

THE SUPREME COURT
FOR THE STATE OF WASHINGTON

IN RE THE PERSONAL RESTRAINT OF
CHARLES WEBER

NO. 85992-2

DECLARATION OF
MICHAEL KAHR
in reply brief of
Petitioner Weber.

CLERK OF COURT
2011 AUG 18 11 08:12
STATE OF WASHINGTON

I am over eighteen years of age and am competent to so testify.

I am counsel for Mr. Weber. I ran a Google search on August 16, 2011. In this search, I researched slang Mexican terms for "crazy white." When I used the search term "guero loco," I located approximately 18,400 results. When I used the search term "heuro loco," I located approximately 4,300 results. Finally, I used the search term "wedo loco" and located 679 results.

1. Attached as Exhibit A is a true and correct copy of the search I conducted for "guero loco."
2. Attached as Exhibit B is a true and correct copy of the search I conducted for "huero loco."
3. Attached as Exhibit C is a true and correct copy of the search I conducted for "wedo loco."
4. Attached as Exhibit D is a true and correct copy of the Certification for Determination of Probable Cause from *State v. Grande-Martinez*, King County, No. 00-1-10385-5 SEA.

I swear under the penalty of perjury under the laws of the State of Washington that the forgoing is true and correct.

DATED THIS 16th of August, 2011.


MICHAEL KAHR



About 18,400 results (0.07 seconds)

x Advanced search

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- Seattle, WA**
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▶ **GUEROLOCO - HIP HOP EN ESPAÑOL Y REGGAETON | Free Music, Tour ...**
www.myspace.com/gueroloco - Cached
GUEROLOCO - HIP HOP EN ESPAÑOL Y REGGAETON's official profile including the latest music, albums, songs, music videos and more updates.

Gueroloco - El Unico Gringo Americano Haciendo Musica Urbana en ...
www.gueroloco.com/ - Cached
 Official website of Latin Urban Artist **Gueroloco**. Music, Press Info, Tour Schedule, Pics, Videos, CD Information and Contact Info.

Güero - Wikipedia, the free encyclopedia
en.wikipedia.org/wiki/Güero - Cached
 1993), aka Juan Francisco Murillo Díaz, a member of the Tijuana Cartel; El **Güero Loco**, one of the many aliases of Ivan Martin, member of the Chicano Hip-hop ...

el guero loco - YouTube
 www.youtube.com/watch?v=TNxealu6JWM
 5 min - Nov 15, 2006 -
 Uploaded by dave40213
 party pic of el **guero loco**. ... Delinquent Habits Porque **Guero Locoby** guerolokosickbreal462 views · Thumbnail 9:58. Add to el **guero** ...

***NEW* 2011* GUERO LOCO FT. SPIDER aka MR 19 - "COSAS DEL ...**
 www.youtube.com/watch?v=Y5pluejWrog
 5 min - Feb 17, 2011 -
 Uploaded by spider317
 LATIN INDUSTRY CONNECTION & BROWN LIFE RECORDZ PRESENTS: **GUERO LOCO FT. SPIDER** aka MR. 19 - "COSAS DEL DESTINO ...

More videos for "guero loco" »

Amazon.com: El Guero Loco: MP3 Downloads
www.amazon.com/El-Guero-Locho/dp/B001HU3I38 - Cached
 7 Results – Amazon.com: El **Guero Loco**: MP3 Downloads. ... Shop for "El **Guero Loco**" in our Amazon CD Store (1). Search powered by, A9. Category ...

Ads
LOCO Online @ alaplaza
loco.alaplaza.net
 LOCO opens its gates: Prepare yourself for the last war!
 See your ad here »

Guero Loco | Facebook

www.facebook.com/people/Guero-
Loco/510052404 - Cached

Guero Loco is on Facebook. Join Facebook to connect with **Guero Loco** and others you may know. Facebook gives people the power to share and makes the world ...

El Guero Loco :: Beatport

www.beatport.com/artist/el-guero-loco/22192

El **Guero Loco** is available on Beatport, the world's largest music store for DJs.

Images for "guero loco" - Report images



GUERO LOCO (GUEROLOCO13) on Twitter

twitter.com/GUEROLOCO13 - Cached

GUERO LOCO (GUEROLOCO13) is on Twitter. Sign up for Twitter to follow **GUERO LOCO (GUEROLOCO13)** and get their latest updates.

Guero Loco | LinkedIn

www.linkedin.com/pub/guero-loco/18/674/665 - Cached

Indianapolis, Indiana Area - Gringo that raps in Spanish and supports the people

View **Guero Loco's** professional profile on LinkedIn. LinkedIn is the world's largest business network, helping professionals like **Guero Loco** discover inside ...

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About 4,300 results (0.19 seconds)



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Did you mean: "**guero loco**"

Loco Huero on Myspace

www.myspace.com/25837001 - Cached

Loco Huero's profile on Myspace, the leading social entertainment destination powered by the passion of our fans.

Ives Irie, el huero loco Photos from Delinquent Habits (Delinquent ...

www.myspace.com/delinquentxhabits/photos/30830335 - Cached

Add your own comments to "Ives Irie, el huero loco" from Delinquent Habits ...

Angel Alvarez (Huero Loco) on Myspace

www.myspace.com/457323867 - Cached

Angel Alvarez (Huero Loco)'s profile on Myspace, the leading social ...

Show more results from myspace.com

Delinquent Habits - Wikipedia, the free encyclopedia

en.wikipedia.org/wiki/Delinquent_Habits - Cached

Kemo the Blaxican (David L.K. Thomas); Ives, Irie, El Guero/Huero Loco (Ivan Martin, MC); O.G. Style (Alejandro Martinez, DJ and Producer); Michelle (Vocals

...

Members - Discography - Trivia - External links

Huero Loco | Facebook

www.facebook.com/people/Huero-Loco/100002592201768 - Cached

Join Facebook to connect with Huero Loco and others you may know. Facebook gives people the power to share and makes the world more open and connected.

I be that one huero loco psyclone in la mente - Wallah

rapgenius.com/.../i-be-that-one-huero-loco-psyclone-in-la-mente?... - Cached

"I be that one huero loco psyclone in la mente" from "Wallah" by Delinquent Habits.

Because the **huero loco** came in here to play.. -

Tres Delinquentes

rapgenius.com/.../because-the-huero-loco-came-in-here-to-play-bab... - Cached

"Because the **huero loco** came in here to play baby" from "Tres Delinquentes ...

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huero loco - download - (2 files)

www.filestube.com/h/huero+loco

Sep 18, 2009 - **huero loco** download on FilesTube.com search engine -Huero Snipes Protect The West The Mixtape by el vato 2008 ,Spanky Loco Take My Style Ft ...

Ives Irie from Delinquent Habits says 'hello' -

YouTube



www.youtube.com/watch?v=uE-mDbkobco

16 sec - Oct 21, 2010 -

Uploaded by aleggs70

Ives Irie, a.k.a. El Guero/**Huero Loco**, a.k.a.

Ivan Martin says hello to blog. dmd2.net and

everyone enjoying good quality radio

programming ...

More videos for "**huero loco**" »

HUERO LOCO - SuperCo

www.sccla.com/2010/11/09/huero-loco-2/ - Cached

Nov 9, 2010 - Words; Goods · Flicks · I'm Here ·

HUERO LOCO. < DUANE BALLARD — THE PAINTER

>. Content Protected Using Blog Protector By: PcDrome.

SuperCo©

Did you mean to search for: "**guero loco**"

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Seattle, WA

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- Medium (4-20 min.)
- Long (20+ min.)

More search tools

este **wedo loco** = crazy light skinned - this crazy wedo an street ...

www.spanishdict.com/.../este-wedo-loco-crazy-light-skinned-this-cr... - Cached

Nov 13, 2010 – este **wedo loco** = crazy light skinned - this crazy wedo an street slang wado loco **wedo loco** is crazy whiteboy who grew up with mexican ...

Polaco and mexicano by wado loco rap este **wedo loco** hip hop - YouTube



www.youtube.com/watch?v=LJc6RaqP7YM
5 min - Jul 5, 2011 -

Uploaded by MrRapmusic2012
wado loco rap on itunes
http://itunes.apple.com/us/album/stop-trippin-west-c-oast-g-funk/id448847907?i=448847910&ign-mpt=uo%3D4 ...

este wedo knows what he is doing - WADO LOCO - YouTube



www.youtube.com/watch?v=8dnmDkINN04
5 min - Jul 19, 2011 -

Uploaded by MrRapmusic2012
WADO LOCO itunes http://itunes.apple.com/us/album/lets-get-ready-to-rumble/id448847907 ESTE **WEDO LOCO** POLACO ...

este **wedo loco** by wado loco rap - YouTube



www.youtube.com/watch?v=z65pRFsROGM
4 min - Jun 30, 2011 -

Uploaded by MrRapmusic2012
este **wedo loco** by wado loco rap.
MrRapmusic2012 106 videos. Subscribe ...
este **wedo loco** es polaco y mexicano
search WADO LOCO rap ...

ThE WADO LOCO | BOISE, ID | Hip Hop / RAP / WEST COAST | Music ...



www.reverbnation.com/thawadoloco
May 23, 2011

this a extra page i made for idaho for the time i lived there 'wado loco is on itunes.com este **wedo loco** polaco mexicano polished skin este ...

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[Wedo Loco \(Wedo\) on Myspace](#)

www.myspace.com/456908800 - Cached

Wedo Loco (Wedo)'s profile on Myspace, the leading social entertainment destination powered by the passion of our fans.

[Steven Hayles \(stevie---el wedo loco----: P\) on Myspace](#)

www.myspace.com/stevie_theman_andrew - Cached

Steven Hayles (stevie---el **wedo loco**----: P)'s profile on Myspace, the ...

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[free mp3 downloads and videos rap hip hop wado loco theres 8 songs ...](#)

www.wadoloco.com/wado_loco_rap_tracks - Cached

wado Loco , este **wedo loco** ' pulir mexicano , white & brown , im your vato and your cracka - THE MORE YOU LISTEN THE MORE YOU'LL UNDERSTAND ...

[Video: lets rumble este wedo loco rap hip hop](#)

ipolitics360.com/.../letsrumbleestewedolocoraphiphop-z65pRFsROG... - Cached

Jun 30, 2011 – search wado Loco rap in google to find more of me.

[Lets Get Ready To Rumble : Wado Loco : wado Loco \(este wedo loco ...](#)

www.rhapsody.com/artist/wado...to.../wado-loco-este-wedo-loco - Cached

wado Loco (este **wedo loco**). Play. Options. Queue. 4:22. A skit to ride too (feel the funk ride the west coast beat). Play. Options. Queue. 3:54 ...

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CAUSE NO. 00-1-10385-5 SEA

PHOTOCOPY



**CERTIFICATE FOR DETERMINATION
OF PROBABLE CAUSE**

INCIDENT NUMBER 00-438712; 00- 447344; 00-448892
UNIT FILE NUMBER 00-331

That Eugene Ramirez is a Detective with the Seattle Police Department and has reviewed the investigation conducted in Seattle Police Department Case Number 00-438712; 00-447344; 00-448892;

There is probable cause to believe that Elmer Cisneros and Emmanuel Grande-Martinez and both of them committed the crime (s) of Murder in the First Degree and Assault in the First Degree.

This belief is predicated on the following facts and circumstances:

I. Incorporation of 25 October 2000 certification by reference

This certification for determination for probable cause is a supplement to the certification prepared by me on 25 October 2000 concerning Seattle Police Department [SPD] Case Numbers 00-447344 and 00-448892, which have since been filed as King County Cause No. 00-1-10385-5 SEA, State of Washington v. Emmanuel Grande-Martinez. That certification is incorporated herein by reference.

II. Correction of 25 October 2000 certification

Section IV. of the 25 October 2000 certification describes a shooting on 18 September 2000, in which the victim was injured by the same weapon subsequently used to kill John Diklich and Jorge Temblador-Topete. This information is correct; however, although the assailants in that case were looking for a "Guero", the man who was shot was actually named Ramon Estrada-Ocegeda (who shared a residence with a man named "Guero").

III. Statements of Defendant Elmer Cisneros and his gang members

Defendant Elmer Cisneros was arrested during the search of his residence on 20 October 2000 (this search is described in the 25 October Certification at X.). After acknowledging and waiving his Miranda rights, the defendant identified defendant Grande-Martinez as the shooter in both of the murders, but denied any involvement in any of the shootings or murders. He implicated a third person as the driver of the vehicle used to transport the shooter, defendant Grande Martinez, to and from the scene of the Dicklich shooting. He named the same individual as the driver of the vehicle in which defendant Grande-Martinez was riding shortly before and after the murder of Jorge Temblador-Topete, and named another passenger in that vehicle.

Detectives subsequently interviewed the man defendant Cisneros identified as the passenger of the vehicle used in the Temblador-Topete murder. The passenger acknowledged his own presence in the vehicle, identified defendant Grande-Martinez as the shooter, and corroborated defendant Cisneros' identification of the driver.



**CERTIFICATION FOR DETERMINATION
OF PROBABLE CAUSE**

INCIDENT NUMBER 00-438712; 00- 447344; 00-448892
UNIT FILE NUMBER 00-331

On October 24, 2000, SPD detectives interviewed another MS gang member, who told them that defendant Cisneros had been present at the scene of both murders. According to this individual, defendants Cisneros and Grande-Martinez acknowledged that they had committed the murder of John Diklich. The same individual reported to detectives that both defendants left the Renton residence together the following night, and that both were armed with handguns. The witness told detectives that, later that night, defendant Cisneros had professed his happiness with the events of 23 and 24 September 2000.

Later that day, detectives re-interviewed defendant Cisneros. After again acknowledging, and waiving, his Miranda rights, defendant Cisneros gave another statement. In this second statement, defendant Cisneros acknowledged that he had been riding in the vehicle with defendant Grande-Martinez shortly before defendant Grande-Martinez shot John Diklich. Cisneros also acknowledged that he was the driver of the vehicle in which defendant Grande-Martinez had been riding on the very next day shortly before and after defendant Grande-Martinez shot Temblador-Topete and his companions. Apparently unperturbed by this striking coincidence of events, defendant Cisneros claimed that he had no foreknowledge of either shooting. Cisneros admitted that, in an effort to corroborate falsehoods he made in his original statement to the detectives, he had instructed the passenger in the vehicle used in the Temblador-Topete murder to falsely identify the same person defendant Cisneros had identified, instead of defendant Cisneros, as the driver of that vehicle.

Detectives subsequently re-interviewed the man defendant Cisneros had persuaded to lie to them about the identity of the driver. This man acknowledged that he had lied to the police at defendant Cisneros' direction. The man confirmed that he had been a passenger in the vehicle used in the shooting of Temblador-Topete and his companions, and told the detectives that defendant Cisneros was the driver of the car.

On 25 October 2000, detectives interviewed the man whom defendant Cisneros identified as the driver of the vehicle used to transport both defendants to and from the scene of the Diklich murder. This man acknowledged that he was the driver of that vehicle. He said that Cisneros had said "let's go get some fools" (rival gang members), and asked the man to drive the defendants to the White Center area of Seattle. When they saw some individuals whom they associated with a rival gang, defendant Cisneros told the driver to stop the vehicle. Both defendants got out of the car and headed toward the men they had seen. Gunshots were heard, and the defendants returned to the car. According to the witness, defendant Cisneros remarked, "we got that fool."

This same witness acknowledged that he had been present at the scene of the shooting, on 18 September 2000, described in the original Certification for Determination of Probable Cause at IV. According to this man, he rode with both defendants to the South Park area of Seattle for the express purpose of confronting rival gang members. The witness told detectives that both defendants left the car and, shortly thereafter, he heard gunshots. When the defendants returned to the car, defendant Grande-Martinez said that they "got some fool by the window." According to police reports, victim Ramon Estrada-Ocegeda was shot while standing near a window. As recounted in the initial Certification for Determination of Probable Cause, the weapon used in this shooting was the same Glock 9mm used in the murders on 23 and 24 September and the shootings on that latter date.



CERTIFICATION FOR DETERMINATION

OF PROBABLE CAUSE

INCIDENT NUMBER 00-438712; 00- 447344; 00-448892
UNIT FILE NUMBER 00-331

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct. Signed and dated by me this 26th day of October, 2000, at Seattle, Washington.

D. F. Chapman
D.F. Chapman SP.D.