

FEB - 2 2001

SUPERIOR COURT  
STEVEN'S COUNTY, WA

1 **SUPERIOR COURT OF WASHINGTON**  
2 **COUNTY OF STEVENS**

3 STATE OF WASHINGTON,

Plaintiff,

NO. 00-1-00190-2

4 vs.

5 JOHN DOUGLAS GRANGE,  
6 DOB: 9/9/74

Defendant.

**ADDITIONAL OFFER OF PROOF UNDER  
ER 404(b)**

8 **Detective Loren Erdman provided the following:**  
9

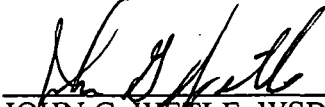
- 10 • Cunningham had been in the "Family" for close to five years. The "Family" is drug oriented.  
11 They follow the Phil Lesh Band and sell drugs at the concerts, also at Rainbow gatherings,  
12 Hemp Fests and Barter Faires.
- 13 • O'Ryan used to run the Portland Family until he was arrested about three and one-half years  
14 ago. At that time Rob Schultz and "Shadow" took over the "Family" in Portland.
- 15 • Family in San Francisco, Los Angeles and Seattle would have to agree for Rob Schultz to be  
16 the Portland boss. Rob Schultz asked Cunningham to go to Stevens County, Crown Creek  
17 area, to grow marijuana and find a supplier for cheap marijuana for the Portland Family.  
18 Cunningham knew that John Grange "Chuey" worked for Schultz for approximately two  
19 years selling pot, acting as bodyguard, and collecting. The "Family" taught Kaiser to make  
20 LSD with the chemicals coming from California.
- 21 • Cunningham said Schultz and "Shadow" wanted John Grange "Chuey" to go to the cabin at  
22 Crow Creek because Cunningham wasn't doing what they wanted. Cunningham was tired of  
23 the "Family" telling him what to do but not paying him. "Chuey" was supposed to make a  
24 bigger or better "family" influence in Northport and gain respect for the family.

27 OFFER OF PROOF - 1

28 **JOHN G. WETLE**  
29 STEVENS COUNTY PROSECUTING ATTORNEY  
30 P.O. BOX 390  
Colville, WA 99114  
(509) 684-7500 fax (509) 684-8310

- 1 • Schultz had mentioned to "Chuey" that they needed a lawyer in the "Family" and said they
- 2 might put him through law school.
- 3 • Cunningham said "Chuey" had Family members under him who sold drugs for him.
- 4 • The purchase and possession of a semi-automatic .22 caliber rifle on June 7, 2000, two days
- 5 before the Northport Barter Faire was to begin and four days before it was used to kill Nick
- 6 Kaiser and Josh Schaefer.
- 7 • A large tattoo on the defendant's back about the "Irish Mafia".

8  
9  
10 Dated: Feb 1, 2001

  
11 JOHN G. WETLE, WSBA#7533  
12 Prosecuting Attorney

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27 OFFER OF PROOF - 2

28 JOHN G. WETLE  
29 STEVENS COUNTY PROSECUTING ATTORNEY  
30 P.O. BOX 390  
Colville, WA 99114  
(509) 684-7500 fax (509) 684-8310