 (Off the record.)

11 (Record read.)

12 THE WITNESS: Yes.

13 BY MS. BOOKER:

14 Q. Okay.

15 A. Now it's doing it again. Oh, I'm back. Okay.

16 Q. And was that deposition taken via Zoom, or was
17 that an in-person deposition?

18 A. In-person.

19 Q. Okay. So I'm going to kind of take some time
20 to go over some deposition ground rules. Some of the
21 instructions or things I'll go over will be similar to
22 your last deposition. Some will be new because we're
23 doing a Zoom deposition instead of an in-person one.

24 So as you've previously experienced, we have a
25 court reporter here today transcribing this entire

1 deposition; so therefore, we have to give verbal
2 responses. We can't just nod. Even a simple "mm-hmm,"
3 something like that, isn't going to work. So I'm going
4 to ask that you give me "yes" or "no" questions.

5 You might -- I might follow up one of your
6 responses with "Was that a yes, or was that a no?" It's
7 just me trying to make sure we have a clear record for
8 the court reporter.

9 A. Okay.

10 Q. In that same line, because we have a court
11 reporter, we have to do our best to not speak over each
12 other; therefore, I'm going to ask that you wait until I
13 finish asking my entire question before you give your
14 response, and I will do my best to give you the same
15 courtesy of letting you finish your entire response
16 before I ask my next question.

17 We're not going to be perfect at this. I don't
18 ever think I've made it through a full deposition
19 without getting asked once by a court reporter to please
20 not talk over each other.

21 So this deposition, I'm hoping, shouldn't take
22 more than two hours; however, if at any time you need a
23 break, please feel free to ask for one. We can take a
24 five-minute, ten-minute recess. I do ask, though, if
25 you're going to need a break, that you're going to

1 answer the question that is -- if there's a pending
2 question, you answer the question before we take a
3 break.

4 So -- and then finally, this is our one and
5 only chance we're really going to get to speak before
6 this matter goes to trial. And so if you have any
7 questions on the questions I'm asking you, if you don't
8 understand what I'm asking you, I would ask that you
9 please let me know, and I'll try and explain my
10 questions to you. In the same line, if you answer a
11 question and then you've decided -- 20 minutes down the
12 line, you're like, Oh, I forgot this one part, I want to
13 clarify my answer, I ask that you please give me those
14 full and complete answers. Can you do that?

15 A. I can.

16 Q. Okay. So today I'm now going to ask you kind
17 of a line of technical questions because we're doing
18 this kind of on Zoom.

19 You said you're taking your deposition from
20 your residence today. Does anybody else reside with
21 you?

22 A. I have three roommates.

23 Q. Are they present in the home today?

24 A. I don't think at the moment here. Everybody's
25 off at work.

1 Q. Okay. I'm going to ask that if anybody comes
2 home or anything, that they not be present in the room
3 with you.

4 A. Oh, I've got the door closed.

5 Q. Okay. Clearly, currently, you have Zoom open
6 on your computer. Do you have any other computer
7 programs open on your computer right now?

8 A. I have Adobe Acrobat with copies of what's been
9 filed so far from -- from our end of the case.

10 Q. Okay. And so for this deposition, I'm actually
11 going to ask that you not reference anything unless I'm
12 directly showing it to you just so we can -- if you're
13 looking at something, we're all looking at the same
14 time. So anything that --

15 A. Okay.

16 Q. -- you're going to need to reference, I will
17 put up on the screen for you for your viewing.

18 A. Okay.

19 Q. So I'm going to ask that you, at the very
20 least, minimize, if not completely close out of, Adobe
21 Acrobat so you have nothing else.

22 Do you have any --

23 A. Okay.

24 Q. -- notes or anything on your physical desktop?

25 A. No.

1 Q. Okay. And then do you have any other
2 electronics on you, like a cell phone or an iPad?

3 A. My cell phone in my pocket.

4 Q. I'm going to ask that for the remainder of this
5 deposition, at least while we're on the record, that you
6 not use your cell phone or any other communication app
7 or service to speak with anybody outside of this
8 testimony for the remainder of the deposition.

9 A. For clarification, would I be allowed to text
10 my lawyer while we are doing this deposition?

11 Q. No. You can ask to take a break, but you will
12 have to answer pending questions before those breaks --

13 A. Okay.

14 Q. -- can be taken.

15 A. Okay.

16 Q. Did you do anything to prepare for this
17 deposition today?

18 A. Beyond talking to my lawyer yesterday, no.

19 Q. Did you review any specific documents?

20 A. I reviewed documents that I filed, yes.

21 Q. When you say documents that you filed, do you
22 mean documents only that you filed in this lawsuit?

23 A. To prepare, yes.

24 Q. Okay. And when I say "this lawsuit," I don't
25 mean the underlying defamation lawsuit; I mean this

1 bankruptcy action.

2 A. Yes.

3 Q. Okay. Did you talk to anybody about this
4 deposition other than your attorney?

5 A. I -- I told my roommates that I was going to be
6 on the computer and if they were home, to not be on the
7 computer. The internet's terrible.

8 Q. Okay. But you didn't speak about the contents
9 with anybody?

10 A. No.

11 Q. And is there any reason why you would be unable
12 to give truthful or full answers today?

13 A. No.

14 Q. Are you on any kind of medication that would
15 inhibit your ability to do this?

16 A. No.

17 Q. Okay. Let's start with some background
18 questions. I want to start with your educational
19 background. What is the highest degree that you have
20 earned?

21 A. A master's degree.

22 Q. And what did you earn that degree in?

23 A. Space study.

24 Q. When and where did you earn that degree?

25 A. That was conferred.

1 Q. I'm sorry. You broke up a little there. Can
2 you say that? You -- it was conferred? In what year
3 and from where?

4 A. 2019. American Public University.

5 Q. Okay. And so I would assume that you received
6 a bachelor's degree prior to that?

7 A. Yes.

8 Q. What did you receive a bachelor's degree in?

9 A. A bachelor's degree -- I've got a BS in
10 astronomy, a BA in geography, and a BA geology.

11 Q. I'm going to -- you broke up again. I'm going
12 to clarify. A BS in astronomy, a BA --

13 A. A B -- a BA in geography and a BA in geology.

14 Q. Okay. And where did you receive those
15 bachelor's degrees? Did you receive all those degrees
16 at the same time?

17 A. Yes. At the University of Hawaii at Hilo.

18 Q. And what year were those degrees conferred?

19 A. It would have been 2008.

20 Q. Okay. And then have you received any other
21 kind of certifications, degrees --

22 A. I have a -- a certification, Microsoft
23 Certified Systems Engineer.

24 Q. When did you receive that certification?

25 A. That would have been 1999.

1 Q. Okay. All right. Now I want to talk about
2 your employment history. Are you currently employed?

3 A. Yes.

4 Q. What do you do?

5 Can you say that again? You broke up.

6 A. I didn't hear the question. I'm sorry.

7 Q. What are you -- where are you currently
8 employed?

9 A. Oh, Bruciato.

10 Q. And what do you do for them?

11 A. I work as an expo.

12 Q. What does that mean?

13 A. An expediter. I -- I finish pizzas and take
14 them to tables for people.

15 Q. Where did you work -- when did you start there?

16 A. 2017.

17 Q. Where did you work prior to that?

18 A. I worked at a place called Harbour Pub. I also
19 taught at the Art Institute of Seattle. I have taught
20 at Edmonds Community College, and I have taught at the
21 Seattle Film Institute.

22 Q. And have you ever received any education in
23 marketing or the use of social media?

24 A. No.

25 Q. Okay. And then I have one more standard

1 background question. Have you ever been arrested or
2 charged with a crime?

3 A. Oh, no, did everyone freeze again?

4 Q. Yeah, I think you were frozen, Mr. Wade.

5 My last question for you was have you ever been
6 arrested --

7 A. I'm sorry.

8 Q. Mr. Wade, can you hear me?

9 A. I can. I have -- I have never been arrested or
10 charged with a crime.

11 Q. Okay. So let's talk about the case at hand.
12 So this is a bankruptcy action based off of a judgment
13 on a -- excuse me -- on a defamation action that was
14 filed by Mr. Nelson against you; correct?

15 A. Correct.

16 Q. How do you know Mr. Nelson outside of the
17 lawsuit?

18 A. I've known Mr. Nelson since I was around four
19 years old. He married a woman who lived two floors up
20 from my family.

21 Q. Okay. And how often would you interact with
22 Mr. Nelson?

23 A. As a child, not many times because I was told
24 not to interact with him.

25 Q. Okay. And so if you've -- and I'm sorry. I

1 didn't ask. What's your date of birth?

2 A. May 22, 1981.

3 Q. Okay. And so you knew Mr. Nelson when you were
4 a child, and you didn't interact with him very often.
5 When did you begin to interact with him again after
6 that?

7 A. I wouldn't say I ever intentionally interacted
8 with Mr. Nelson.

9 Q. But you did interact with him?

10 A. Yes.

11 Q. So when -- when did you interact with him?

12 A. Let's see here. The next time that I
13 distinctly remember interacting with Mr. Nelson was
14 March of 1999. This is when Mr. Nelson showed up to a
15 party at a -- at one of my friend's homes after the Tolo
16 dance, which is a dance where the girls ask the boys,
17 like Sadie Hawkins, and Mr. Nelson showed up with drugs,
18 a bag of drugs with him, and tried to force himself on a
19 girl who was asleep on a couch. And myself and the
20 other boys who were present forced him out of the home.

21 Q. Okay. And when did you interact with him again
22 after that?

23 A. This would have been during the city council
24 campaign when he threatened me in front of a room full
25 of people at Town & Country grocery store at the coffee

1 stand.

2 Q. What year was that?

3 A. That would have been 2001, October -- end of
4 October or first week of November 2021.

5 Q. So you ran in a political campaign against
6 Mr. Nelson in 2001?

7 A. Yes. Correct.

8 Q. And what was the outcome of that political
9 campaign?

10 A. Mr. Nelson lost the election.

11 Q. Did you win?

12 A. I ended up dropping out of the election because
13 I was offered a contract to play baseball in Europe.

14 Q. Did you go play baseball in Europe?

15 A. I did.

16 Q. Okay. And after 2001, when did you interact
17 with Mr. Nelson again?

18 A. Well, in the fall of 2001, Mr. Nelson, several
19 times, came back into the grocery store and threatened
20 me; then the times after that would have been at the
21 Harbour Public House when I was working there. Whenever
22 Mr. Nelson would come into the restaurant, I would have
23 somebody else deal with him.

24 Q. And remind me again. When did Mr. Nelson --
25 when did you work at the Harbour Pub?

1 A. I was there from 2002 until 2016.

2 Q. And how often would he come in?

3 A. There was a period of time where he had the
4 contract to replace the windows. That might have been
5 the summer of 2002, maybe 2003. And I avoided him as
6 best as I could. And he would come in -- I don't
7 know -- probably several times a month.

8 Q. But you weren't interacting with him on a daily
9 basis?

10 A. No. I would have somebody else -- if he sat in
11 my section, I would have somebody else wait on him.

12 Q. Okay. And after the -- did you interact with
13 him outside of Harbour Pub?

14 A. No.

15 Q. And after -- since working at Harbour Pub, have
16 you interacted with him outside of this lawsuit?

17 A. Outside of the lawsuit? No.

18 Q. Okay. And so --

19 A. Oh, that's not true. He did -- was a witness
20 in the Du Wors case, and so I questioned him there. And
21 he did do a fake service of papers on me that he
22 recorded and then sent to a man who has been stalking me
23 to post on the internet.

24 Q. Did he -- do you have a copy of that video?

25 A. I can get a copy for you.

1 Q. Okay. And where on the internet did it get
2 posted?

3 A. It was posted by a man named Richard Lee
4 Rynearson who is a member of the Oath Keepers Militia
5 and is a serial stalker and has it posted on his YouTube
6 page.

7 Q. Okay. Can you spell that name for the record?

8 A. Richard, R-i-c-h-a-r-d; middle name, Lee,
9 L-e-e; last name, Rynearson, R-y-n-e-a-r-s-o-n. Yeah, I
10 think that's how it's spelled.

11 Q. Okay.

12 A. Sorry, I'm a terrible speller.

13 Q. Did you ever have a business relationship with
14 Mr. Nelson?

15 A. No.

16 Q. Have you ever had -- outside of your minimum
17 contact with him, have you ever had a personal
18 relationship with him?

19 A. No.

20 Q. Would you say you know Mr. Nelson well?

21 A. I would say I know of Mr. Nelson well.

22 Q. Okay. Have you ever had any long conversations
23 with him?

24 A. Beyond him threatening me, no.

25 Q. And when did he threaten you?

1 A. That would have been 2001 several times.

2 Q. During your political campaign?

3 A. After the political campaign.

4 Q. So Mr. Wade, do you use social media?

5 A. I do.

6 Q. Would you say you're an avid social media user?

7 A. I am.

8 Q. As of today, what are your -- what social media
9 accounts do you have?

10 A. I have a Facebook and a Twitter and a YouTube.

11 Q. What's your Facebook -- what's your name on
12 Facebook?

13 A. My name, Houston Wade.

14 Q. And what's your Twitter -- I believe it's
15 called a Twitter handle.

16 A. Yes. @TheHoustonWade.

17 Q. Okay. And I'm sorry. You said one other
18 thing.

19 A. YouTube.

20 Q. Okay. And is -- do you have a special user
21 name for your YouTube?

22 A. It's Houston Wade.

23 Q. And what do you use your social media for
24 today?

25 A. Today or just in general?

1 Q. In general, like right now.

2 A. I love -- I'm a news junkie. I love reading up
3 on current events, and I love debates. My YouTube
4 channel is used for -- I do live streams where people
5 from the internet ask me questions and I answer them.

6 Q. So you just said you love to debate?

7 A. Yes.

8 Q. So why does that play into your social media
9 use?

10 A. It's an exercise of the mind. Forces me to do
11 research on topics and learn about things.

12 Q. How so?

13 A. Well, if somebody -- let's say -- an example --
14 someone is a flat earther, and they make a statement, an
15 erroneous statement, about the horizon of the sea, I can
16 then do a deep dive of research, go into the details and
17 the physics of -- of a spherical earth, and then I can
18 come back with a competent answer.

19 Q. Okay. And when you say you do research, how do
20 you do this research?

21 A. I have, as you can see, lots of books. I also
22 read journal articles. I do math equations. I will
23 read up on current events, latest research, as one would
24 do if they're studying anything.

25 Q. Okay. And so would you say you use -- like,

1 you Google answers?

2 A. I can -- I can use Google and other search
3 engines, yes.

4 Q. And the kinds of resources you rely on for this
5 research, do you -- what kind of resources are you
6 relying on? Are you only relying on peer-reviewed
7 articles? Are you checking that kind of thing? Are you
8 just kind of Googling and seeing what pops up and
9 reading that?

10 A. I -- if it has to do with a scientific or
11 academic purpose, it would be peer-reviewed articles,
12 yes.

13 Q. Are you only debating on scientific or academic
14 topics?

15 A. Often, but I will -- I will -- I'll debate
16 politics. I will debate human rights. I will debate
17 anything that -- that interests me.

18 Q. Okay. And so -- and so the -- and this is what
19 you use social media for. Do you use it just kind of
20 standardly, too, to keep up with your friends and the
21 others in your community?

22 A. Of course.

23 Q. Can you say that again? I didn't catch that.

24 A. Of course.

25 Q. Sorry. So prior to this lawsuit, you had

1 started a -- it's my understanding that you had started
2 a Facebook page called the Bainbridge Bad List; is that
3 correct?

4 A. The Bainbridge Island Bad List, yes.

5 Q. And when did you create that?

6 A. October 2018.

7 Q. Okay. And what did you post on this?

8 A. I posted five articles about men in the
9 community who had hurt women and children and had
10 seemingly gotten away with it or were violating the
11 terms of their release from prison.

12 Q. Okay. And that's all you used it for, was to
13 report those five articles?

14 A. I wrote those five articles, yes, and then I
15 was served with lawsuits.

16 Q. How long was the Bainbridge Bad List an active
17 Facebook page?

18 A. Active? The page itself, I believe I took down
19 in either late 2020 or early 2021.

20 Q. Okay. And when you were -- while it was
21 active, were you consistently posting on it, or did you
22 only post these five articles?

23 A. I only posted those five articles.

24 Q. What was your intent with -- why did you post
25 those articles?

1 A. To protect the community.

2 Q. How did posting these articles protect the
3 community?

4 A. It made people aware of what these men do.

5 Q. And making these -- in making these people
6 aware, how did it help them?

7 A. Well, for example, on one of the articles that
8 I posted, the man ended up getting arrested by federal
9 authorities, charged with raping his granddaughter, and
10 sent to prison for six years.

11 Q. And you attribute that to the article you
12 posted?

13 A. I -- I did have something to do with that, yes.

14 Q. Okay. And so you wanted to help get these men
15 criminally convicted?

16 A. Convicted would be fantastic, yes.

17 Q. Okay. And these articles and your warning
18 people, are you trying to warn people away from
19 interacting with the men that you posted these articles
20 about?

21 A. Well, if a man is consistently abusing, raping,
22 sexual assaulting, or trafficking women and children, I
23 think it would be best for women and children to avoid
24 those men, yes.

25 Q. Just women and children?

1 A. That's -- that's -- well, with one of the
2 cases, Franklin Row, he was abusing boys as well, but
3 those are children.

4 Q. So you wanted to ward people off from
5 interacting with these men you wrote these articles
6 about; is that --

7 A. Yes.

8 Q. Is that --

9 A. Yes.

10 Q. You didn't want them to interact with them in
11 any way, shape, or form; correct?

12 A. No. I specifically said to avoid those men in
13 those articles.

14 Q. Yeah. So you didn't want them to have any kind
15 of business relationships with them?

16 A. Well, considering that in Mr. Nelson's case, I
17 wrote about how Mr. Nelson had lost investor's money as
18 well, that would -- yes, that would -- you don't want to
19 do business with men who hurt women and children and
20 lose you money, no.

21 Q. Okay. So you posted these things in the hopes
22 that other people would gain the knowledge of your
23 allegations and act in accordance with those
24 allegations; correct?

25 A. I would say -- I would hope people would become

1 aware of predators in their community and avoid them the
2 best they can because the law enforcement wasn't doing
3 anything about it.

4 Q. Okay. All right. I want to take a minute to
5 show you an exhibit. You were served with a set of
6 requests for admissions that you answered. You were
7 actually served with two sets, but I'm going to be
8 asking you about the second set. Do you remember being
9 served with these?

10 A. My -- my lawyer was served with them, and we
11 have gone through them, yes.

12 Q. Okay. And I'm going to mark for the court
13 reporter what is Exhibit 1.

14 I'm going to show you not your responses, but
15 our served requests to you just because the exhibits are
16 in our requests, not your responses. So I'm going to
17 share screen with you really quick.

18 Okay. So I'm going to scroll to the top of the
19 page. This says, "Plaintiff William Nelson, Second Set
20 of Requests for Admission to Defendant." Do you see
21 that?

22 A. I do.

23 (Exhibit 1 marked for identification.)

24 BY MS. BOOKER:

25 Q. I'm going to scroll down. It says Request for

1 Admission Number 7. So you've seen this document
2 before?

3 A. I have.

4 Q. You've reviewed this document?

5 A. I have.

6 Q. Okay. At the end of this document, there are a
7 number of different social media posts exhibited.

8 A. Yes.

9 Q. Have you seen these?

10 A. Yes.

11 Q. Okay. Okay. So I first want to talk about
12 this post right here. And let me know, can you read
13 this? It says, "Houston Wade, the primary reason I ran
14 in 2001 was" -- can you read that?

15 A. Yes. Yes, I can.

16 Q. Or do you need it bigger?

17 A. I can read it.

18 Q. Okay. So here you can see, it says, "Houston
19 Wade." This looks to be a Facebook post based on the
20 image. It says, "The primary reason I ran in 2001 was
21 because Mr. Nelson ran. I, as a child, lived in the
22 condo below. His" -- "he was abusive to his
23 stepchildren, my friends, a drunk. And later, he raped
24 my friend's daughter. She later committed suicide off
25 the Agate Pass Bridge. I did not want to see him on the

1 city council, so I threw my hat into the ring. Knobloch
2 was an excellent alternative until he started suffering
3 dementia and getting in fights.

4 "Eventually, it was discovered by me that
5 Nelson had received tens of thousands of dollars in
6 contributions from out-of-state developers who were
7 using the fake Bainbridge addresses. The Review wrote
8 an article about this, and Nelson started stalking me
9 and threatening my life beginning the Saturday before
10 the election. It worked out eventually he eventually
11 went bankrupt on his Lynnwood Center project and took a
12 lot of the big local Republican donors who invested in
13 it down with him."

14 A. Yes.

15 Q. You posted this, correct?

16 A. I did.

17 Q. Okay. And you posted it on Facebook?

18 A. I believe so, yes.

19 Q. And Facebook is a public forum; right?

20 A. This was in a restricted private group, I
21 believe.

22 Q. What kind of private group?

23 A. It's probably one of the Bainbridge Island
24 groups. I don't remember which specific one.

25 Q. But if it's a restricted private group for

1 Bainbridge Islanders, the people of the community who
2 interact with Mr. Nelson would -- would have seen it;
3 correct?

4 A. Very likely, yes.

5 Q. Okay.

6 MS. LANE: I'm going to ask a clarifying
7 question on that.

8 MS. BOOKER: Ms. Lane, you can -- can we go off
9 the record, Ms. Marcus?

10 (Off the record.)

11 BY MS. BOOKER:

12 Q. Mr. Wade, we just spoke with your attorney off
13 the record. I want to clarify my question.

14 I asked, So the people who were in the
15 Bainbridge Island Facebook group community would have
16 seen this post?

17 A. Yes.

18 Q. Correct?

19 A. Yes.

20 Q. And those people who are part of that Facebook
21 group are part of the larger Bainbridge Island
22 community; correct?

23 A. I assume, yes.

24 Q. This post here, why did you post this?

25 A. I was perhaps asked a question. I don't

1 remember the exact prompt before that. This is in a
2 chat to a larger thread, obviously.

3 Q. Okay. And in posting this, what did you expect
4 to happen?

5 A. Well, it looks to me I was clarifying
6 something. I don't know because I don't see the
7 original prompt.

8 Q. Okay. So here, you state that the primary
9 reason you ran in 2001 was because Mr. Nelson ran?

10 A. Yes.

11 Q. So you purposely ran to hinder Mr. Nelson;
12 correct?

13 A. I -- I purposely ran because I don't believe
14 men who hurt women and children should be elected
15 representatives in the community.

16 Q. And it's your belief that Mr. Nelson -- or at
17 least you're alleging that Mr. Nelson hurt children and
18 women?

19 A. He hurt my friend, yes, and he hurt my friend's
20 mother, yes.

21 Q. And so by -- by running -- by having this
22 belief, you believe that Mr. Nelson shouldn't have
23 been -- shouldn't have taken a political position, so
24 therefore you ran against him; correct?

25 MS. LANE: I'm objecting to the scope of the

1 questioning. This is outside of the scope of this
2 litigation and what has been determined by the judge of
3 what's going to be -- or what the judge will be ruling
4 on.

5 This was an occurrence that happened in 2001.
6 This litigation is surrounding the defamation lawsuit,
7 not what happened in 2001.

8 Go ahead, Houston. You can go ahead and answer
9 the question.

10 THE WITNESS: I -- I ran specifically because I
11 did not want Mr. Nelson, a man who hurt my friends and
12 her family for years, to have a political office. This
13 is also after I personally witnessed Mr. Nelson try to
14 force himself on an unconscious girl.

15 BY MS. BOOKER:

16 Q. Okay. And so then you -- in this post you also
17 say, "Eventually, it was discovered by me that
18 Mr. Nelson had received tens of thousands of dollars in
19 contributions out-of-state" -- "from out-of-state
20 developers." Do you mean contributions in relation to
21 the 2001 election?

22 A. Yes.

23 MS. LANE: Again, I'm going to object. This is
24 outside of the scope of this lawsuit.

25 Go ahead, Houston.

1 MS. BOOKER: Ms. Lane, I'm -- I hear your
2 objection. Relevancy objections and, therefore, your
3 scope objection are improper in discovery depositions.

4 BY MS. BOOKER:

5 Q. Mr. Wade, please answer my question.

6 A. Yes, it was in relation to the 2001 election.

7 Q. Okay. And then it says -- then you say, "It
8 worked out eventually. He eventually went bankrupt on
9 his Lynnwood Center project."

10 So did -- and by making that statement, are you
11 saying that him losing the election led to him going
12 bankrupt on that project?

13 A. I believe that's in a reference to karma.

14 Q. It's in reference to what?

15 A. Karma.

16 Q. What does that mean?

17 A. Karma is essentially you get out of the
18 universe what you put into it, and yeah.

19 Q. Are you saying karma, k-a-r-m-a?

20 A. Yes.

21 Q. I'm sorry. I couldn't -- it was coming across
22 muffled on my end.

23 Okay. And when did Mr. Nelson go bankrupt?

24 A. I believe that was somewhere between 2009 and
25 2011.

1 Q. Okay. All right. I want to move on to this
2 post here.

3 Do you see this post here? It's got a picture,
4 and it says, "I just won the injunction hearing which
5 means I can write this: William "Bill" P. Nelson rapes
6 women and abuses children. He's a drunk and a cokehead
7 and currently facing multiple DUIs and a hit-and-run.
8 He's a terrible human being, and everyone on earth
9 should avoid him at all costs. #timesupdouchebagsofthe
10 world."

11 A. I can see that, yes.

12 Q. Did you post this?

13 A. I did.

14 Q. And did you post it with this picture?

15 A. I did.

16 Q. And what is this a picture of?

17 A. That's a picture of William "Bill" P. Nelson.

18 Q. And he's holding something in his hands. Do
19 you know what he's holding?

20 A. I believe it is the design schematics for the
21 development upon which he went bankrupt.

22 Q. Okay. And after the -- so you say you won the
23 injunction hearing. Why did you post this post?

24 A. Because prior to the injunction hearing, I was
25 not allowed to post anything about Mr. Nelson.

1 Q. Why did you want to continue to post about
2 Mr. Nelson?

3 A. Because Mr. Nelson hurts women and children,
4 and the community should be made aware of that.

5 Q. And they should be made aware of that so they
6 avoid him?

7 A. Of course. That's what it says right there.

8 Q. In all aspects of life?

9 A. Yes.

10 Q. Including in business relationships?

11 A. Why would you do business with somebody who
12 hurts women and children?

13 Q. I'll take that as a yes.

14 Let's move on to the next one. I apologize.
15 This is going to be PDF page 21 for what has been marked
16 Exhibit 1. This is a screenshot of what looks like a
17 Twitter feed. The poster's name is Rock God
18 @theHoustonWade. That's your Twitter handle; correct?

19 A. No. That account no longer exists.

20 Q. Okay. Was that your Twitter handle?

21 A. For a time, yes.

22 Q. Okay. And so this -- this post specifically
23 says, "Which parts? I wrote articles exposing powerful
24 men in my community who raped women and kids. Yeah, I
25 got sued by one of them. So what? He raped and beat my

1 best friend when she was 7. I would do it again."

2 And then further down, you say, "The man would
3 do that to a 7-year-old girl is who you are backing in
4 this. Be better."

5 You posted these; correct?

6 A. I did.

7 Q. What did you mean when you said "Be better"?

8 A. Because I don't think people should support men
9 who hurt women and children, and he should be better
10 than that.

11 Q. So you don't think people should support
12 Mr. Nelson?

13 A. Oh, God, no.

14 Q. In any fact of life?

15 A. Until he repents for what he's done to women
16 and children, no.

17 Q. And that's why you posted this -- posted these
18 comments about him?

19 A. I believe those comments were probably in
20 response to somebody else asking me something.

21 Q. But you want -- you posted comments about
22 Mr. Nelson because you wanted people to be aware of what
23 you allege he did, and you wanted them to avoid him;
24 correct?

25 A. It's not what I allege he did; it's what his

1 victims allege he did.

2 Q. Okay. But that's why you posted these;
3 correct?

4 You post -- you posted these allegations. You
5 posted about these allegations from these victims online
6 because you wanted the community to avoid Mr. Nelson;
7 correct?

8 A. Yes. The community should avoid Mr. Nelson.

9 Q. And you didn't want -- you didn't want them
10 doing business with him; correct?

11 MS. LANE: I'm just going to object for the
12 record. It's calling for speculation.

13 Go ahead, Houston.

14 THE WITNESS: Again, if interacting involves
15 business, then people should not interact with
16 Mr. Nelson.

17 BY MS. BOOKER:

18 Q. Okay. What did you expect to happen by making
19 this post and saying "Be better"?

20 A. Well, I would expect people to go, Oh, maybe I
21 shouldn't spend my time online defending men who hurt
22 women and children.

23 Q. All right. I want to move on to another --

24 I apologize. Can -- Ms. Lane, can we take a
25 ten-minute break? It looks like my Adobe Acrobat just

1 shut down, so I don't want to waste everyone's time.

2 MS. LANE: Okay.

3 MS. BOOKER: Are you agreeable to that?

4 MS. LANE: Yes.

5 (Off the record.)

6 BY MS. BOOKER:

7 Q. Mr. Wade, before we went off the record, we
8 were going through what I had marked for this deposition
9 as Exhibit 1, which was a copy of the request for
10 admissions that we served upon you in this case. I'm
11 going to reopen that document, and then I'll scroll
12 through it again just to show you that we're still
13 looking at the same thing.

14 Again, here, the Plaintiff William Nelson's
15 Second Set of Requests for Admissions to Defendant, do
16 you see that?

17 A. I do.

18 Q. We've already established that you've seen and
19 looked at these before. This is the same document we
20 were looking at prior to the break?

21 A. Appears so, yes.

22 Q. Okay. I want to go to the next post here. It
23 was made by Rock God @theHoustonWade. It looks like it
24 was on Twitter. Down here, it says, "Twitter for
25 Android."

1 A. Yes.

2 Q. This was your social media account at one
3 point; correct?

4 A. Yes.

5 Q. Okay. So you -- this post says, "I created the
6 Bainbridge Island list to spotlight these creeps in my
7 community. Currently being sued for 5 million dollars
8 by a pissed-off rapist. He's going to lose." You made
9 this post; correct?

10 A. It appears I did, yes.

11 Q. So these are your words; right?

12 A. It appears so.

13 Q. You said, "I created this list to spotlight
14 these creeps."

15 A. Yes.

16 Q. What did you mean by spotlight the creeps?

17 A. Well, the point of the Bainbridge Island Bad
18 List was to make people in the community of aware of men
19 who hurt women and children, and I would classify those
20 people as creeps.

21 Q. Okay. And what -- what did you want the
22 outcome of them being aware of these so-and-so creeps to
23 be?

24 A. As we established.

25 MS. LANE: Objection. Asked and answered.

1 Sorry, he's -- objection. Asked and answered.

2 BY MS. BOOKER:

3 Q. You may answer, Mr. Wade.

4 A. As I said before, so that people would avoid
5 these violent, terrible men in our community.

6 Q. Okay. All right. And when did you post this?
7 Do you remember when you posted this?

8 A. Well, the date there says January 5, 2019.

9 Q. Okay. All right. Let's go to the next one.

10 Okay. All right. I'm going to make this
11 bigger and scroll over. Looks like this was posted by
12 Houston Wade. This is in response to a conversation
13 chain. It says, "Yup, Bill Nelson. I worked hard to
14 bankrupt him and finally did. We got the Manor House
15 declared a historic landmark and managed to keep banks
16 from lending to him for years so that when he finally
17 began construction at Pleasant Beach, it was right
18 before the bottom fell out of the economy, and he had to
19 spend millions renovating the Manor House before he was
20 allowed to start building the rest of the development.

21 "A group of us met at the tree house and sat
22 outside and cheered every time he left with a load in
23 his pickup truck as he was being evicted from the
24 development by the bank." You posted that; correct?

25 A. It appears I did, yes.

1 Q. Okay. So you have purposely worked to bankrupt
2 Mr. Nelson; correct?

3 MS. LANE: Objection. Calls for speculation.
4 Go ahead, Houston.

5 THE WITNESS: Well, I definitely told people
6 about Mr. Nelson's history when I was informed that they
7 were working with him, yes.

8 BY MS. BOOKER:

9 Q. And you've -- you just testified you posted
10 this. You made this statement. You made the statement,
11 "I worked hard to bankrupt him and finally did."
12 Correct?

13 A. It looks -- it appears I made that statement,
14 yes.

15 Q. Okay.

16 A. And below that statement, you also see the
17 people are agreeing that he was horrendous and he would
18 creep on young girls.

19 Q. Move to strike. There was no pending question.
20 Have you ever -- okay. I'm done with this
21 exhibit, so I'm going to take it down.

22 Mr. Wade, have you ever stated that someone
23 shouldn't give money to Mr. Nelson?

24 A. I believe that in the Bainbridge Island Bad
25 List article I wrote about Mr. Nelson, I stated that

1 people should not invest with him, yes.

2 Q. Okay. Do you think Mr. Nelson is a bad guy?
3 Right?

4 MS. LANE: Objection. Calls for speculation.

5 THE WITNESS: Mr. Nelson -- I would say that
6 people who hurt women and children are bad people, yes.

7 BY MS. BOOKER:

8 Q. And you believe that Mr. Nelson hurts women and
9 children?

10 A. Mr. Nelson -- there's -- there's a police
11 record and a restraining order from when Mr. Nelson
12 attempted to murder his wife in front of his children,
13 so yes, he's a terrible person.

14 Q. Earlier, when you were testifying, we were
15 talking about a post in which you had claimed that
16 Mr. Nelson had eventually gone bankrupt, and you had
17 said that it was karma; correct?

18 A. Yes.

19 Q. So you think Mr. Nelson had the financial harm
20 coming to him; correct?

21 MS. LANE: Objection. Calls for speculation.

22 THE WITNESS: I think that when people do
23 horrible things to others, that the universe eventually
24 results in them getting what they deserve.

25 BY MS. BOOKER:

1 Q. But your statement was directly in relation to
2 financial harm that Mr. Nelson suffered from?

3 A. My statement --

4 MS. LANE: Hold on a second, Houston.

5 Is there a question?

6 BY MS. BOOKER:

7 Q. Yes. Your statement in which you said that
8 karma -- that it was karma that Mr. Nelson suffered from
9 bankruptcy, that directly relates to a financial harm;
10 correct?

11 A. Am I not part of the universe?

12 Q. I -- I -- I apologize. If you could answer the
13 question. I don't understand your answer.

14 A. I am a member of -- I am a part of the
15 universe, correct?

16 Q. Yes.

17 A. So if someone does horrible things not only to
18 people you love and care about, but also threatened to
19 kill you personally and stalk you and make repeated
20 threats and violent acts, would it not be logical that
21 the victim in that case, you, would perhaps tell other
22 people about their actions? Wouldn't that perhaps lead
23 to, say, someone at a bank rejecting them for a loan and
24 then Mr. Nelson -- I don't know -- stalking and
25 threatening that loan officer and then that loan officer

1 getting blackballed for multiple banks in the area?
2 Would that not be a logical outcome of one's actions?

3 Q. So there was a lot of hypotheticals thrown
4 around in that conversation right there. I guess I want
5 to get back to what my question was, though, is that you
6 believed that Mr. Nelson deserved the financial harm
7 that came to him?

8 MS. LANE: Objection. Speculation. Also asked
9 and answered.

10 BY MS. BOOKER:

11 Q. You still have to answer my question, Mr. Wade.

12 A. Mr. Nelson deserves to be alone and not in any
13 contact with another human being until he repents and is
14 a better person.

15 Q. Okay. I want to circle back. At the beginning
16 of this deposition, we were talking about your
17 interactions with Mr. Nelson, and you kind of went over
18 a few time periods, and I just want to circle back on
19 those. So you knew him when you lived in the same
20 building as him in the '80s; correct?

21 A. Correct.

22 Q. And how long was that? How many years?

23 A. That would have been 1984, 1985, in there.

24 Q. Okay. Two years. So you were four and five at
25 the time; correct?

1 A. Yeah. Around then, yes.

2 Q. And then your next interaction didn't happen
3 until the '90s at the party; correct?

4 A. You know what? There was one interaction in --
5 it would have been around winter 1998 near Christmas. I
6 was a member of the Earth Service Corps and so was his
7 stepdaughter at the time, and there was a meeting at her
8 house --

9 Q. Okay.

10 A. -- and he was there.

11 Q. And -- and so then -- and then so you had those
12 two -- so it was the minimal interactions for the years
13 in the '80s, correct, when you were four and five?

14 A. Yes.

15 Q. And you said you had very minimal contact with
16 him?

17 A. Yes.

18 Q. Then two interactions in the '90s. Then there
19 was the election in 2001; correct?

20 A. Correct.

21 Q. And then the next interactions you had with him
22 were the occasional times you would see him while
23 working at the -- I want to say -- I apologize if I get
24 the name wrong -- Harbour Pub, the public restaurant you
25 had worked at?

1 A. Correct. Harbour Public House.

2 MS. BOOKER: Thank you. Okay. I believe those
3 are all the questions I have for you today.

4 Your attorney might have some follow-up
5 questions she may want to ask you, but I want to thank
6 you for your time and for sitting and speaking with me,
7 Mr. Wade.

8 THE WITNESS: Thank you.

9 MS. BOOKER: Ms. Lane, do you have any
10 questions? I saw your mouth move, but I didn't hear
11 you.

12 MS. LANE: Oh, I'm sorry. Can you hear me?

13 THE WITNESS: Yes.

14 MS. BOOKER: I can now.

15 MS. LANE: I'm going to share my screen. Okay.
16 Can everybody see this?

17 THE WITNESS: Not yet. Oh, there we go.

18 MS. LANE: Can everybody see this?

19 THE WITNESS: Yes.

20 EXAMINATION

21 BY MS. LANE:

22 Q. Okay. So this was -- we were just looking over
23 this. This is the Plaintiff William Nelson's Second Set
24 of Requests for Admission to the Defendant. And I'm
25 going to go back down. I'm going back down to this

1 comment, the one that we just went over with Ms. Booker.

2 A. Yes.

3 Q. Do you know if you are listed anywhere in his
4 bankruptcy petition?

5 A. I am not.

6 Q. And do you know what you -- because this -- you
7 can see up here, it says -- there's 16 replies. Do you
8 have any idea what this was in response -- your comment
9 was in response to?

10 A. Off the top of my head, no.

11 Q. And do you see this comment here right below
12 yours, Alana Brook?

13 A. Alana Brooke Simcoe.

14 Q. Do you know her?

15 A. I do.

16 Q. How do you know her?

17 A. We've known each other since fifth grade.

18 Q. And she states, "He was horrendous. I remember
19 him sniffing any young woman he could get close to."

20 A. Yes.

21 Q. Did you ask her to post this?

22 A. I did not.

23 MS. BOOKER: Ms. Lane, can we just make clear
24 for the record exactly which post you're referring to
25 either by reading it for the record or stating which PDF

1 page you are on?

2 MS. LANE: So I read it for the record, but
3 I'll read it again.

4 MS. BOOKER: I meant not -- not the third
5 parties. This is PDF page, I believe, 28.

6 MS. LANE: So this is PDF page 26 --

7 MS. BOOKER: Okay.

8 MS. LANE: -- of 36.

9 MS. BOOKER: Okay. I just wanted to make it
10 clear for the record.

11 BY MS. LANE:

12 Q. And it's the Houston Wade comment, "Yup, Bill
13 Nelson. I worked hard to bankrupt him and finally did.
14 We got the Manor House declared a historic landmark and
15 managed to keep banks from lending to him for years so
16 that when he finally began construction at Pleasant
17 Beach, it was right before the bottom fell out of the
18 economy, and he had to spend millions renovating the
19 Manor House before he was allowed to start building the
20 rest of the development?

21 "A group of us met at the tree house, and we
22 sat outside and cheered every time he left with a load
23 in his pickup truck as he was being evicted from the
24 development by the bank."

25 Mr. Wade, did you have anything to do with

1 the -- the recession in 2008?

2 A. I did not.

3 Q. Are you aware that many construction workers,
4 developers had filed bankruptcy due to the recession in
5 2008?

6 A. I am.

7 Q. And is Mr. Wade a part of that?

8 A. I am not.

9 Q. I'm sorry. Is Mr. Nelson a part of that?

10 A. Yes. He is a developer.

11 MS. LANE: Thank you. All right. Those are my
12 only questions.

13 MS. BOOKER: Can you leave that up, Ms. Lane?
14 I have one follow-up question, and then I'll be done.

15 RE-EXAMINATION

16 BY MS. BOOKER:

17 Q. Although you weren't directly involved in the
18 recession or anything, it was your understanding that
19 you played a part in his bankruptcy; correct?

20 A. If there was a part to play, it was because my
21 friend Catherine Wanio at the time was a commercial loan
22 officer, and she was telling me about any development
23 that was going to be going in at Lynnwood Center.
24 Someone had come in and asked for a loan. And I asked
25 who it was; she said it was Bill Nelson. And I told her

1 about the rape and abuse Mr. Nelson had done against
2 people in my life and classmates of hers and mine. And
3 she rejected his loan.

4 And then she got a job at a new bank shortly
5 thereafter, and he came and applied again. And she
6 rejected him at that bank, and after that, he started
7 threatening and stalking her, so she went out of her way
8 to blackball him from every bank in Washington she could
9 think of.

10 MS. BOOKER: Okay. That's my only question,
11 Ms. Lane.

12 MS. LANE: I have a -- I also have a follow-up
13 question.

14 RE-EXAMINATION

15 BY MS. LANE:

16 Q. Mr. Wade, do you know -- what was -- I'm sorry.
17 What was the name of your friend again?

18 A. Catherine Wanio.

19 Q. Can you spell her last name, please?

20 A. Oh, goodness. I believe it's W-a-n-i-o.

21 Q. Thank you. And do you know the parameters that
22 Ms. Wanio used at her bank to approve or disprove
23 Mr. Nelson for a loan?

24 A. I do not.

25 MS. LANE: Thank you. That's my only question.

1 MS. BOOKER: I have no further questions, so I
2 believe that concludes this deposition.

3 (Deposition concluded at 12:17 PM.)
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 STATE OF WASHINGTON)
2)
3 COUNTY OF KING)
4
5

6 I, Anna Marcus, a Certified Shorthand Reporter,
7 do hereby certify:

8 That prior to being examined, the witness in
9 the foregoing proceedings was by me duly sworn to testify
10 to the truth, the whole truth, and nothing but the truth;
11 That said proceedings were taken before me at the time
12 and place therein set forth and were taken down by me in
13 shorthand and thereafter transcribed into typewriting
14 under my direction and supervision;

15 I further certify that I am neither counsel
16 for, nor related to, any party to said proceedings, not
17 in anywise interested in the outcome thereof.

18 In witness whereof, I have hereunto subscribed
19 my name.

20
21 Dated: July 10, 2023

22 

23 _____
24 Anna Marcus
25 CCR No. 7718

1 Paul K. Friedrich, WSBA #43080
2 WILLIAMS, KASTNER & GIBBS PLLC
3 601 Union Street, Suite 4100
4 Seattle, WA 98101-2380
5 Telephone: (206) 628-6600
6 Fax: (206) 628-6611
7 *Attorneys for Plaintiff/Creditor William Nelson*

The Honorable Timothy W. Dore
Chapter 7

8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON

10 IN RE:
11 HOUSTON CURRY WADE,
12 Debtor.
13
14 WILLIAM NELSON,
15 Plaintiff,
16 v.
17 HOUSTON CURRY WADE,
18 Defendant.

NO. 22-10852-TWD

Adversary Case No. 22-01039-TWD
PLAINTIFF WILLIAM NELSON'S
SECOND SET OF REQUESTS FOR
ADMISSION TO DEFENDANT

19 Pursuant to FRCP 26 and 36, Plaintiff William Nelson ("Plaintiff") requests that
20 Defendant Houston Curry Wade ("Defendant"), admit or deny the following statements.

21 Failure to serve a written answer of objection within the time allowed by FRCP 36 will
22 result in an admission of the following requests.

23 Please note that if you make any objections, you must specify the reasons for your
24 objections. If you do not admit a fact or application of law to facts, you must specifically deny
25 the matter or set forth in detail the reasons why you cannot truthfully admit or deny the matter.

PLAINTIFF WILLIAM NELSON'S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 1

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1



1 A denial must fairly meet the substance of the requested admission, and when good faith requires
2 that you qualify your answer or deny only a part of the matter of which an admission is requested,
3 you shall specify some of it as is true and qualify or deny the remainder.

4 You may not give lack of information or knowledge as a reason or failure to admit or
5 deny unless you state that you have made reasonable inquiry and that the information know or
6 readily obtainable by you is insufficient to enable you to admit or deny.

7
8 **REQUESTS FOR ADMISSION**

9
10 **REQUEST FOR ADMISSION NO. 7:** Admit that you were the administrator and/or
11 operator of the Facebook page titled “The Bainbridge Island Bad List.”

12 **RESPONSE:**

13
14
15 **REQUEST FOR ADMISSION NO. 8:** Admit that you were the administrator,
16 operator, and/or sole poster on the Facebook account, “Houston Wade.”

17 **RESPONSE:**

18
19
20 **REQUEST FOR ADMISSION NO. 9:** Admit that you were the administrator,
21 operator, and/or sole poster on the Twitter Account titled RockGod with a username
22 @TheWouston.

23 **RESPONSE:**

1
2 **REQUEST FOR ADMISSION NO. 10:** Admit that you posted the following quotes

3 on the Bainbridge Islanders page:

4 Laurie, there is a large contingent of rich men on this island who prey on young
5 girls. They even had a clubhouse called the Chicken Coop where they would
6 pay underage girls to strip and perform sex acts at private parties. Members of
7 the police department in the pre Hamner days would also go to thses [sic]
8 parties. It was completely predatory.” and “I tried in 2012 to get the Kitsap Sun
9 to report on it. They didnt [sic]. I finally brought it out in the open last year and
10 one of the men involved (Bill Nelson) is suing me for defamation as a result.
11 The other man who owned the establishment (Bill Blakely) has high tailed it out
12 of our community.

13
14 And when you put those dudes on blast for rape or abuse, they like to think they
15 can sue you into silence. How about rich asshole men on this island stop hurting
16 women and children? There are a select few men here who have left dozens of
17 victims in our community and too many of us turn a blind eye and hope it goes
18 away.

19 Once this latest lawsuit gets out of the way, the Bainbridge Island Bad List will
20 grow by a few more names.

21 I’m being sued by Bill Nelson for writing an article about the women he raped
22 and children he abused.

23 Was sued by John Du Wors for writing an article about his convictions for
24 beating his kid and wife. Won that one.

25
These quotes are demonstrated under **Exhibit A**.

RESPONSE:

26
27 **REQUEST FOR ADMISSION NO. 11:** Admit that **Exhibit A** are true and correct
28 copies of your posts on the Facebook page “Bainbridge Islanders.”

29 **RESPONSE:**

30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000

PLAINTIFF WILLIAM NELSON’S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 3

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

1 **REQUEST FOR ADMISSION NO. 12:** Admit that you posted the following quotes
2 on Facebook from your personal Facebook account:

3 The primary reason I ran in 2001 was because Nelson ran. I as a child I lived in
4 the condo below his. He was abusive to his step children (my friends), a drunk,
5 and later he raped my friend's daughter (she later committed suicide off the
6 Agate Pass Bridge). I did not want to see him on the city council so I threw my
7 hat into the ring. Knobloch was an excellent alternative until he started suffering
8 dementia and getting in fights.

9 Eventually it was discovered (by me) that Nelson had received tens of
10 thousands of dollars in contributions from out of state developers who were
11 using fake Bainbridge addresses. The Review wrote an article about this and
12 Nelson started stalking me and threatening my life beginning the Saturday
13 before the election.

14 It worked out eventually, he eventually went bankrupt on his Lynwood Center
15 project and took a lot of the big local Republican donors who invested in it
16 down with him.

17 When one is involved in local politics at a young age, one finds out the inner
18 workings quickly. I have a lot of experience with the dark side of the money on
19 this island.

20 I just won the injunction hearing which means I can write this:
21 William "Bill" P. Nelson rapes women and abuses children. He's a drunk and a
22 coke head and is currently facing multiple DUIs and a hit and run. He's a
23 terrible human being and everyone on Earth should avoid him at all costs.
24 #TimesUp, douchebages of the world!

25 These quotes are demonstrated in **Exhibit B**.

RESPONSE:

REQUEST FOR ADMISSION NO. 13: Admit that **Exhibit B** is a true and correct
copy of your post on a Facebook page.

RESPONSE:

PLAINTIFF WILLIAM NELSON'S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 4

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

1 **REQUEST FOR ADMISSION NO. 14:** Admit that you posted the following quotes

2 on Twitter under the username @TheWouston:

3 Which parts? I wrote articles exposing powerful men in my community who
4 raped women and kids. Yeah, I got sued by one of them. [sic] So what? He raped
5 and beat my best friend when she was 7. I'd do it again.

6 Can you imagine being 7 years old and everytime [sic] you heard that car pull
7 into the driveway you'd crawl under the bed and press yourself against the wall
8 out of pure fear? That you'd go to the bathroom in your wastepaper basked
9 rather than chance leaving your room?

10 The man who would do that to a 7 year old girl is who you are backing in this.
11 Be better.

12 I'm trying. When I find out about them, they go on blast on my community page
13 "The Bainbridge Island Bad List". Currently being sued for defamation by one
14 of the rapists on there, but I'll win in the end. There are too many victims for
15 him to prevail.

16 I created the Bainbridge Island Bad List to spotlight these creeps in my
17 community. Currently being sued for \$5 million by a pissed off rapis. He's
18 going to lose.

19 These quotes are demonstrated in **Exhibit C**.

20 **RESPONSE:**

21 **REQUEST FOR ADMISSION NO. 15:** Admit that **Exhibit C** is a true and correct
22 copy of your post on Twitter under the username @TheWouston

23 **RESPONSE:**

24 **REQUEST FOR ADMISSION NO. 16:** Admit that you posted the following quotes
25 on your personal Facebook page:

 Years ago a connected, alcoholic Republican politician/real estate developer
 raped my friend's daughter in Fort Ward. She escaped and ran naked to the door
 of the neighbors, who happens to be another friend of mine, screaming for help.
 They took her in, and called the police. When the cops arrived they shook hands
 with the rapist and joked with him for some time and then left. No arrests, no
 charges, no taking the victim for a medical exam or rape kit. Nothing.

PLAINTIFF WILLIAM NELSON'S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 5

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

1 Years later, in the middle of the night, she phoned her 13 year old son and said
2 her goodbyes, then jumped from the Agate Pass Bridge.

3 It doesn't seem to matter if it is reported the moment it happens, or 36 years
4 later. Rich, drunk, asshole frat boys will still get away with it.
#DumpKavanaugh

5 Yup. Bill Nelson. I worked hard to bankrupt him and finally did. We got the
6 Manor House declared a historic landmark and managed to keep banks from
7 lending to him for years, so that when he finally began construction at Pleasant
8 Beach it was right before the bottom fell out of the economy and he had to
9 spend millions renovating the Manor House before he was allowed to start
10 building the rest of the development.

11 A group of us met at the Treehouse and sat outside and sheered everytime he
12 left with a load in his pickup truck as he was being evicted from the
13 development by the bank.

14 My senior year I was at a party full of other high schoolers and he appeared out
15 of no where and tried to force himself on a 15 year old girl who was passed out
16 on a couch. A large group of us removed him. I ran for city council at 20
17 entirely because he ran and there was no way I was going to let that sack of shit
18 have sway over our community.

19 These quotes are demonstrated in **Exhibit D**.

20 **RESPONSE:**

21 **REQUEST FOR ADMISSION NO. 17:** Admit that **Exhibit D** is a true and correct
22 copy of your post on your personal Facebook page.

23 **RESPONSE:**

24 **REQUEST FOR ADMISSION NO. 18:** Admit that you posted the following quotes
25 as "The Bainbridge Island Bad List" on Facebook:

James, we aim to make this a less awful place by exposing the jerks who make
it bad. Don't let John define the Island, let the Island define John for the wife
beater he is.

PLAINTIFF WILLIAM NELSON'S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 6

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

1 We have a job. It is outing abusive people who live in our community. I am sure
2 your partners at your love firm looooooove the exposure. I bet they are so
3 glad they hitched their future to this horse.

4 Bill Nelson rapes women. He also cheats investors, is an alcoholic and coke
5 head, and also abusive not only to his partners and wives, but his children as
6 well.

7 Stay away from Bill Nelson and definitely don't give him any money.

8 Years ago Bill Nelson raped Elizabeth Kaltreider. She ran naked to a neighbor's
9 home and beat on the door screaming for help. The neighbors took her in and
10 called the police. The Bainbridge police showed up, chatted and joked with her
11 rapist and then left. No arrests made. No taking the victim to the hospital for a
12 wellness check or administration of a rape kit.

13 In 2011 Elizabeth called her son to say goodbye and then jumped to her death
14 off the Agate Pass Bridge.

15 Bill Nelson is still alive and still a psychopath rapist. He has also run for public
16 office twice.

17 These quotes are demonstrated in **Exhibit E**.

18 **RESPONSE:**

19 **REQUEST FOR ADMISSION NO. 19:** Admit that **Exhibit E** is a true and correct
20 copy of your posts on a Facebook page.

21 **RESPONSE:**

22 **REQUEST FOR ADMISSION NO. 20:** Admit that on January 30, 2022 you made a
23 post from your Twitter account, @TheWouston, in response to a post from the Twitter account,
24 @Jackbewright, and your post stated "I'm not paying a rapist shit."

25 **RESPONSE:**

1 **REQUEST FOR ADMISSION NO. 21:** Admit that you yourself posted **Exhibit F**
2 and it is a true and correct copy of your post on Twitter under the twitter handle
3 @TheWouston.

4 **RESPONSE:**

5
6 **REQUEST FOR ADMISSION NO. 22:** Admit that you posted the following quotes
7 as “The Bainbridge Island Bad List” on Facebook:

8 I understand their concerns, but I firmly believe that beating and abusing one’s
9 children, and getting into hit and run accidents with them in the car have a way
10 larger negative impact on a child’s life.

11 Also, the court rules that i [sic] was being responsible in warning the other
12 women in the community about John’s behavior and propensity for violence and
13 public drunkenness.

14 John Du Wors is using the court during their divorce proceedings to force her to
15 try and convince me to take this article down. Its yet another symptom of his
16 abusive nature. John hogtied and beat his daughter. John threw his wife around
17 the house by her head. John sleep deprived her for days and the called the cops
18 on her alleging abuse and then admitted in an email that he did so in order to
19 obtain mug shots of her so that he could blackmail her.

20 John Du Wors is a fucking monster. The page will remain until I have some
21 guarantees that he will stop drinking, become a voluntarily celibate individual,
22 and move out of our community. Until then, the page remains.

23 *Another update*

24 John Du Wors is apparently, and desperately, trying to get this article removed
25 claiming that he is losing law clients because of this... oh darn? A man who is
likely weeks away from being disbarred by the Washington State Bar
Association is losing clients because he is a convicted criminal and a known
perjurer? It would appear that he his [sic] once again threatening his estranged
wife with more frivolous lawsuits (or something similar) to try and have her
convince us to take this article down. John, you estranged, and abused, wife said
that you are trying to make this article a negotiating point in your divorce and
asked me about removing it. This is not her page, she does not have access to it.
John, if you don’t want articles about your crimes being written, then don’t
commit crimes.

PLAINTIFF WILLIAM NELSON’S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 8

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

1 I'll tell you what, John, if you go to rehab, never take an illicit drug or drink
2 alcohol ever again, AND give your estranged wife all the shares in Green
3 Canopy you promised her (for which you authored and signed a contract giving
4 it to her with the stipulation that it not ever be included in communal property
5 during a divorce...despite the fact that you never gave her the shares and have
6 sinc placed it in communal property to which only you have access and she does
7 not) after you were convicted for throwing her around the house by her head, as
8 well as half of all your assets including the communal property you used to
9 purchase a million dollar McMansion, AND if you agree to move out of state
10 and never have contact with your wife or children again, AND never use a
11 dating website and remain celibate for the rest of your life...I will remove the
12 article. Until then, no dice.

13 You done pissed me off, abuser (did you forget the fact that you sent me my
14 mothers [sic] home address, described her home in detail, and then said you
15 were heading over there to sodomize her? It's in the court record, you abusive
16 piece of shit).

17 Also won in court where the man who called the police perjured himself dozens
18 of times. Looks like he will soon lose his license to practice law as well.

19 These quotes are demonstrated in **Exhibit G.**

20 **RESPONSE:**

21 **REQUEST FOR ADMISSION NO. 23:** Admit that you yourself made the posts
22 attached herein as **Exhibit G** and it is a true and correct copy of your posts.

23 **RESPONSE:**

24 **REQUEST FOR ADMISSION NO. 24:** Admit that you posted the following quotes
25 on the Real Bainbridge Islanders page:

It's more talking about a child sex trafficking ring in a public forum and keeping
the community aware that these men also drugged and raped dozens, if not
hundreds, of women, and never faced consequences for it. Plus, the litigation
isn't long for this world since Nelson keeps threatening witnesses (felonies).

These quotes are demonstrated under **Exhibit H.**

PLAINTIFF WILLIAM NELSON'S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 9

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

RESPONSE:

REQUEST FOR ADMISSION NO. 25: Admit that **Exhibit H** is a true and correct

copy of your post on the Facebook page “Real Bainbridge Islanders.”

RESPONSE:

DATED this 17th day of March, 2023.

/s/ Paul K. Friedrich

Paul K. Friedrich, WSBA #43080
WILLIAMS, KASTNER & GIBBS PLLC
601 Union Street, Suite 4100
Seattle, WA 98101-2380
Telephone: (206) 628-6600
Fax: (206) 628-6611
Email: pfriedrich@williamskastner.com
jcox@williamskastner.com

Attorneys for Plaintiff/Creditor William Nelson

VERIFICATION

1
2
3 I, Houston Wade, declare under penalty of perjury that I have read the foregoing
4 Objections and Answers and Responses to Plaintiff William Nelson’s Second Set of Requests
5 Request for Admission to Defendant, know the contents thereof and believe the same to be true
6 and complete.

7 DATED this _____ day of April, 2023.

8
9 _____
Houston Wade

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
PLAINTIFF WILLIAM NELSON’S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 11

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

ATTORNEY CERTIFICATION

The undersigned attorney for Defendant Houston Wade has read the responses to the foregoing Requests for Admission and certifies that they are in compliance with FRCP 26(g).

DATED this ____ day of April, 2023.

WASHINGTON LAW GROUP, PLLC

Erin Lane, WSBA #42504
Washington Law Group, PLLC
2319 N 45th St Ste 215A
Seattle, WA 98103
Telephone: (206) 686-6054
Fax: (206) 400-7919
*Attorneys for Defendant
Houston Wade*

PLAINTIFF WILLIAM NELSON'S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 12

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

DECLARATION OF SERVICE

I, Elizabeth Morris declares under penalty of perjury under the laws of the State of Washington that I am over the age of 18 years, not a party to this action and am competent to be a witness herein. On March 17, 2023, I caused to be delivered a true and correct copy of the above to the following attorneys of record:

Erin Lane, WSBA #42504 Washington Law Group, PLLC 2319 N 45th St Ste 215A Seattle, WA 98103 Telephone: (206) 686-6054 Fax: (206) 400-7919 Email: erinl@washingtonstateattorneys.com; paralegal1@washingtonstateattorneys.com Attorney for Houston Wade	<input type="checkbox"/> Via Messenger/Hand Delivery <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail
--	---

DATED this 17th day of March, 2023.



Elizabeth Morris, Legal Assistant

PLAINTIFF WILLIAM NELSON'S SECOND SET OF REQUESTS
FOR ADMISSION TO DEFENDANT 13

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

7725233.1

Exhibit A

Bainbridge Islanders

Closed group

About

Discussion

Chats

1

Members

Events

Videos

Photos

Files

Recommendations



Houston Wade Laurie, there is a large contingent of rich men on this island who prey on young girls. They even had a clubhouse called the Chicken Coop where they would pay underage girls to strip and perform sex acts at private parties. Members of the police department in the pre Hamner days would also go to these parties. It was completely predatory.

Like · Reply · 1d · Edited



1



Fiona Yates **Houston Wade** oh my! That is awful 😞 was it exposed publicly?

Like · Reply · 23h



Houston Wade I tried in 2012 to get the Kitsap Sun to report on it. They didn't. I finally brought it out in the open last year and one of the men involved (Bill Nelson) is suing me for defamation as a result. The other man who owned the establishment (Bill Blakely) has high tailed it out of our community.

Like · Reply · 23h · Edited



2

Bainbridge Islanders

Closed group

About

Discussion

Chats

Members

Events

Videos

Photos

Files

Recommendations

Search this group

Shortcuts



Houston Wade And when you put those dudes on blast for rape or abuse, they like to think they can sue you into silence. How about rich asshole men on this island stop hurting women and children? There are a select few men here who have left dozens of victims in our community and too many of us turn a blind eye and hope it goes away.

Once this latest lawsuit gets out of the way, the Bainbridge Island Bad List will grow by a few more names.

Like · Reply · 2h



^ Hide 13 Replies



Andreas Nordstrom I guess I'll be the one to ask, what lawsuit?

Like · Reply · 2h



Houston Wade I'm being sued by Bill Nelson for writing an article about the women he raped and children he abused.

Like · Reply · 2h



Houston Wade Was sued by John Du Wors for writing an article about his convictions for beating his kid and wife. Won that one.

Like · Reply · 2h



Exhibit B



Houston Wade The primary reason I ran in 2001 was because Nelson ran. I as a child I lived in the condo below his. He was abusive to his step children (my friends), a drunk, and later he raped my friend's daughter (she later committed suicide off the Agate Pass Bridge). I did not want to see him on the city council so I threw my hat into the ring. Knobloch was an excellent alternative until he started suffering dementia and getting in fights.

Eventually it was discovered (by me) that Nelson had received tens of thousands of dollars in contributions from out of state developers who were using fake Bainbridge addresses. The Review wrote an article about this and Nelson started stalking me and threatening my life beginning the Saturday before the election.

It worked out eventually, he eventually went bankrupt on his Lynwood Center project and took a lot of the big local Republican donors who invested in it down with him.

[Like](#) · [Reply](#) · 1y · [Edited](#)



David Johnson Such drama -- and to experience it at such a young age. Mercy!

[Like](#) · [Reply](#) · 1y



Houston Wade When one is involved in local politics at a young age, one finds out the inner workings quickly. I have a lot of experience with the dark side of the money on this island.

[Like](#) · [Reply](#) · 1y



Debbie Sanowski **Houston Wade** Do you think you might be projecting some of your past bad experiences onto Matt because he is unknown to you?

[Like](#) · [Reply](#) · 1y



Houston Wade That is exactly what I am doing, Debbie. History repeats itself.

[Like](#) · [Reply](#) · 1y



Houston Wade

4 hrs · 🌐



I just won the injunction hearing which means I can write this:

William "Bill" P. Nelson rapes women and abuses children. He's a drunk and a coke head and is currently facing multiple DUIs and a hit and run. He's a terrible human being and everyone on Earth should avoid him at all costs.

#TimesUp, douchebags of the world!



👍❤️😱 68

33 Comments

Exhibit C



RockGod @TheWouston · 1h

...

Which parts? I wrote articles exposing powerful men in my community who raped women and kids. Yeah, I got sued by one of them. So what? He raped and beat my best friend when she was 7. I'd do it again.



RockGod @TheWouston · 1h

...

Can you imagine being 7 years old and everytime you heard that car pull into the driveway you'd crawl under the bed and press yourself against the wall out of pure fear? That you'd go to the bathroom in your wastepaper basket rather than chance leaving your room?



RockGod @TheWouston · 1h

...

The man who would do that to a 7 year old girl is who you are backing in this. Be better.





Rock God
@TheHoustonWade



Replying to [@emrazz](#) [@alamkara](#) and [@the_unitron](#)

I'm trying. When I find out about them, they go on blast on my community page "The Bainbridge Island Bad List". Currently being sued for defamation by one of the rapists on there, but I'll win in the end. There are too many victims for him to prevail.

11:42 PM · Nov 16, 2019 · [Twitter for Android](#)



Rock God

@TheHoustonWade

Replying to [@JulieDiCaro](#)

I created the Bainbridge Island Bad List to spotlight these creeps in my community. Currently being sued for \$5 million by a pissed off rapist. He's going to lose.

7:18am · 5 Jan 2019 · Twitter for Android



Exhibit D

Houston Wade

Home Find Friends

Houston Wade Timeline Recent Add Friend

Intro
You want to know more about me, don't you? Weird.

- CEO & Founder at Noosphere Geologic Services International
- Studied Astrophysics at University of Hawaii at Hilo
- Went to Bainbridge High School
- Lives in Bainbridge Island, Washington
- From Bainbridge Island, Washington
- Single
- Manages Houston Bored in Math Class

Houston Wade 17 hrs

Years ago a connected, alcoholic Republican politician/real estate developer raped my friend's daughter in Fort Ward. She escaped and ran naked to the door of the neighbors, who happens to be another friend of mine, screaming for help. They took her in, and called the police. When the cops arrived they shook hands with the rapist and joked with him for some time and then left. No arrests, no charges, no taking the victim for a medical exam or rape kit. Nothing.

Years later, in the middle of the night, she phoned her 13 year old son and said her goodbyes, then jumped from the Agate Pass (bridge).

It doesn't seem to matter if it is reported the moment it happens, or 36 years later. Rich, drunk, asshole frat boys will still get away with it.

#DumpKavanaugh

117 23 Comments 9 Shares

Like Comment Share

Tracy Lang He still here?
Like Reply · 17h
Hide 18 Replies

Houston Wade Yup, Bill Nelson. I worked hard to bankrupt him and finally did. We got the Manor House declared a historic landmark and managed to keep banks from lending to him for years, so that when he finally began construction at Pleasant Beach it was right before the bottom fell out of the economy and he had to spend millions renovating the Manor Ho


Chat (4)

Houston Wade

Home Find Friends

Houston Wade Timeline Recent

Add Friend



Tracy Lang He still here?
Like · Reply · 17h

Hide 18 Replies

Houston Wade Yup, Bill Nelson, I worked hard to bankrupt him and finally did. We got the Manor House declared a historic landmark and managed to keep banks from lending to him for years, so that when he finally began construction at Pleasant Beach it was right before the bottom fell out of the economy and he had to spend millions renovating the Manor House before he was allowed to start building the rest of the development.
A group of us met at the Treehouse and sat outside and cheered everytime he left with a load in his pickup truck as he was being evicted from the development by the bank.
Like · Reply · 17h

Alaina Brooke-Simcoe Seyssel He was horrendous. I remember him sniffing any young woman he could get close to.
Like · Reply · 17h

Houston Wade My senior year I was at a party full of other high schoolers and he appeared out of no where and tried to force himself on a 15 year old girl who was passed out on a couch. A large group of us removed him, I ran for city council at 20 entirely because he ran and there was no way I was going to let that sack of shit have sway over our community.
Like · Reply · 17h

Tracy Lang Photo?

Chat (4)

Exhibit E



The Bainbridge Island Bad List James, we aim to make this a less awful place by exposing the jerks who make it bad. Don't let John define the Island, let the Island define John for the wife beater he is.

Like · Reply · 4h



The Bainbridge Island Bad List We have a job. It is outing abusive people who live in our community. I am sure your partners at your love firm loooooooove the exposure. I bet they are so glad they hitched their future to this horse.

Like · Reply · 6h



Exhibit F



John Jacob Jingleheimer Schmidt @Jackbewright · 6h

...

You paid off the \$500k you owe the guy for defamation?



2



RockGod

...

@TheWouston

Replying to @Jackbewright and @RightWingCope

I'm not paying a rapist shit.

11:35 AM · Jan 30, 2022 · Twitter for Android

1 Like

Exhibit G



The Bainbridge Island Bad List

Home

Posts

Reviews

Photos

About

Community

Create a Page

Like Follow Share ...



The Bainbridge Island Bad List I understand their concerns, but I firmly believe that beating and abusing one's children, and getting into hit and run accidents with them in the car have a way larger negative impact on a child's life.

Also, the court rules that i was being responsible in warning other women in the community about John's behavior and propensity for violence and public drunkenness.

Like · Reply · 6w



2



Amber Petrich Admin, please remove this post about John. I know you have personal issues with him, but it could potentially negatively impact the children .

Like · Reply · 6w · Edited



Roy Bettie Are you serious or was this satire?

Like · Reply · 1w



The Bainbridge Island Bad List John Du Wors is using the court during their divorce proceedings to force her to try and convince me to take this article down. Its yet another symptom of his abusive nature. John hogtied and beat his daughter. John threw his wife around the house by her head. John sleep deprived her for days and then called the cops on her alleging abuse and then admitted in an email that he did so in order to obtain mug shots of her so that he could blackmail her.

John Du Wors is a fucking monster. The page will remain until I have some guarantees that he will stop drinking, become a voluntarily celibate individual, and move out of our community. Until then, the page remains.

Like · Reply · 1w



The Bainbridge Island Bad List

November 6, 2018 · 🌐

...

Another update

John Du Wors is apparently, and desperately, trying to get this article removed claiming that he is losing law clients because of this... oh darn? A man who is likely weeks away from being disbarred by the Washington State Bar Association is losing clients because he is a convicted criminal and a known perjurer? It would appear that he his once again threatening his estranged wife with more frivolous lawsuits (or something similar) to try and have her convince us to take this article down. John, your estranged, and abused, wife said that you are trying to make this article a negotiating point in your divorce and asked me about removing it. This is not her page, she does not have access to it. John, if you don't want articles about your crimes being written, then don't commit crimes.

I'll tell you what, John, if you go to rehab, never take an illicit drug or drink alcohol ever again, AND give your estranged wife all the shares in Green Canopy you promised her (for which you authored and signed a contract giving it to her with the stipulation that it not ever be included in communal property during a divorce... despite the fact that you never gave her the shares and have since placed it in communal property to which only you have access and she does not) after you were convicted for throwing her around the house by her head, as well as half of all your assets including the communal property you used to purchase a million dollar McMansion, AND if you agree to move out of state and never have contact with your wife or children again, AND never use a dating website and remain celibate for the rest of your life... I will remove the article. Until then, no dice.

You done pissed me off, abuser (did you forget the fact that you sent me my mothers home address, described her home in detail, and then said you were heading over there to sodomize her? It's in the court record, you abusive piece of shit).



Bob Drago The Bainbridge Island Bad List

Congrats. You made the police blotter:... [See More](#)

Like · Reply · 1w



Alison Whiteman Bob Drago interesting. Also presented in court was a privileged document which is theft. It can in fact carry a one-year jail sentence to three-year prison sentence. If I read that law correctly. How did an admin get possession of a privileged document? Talk about stupid. The lengths some will go to ruin other people's lives astounds me. And why? No thought to the children, the ex, no thought at all. Narcissism.

Like · Reply · 1w



Alison Whiteman Also, it eats up cop time, court time, taxpayer dollars----property taxes go up here....no thought at all to others. I do not understand this at all. One cannot assert s/he is for the greater good (Bernie) and behave like this. Unless you can split your personality so well with no conscience it doesn't matter to you at all.



Like · Reply · 1w



The Bainbridge Island Bad List Also won in court where the man who called the police perjured himself dozens of times. Looks like he will soon lose his license to practice law as well.

Like · Reply · 2d

Exhibit H

Real Bainbridge Islanders

Closed group

About

Discussion

Members

Events

Videos

Photos

Files

Recommendations

Search this group

Shortcuts

North Kitsap Shares

Bainbridge Island Un... 3

Real Bainbridge Islanders

Bainbridge Island - ... 20+

Kitsap politics 6

See more

39

99 Comments

Like

Comment

View 4 more comments



John Haydon Max, nothing since 2006! Good on you for turning your life around. Your family must be proud, Max.

Like · Reply · 3d



John Haydon replied · 4 Replies



Matt McCulloch What's the purpose of talking about ongoing litigation on a public forum? Just wondering.

Like · Reply · 6h



Bob Drago Matt McCulloch He wants attention.

Like · Reply · 5h



Replied to Bob Drago



Matt McCulloch It appears that way.

Like · Reply · 5h



Houston Wade It's more talking about a child sex trafficking ring in a public forum and keeping the community aware that these men also drugged and raped dozens, if not hundreds, of women, and never faced consequences for it. Plus, the litigation isn't long for this world since Nelson keeps threatening witnesses (felonies).

Like · Reply · 1h



John Haydon Wow.

Like · Reply · 35m