

The State of Idaho v. Kingsley Ford

2023 IDAHO HIGH SCHOOL MOCK TRIAL CASE





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DISCLAIMER

This case is a work of fiction. The names, characters, businesses, organizations, places, events, and incidents herein are (mostly) the product of the authors' very vivid imaginations.

VERSION CHANGES

VERSION 1.0

Version 1.0, dated November 28, 2022, does not include any changes.

FINAL VERSION

See Appendix A for changes to the final version of the case.

STIPULATIONS

- 1) The jurisdiction and venue for this case have been previously established and are proper.
- 2) All parties have agreed to the jury instructions.
- 3) All exhibits included in the case materials are authentic and accurate representations of the items they depict, and the proper chain of custody with regard to the exhibits has been maintained. All parties must use the proper procedures for admitting exhibits into evidence, and all exhibits are subject to objection, except as to their authenticity.
- 4) All witnesses made the statements attributed to them in their own witness statements.



- 5) Any instances where a witness is referred to with gender specific language is inadvertent. All witnesses may be played by any student.
- 6) The dates of witness statements are not relevant and therefore not included. No challenges based on the dates of the witness statements will be entertained.
- 7) The signatures and signature representations (items marked with /s/) on documents included in these case materials are authentic. No challenges based on the authenticity of signed document will be considered.
- 8) Witness statements were taken after the alleged incident but before trial. Each witness was given an opportunity to update or amend their statement before trial, and no changes were made.
- 9) As part of a plea agreement, Rowan Pentito received immunity for testifying against Kingsley Ford.
- 10) In any instance where actual statutes differ from any law utilized in the mock trial case, teams must rely on the law as written into the case materials.
- 11) Sophisticated Systems Sales and Inventory data is a true and accurate summary.
- 12) If a particular exhibit includes more than one page, all the pages are part of the same exhibit and teams may not try to exclude any information from the exhibit based on the exhibit occupying more than one page.
- 13) It is anticipated that the trial time will not permit use of all exhibits provided. Each party should select and use only those exhibits that best support and illustrate that party's theory of the case.



INDICTMENT

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF
THE STATE OF IDAHO AND FOR THE COUNTY OF LATAH

THE STATE OF IDAHO)	
)	
)	Plaintiff
)	Case No. IDMT2023
vs.)	
)	INDICTMENT
KINGSLEY FORD)	
)	
_____)	Defendant

KINGSLEY FORD is accused by the Grand Jury of Idaho, by this Indictment, of the crime of: THEFT BY SELLING STOLEN PROPERTY, I.C. § 18-2400, committed as follows:

The Defendant, KINGSLEY FORD, on or between February 2021 and May 2022, in the State of Idaho, did knowingly sell stolen property, to wit: computer chips manufactured by TaterChips, either knowing the property was stolen by another or under such circumstances as would reasonably induce the Defendant to believe the property was stolen.

All of which is contrary to the form, force and effect of the statute in such case made and provided and against the peace and dignity of the State of Idaho.

A TRUE BILL

Presented in open Court this 10th day of June, 2022.

Jem Trotter
Jem Trotter
Presiding Juror of the Grand Jury of
the State of Idaho

PROSECUTION WITNESSES

KELLY ADAMS, MANAGER, TATERCHIPS

1 Look. I've got to be honest with you. I don't know Kingsley Ford other than what
2 Rowan Pentito has told me about the defendant. Not to be too flippant about the whole
3 thing, but I couldn't pick Kingsley out of a line up if my life depended on it. But I do know
4 that my company, TaterChips, was the victim of a series of thefts and that someone needs to
5 be pay for this. I'll leave it to law enforcement to work out the details; I'm just here to tell
6 you my part of what happened so that justice can be served.

7 But, before I get too far ahead of myself, you probably want to know a little bit about me
8 and why I find myself caught up in this situation. My name is Kelly Adams. I'm Moscow
9 born and raised. Some people might call me a townie, but I prefer to think of myself as a
10 hometown kid. I graduated from Moscow High School in 2013. I don't know that I would
11 call it the dream of a lifetime or anything, but I always expected I would go to the
12 University of Idaho and become the first person in my family to get a college education.

13 I was always a pretty good student; certainly a good enough student to get into the U of
14 I. But in my high school it was hard to get noticed if you weren't a kid of someone
15 connected to the University. Since I was competing with kids who had an automatic in to
16 the University, I needed to make sure I found a way to rise to the top when it came to my
17 college applications. I convinced one of my teachers to write me a letter of recommendation.
18 What she wrote was so clearly written like a generic form letter and made me out to be
19 some middle of the road student with no talent. The letter certainly wasn't going to make
20 me seem like the ideal candidate to get into the University, even though I was.

21 I was crushed. Then I was angry. So I did something that in retrospect and with a few
22 years of maturity I now know was completely unethical. I got a friend to help me hack into
23 the college application system and I replaced the letter with one that painted me in a better
24 light and shared a more accurate picture of who I was and what I was capable of becoming
25 with a college education. The thing of it is that, somehow, I got caught. The school

26 administration found out what I had done. So, not only did I not get into the U of I, I was
27 basically black balled by our school administration when it came to recommendations and
28 didn't get into college anywhere. I guess I should consider myself lucky I didn't get
29 expelled.

30 Look. After many years of working at TaterChips and interacting with students from the
31 University who we hire to work here, I've realized I really didn't miss much by not going to
32 college. My real-world experience has been just as valid and has given me a proper work
33 ethic. I've noticed that in many of the college students that I have to supervise at work don't
34 always get the importance of hard work, but still think they are better than me by virtue of
35 the fact that they are attending college. There's more than one path to success. Someday I
36 may very well go to college but by then I will be someone who respects the importance of
37 the education I'll receive. Or maybe I'll never go to college and find another path to success.
38 I'm sure you've heard of Rockefeller, or Walt Disney, or even Oprah. All of those people
39 managed to make nice little lives for themselves without going to college.

40 So, there I was in the fall of 2013 without a lot of options and really not wanting to run
41 into anyone I went to high school with and have to explain why I wasn't in college, so I
42 moved down to Lewiston, got an apartment, and took a job at this great local pizza joint
43 called Southway Pizzeria. Most days I was the delivery driver and one of my regular clients
44 was TaterChips. They would sponsor lunches for their Lewiston office every Thursday and
45 weekends if there was any need for overtime work. Because I delivered to them so often, I
46 struck up a bit of a friendship with that entire office. The manager at that time totally
47 recognized my smarts and savvy and understood that my potential was being wasted
48 slinging pepperoni. So she offered me a job with the company as a Courier. That was nine
49 years ago and I've been with TaterChips ever since.

50 Before I go on any further, I think it's important that I share a little bit more about
51 TaterChips because what we do and who we are is really important to this overall situation.
52 TaterChips is a global company that started in Boise, Idaho but with employees and offices
53 all over the world. We have a stellar reputation as the seller of high quality, affordable

54 central processing units (or CPU as its's know in the industry). Since I know that, like me,
55 not everyone is a tech geek, I really shouldn't take it for granted that everyone knows what
56 a CPU is. So let me briefly explain. It's truly amazing that when this tiny little chip, this
57 square no more than 3 inches per side, is put into a desktop or a laptop with all the other
58 hardware, it acts as the brains of the computer. Anyway, like I said, TaterChips carries really
59 stellar CPUs. Chips can range in price from really low end at \$250 to the Cadillac of chips at
60 upwards of \$3,500. TaterChips sources some low-end chips, but we don't sell the most
61 expensive ones. Our most expensive chips are in the \$1,500 per CPU range. But it's still a
62 value for how well they work.

63 Obviously, most CPUs are cheaper to purchase overseas at the moment so TaterChips
64 contracts with companies in places like South Korea to secure our product before sending
65 them back stateside for distribution. Believe it or not, Lewiston is an important hub in the
66 supply chain management process for TaterChips. People are always astounded when I tell
67 them that Lewiston has a shipping port. All you need to do is look at a map to realize
68 Lewiston is not a coastal town but our little ole Lewiston has one of the furthest inland
69 shipping ports in the world. Crazy, huh? And it's easier and cheaper to ship our processors
70 by boat.

71 From there, the Port of Lewiston serves as a hub for all different kinds of transportation,
72 with immediate access to a river, roads, rail routes, and a nearby airport. This makes
73 Lewiston a very easy place to ship our products to our partners all across the Western half
74 of the United States. That's one of the things that allows TaterChips to really compete with
75 much bigger companies, we've gotten our supply chain logistics streamlined and nailed
76 down.

77 Just so we're clear on what we are talking about, supply chain management is business
78 speak for how a product goes from being made to being delivered to a customer and all the
79 steps in between. This helps companies save money and operate efficiently.

80 The Lewiston office of TaterChips focuses on product storage and shipping and only has
81 a few levels of employees. Most people start out as couriers. This was the job that I had and

82 also that Rowan had at the company. Couriers help transport processors between the port in
83 Lewiston and our office in Boise as well as delivering product to local and regional partners.
84 Occasionally couriers may help fill orders outside of the local area for very important orders
85 or clients. Because the working hours can be sporadic, it does seem to attract college
86 students. Couriers are paid pretty well—a monthly salary—considering that some months
87 they really may not have that much work to do. But when we need couriers to make
88 deliveries in a timely manner, it's important to TaterChips that we have people available, so
89 it's worth the money we pay them. And because we pay so well, there are many students
90 who are willing to make the schlep between Moscow and Lewiston to do this job.

91 After couriers, our next level of employee is a supply chain agent. If couriers help get
92 things from our headquarters to customers, agents are primarily responsible for finding
93 those customers and arranging all the details for deliveries. And then finally the highest
94 position in our office is a supply chain supervisor, which is my position. I've been in my
95 current role for about eighteen months.

96 I am responsible for tracking local inventory, managing agents, hiring couriers and
97 agents, and coordinating logistics with our shipping partners. There are only three
98 supervisors in the Lewiston office. The other two have college degrees but I was able to rise
99 through the ranks through experience and hard work. There are definitely days when I feel
100 like all I do is shuffle paper around and because that's not my favorite part of the job, I
101 admit that at times I can procrastinate about getting the paperwork organized. But in the
102 end, it's part of my job and every job has tasks that aren't necessarily our favorites, right?

103 One of the most important roles that my fellow supervisors and I fulfill for the Lewiston
104 office is to keep track of inventory from shipment to delivery. This involves ordering chips
105 from one of the factories overseas, sending Couriers to pick up orders from the Port of
106 Lewiston and bring the orders to our Lewiston or Boise offices to process, and then
107 distributing the orders to local and regional clients, often using our Couriers to deliver the
108 products when necessary.

109 This process is seemingly pretty simple, but it has a lot of steps and as a supply chain
110 supervisor it's my job to make sure everything is taken care of at each step of the process. I
111 do that by tracking every box of chips in our online inventory system, so I know that what
112 was sent from the factory is what arrives with our customers. Only the supply chain
113 supervisors have access to input information into the inventory system, collecting any
114 paperwork along the way. For example, each order that comes from a factory is delivered
115 with paperwork. I have to doublecheck that what's listed on the paperwork matches what's
116 in the order. And then in turn, I have to create an online invoice that goes with each order
117 that's delivered to a client. The client then verifies receipt by logging into their individual
118 account and confirming receipt of their order after it's been delivered by courier or other
119 means. Then each week I am supposed to create a report that I send to the main office that
120 summarizes all the transactions for the week.

121 Over time our office has tried time to refine our processes to ensure that our inventory is
122 as accurate as possible while also giving us the requisite amount of security for our system.
123 Look. Any supplier of a product has to deal with some degree of loss and shrinkage. That's
124 especially true with chips. They are these really small items, which can make them easy to
125 steal and hard to track.

126 Sometimes, what a factory inadvertently sends us an order that says there is more chips
127 than they actually deliver. That's part of what make the inventory process so important. At
128 each phase, it allows us to make sure everything is accurate and accounted for. And I'm sure
129 from time to time a courier or an agent has slipped a chip or two into her pocket to sell on E-
130 Bay or something. But we've definitely never lost chips to the volume that we're talking
131 about in this case.

132 A few years ago, there was an agent who was lazy about making sure all the numbers
133 were accurate in the inventory reports when he was filling orders. It led to a complete series
134 of headaches because we were delivering an inaccurate number of chips to our customers
135 too often. This led to us losing at least two very important clients. While I was only an agent

136 at the time, I saw how important tracking numbers was. I've communicated that directly to
137 the agents that work for me now.

138 So, this brings me to Rowan. I hired Rowan in February of 2021. Rowan seemed like a go
139 getter and was really eager to work for us. During the time Rowan worked here I was
140 impressed – always on time, always willing to take extra shifts; always dressed
141 professionally. And as a computer science major I was impressed with how much Rowan
142 knew about our product. One time I heard Rowan explain to one of the other couriers how
143 each chip includes a logo, a serial number, and the TaterChips insignia so everyone can
144 know when a chip comes from TaterChips and also which batch it's part of.

145 Then in September of 2021 I received a call from one of our clients who was angry
146 because there were eight chips missing from her order. I didn't want the company to lose
147 any clients on my watch so I went into our inventory to make sure I had tracked everything
148 correctly. Sure enough, the client was supposed to receive 60 CPUs and had only received
149 52. I noted that Rowan had delivered the order with the missing chips. I called Rowan into
150 my office and asked if Rowan knew anything about the missing chips. Rowan looked down
151 at the floor and was quiet for about 10 seconds and then said, "I delivered what you gave
152 me to deliver." That it took so long for Rowan to give this answer gave me pause, but there
153 was nothing I could do about it at that point. I had no proof that Rowan had done anything
154 wrong.

155 So, I checked in with the other supervisors and asked them to check their inventory as
156 well. Between all of us, we uncovered that there was a total of 42 missing chips from the
157 period of March 2021 through the end of September 2021. That's a pretty big loss for our
158 company, well over \$10,000 worth of merchandise. Most of the orders with missing chip
159 only had two or four missing from the order but in addition to the eight missing chips from
160 the order that was reported to me, there were other orders that had four to six chips
161 missing. And of the 15 orders with missing chips, 10 were orders that Rowan had either
162 picked up at the port or had been in charge of either delivering or shipping to clients. These
163 10 orders had a total of 25 processors missing.

164 It took a while to get all this information but, when it came down to it, Rowan was the
165 common thread to all of this. So, in early October 2021, I confronted Rowan again about the
166 missing chips. This time Rowan admitted to stealing the chips. Rowan was shaking and on
167 the verge of tears and said, "I did it. I took them. But it's not my fault. I needed the chips to
168 keep my business going and my partner talked me into this. We were desperate." I've since
169 learned that the partner Rowan mentioned is Kingsley Ford and the business is
170 Sophisticated Systems, the computer business Rowan and Kingsley started to refurbish
171 computers and sell them to college students. I found it really strange that this was the first
172 time I was hearing about Rowan having a business. I mean, TaterChips could have provided
173 chips for Rowan's computers, especially given that we offer a 25% discount to our
174 employees. But we had never sold any chips to Rowan or Sophisticated Systems.

175 Of course, I had to fire Rowan on the spot. I also filed a police report at that time. I spoke
176 with an Officer Adrian Moltisanti. Odd duck that one, but you could tell the officer was a
177 good investigator who spent a lot of time going over our inventory records to confirm the
178 information from my police report. The officer also informed me that Rowan had already
179 gotten an attorney and confessed the crime to the local police just days before confessing to
180 me.

181 Officer Moltisanti asked TaterChips not to publicize the thefts until further notice—
182 apparently the police were in the process of getting an undercover cop into Sophisticated
183 Systems and arranging a controlled buy. Officer Moltisanti also asked that we continue
184 providing processors so that Rowan could have something to give to Kingsley, with the
185 police department paying for them. I learned that Rowan was given an immunity
186 agreement for cooperating with the police to point the finger at Kingsley Ford. I guess some
187 people have the privilege of not having to suffer the consequences of their actions. Because
188 of this situation, I am on thin ice with the higher ups at TaterChips. I hired Rowan and
189 many of the chips were stolen from the orders I supervised. At this point, I just really want
190 to keep my job and put this whole situation in the rear view. I really don't care who gets
191 held accountable, as long as someone does.

ADRIAN MOLTISANTI, IDAHO STATE POLICE DETECTIVE

1 My name is Adrian Moltisanti. I have worked for the Idaho State Police District 2 Office
2 in Lewiston for seven years, five years as a Patrol Officer in Traffic Control Enforcement and
3 two as a Detective in the Investigations Office. I may have only been doing this work for
4 seven years, but police work is in my blood. I am the fifth generation of my family to work
5 in law enforcement. My Pops was the Superintendent of Police for the Port Authority Police
6 Department for New York and New Jersey. In case you don't know, the PAPD is the largest
7 transit police department in this great country. It oversees the safety of one of the biggest
8 transit hubs in the world. Although I chose to take a different path to "the blue," I know a
9 thing or two about port security from growing up and listening to my Pops tell stories about
10 the shenanigans on shipping docks. But before I get my investigation of Kingsley Ford, let
11 me tell you about my qualifications and experience that helped me crack this case.

12 Like I said, my path to the uniform wasn't the same as my Pops' path. While I admired
13 my Pops, I didn't want to spend my career in the Big Apple, much less anywhere near
14 Jersey. If you know anything about reality TV, you'll know what I am talking about. The
15 Jersey Shore and The Real Housewives are pretty dead on. I met more than one version of
16 "The Situation," "Snooki," and the Giudice family growing up on the east coast. I decided
17 that's just not a place I wanted to raise my family. So, after I graduated from high school in
18 2010, I joined the Navy. I was in the Navy for four years and spent part of that time at the
19 Acoustic Research Detachment on Lake Pend Oreille in Bayview, Idaho. That's where I
20 gained the computer hardware experience that's been very useful for this case. I've always
21 been kind of a natural with computers and the ARD needed someone to keep the high-tech
22 equipment up to date and in good working order. By the way, in case you don't know, the
23 ARD works on research and development and testing and evaluation for submarine
24 acoustic stealth technology. Although that work was interesting, law enforcement has
25 always been my calling. So, as soon as my naval service commitment ended, I pursued a job
26 with the Idaho State Police. After spending time on Lake Pend Oreille, I knew I wanted
27 Idaho to be my home (despite the lack of a major sports team – GO METS!).

28 As part of my law enforcement training, I attended the POST Academy – that stands for
29 Police Officer Standards and Training. I learned a lot of basic law enforcement stuff (most of
30 which I already knew from my Pops) and a lot about Idaho law. The academy focuses on
31 the foundation of knowledge and practical skills necessary to be a law enforcement officer
32 in the state of Idaho. Successful completion of a POST basic academy is required to be
33 eligible for basic certification. In other words, if I hadn't passed academy, I wouldn't be a
34 police officer right now.

35 In the time I have been an officer, I have only had one negative incident on my service
36 record. It was an allegation that I had violated someone's Fourth Amendment rights. I will
37 never agree that I was wrong in that incident. The schmuck defendant said I illegally
38 detained him without reasonable suspicion during a traffic stop. But the defendant was
39 driving in a known drug corridor in a rental car. But the icing on top of the cake was his
40 failure to signal long enough when he made a lane change so I pulled him over and talked
41 to him long enough to get a drug dog on scene. Lo and behold, he had drugs in the car. The
42 judge said I didn't have a legal basis to keep the guy stopped so I could wait for the drug
43 dog.

44 My partner at the time, Mag, agreed with the judge and said so publicly. Whatever. Mag
45 was not a good police officer; just didn't have the officer instincts. In the end, Mags couldn't
46 even make it on the force for more than a couple years and ended up leaving to become a
47 "private investigator," whatever that means. The only reason Magnum has any clients is
48 because Magnum ripped off the name Magnum P.I. from that TV show. You know I like TV,
49 but I like the real shows, not that made-up nonsense where some crime is solved in an hour,
50 including commercial breaks. Mag probably approaches cases the same way – get it done in
51 an hour and take as many breaks as possible in the process!

52 That erroneous ruling delayed my advancement to detective, but not for long. My case
53 assignments are mostly white-collar type stuff, like bank fraud and other financial crimes.
54 So far I have worked about six cases as a detective, but this case was my first as an
55 undercover officer. Here's how it happened.

56 In October 2021, I received a call from the Moscow Police. They told me that someone
57 had come to their office with an attorney to turn themselves in for a theft. MPD felt like the
58 State Police were better equipped to deal with the case so they turned it over to our office. I
59 wasn't familiar with the attorney. She was some suit from North Idaho. I asked the lawyer
60 to come to our office so we could work through the details of what happened. I will say that
61 it's unusual for suspect to work a deal for a crime that hadn't even been charged yet but if
62 the trash is going to take itself out, who am I to argue? Whatever I can do to help get a
63 criminal off the street, I'm gonna do. That's how I met Rowan Pentito. And our office
64 worked an agreement with the attorney on behalf of Rowan that Rowan would get
65 immunity from prosecution if Rowan told the full truth of what had happened and helped
66 us get a conviction in this case.

67 The lawyer tells me Rowan is a college student who got involved in some scam stealing
68 computer chips. Apparently Rowan and a friend ran some business rebuilding old
69 computers in a garage and decided to steal some of chips they needed to make that happen.
70 Rowan's friend is the defendant, Kingsley Ford. The lawyer said Rowan also had a part-
71 time job as a courier transporting the computer chips from the Port of Lewiston for some
72 outfit called TaterChips. The chips were delivered to a lot of different places, including the
73 TaterChips offices in Lewiston and Boise as well as to customers of TaterChips. That part
74 was legit. Rowan skimmed some chips from several shipments in the process then used
75 them in the business Rowan had with Ford.

76 I read people pretty well. Rowan was a little cagey and was definitely willing to throw
77 Ford under the bus to avoid being arrested for theft. But I also believe that Rowan was
78 telling the truth based on what I learned at the academy about interviewing suspects and of
79 course my many years of using what I learned during the interview process. First, I asked
80 Rowan to tell the story of what happened on more than one occasion and the details of the
81 story stayed the same. The story was always filled with a lot of relevant details about the
82 events and never deviated from telling to telling. I will also say that Rowan had the body
83 language of someone telling the truth. It's well known that liars maintain more deliberate

84 eye contact than truthful people. With that in mind, I pay attention to the way the person
85 I'm talking to is maintaining eye contact With Rowan if was never a complete stare down,
86 but moments of eye contact followed by glances away. That's a clear sign of genuine
87 communication. And finally, Rowan's rate of eye blinking and voice remained steady. These
88 are all signs of a truthful person.

89 In mid-October, 2021 I verified Rowan's story when I interviewed Kelly Adams from
90 TaterChips where the stolen processors originated. One thing Rowan said during the
91 interview is that it was easy to steal chips from TaterChips because of how disorganized the
92 company was. Rowan said it was obvious right away that Kelly wasn't staying on top of the
93 paperwork. Rowan confessed to starting with stealing two chips from an order and when a
94 month went by and Kelly hadn't said anything about the missing chips, Rowan continued to
95 skim off the top of orders.

96 Rowan was right. Kelly's records were not in pristine order. When I asked Kelly to give
97 me a list of which chips were missing from what orders, Kelly couldn't give me what I
98 asked for right away. I watched Kelly shuffle through a huge stack of papers on the desk.
99 Many of the invoices Kelly gave me that day were dated back at least 4 months. Kelly said
100 TaterChips had been busy with orders and that there wasn't time to enter data into the
101 inventory system right away. A week later, at the end of October 2021, I received a report
102 from Kelly Adams that included the list of all the missing chips from the period of February
103 2021 to October 2021, including the ones that were alleged to have been stolen from Rowan
104 while working at TaterChips.

105 While I mostly trusted Rowan I still wanted to check Rowan's story out from the inside
106 rather than just take Rowan's word for it. To make a strong case, you have to approach it
107 from as many angles as possible and not just rely on the word of an admitted thief. So, I am
108 the one who suggested an undercover operation. I had to convince my captain to sign off on
109 the deal, but she eventually agreed to it. The plan was for me to pose as a computer science
110 major at the University of Idaho. That would give me access to Ford and Rowan, and make
111 me seem legit. Of course it didn't hurt that I already know the ins and outs of computer

112 hardware from my time in the Navy. Although I may have been a little older than a
113 traditional college student, we all know that you're never too old to learn. Plus, I have a
114 baby face. It's that good Italian blood running through my veins.

115 Back to the undercover plan. Rowan convinced Ford to let me help them with their
116 refurbishing business - Sophisticated Systems. More like unsophisticated systems if you ask
117 me. They had a bunch of disorganized junk piled up in their workspace in a garage, where
118 they made the computers. I told Ford I would organize the garage. This gave me a chance to
119 inventory everything and look for the stolen parts they were using. After I started working
120 with Ford, Rowan sort of disappeared. Rowan led me to the water but didn't stay around to
121 drink with me.

122 Nevertheless, I was able to build a relationship with Ford and see how the whole
123 operation worked. Sure enough, at one point Ford showed up with some computer parts.
124 Ford said Rowan delivered them outside but didn't have time to come in or even say hello
125 to me. Ford seemed to think that was fishy but didn't say much more about it. But Ford did
126 talk about Rowan's computer source.

127 Ford claimed that Rowan found a cheap supplier of computer parts, but Ford wouldn't
128 provide any further details. I got the sense that Ford didn't really care where the parts came
129 from as long as they would keep the business moving. Ford told me: "Doesn't really matter
130 to me how Rowan gets what we need, as long as we get it."

131 After working there for a couple of months, I asked Ford if I could buy a laptop. Ford
132 immediately pulled out this hideous-looking laptop. I didn't want to touch it at first because
133 it looked like it was covered in vomit. Turns out it was just a bad paint job by some weird
134 college student that owned it before. I could tell that Ford was desperate to get rid of it
135 because Ford kept playing up how good the laptop was. At one point, Ford said, "Look, this
136 laptop even has a processor from TaterChips. That alone makes it worth \$1200." Ford gave
137 me a "discount" and sold it to me for \$600. The sale happened March 24, 2022. Afterward, I
138 opened up the laptop (after disinfecting it—you can never be too sure) and saw TaterChips'

139 insignia on one of the chips. It was an Intel Core i5-12600K processor with the serial number
140 M041Y6M700714, which was listed on a packing slip I later found.

141 The entire time I worked at Sophisticated Systems, I took photographs of all the
142 computer parts that got delivered. I wasn't sure if Rowan was the one who delivered all of
143 them, but I didn't think that mattered. As long as I could document the serial number and
144 manufacturer on each processor, I could match it up to its source later. Eventually we would
145 track down where the parts were stolen from and who stole them...although I already knew
146 the answer to the that because Rowan admitted that much. The only thing left to do was to
147 get evidence that Ford was complicit in the theft. That turned out to be easy enough. First,
148 Ford already indicated that the chips came from TaterChips even though Kelly Adams
149 confirmed that no chips from TaterChips had ever been sold to Sophisticated Systems. Plus,
150 I could sense tension increasing between Ford and Rowan. One day Ford was in the garage
151 doing some paperwork and said into an iPhone, "Siri, call Rowan." I then heard Ford say,
152 "Where have you been? We're getting low on chips and other parts and we need some
153 more. You are a partner in this business and you need to pull your weight. You have to
154 remember that we sink or swim together." Since the phone wasn't on speaker, I couldn't
155 hear what Rowan said.

156 Once I felt I had enough information for a search warrant, I completed the necessary
157 paperwork and the judge gave me a warrant. With the search warrant in hand, we collected
158 all the evidence we needed. We got all the processors and a bunch of other equipment. We
159 also recovered tax documents and paperwork, including paperwork for some processors,
160 but not all of the ones they had on hand. Rather than requiring a jury to go through all this
161 paperwork, I compiled it into a summary called Exhibit 5. The summary shows that
162 Sophisticated Systems was selling more computers than it was buying processors. In
163 addition, I found many of the seized computers had processors with serial numbers
164 matching those that TaterChips reported as missing.

165 I tried to get Ford to talk to me, but Ford refused to talk. I told Ford things would go
166 easier with a confession like Rowan made. Still refused to talk. I told you Ford isn't that

167 | smart. I can't wait to hear what defense the defense team comes up with trial – if it was
168 | legitimate, Ford would have told me the full story when given the opportunity to clear
169 | Ford's name.

ROWAN PENTITO, CO-OWNER, SOPHISTICATED SYSTEMS

1 I need to say this right at the outset: None of this processor theft scheme was my idea.
2 Do you really think a first-generation college student like me, the child of a factory worker
3 and a part-time housekeeper from Pocatello, could develop such a scheme? Give me a
4 break! Look, I may have crossed some lines I shouldn't have, but I had no choice. Kingsley
5 Ford manipulated me into participating in this scheme. But, I suppose you really do not
6 want my sob story. What you want is the goods on Kingsley. I mean, that's what my
7 immunity agreement requires from me, right? I give you Kingsley and the government
8 won't charge me for participating in Kingsley's scheme. And let's be clear: I will give you
9 the real Kingsley--not the meticulously cultivated immaculate persona Kingsley displayed
10 to the public. Kingsley's professors always ate that nonsense up with a spoon. But that's not
11 the real Kingsley. I'm here to show you the deceptive person behind the mask, willing to do
12 anything to get ahead.

13 I met Kingsley the very first day of classes during my freshman year at the University of
14 Idaho. Despite our different majors, Kingsley and I were in the same section of a few general
15 education courses: world history, introduction to college writing, and the like. We formed a
16 little study group for these classes with some other students. We usually would hang out in
17 Kingsley's dorm room listening to old Sinatra records and doing homework. On weekends,
18 our little study group would go hiking through places like Idler's Rest and camping in
19 nearby state parks. We all really enjoyed the outdoors, and the natural beauty of the
20 surrounding area had attracted me to the University. Moreover, neither Kingsley nor I had
21 much money, so cheap forms of entertainment like that appealed to us.

22 During the second semester of our sophomore year, Kingsley approached me with a
23 business proposition. As part of a business management course, Kingsley developed a
24 business model prioritizing sustainability. Kingsley's business plan was to strip serviceable
25 components from this used computer equipment for use in low-cost refurbished computers
26 that would be marketed to college students. Kingsley wanted to partner with me to
27 implement this business plan. Kingsley knew I was majoring in computer science and that I

28 had never purchased a pre-assembled computer because I built my own systems from
29 scratch.

30 Not to brag, but I assembled my first computer with discarded components scavenged
31 from the dumpster of my local computer repair shop while still in middle school. Getting an
32 operating system for the computer was a bit challenging as I had very little pocket money.
33 However, the owner of the computer repair shop I scavenged parts from was so impressed
34 with my resourcefulness that he gave me a “deal.” Of course, the second I saw the discs for
35 the operating system I realized that my fifty dollars had bought me a pirated copy of an
36 operating system. That I got a pirated operating system did not bother me so much as the
37 price I paid for it. Fifty dollars was outrageously expensive! Just because I built my
38 computer for free was not a reason to gouge me on an illegally copied software. I built many
39 more systems after that initial effort. Over time, I progressed from building desktops to
40 laptops. Most people simply have no idea how simple it is to build “homebrew” computers
41 on the cheap. Anyway, Kingsley wanted me to use my technical knowhow to assemble
42 functional refurbished computer systems from used computer components.

43 I was particularly intrigued by Kingsley’s proposal, as I had just folded my private
44 tutoring business the prior semester. During the first semester of my sophomore year, I
45 began tutoring a number of students who felt they needed a bit of extra help to obtain the
46 grades they desired. The jump from high school to college level coursework is daunting for
47 some students, especially student athletes. For a nominal fee, I helped some of these
48 students make the transition. However, I wasn’t getting enough to cover my monthly
49 expenses, so I let the tutoring business go. After working in the campus cafeteria for a few
50 weeks to make up my lost tutoring income, I was more than happy to try developing
51 another income stream with Kingsley. I quit my job at the cafeteria got to the refurbished
52 computer business. We decided to name the business Sophisticated Systems. Amazingly,
53 Kingsley obtained our initial stock of used computer components for free from a local
54 insurance company that was upgrading its computer systems. In just a few weeks following
55 final exams, I assembled about twenty functional laptops and desktops out of Kingsley’s

56 garage, which we began selling over the internet to college students at a tidy profit. We used
57 much of those profits to obtain more used computers from other businesses around the
58 country. Then things started getting crazy.

59 Halfway through the second semester of my sophomore year, the Governor issued a
60 stay-at-home order in response to what would become known as COVID-19. I thought the
61 pandemic would kill Sophisticated Systems, but Kingsley almost immediately realized the
62 impact the virus would have on college education. Kingsley predicted that colleges would
63 have to hold classes remotely in the fall due to COVID-19, increasing the demand for
64 computer systems among college students. I was a bit reluctant to allow Kingsley to sink all
65 of the business's retained profits into more used computer components. However, Kingsley
66 can be very persuasive, so I ultimately capitulated. Throughout the summer following our
67 sophomore year, Kingsley and I worked tirelessly to build up as much inventory as we
68 could in anticipation of a spike in demand for low-cost computer systems with enough
69 processing power necessary for remote learning.

70 Boy was Kingsley right. When the University announced its plan to offer all classes
71 remotely during the month before my junior year, sales skyrocketed and so did profits. I
72 don't know the exact details because Kingsley handled the money end of the business but I
73 do know our initial investment in Sophisticated Systems doubled before the second week of
74 classes! However, our inventory depleted just as quickly.

75 High off our recent success, Kingsley convinced me to authorize Sophisticated Systems
76 to take out a \$50,000 loan to quickly rebuild our inventory, despite the loan requiring both
77 of us to personally guarantee repayment. Apparently, the loan was part of some federal
78 COVID-19 relief program. Unfortunately, just after executing the loan documents at the end
79 of the first semester of our junior year, the computer chip industry started suffering supply
80 chain issues related to Covid. You might be wondering how supply chain issues could affect
81 a business model based upon reusing existing chips. Although we could scavenge most of
82 the necessary parts to produce our refurbish computers, processors were always a problem.
83 Many of the used computers we obtained had woefully underpowered processors. To

84 ensure that our refurbished computers were serviceable, we usually had to purchase a
85 whole new CPU. Without an adequate supply of processors, we could not replenish our
86 inventory. Sales ground to a halt, despite continuing demand. Chip manufacturers were
87 short staffed. Shipping channels were taking much longer than usual to get product to
88 companies like TaterChips. And of course, in a capitalist system like ours when there's more
89 demand than supply, companies were price gouging, making the cost of their chips
90 prohibitive to a small company like ours, even for low end chips. So, we couldn't get this
91 critical component for our computers and even when we could we were priced out the
92 market; chip costs more than doubled cutting into Sophisticated Systems profits
93 significantly.

94 The disruption of Sophisticated Systems' business put me under huge financial stress.
95 Now I was on the hook for a fifty grand loan with no real source of income, especially with
96 Kingsley insisting we put every cent we made back into business development. We were
97 sitting on a gold mine and Kingsley wouldn't even let me have a little nugget. I felt like I
98 was working for Scrooge McDuck. At one point, I had to resort to eating Tuna Helper sans
99 tuna because I did not have a dollar for a can of tuna to add to the mix. I got a little relief
100 when one of my computer science professors heard about my predicament and got me a
101 part-time job as a courier for the satellite office of a technology company, called TaterChips
102 managed by Kelly Adams. So, in February of 2021 I took a job with TaterChips. Essentially,
103 my job was to pick up shipments of a few hundred computer processors from someone at
104 the port in Lewiston every other week and fly to Boise with them. I would then hand-
105 deliver the chips to the main office of the technology company and fly back to Lewiston.
106 Sometimes I would run chips from Lewiston directly to customers.

107 It amazed me that someone as sloppy as Adams was allowed to manage a successful
108 tech company. Adams never seemed to check the deliveries I made. Don't get me wrong; I
109 was glad to have a job, but using an independent courier seemed like a strange and
110 unnecessarily expensive method of transporting chips. But when Kelly Adams explained to
111 me that it was both a security and an efficiency issue, it made more sense. Chips coming in

112 by boat can take a long time to be processed and released to vendors but we had developed
113 contacts with the Port of Lewiston so that if someone from TaterChips went to personally
114 pick up a shipment Port personnel agreed to release it more quickly. Also, computer chips
115 are an expensive little item and because of their small size are easy to steal. TaterChips
116 trusted the chips in the hands of their people over some rando at the Port of Lewiston.

117 When Kingsley found out about my side gig, things began to go really bad. We were still
118 having a lot of difficulty sourcing enough processors for our refurbished computers. When
119 Kingsley learned what I was ferrying chips, lightning struck. Kingsley immediately
120 suggested taking a few processors from each shipment for use in our refurbished
121 computers. Kingsley could see I was reluctant and then did something I never thought
122 Kingsley would do--offer to pay me! Kingsley said, "Look, I know you're struggling
123 financially right now. How about I write you a check from Sophisticated Systems each time
124 you get us some processors? That way we both win—I get cheaper chips and you get paid.
125 Plus, I can write off the checks as a business expense, so I don't need to pay employee
126 taxes."

127 Faced with a crushing debt, I allowed myself to accept Kingsley's foolish rationalizations
128 and agreed to take a few processors from the next shipment I picked up from the port. I was
129 sure that the company was going to notice something was wrong immediately. However, it
130 seemed like Kingsley was right. I heard nothing from the company in the weeks that
131 followed, so I decided to take just a few processors from subsequent shipments. This
132 allowed Sophisticated Systems to produce just enough refurbished computers to pay the
133 interest on the small business loan. We planned to keep siphoning processors just until the
134 supply chain issues got worked out and we could get them through legitimate channels. I
135 had an employee discount with TaterChips, where I could buy parts for 25% off. I figured
136 that, once things in the future got better, I'd pay for the stolen chips using the discount but
137 not take the chips out of the inventory. That way the inventory would match up and no one
138 could trace the missing chips back to me.

139 By the summer of 2021, I realized we were going to get caught eventually. Look, Adams
140 was disorganized, but it was only a matter of time before Adams got caught up on the
141 paperwork and figured out something was amiss with my processor deliveries, And of
142 course, it eventually happened. In September, Kelly asked me about some missing chips. I
143 denied knowing anything about the missing chips but I knew it was time that I started
144 looking for a way out. I met with a local attorney to discuss my options. She suggested
145 leveraging my inside knowledge of the processor thefts to obtain immunity from the
146 government. After paying the attorney with some money I borrowed from my parents, the
147 attorney contacted law enforcement and was able to negotiate an immunity agreement with
148 them. Essentially, I had to aid investigations into both the thefts and smuggling and testify
149 in any criminal cases brought against those involved in the schemes to get immunity. I felt a
150 little bit bad about becoming a stool pigeon, but it was Kingsley's idea to take the processors
151 in the first place. Shortly after finalizing my immunity agreement, a law enforcement officer
152 named Adrian Moltisanti contacted me. Adrian had been assigned to investigate the
153 processor thefts. After meeting with Adrian and divulging all the details of the thefts,
154 Officer Moltisanti suggested conducting an undercover operation to obtain additional
155 evidence of Kingsley's wrongdoing.

156 We developed a cover story in which Adrian would pose as a freshman computer
157 science major. I would complain to Kingsley that trying to work at both Sophisticated
158 Systems and as a courier was killing my grades and I wanted to take Adrian on as an intern
159 to help me assemble the refurbished computers. I have to hand it to Adrian, the plan
160 worked well at first. Kingsley agreed to hire Adrian. However, Adrian eventually wanted
161 access not only to all of the computer components used in the refurbished computers, but to
162 all the financial information for the business. Getting Adrian access to those records without
163 Kingsley noticing was hard enough, but then Adrian left some printed copies of bank
164 records on an assembly station at Sophisticated Systems. Seeing those documents just laying
165 around would have prompted some uncomfortable questions from Kingsley. Before I had a
166 chance to talk with Adrian about the records, the police showed up, seized all the business's
167 inventory and assets, and arrested Kingsley. What a relief that was. I don't think I could

168 have kept up the ruse had Kingsley started asking questions. Anyway, I obviously could not
169 continue the computer refurbishing business and had to declare bankruptcy to discharge
170 repayment obligation for the small business loan.

171 But Kingsley's arrest didn't end the string of bad events in my life. To get to this next
172 one, I've got to back up a bit. Because of the thefts, TaterChips had fired me in October 2021.
173 At that time, Kingsley was only paying me via "reimbursements." As part of my
174 cooperation agreement, I had to turn this money over to the police, so I had no source of
175 income. Although it hadn't worked out well in the past, I was desperate and so I started up
176 my tutoring business again just before finals in December 2021.

177 Apparently, this time I was too successful. Some of my students did so well that they
178 wrecked the grading curve in their classes. I guess some other jealous, underperforming
179 student did not want to compete with my students and falsely reported them to the
180 University Honor Board for cheating. The Board's investigation into this report eventually
181 led them to me. From that point on, one of the Board members, Professor Auden Vera,
182 really had it out for me. It seemed like Vera was on some kind of personal crusade against
183 me. I mean, Dr. Vera had vouched for my character as part of the loan documents so Vera
184 knew who I was.

185 Vera accused me of not only completing assignments for other students, but also taking
186 examinations for some of them. Does that even make sense? Sure, some general education
187 courses have more than one hundred students, but do you really think I could sit for a test
188 without getting caught before completing the exam? Despite the absurdity of the
189 accusations, I fully cooperated with the investigation. Vera did not find any direct evidence
190 of wrongdoing on my part, despite weeks of investigation. Once the athletic department got
191 wind that a few football players were being investigated, however, Vera and the rest of the
192 Board backed off. I am unsure precisely what happened, but the Board agreed to conclude
193 its investigation if I voluntarily ceased tutoring students. Although terminating my tutoring
194 business stressed my finances a bit, it was worth it to end the hassle of that ridiculous
195 investigation. After that, it was back to cafeteria work for me.

196 In the end, all of the bad events seemed like an appropriate punishment for letting
197 Kingsley talk me into all the stupid decisions I made. I just hope Kingsley likewise gets an
198 appropriate punishment for being the ringleader and pushing me into becoming a criminal.

DEFENSE WITNESSES

KINGSLEY FORD, FOUNDER, SOPHISTICATED SYSTEMS, DEFENDANT

1 When I was a kid, my mom watched true crime shows. I had a horrible fascination with
2 episodes about completely innocent people thrown in prison based on false reports or
3 slipshod detective work. I wondered how it would feel to have the whole world label you as
4 a heinous criminal with no one to believe you when you say you're innocent. Unfortunately,
5 I now know precisely what it feels like, thanks to Rowan Pentito and Officer Adrian
6 Moltisanti. It's awful.

7 But, before I get into how my friend betrayed me, let me tell you a little about myself.
8 My parents were poor, so I didn't get paid for chores like other kids. If I wanted money, I
9 had to go out and earn it in the real world. I started with a lemonade stand, but that didn't
10 make much money, so I moved on to other ventures like dog walking and weed pulling. I
11 worked hard. Then, as a teenager, I got ahold of Atlas Shrugged by Ayn Rand. The book
12 spoke to me. One of the biggest things that I learned is that selfishness is a virtue. It's
13 completely rational to seek to get ahead in life and beat out others through healthy and
14 ruthless competition. I'm not one of those hypocrites who are ashamed to admit that they
15 are greedy. After all, greed is what makes our nation great. Were all those skyscrapers in
16 New York City built by people filled with altruism? Not a chance!

17 Of course, part of being rational is obeying the law. I learned that the hard way as a kid.
18 I knew there was a business license requirement in my hometown, but I didn't get one
19 because I wasn't about to let my hard-earned money go towards some stupid licensing fee!
20 While out walking my dogs, I kept a sharp lookout for cops and ran away whenever I saw
21 one. Then, one time I forgot to take a dog out for a walk while the owner was on vacation.
22 Boy was the owner mad about the carpet damage! When the owner went to complain about
23 my business, she learned that I didn't have a business license and reported me. I avoided
24 getting a misdemeanor on my record by paying a fine (on top of the licensing fee) and
25 taking some sort of "thinking errors" class. I learned it's better to be up front with the law
26 than to try to cheat the system!

27 Given my childhood experience running businesses, I knew exactly what I wanted to
28 study in college. After enrolling in the University of Idaho College of Business and
29 Economics, I hit the ground running and immediately declared my major in Operations and
30 Supply Chain Management, which studies how to manage people and processes to bring
31 about better goods and services to consumers. I wasn't going to be one of those waffling
32 people who waste time and money trying to "find themselves."

33 In the fall of 2018, on one of my first day of classes in my freshman year, I met Rowan
34 Pentito. It turned out we had several classes together, so we started a study group. We
35 found we had similar interests, including hiking and camping, as well as poor wallets. On
36 one of our first hikes, one of the professors from our school, Auden Vera, joined us. I lent
37 Professor Vera a jacket and, when it came back to me, I noticed that it had some change in
38 the pocket. There wasn't much—maybe a couple of dollars—but I figured it would be good
39 to network with professors. So, before class the next morning I went to Professor Vera's
40 office and returned the change. It was pretty easy to segue the conversation into business,
41 which was the area I wanted to study. Professor Vera gave me some helpful guidance
42 regarding my major, so it was definitely worth the early-morning trip!

43 I knew Rowan was someone like me--hungry for an opportunity to make the big bucks!
44 As with everyone I meet, I started keeping a mental inventory of Rowan's skills that might
45 be of use to me in the future. One of the skills was Rowan's ability to build computers from
46 basically garbage--the one Rowan had at the time worked like a \$1000 laptop, but the junk
47 parts cost just a fraction of that. It put an idea in my head that I decided to exploit during
48 my sophomore year.

49 In the fall of 2019, I signed up for a business management course taught by Professor
50 Vera because it had a project requirement and I wanted to work on my idea. I decided to sell
51 my project idea to Professor Vera as a "business model prioritizing sustainability." I figured
52 that the label would not just help Professor Vera approve the project, but that it would also
53 be a selling point for the business in the future. I mean, I do kind of care about the

54 environment but, to be frank, I was going into the business of reusing parts solely because I
55 wanted to make money. That's what motivates every good businessperson.

56 That same semester, Rowan started a tutoring business. I told Rowan that there isn't
57 much money in the tutoring business and to aim higher. Of course, Rowan didn't listen and
58 just plunged ahead. But all the tutoring business seemed to do was fund Rowan's new and
59 weird obsession with wigs--Rowan bought a lot of wigs that semester and wore them at
60 random times while on campus, but never while in our classes or at home. Rowan would
61 always change the conversation suddenly when I asked about the wigs, so I never learned
62 the purpose behind them.

63 I finished my business model project. Professor Vera was impressed with the project and
64 personally invested \$300 into our venture in exchange for some stock options once the
65 company was created. Professor Vera also promised to give us business advice for several
66 years. During winter break, I found my first source for computer parts. There was a local
67 insurance company that was upgrading its computer system. I informed them that I was a
68 college student working on implementing a "sustainability project." They didn't seem
69 interested in the details of what I was doing, so I didn't bother to describe it further. Because
70 I lacked capital, I asked if they'd agree to donate the parts. To my surprise, they agreed.
71 Now all I needed was Rowan.

72 That part turned out to be easy because Rowan had left the tutoring business. When I
73 asked why, Rowan said that the money from tutoring wasn't worth the hassle. I resisted the
74 temptation to say, "I told you so!" because I figured that wasn't a good way to start a
75 business relationship. I informed Rowan I couldn't afford to pay a salary, but that I'd be
76 willing to have a business partner and split profits 50-50. We stayed up most of one night
77 talking it through, which required me to keep prodding Rowan back awake. When the sun
78 dawned, Rowan finally agreed to my terms, and we shook hands. Sometimes people are
79 hard to motivate!

80 Our business plan was simple--obtain cheap or free computer parts, use them to build
81 computers, and then sell them to college students. Using the parts from the insurance

82 company, we launched our business in December right after the fall semester ended. I rent a
83 room in a home with a garage and, after some persuading, I got my other roommates to get
84 their stuff out of the garage so Rowan and I could run our business there. We created a
85 corporation called "Sophisticated Systems, Inc." and registered it with the secretary of state
86 in December 2019. I decided to use the brand name "Phoenix Laptops" to describe the
87 laptops we'd sell, as a way of emphasizing the renewable aspect of our business.

88 I had to push Rowan to get working right away and not to spend winter break with
89 family. There was money to be made! For me, this business was just a stepping stone--after
90 getting Sophisticated Systems running smoothly, I planned on turning the reins over to
91 Rowan and then starting an even bigger company. Rowan assembled twenty computers and
92 I sold them to students who were starting next semester. At \$300 a pop, we made \$6000 in a
93 matter of months! I saw the potential for this to get bigger, but Rowan kept complaining
94 about the lack of pay. I had to keep reminding Rowan about the bigger vision--some pain
95 now could mean millions of dollars in the future! We decided to reinvest all the money into
96 the business and buy more parts. Of course, I wasn't able to get more computer parts for
97 free--I just got lucky before--but I got them quite cheap by emphasizing that we were college
98 students making the world greener.

99 There was one part that we couldn't get on the cheap. I admit I kind of blew up when
100 Rowan told me we needed to buy new processors because the used ones were outdated.
101 That cut deep into our profit margin, but I eventually realized Rowan was right. We'd
102 lucked out with our first set of donated parts, because those processors were working well
103 enough, but after that point we needed new processors in almost every computer.

104 Then, COVID-19 came and gave us a golden opportunity. When the governor issued a
105 stay-at-home order in early 2020, I realized that the college would have to offer classes
106 online, which would send computer sales skyrocketing. A few weeks after my realization,
107 Professor Vera confirmed for me that the University would offer classes remotely. Even
108 though we'd been making about \$1000 per month, I insisted that we still couldn't pay
109 ourselves a salary--we needed every cent to catch that sweet wave of demand coming our

110 way. And boy, was I right! We ended up selling computers for about \$600 each and sold all
111 of them before our junior fall semester started. After subtracting our costs, I figured we
112 netted about \$12,000 since March 2020. In other words, our \$6000 investment had doubled
113 in about seven months! Now THAT's what I call success!

114 With a proven profit track record like that, it was time to leverage our position by
115 getting a loan. The proof was in the pudding, so it was time to convince a lender that we
116 had a feasible plan to justify a small business loan. Professor Vera sent a letter to a
117 government program giving small business loans during the pandemic (it was the Paycheck
118 Protection Program) and vouched for our business plan and my character. They were
119 impressed and approved a loan for \$50,000 at 7.87% interest, with both Rowan and I
120 personally liable for the loan. Rowan was stressed, but I wasn't worried. I estimated that, by
121 Rowan and I putting all our spare time into the business for a full year, we could double the
122 \$50,000, pay back the loan, and use the remaining \$50,000 as collateral to leverage an even
123 bigger loan. If we could just tighten our belts for a couple of years, we could soon have a
124 multi-million-dollar company!

125 We used some of the money from the loan to advertise our computers, but most of it
126 went towards buying a lot more parts, some of which we couldn't get on the cheap, in
127 anticipation of the big business boom that was coming. It was around this time that I started
128 having a hard time keeping up with all the record keeping, especially all of the receipts for
129 the processors. From my business classes, I knew it was important to keep track of
130 inventory and financial records for tax purposes, but my main focus had to be on growing
131 the company. I figured we'd catch up on the record keeping later, when we could afford to
132 hire someone to do inventory. Unfortunately, as you'll see, Rowan took advantage of this
133 gap in our records.

134 At first, things were great--we were chugging along and our sales were increasing. They
135 were increasing so fast, in fact, that we started taking payment in advance for computers we
136 had not yet built. I reinvested every penny of profit back into the business. But then we
137 started experiencing supply chain issues in the fall of 2020. We couldn't find as many cheap

138 parts because companies weren't upgrading very much. More critically, the chip shortage
139 meant new processors were almost impossible to find. Soon we were missing deadlines and
140 customers who had already paid money were becoming irate. I saw my million-dollar
141 business slipping away.

142 Around this time, Rowan started losing steam. One time, Rowan whined about not
143 having money to buy tuna to go along with Tuna Helper. I was tired of arguing, so I
144 reached over, grabbed the cardboard box the Tuna Helper came in, and ate it. Rowan got
145 the point and stopped complaining, but only for like a week. It was exhausting to keep
146 Rowan going.

147 Eventually, work slowed down due to lack of parts. Rowan took some other side gig
148 delivering parts. It was around this time that Rowan became super stressed and seemed to
149 never sleep well. Rowan told me that the new job involved flying at night. Rowan hated
150 planes, but I don't think that was the reason for the sleeplessness.

151 One benefit of Rowan's new job, however, was the employee discount Rowan got from
152 TaterChips (the company Rowan delivered for). Rowan told me that TaterChips would
153 apply a 25% discount for parts bought by an employee, but that the number of parts we
154 could buy had a limit per month (Rowan was never clear on what the precise limit was).
155 Because Sophisticated Systems wasn't an employee of TaterChips, Rowan would buy the
156 processors from TaterChips using the employee discount and then I would write a check
157 from Sophisticated Systems to reimburse Rowan. I have digital copies of those checks in my
158 bank records. I didn't ask for receipts because I was busy and I trusted Rowan. Around
159 November or December of 2021, Rowan began complaining about the workload and asked
160 me if I'd hire a person named Adrian Moltisanti. I complied, but on the condition that
161 Adrian work for experience--we couldn't afford to pay an employee. At first, I was a little
162 put off by Adrian's lack of work ethic. Adrian would kind of poke at the parts, but not really
163 do anything. Adrian seemed more intent on rummaging around the place and looking at
164 stuff, which puzzled me. At the time, I chalked it up to Adrian trying to get familiar with
165 our business. One day, Adrian mentioned having some experience with inventory. I jumped

166 at the chance to get our records straightened out—if we could just make it through this hard
167 time, we’d need good records to convince a real bank to give a second and bigger loan when
168 the supply chain issues got sorted out. So, Adrian and I started working on trying to figure
169 out the business records. It was a mess.

170 Around this time, Rowan pretty much stopped coming into work except to bring
171 processors. I’d learned from Rowan some of the basics for putting computers together, so I
172 could keep the company limping along with just Adrian and I working. I noticed Rowan
173 was pretty jumpy and was easily startled by small noises. One day, Adrian asked where
174 Rowan was getting the processors. I said, “I don’t know--all I know is that Rowan is getting
175 them for a steal!” Adrian didn’t seem to think that was funny, for some reason, and started
176 asking me where the receipts for Rowan’s purchased processors were. Of course, I didn’t
177 have them, so I told Adrian to ask Rowan for them.

178 Sometime in March of 2022, Adrian began asking me about getting a laptop for personal
179 use. I saw Adrian’s interest as a way to get rid of this awful laptop we had refurbished back
180 in September of 2021 and had never been able to sell. It wasn’t awful in the sense that it
181 didn’t work—in fact, it was one of our better performing laptops—but the color was some
182 sort of green mottled with splotches of puce, brown, and yellow. No one wanted it. I knew it
183 would be a tough sale, so I did what every good salesperson does—puff up the price and
184 then reduce it so the customer feels special. I told Adrian that I figured the laptop was worth
185 \$1,200 but that, as an employee, Adrian could have it for half that amount. Adrian took it,
186 and I was happy we didn’t have to waste time breaking down that laptop to recover all the
187 parts we put into it! Then came the worst day of my life. May 23, 2022. Adrian came to my
188 apartment to arrest me. Turns out Adrian is an undercover cop. It also turns out that Rowan
189 had been stealing processors and then collecting “reimbursements” from me. When caught,
190 Rowan told Adrian that I was the mastermind behind the thefts. And, like one of those
191 inexperienced cops on TV, Adrian believed Rowan without any proof. Adrian put me in a
192 room and tried to question me. I knew from watching those crimes shows with my mom
193 that innocent people shouldn’t answer questions from a cop without talking with a lawyer

194 first, so I kept my mouth shut. In one day, I was betrayed by both my friend and the justice
195 system.

196 I hired a private investigator, Tay-Sullivan Magnum, to help with my case. I was
197 surprised when the investigator pointed out a teeny-tiny insignia printed on some of the
198 chips—I had no idea they were there! Apparently, every chip Rowan stole had this insignia
199 on it. I wish I had noticed the insignia earlier, because it might have tipped me off that
200 Rowan was doing something off—there were way more chips with insignia from
201 TaterChips than I thought we had bought through Rowan. Thankfully, my eagle-eyed
202 investigator found it.

203 After my arrest, Sophisticated Systems crumbled. The computer parts were seized, the loan
204 went into default, and my credit was ruined forever. I filed a lawsuit against Rowan for
205 defamation--if the criminal justice system isn't going to punish Rowan, I will. My attorney
206 says that, if I'm found not guilty, we can use the verdict form as evidence that Rowan
207 defamed me. I'm not afraid of trial. I may be ambitious, aggressive and greedy, but I am not
208 criminal!

TAY-SULLIVAN MAGNUM

1 My name is Tay-Sullivan Magnum. My friends call me TS or Mags. I am a private
2 investigator. You may have seen my ads on a bus bench or two: Magnum, P.I. - Truth
3 Hunter. I know what you're thinking...isn't Magnum, P.I. a TV show? It is. But my job is
4 about fact, not fiction. Plus, I am no Tom Selleck - obviously. But, I have to admit my mom
5 actually named me after that show. She loved it, and her influence undoubtedly is a reason I
6 got in to law enforcement. What can I say? Some parents name their kids after great literary
7 characters like Atticus Finch or great literary writers like Ayn Rand, but my mom preferred
8 great TV characters. And, I can't say that it bothers me. In fact, my name has been pretty
9 good for business! But, don't get me wrong, being a private investigator in real life isn't like
10 TV. I can't and don't solve crimes in an hour. It takes a lot of leg work and long hours, and
11 it's just me doing all the work. I don't have a partner or support staff. I handle all of my
12 clients personally.

13 I have been a private investigator for about five years. I switched to that line of work
14 after ten years in law enforcement. I ultimately made the switch to what some prosecutors
15 call the "dark side," but there is light in the truth, and that's what I hunt...and find. And it's
16 not like the other side is all light all the time. Adrian Moltisanti is a good example of that. I
17 am sure you have heard about Adrian's case that crossed the line during a traffic stop,
18 trying to extend it until a drug dog could come conduct a sniff to confirm the presence of
19 drugs. I actually worked with Adrian at that time. Listening to Adrian talk about the case, it
20 was clear Adrian knew where the line was but crossed it anyway. Don't get me wrong, a lot
21 of times you have to go with your gut in this line of work, but you also have to follow the
22 rules. I admit the rules on the dog sniffs during traffic stops were murky at the time, but I
23 agree with the judge's ruling even if Adrian didn't, and I told Adrian that at the time.
24 Adrian was out to get me after that, which is why I left that agency and started my own
25 private investigator business. Adrian told a couple of other officers and one of our
26 command staff that I took unauthorized breaks while on patrol, claiming that's why I didn't
27 issue as many citations or make as many arrests as other officers. That was a crock. I made
28 just as many stops as other officers. While it was true that I had fewer citations and arrests,

29 it wasn't a contest, and I wasn't trying to reach a quota. My numbers were lower because I
30 am meticulous and I follow the rules to the letter. If that means lower numbers, so be it.
31 Unlike Adrian, I am not trying to impress my "Pops." Even if I hadn't left because of
32 Adrian's lies about me, I probably would have left just so I didn't have to listen to Adrian
33 talk about Pops for one more second. Pops sounds like a great guy, but the fruit fell far from
34 that tree. And, I will say this about working for the police department – it gave me all the
35 experience I needed to open my own private investigator business.

36 As a private investigator, I have worked all kinds of cases, including several cases
37 investigating employee thefts and embezzlement. I have built a solid reputation for that
38 type of work. That's why Kingsley called me about working on this case and helping with
39 the defense. Kingsley was really upset when we first met. We met at the garage that housed
40 Sophisticated Systems. Sophisticated is kind of a misnomer for this company. The place was
41 a mess, and not just because the police left things scattered about after seizing computer
42 parts and paperwork. The bins that the computer parts had been in were completely
43 disorganized, and some weren't labeled at all. But I could tell Kingsley had a lot of passion
44 about the business and was devastated by what was happening. Problem is, Kingsley didn't
45 have a lot of money to pay for my services. I mean, Kingsley could only offer me tuna-less
46 helper and generic soda pop when we met at the office. But, I was inspired by Kingsley's
47 ambition and dedication to the company, so I agreed to investigate the case for a heavily
48 reduced fee. I told Kingsley I would interview all of the relevant players - or at least try to.

49 I started with Rowan Pentito - the so-called informant or, in my view, the real thief.
50 Surprisingly, Rowan agreed to talk to me, although it turns out Pentito didn't say much
51 worthwhile. I asked Rowan to describe what role Rowan played in Kingsley's business.
52 Rowan was short on details and long on accusations. That kid bounced around like a
53 pinball. I can't believe Adrian ever believed a word Rowan said – when talking with me,
54 Rowan avoided eye contact and mumbled whenever I asked questions that could implicate
55 Rowan in the thefts. Just another one of Moltisanti's shortcuts, I guess. Seems to me that
56 Rowan is the mastermind behind the processor thefts given that Rowan is the only one who

57 had the access, opportunity, and motive. Rowan was able to describe the chips in detail –
58 something Kingsley has never been able to do. Rowan even acknowledged that Kingsley
59 said they needed to figure out a way to get receipts for the processors for their business
60 records and tax purposes. Rowan couldn't produce the receipts so found a way out—
61 blaming everything on Kingsley. That's the conclusion my training and experience led me to
62 and I am more than happy to say that under oath.

63 Next, I interviewed Kelly Adams. You know the kid in your neighborhood growing up
64 that needed the latest video-game system to attract any friends? Adams is definitely that
65 kid, grown into an adult. Kelly may rub shoulders with the perceived "big shots" at
66 TaterChips. But I would describe Kelly as a low-level performer. As we talked, Kelly
67 described how to go above and beyond the job duties. I've always found that someone who
68 is really good at their job doesn't need to tell you how good they are at their job. Kelly was
69 the opposite of that and came across as blowing smoke. Trust me, TaterChips would be
70 better off if Kelly never showed up for work at all. Kelly does not have the training for
71 supervising a kids' lemonade stand, let alone sharing responsibility for the entire Lewiston
72 office of TaterChips. As Kelly described different projects they had worked on, I confirmed
73 from review of the records that Kelly had introduced multiple inventory errors into
74 TaterChips' inventory-log system. For instance, one time in 2020 Kelly failed to realize that
75 some of TaterChips' boxes contained ten processors each instead of the normal twelve (these
76 particular chips were a bit bigger than normal). So, when Kelly counted twenty boxes and
77 put in "240" as the number, the system showed that there were 40 extra unaccounted-for
78 chips in the inventory. It took Kelly a couple of days of searching for non-existent chips in
79 other places before thinking to double-check how many were in the boxes. Finally, I talked
80 to Professor Auden Vera. Interesting character, that one, but spot on in the assessment of
81 both Kingsley and Rowan. Admittedly, I didn't spend a lot of time with Professor Vera for a
82 couple of reasons. First, as I mentioned, I was working this case at a reduced rate and still
83 had to keep up with my other cases, which were actually paying the bills. Second, by the
84 time I talked to Professor Vera, I had already concluded that Rowan was the thief, not
85 Kingsley. Since Professor Vera agreed, there wasn't much to talk about after that. Besides

86 that, Dr. Vera is a distinguished professor with an impeccable reputation. Sometimes you
87 just have to trust that people have earned the right to have their word respected.

88 In addition to the interviews, I looked through copies of the seized paperwork from
89 Sophisticated Systems that Kingsley got from defense counsel. Unfortunately, there wasn't
90 any paperwork to account for the processors from TaterChips. But, some of the paperwork
91 for other processor chips and parts was also missing. This was hardly surprising given the
92 disorganization in the garage, but even if being disorganized isn't a defense, it's also not a
93 crime. Plus, Kingsley had already told me that some of the parts they used were donated to
94 Sophisticated Systems and there wouldn't be any paperwork for donated parts. You have to
95 remember: it was Rowan's job to provide the paperwork for the processors Rowan brought
96 to Kingsley to use in their computers. Kingsley believed that Rowan was using an employee
97 discount to obtain parts from TaterChips and trusted Rowan to keep the receipts. Kingsley
98 would have no reason to know that Rowan was stealing the processors the company was
99 using in some of their computers.

100 I also looked at the other evidence collected by Adrian, including the stolen chips. When
101 I was looking at the evidence, Adrian told me that the chips from TaterChips had a special
102 insignia on them. I needed to put my reading glasses on to even see it. Adrian told me that it
103 didn't matter whether I could see it or whether I even understood what it was (which I
104 didn't since I had never seen one before) because all that mattered is Kingsley would or
105 should know exactly what it was given Kingsley's experience and involvement in a business
106 that used the chip. Kingsley would never have to notice the insignia because it was Rowan
107 and then Adrian Moltisanti who were putting together the computers at that point. Kingsley
108 was just too busy with the business end of things to worry about those kinds of details.
109 Kingsley also said that if it would have been fishy to have a lot of chips with the insignia
110 because TaterChips' chips were usually out of their price range and they rarely included
111 them in a refurbished computer.

112 I have no doubt that Rowan is the real thief and that Rowan set Kingsley up to take the
113 fall. It would be a grave injustice for Kingsley to have to go to jail for being stabbed in the

114 | back by a former friend. Someone once said, and I forget who, "The saddest thing about
115 | betrayal is that it never comes from your enemies, it comes from those you trust the most."
116 | In the end, Kingsley's fatal flaw was putting trust in Rowan as an ethical and honest
117 | business partner. After a thorough investigation I can reach no other conclusion.

DR. AUDEN VERA, PROFESSOR OF BUSINESS MANAGEMENT, UNIVERSITY OF IDAHO

1 Truth. Honor. Industry. In every class I teach, I emphasize these values to my students.
2 Some students listen and prosper. Others don't and eventually they end up in prison when
3 their bad acts catch up to them. I've seen it time and time again throughout my career. No
4 one escapes the karma of their deeds. I'm confident that, in time, the justice system will see
5 that Kingsley Ford is innocent and that Rowan Pentito is guilty.

6 First, a little bit about myself. I was born and raised here in Idaho. My parents ran a
7 small business leasing out construction equipment in Meridian. I learned from my parents
8 that a person's word is gold in business--there were times when my parents would rent
9 equipment to a trusted construction company in an emergency without going through the
10 normal time-dragging paperwork. This saved the construction companies time and money,
11 and sometimes even saved an entire project from going under. In return, the construction
12 companies were pretty generous with the lease prices they'd negotiate with my parents.
13 That's karma.

14 Given that business ran in my blood, I attended the University of Idaho and graduated
15 summa cum laude with a degree in economics. I then obtained an MBA from Mercer
16 University in Georgia. Not satisfied, I went on to get my DBA (Doctor of Business
17 Administration--it's similar to a Ph.D.) from Franklin University in Ohio. I spent some time
18 in the private sector but, in 1995, I came back to the University of Idaho to teach business
19 administration (basically, helping to prepare students for managerial roles in companies or
20 other organizations) and quickly realized things needed a little "cleaning up." After
21 reporting a number of my students cheating and plagiarizing, I tired of the feeble sanctions
22 imposed by the University Honor Board, which handles student discipline for honor code
23 violations. Thankfully, the University administration saw the light (with only a little coaxing
24 from yours truly) and appointed me to the Board.

25 It was a couple of years ago that I first came into contact with two students, Kingsley
26 and Rowan. For sake of clarity, I'm going to talk about my interactions with Kingsley first,
27 after which I'll talk about that fraudster, Rowan.

28 From the very beginning, Kingsley's sincerity impressed me. As a professor, I take an
29 interest in the students' outside activities and try to be involved. During the first semester of
30 Kingsley's freshman year, I heard about a hike that Kingsley's study group was planning to
31 take and asked if I could join. They agreed. On the day of the hike, it was chillier than I had
32 anticipated, so Kingsley kindly lent me a jacket. It was a long hike, which gave me time to
33 become pretty familiar with most of the students in the study group. After the hike, I bought
34 the study group some treats from a gas station using cash. I returned the jacket to Kingsley.
35 The next morning, Kingsley came to my office and said that there was loose change in the
36 jacket pocket. Kingsley figured the change came from me because it wasn't there before I
37 borrowed the jacket. While returning the change to me, Kingsley said something like, "I like
38 money, but I want to earn it honestly." I was very impressed by this show of character. We
39 got to talking and, when I learned of Kingsley's interest in business, I mentioned some of the
40 classes I teach that could be helpful.

41 In the fall of the next year, I was pleased to see Kingsley had signed up for my course in
42 sustainable business management. In that course, I try to emphasize how businesses can
43 help the environment in various ways without losing profit. Most of my students seem
44 skeptical, given the costs involved, but Kingsley was one of those students who caught the
45 vision. It takes creativity, resolve, and leadership, all of which Kingsley had in spades.

46 So, when we hit the segment of our course where students develop a real-world
47 business project, I was not surprised one bit to see that Kingsley had come up with a
48 brilliant business model prioritizing sustainability. The project involved recycling computer
49 components in a way that would both bring profit and keep the world greener. I approved
50 Kingsley's proposal. I've never known a student with more genuine enthusiasm for
51 environmentalism. Kingsley had the mark of a truly great businessperson--motivated by a
52 higher cause than just money!

53 At the end of the fall semester, when Kingsley submitted the final project, I decided it
54 was good enough that I'd put a little of my own money into it. I've done this with past
55 students and, although it usually doesn't work out, on the whole I've made a decent return
56 on my little investments. Of course, I don't put much money into these investments--I gave
57 Kingsley only \$300 in exchange for some future stock options in Sophisticated Systems, the
58 new company Kingsley was creating. The terms of the options allowed me to buy 1,000
59 shares of stock for one dollar apiece, but I couldn't exercise the option for the first two years.
60 At that strike price, and my personal estimate that each stock would be worth around 200
61 dollars in a few years, I figured I'd make a nice return. Of course, being on the University
62 Honor Board, I always seek permission from the University before I invest in one of my
63 students. As a professor, I can't do business with a student unless the University waives any
64 conflict of interest that I might have. And, because the amounts I invest are small, the
65 University always approves my requests for a waiver.

66 In return for the stock options, I promised to give Kingsley business advice for the next
67 three years. Kingsley did a good job of keeping me in the loop by consulting with me every
68 week--it was exciting to hear how well Sophisticated Systems was doing! I let students in
69 my classes know that they could buy one of their Phoenix Laptops for cheap, and I'd like to
70 say that I can take some of the credit for Kingsley's initial success. I realized how prescient
71 Kingsley was when, at one my professor meetings, I learned that the University planned on
72 allowing classes to be conducted remotely due to the COVID-19 pandemic. I immediately let
73 Kingsley know the good news--I was confident that this would be the breakthrough that
74 Sophisticated Systems needed!

75 I encouraged Kingsley to get a small business loan from the government to get more
76 leverage to take advantage of the coming opportunity. After reviewing the business
77 proposal that Sophisticated Systems would submit, I told Kingsley to draft a letter for me to
78 sign that would vouch for the plan and Kingsley's character. A couple of days later,
79 Kingsley handed me the letter and I signed it. Unfortunately, I didn't review the letter
80 closely, so I didn't notice that the letter also vouched for Rowan's character. If I had noticed

81 that, I would have not signed the letter because I didn't know Rowan very well at the time.
82 But I don't blame Kingsley. It was my fault that the miscommunication happened because I
83 didn't review the letter closely. I also may have been a little blinded by optimism bias. I
84 admit I was a little excited at the prospect that my \$300 worth of stock options could help
85 me be quite comfortable when I retired.

86 Although Sophisticated Systems did well at first, Kingsley eventually stopped calling
87 me to update me on the progress of the business and get advice, probably around December
88 of 2021. From past experience, I know that students stop calling me when something is
89 going wrong with their business. I tried contacting Kingsley several times by text message,
90 but never got a response. I didn't push too much--I know how crazy busy it can be to start
91 up a business and, if things weren't going well, I didn't want to be a distraction.

92 When I read about Kingsley's arrest in the news, I was shocked--it was completely
93 inconsistent with Kingsley's character to steal. How could a person that returned less than a
94 dollar's worth of change do anything like that? Kingsley called me from jail soon after, and I
95 got the real story. It made perfect sense to me, especially knowing that Rowan was involved.

96 Of course, Kingsley's arrest means my small investment in Sophisticated Systems is now
97 worthless. But the bigger loss is the injury done to my student, Kingsley. After I learned the
98 truth, I went to every professor who knew Kingsley and asked them what they thought of
99 Kingsley's honesty. None of the professors gave any indication that Kingsley was dishonest.
100 Based on my contacts with students and professors, I know that Kingsley has a reputation in
101 our school community for honesty. And not only that, but it is also my opinion, based on
102 my personal interactions, that Kingsley is an honest, upstanding citizen. Kingsley simply
103 lacks the character to steal.

104 Rowan, on the other hand, is a loathsome liar, a conniving con, a wig-wearing wag, a
105 theatrical thief, a fraudulent friend, a pernicious pauper, and a mendacious mountebank.
106 Despite apparently being a part of Kingsley's study group that I accompanied hiking, I only
107 have a vague recollection of Rowan being there. No, my knowledge of Rowan comes from
108 my work on the University Honor Board. The little chiseler ran a cheating ring at the

109 University and was arrogant enough to think the cheating ring could continue without any
110 consequences -- not on my watch!

111 I was the first professor to suspect the existence of Rowan's organized cheating ring.
112 Shortly after the hike with Kingsley's study group, I noticed a sudden, steep spike in the
113 grades of two students in my introduction to business course. A little investigation revealed
114 my newest high fliers were both members of the University football team. It was simply
115 inconceivable that those two meatheads' academic performance was legitimate, so I
116 interviewed them separately in my office to see if I could identify the source of their
117 improved academic fortunes. Although both students admitted to "getting a little help"
118 outside of class, they did not provide any specific details about what this "help" may have
119 been. They wouldn't budge and, without enough evidence or leads to continue the
120 investigation, I let things drop.

121 Later, in April of 2022, another professor responded to one of my postings on the faculty
122 internet forums. This professor had witnessed similar sudden spikes in the performance of
123 some students in a freshman-level world history course. After some discussions with the
124 other professor, we confronted a non-athlete about this "miraculous" academic
125 performance. The student cracked after just a few minutes of questioning, admitting that he
126 bought a set of test answers from a football player. The student was unsure how the football
127 player got the answers, but heard he bought it from a computer science major who had
128 stolen it off the professor's computer after hacking the University's computer network.
129 Apparently, the student who stole the answers would even take tests for students in
130 sufficiently large classes if the price was right.

131 After questioning the football player who allegedly sold the answer key and getting
132 nothing but deception and denials, my investigation hit a dead end. That is, until June of
133 2022 when I noticed advertisements for Rowan's "tutoring" services on bulletin boards in
134 various buildings throughout the University. How did I miss such an obvious clue for so
135 long? Rowan promised that all participants would see a full letter grade improvement their
136 academic performance, for a "nominal fee" of course. Struck by the professional quality of

137 the advertisements, the startling guarantee and Kingsley recently informing me about
138 Rowan's thefts and the attempt to blame Kingsley for them, I decided to investigate. Just a
139 little searching through student records revealed that Rowan was a computer science major.
140 I also remembered that, during our business discussions, Kingsley mentioned several times
141 that Rowan had an odd obsession with wigs and would randomly wear disguises. I knew it
142 couldn't be a coincidence; I had my cheater.

143 I had the Honor Board open an official investigation into Rowan. The Board then
144 interrogated the football players I previously interviewed. Although they all admitted
145 participating in "tutoring" sessions with Rowan, none admitted any cheating took place.
146 Rowan cooperated with the Board's investigation from the outset, even agreeing to an
147 interview with the Board. However, after just a few weeks of investigation, the President of
148 the University asked me to come to her office. I, of course, obliged. My heart sank when I
149 entered the President's office. Seated in front of the President's desk were the University's
150 athletic director and the head coach of the football team. The President explained that the
151 University was concerned about the "aggressive" investigative techniques I had employed
152 while investigating a recent alleged cheating ring, especially checking students' academic
153 performance without permission. Instead of formal sanctions, however, the President
154 offered to let me off with a verbal warning. I was furious. The President informed me that
155 they had been unable to prove that Rowan did anything wrong but that Rowan agreed to
156 stop tutoring.

157 After this frustrating experience, I had virtually no contact with Rowan. I really can't say
158 I was surprised when I learned that Rowan had made a deal with the government to throw
159 Kingsley under the bus to avoid prosecution for stealing computer chips. It was exactly the
160 same thing Rowan did to avoid any serious repercussions for "tutoring" other students.
161 Frankly, anyone would be an idiot to trust anything that comes out of Rowan's mouth.
162 Rowan is a liar, as shown by the lies over several years. Some people never change.
163 Unfortunately, it seems that those most in need of change the most are the least likely to do

164 | so. The only thing that awaits such people is karma. Sometime soon karma will catch up
165 | with Rowan, too.

EXHIBITS

These case materials include the following exhibits.

- 1) TaterChips Inventory of Missing Chips
- 2) Reimbursement Checks from Sophisticated Systems to Rowan Pentito
- 3) Loan Reference Letter from Dr. Auden Vera for Sophisticated Systems
- 4) Search Warrant Inventory List
- 5) Sophisticated Systems Sales Summary
- 6) Seized Packing Slip
- 7) University of Idaho Waiver Letter for Dr. Auden Vera

EXHIBIT 1: TATERCHIPS INVENTORY OF MISSING CHIPS

INVENTORY OF MISSING PROCESSORS

Case: State v. Ford

Suspect Name: Kingsley Ford

Location(s): TaterChips, Lewiston Office, 456 Lilly Drive, Lewiston, Idaho

Lead Investigator: Adrian Moltisanti

Order Date	Order #	Total # Chips in Order	# Chips Missing	Courier for Order
3/17/21	2021-03-0032	28	4	Ellen Ridley
3/30/21	2021-03-0050	15	2	Ellen Ridley
4/1/21	2021-04-0017	42	3	Rowan Pentito
4/3/21	2021-04-0024	40	1	Rowan Pentito
4/28/21	2021-04-0046	34	3	Ellen Ridley
4/30/21	2021-04-0062	25	6	Paul King
5/1/21	2021-05-0001	24	2	Rowan Pentito
5/3/21	2021-05-0012	56	3	Rowan Pentito
5/6/21	2021-05-0021	30	1	Rowan Pentito
5/23/21	2021-05-0073	45	2	Paul King
6/2/21	2021-06-0018	16	1	Rowan Pentito
6/3/21	2021-06-0019	25	2	Rowan Pentito
6/28/21	2021-06-0086	14	1	Rowan Pentito
7/14/21	2021-07-0058	36	3	Rowan Pentito
8/17/21	2021-08-0047	60	8	Rowan Pentito

EXHIBIT 2: REIMBURSEMENT CHECKS FROM SOPHISTICATED SYSTEMS TO ROWAN PENTITO

Sophisticated Systems, Inc.
451 Natalia Drive
Moscow, Idaho 83843

NORTH COMMUNITY BANK

CHECK #043

DATE 4/14/21

PAY TO THE ORDER OF Rowan Pentito \$ 750.00

Seven Hundred Fifty and 00/100 DOLLARS

MEMO Reimbursement for Chips Kingsley Ford

Sophisticated Systems, Inc.
451 Natalia Drive
Moscow, Idaho 83843

NORTH COMMUNITY BANK

CHECK #056

DATE 5/18/21

PAY TO THE ORDER OF Rowan Pentito \$ 1,125.00

One Thousand One Hundred Twenty-Five and 00/100 DOLLARS

MEMO Chips Kingsley Ford

Sophisticated Systems, Inc.
451 Natalia Drive
Moscow, Idaho 83843

NORTH COMMUNITY BANK

CHECK #071

DATE 6/18/21

PAY TO THE ORDER OF Rowan Pentito \$ 562.50

Five Hundred Sixty-Two and 50/100 DOLLARS

MEMO Tuna Helper Fund Kingsley Ford

Sophisticated Systems, Inc.
451 Natalia Drive
Moscow, Idaho 83843

NORTH COMMUNITY BANK

CHECK #078

DATE 7/23/21

PAY TO THE ORDER OF Rowan Pentito \$ 750.00

Seven Hundred Fifty and 00/100 DOLLARS

MEMO CPU Reimbursement Kingsley Ford

Sophisticated Systems, Inc.
451 Natalia Drive
Moscow, Idaho 83843

NORTH COMMUNITY BANK

CHECK #087

DATE 8/19/21

PAY TO THE ORDER OF Rowan Pentito \$ 1498.00

One Thousand Four Hundred Ninety-Eight and 00/100 DOLLARS

MEMO TC Reimbursement Kingsley Ford

EXHIBIT 3: LOAN REFERENCE LETTER

Dr. Auden Vera
10084 Mountain Terrace Road
Potlatch, ID 83855

April 20, 2020

Ms. Janet Trasker
Loan Officer
North Community Bank
425 E. State Street
Moscow, ID 83844

Dear Janet,

I'm following up on our phone call from this morning. I appreciate you taking the time to speak with me about North Community Bank's participation in the Small Business Administration's new Paycheck Protection Program. As I told you, while the loan applicant is a student of mine, I am writing this letter as person with a private interest in the company and not as an employee of the University of Idaho.

As I mentioned to you, one of my students, Kingsley Ford, has started a new business called Sophisticated Systems that refurbishes desktops and laptops with a goal of providing affordable computers for other college students. The nexus for this business idea came from one of my courses on sustainable business practices that Kingsley took from me last fall. Kingsley is an extremely gifted, hard-working student who has hit on a very timely business idea.

In addition to Kingsley's strong business acumen, Kingsley has partnered with another student, Rowan Pentito who is a computer science major with an expertise in computer hardware. Rowan is a creative and dedicated individual worthy of your trust. The marriage of skills between these two partners is a recipe for success.

Of course, none of us could anticipate the situation we find ourselves in with Covid. But it makes Kingsley's business all the more timely and important. With so many students moving online, computer equipment in good working order like those that Kingsley's business, Sophisticated Systems, is exactly the kind of business your bank should be supporting. The loan from North Community Bank will allow the two partners in Sophisticated Systems, Kingsley and Rowan, to continue to be paid while they provide an important service to the Moscow community.

It's my hope that you will approve the loan application from I unequivocally support this business venture. Please feel free to reach out if there's anything else I can do to help or any questions I can answer.

Sincerely,

Auden Vera

Dr. Auden Vera, PhD

EXHIBIT 4: SEARCH WARRANT INVENTORY LIST

SEARCH WARRANT INVENTORY LIST

Case: State v. Ford

Suspect Name: Kingsley Ford

Location(s) Searched: Sophisticated Systems, located in the garage of Kingsley's residence at 451 Natalia Drive, Moscow, Idaho

Lead Investigator: Adrian Moltisanti

ITEM No.	Item Description	Location Found
1	Packing slip addressed to Kelly Adams	Workshop
2	15 refurbished laptop computers	Workshop
3	10 refurbished desktop computers	Workshop
4	Socket wrench & accompanying sockets	Workshop
5	Small flat-bladed screw driver	Workshop
6	Large flat-bladed screw driver	Workshop
7	2 small Phillips-head screw drivers	Workshop
8	Long nosed pliers	Workshop
9	Wire cutter/stripper	Workshop
10	Chip extractor	Workshop
11	Chip inserter	Workshop
12	Tweezers	Workshop
13	Torx drivers	Workshop
14	Assorted clamps	Workshop
15	Flashlight	Workshop
16	Magnifying glass	Workshop
17	Computer memory testing machine	Workshop
18	10 desktop computer motherboards	Workshop
19	5 desktop computer power supplies	Workshop
20	10 containers of miscellaneous computer parts	Workshop
21	Sales records & receipts	Storefront
22	Cellphone	Storefront
23	Laptop	Storefront
24		
25		
26		
27		
28		
29		
30		

EXHIBIT 5: SOPHISTICATED SYSTEM SALES SUMMARY

SOPHISTICATED SYSTEMS SALES & INVENTORY DATA

Jul. 2021 - Oct. 2021

Case: State v. Ford

Suspect Name: Kingsley Ford

Basis of Summary: Data contained in physical documents and computer files extracted from a laptop seized during a search of Sophisticated Systems

Lead Investigator: Adrian Moltisanti

Weekly Sales Transactions

Week of	Desktops Sold	Unit Price	Laptops Sold	Unit Price	Total
7/1/2021	1	\$550	5	\$600	\$3,550
7/5/2021	2	\$550	4	\$600	\$3,500
7/12/2021	3	\$550	7	\$600	\$5,850
7/19/2021	5	\$550	5	\$600	\$5,750
7/26/2021	3	\$550	3	\$600	\$3,450
8/2/2021	1	\$550	2	\$600	\$1,750
8/9/2021	3	\$550	8	\$600	\$6,450
8/16/2021	3	\$550	7	\$600	\$5,850
8/23/2021	1	\$550	1	\$600	\$1,150
8/30/2021	2	\$550	2	\$600	\$2,300
9/6/2021	4	\$550	4	\$600	\$4,600
9/13/2021	3	\$550	5	\$600	\$4,650
9/20/2021	5	\$550	6	\$600	\$6,350
9/27/2021	1	\$550	7	\$600	\$4,750
10/4/2021	1	\$550	2	\$600	\$1,750
10/11/2021	2	\$550	4	\$600	\$3,500
10/18/2021	4	\$550	5	\$600	\$5,200
10/25/2021	2	\$550	4	\$600	\$3,500
Total	46		81		\$73,900

Monthly Component Inventory

Date	Processor Inventory on the First of the Month	Processors Purchased by Kingsley
7/1/2021 - 7/31/2021	2	23
8/1/2021 - 8/31/2021	1	22
9/1/2021 - 9/30/2021	2	35
10/1/2021 - 10/31/2021	1	20
Total		100



EXHIBIT 6: SEIZED PACKING SLIP

PACKING SLIP

Date: 9-10-2021

TSMC Limited
Hsinchu City, Taiwan R.O.C.
TEL: 888-3-5431122
FAX: 888-3-6543322

SHIP TO: Kelly Adams
TaterChips
456 Lilly Drive
Lewiston, ID 83501
(208)-111-2222
Customer ID: 1113456

BILL TO: William Jones
TaterChips
111 Capitol Blvd.
Boise, ID 83704
(208)-222-3333
Customer ID: 1113456

ORDER DATE	ORDER NUMBER	JOB
9-3-2021	1123563	9987934

ITEM #	DESCRIPTION	QUANTITY
44325	Intel Core i5-12600K processor (Serial Nos. M041Y6M700700 - M041Y6M700720)	20
44326	Intel Core i9-13900K (Serial Nos. B045R6N699700 - B045R6N699720)	10
44324	AMD Ryzen 5 7600X processor (Serial Nos. F3989N09870 - F3989N09890)	10

Please contact Customer Service at Phone with any questions or comments.

THANK YOU FOR YOUR BUSINESS!

EXHIBIT 7: WAIVER LETTER**CONFLICT OF INTEREST WAIVER**

To: Professor Auden Vera
From: University of Idaho Board of Ethics
Date: December 13, 2019
Re: Investment in Student Venture

We received your request for a waiver of the University's conflict of interest policy listed in Code of Ethic Rule 15.6. As you know, that rule requires full-time professors to obtain permission before investing in a company owned or managed by a University student. According to our records, this is the twentieth waiver request you have made as a professor, fifteen of which have been in the last five years. Although we appreciate your interest in your students and have approved all of your past requests for waiver, we express concern that the growing number of your requests are coming close to violating the spirit of our ethical rules. That said, given the relatively small amounts invested in the past, we approve your request to waive the conflict of interest one last time. You may invest in Sophisticated Systems, subject to the following restrictions:

1. You may invest up to, but no more than, \$300 in Sophisticated Systems. The investment must be in the form of stock in the business, not a loan to the business. If you ultimately decide to invest, you must do so no later than January 30, 2020.
2. You may not make additional future investments of any form in the business, including stocks or loans.
3. You will refrain from advertising or promoting the business or its products or services to University employees or students, whether on or off campus.
4. You will not provide any confidential University information to the business.
5. You may provide some guidance to Kingsley Ford on the general principles of how to run a business, but the time spent providing guidance must not interfere with your professional teaching responsibilities.

Sincerely,

Wes Fitzgerald

Chairperson, Board of Ethics

JURY INSTRUCTIONS

INSTRUCTION NO. 1

The jury's duty is to determine the facts, to apply the law set forth in the instructions to those facts, and in this way to decide the case. The jury must follow the court's instructions regardless of any juror's own opinion about what the law is or should be, or what either side may state the law to be. The law requires that you're the jury's decision be made solely upon the evidence. Neither sympathy nor prejudice should influence the jury's deliberations. The evidence the jury may consider consists of the testimony of the witnesses, the exhibits offered and received, and any stipulated or admitted facts. Certain things you have heard or seen are NOT evidence, including:

- 1) Arguments and statements by lawyers. The lawyers are not witnesses. What they say in their opening statements, closing arguments and at other times is included to help you interpret the evidence, but it is not evidence. If the facts as you remember them differ from the way the lawyers have stated them, follow your memory;
- 2) Testimony that has been excluded or stricken, or which you have been instructed to disregard.

If the judge sustains an objection to a question or to an exhibit, the witness may not answer the question or the exhibit may not be considered. Do not attempt to guess what the answer might have been or what the exhibit might have shown. The law does not require the jury to believe all the evidence. As the sole judges of the facts, the jury must determine what evidence it believes and what weight to attach to it.

The jury's job is to think about the testimony of each witness and decide how much to believe of what he or she had to say.

INSTRUCTION NO. 2

Under our law and system of justice, a defendant is presumed to be innocent. The presumption of innocence means two things. First, the State has the burden of proving the Defendant guilty. The State has that burden throughout the trial. Second, the State must

prove the alleged crime beyond a reasonable doubt. A reasonable doubt is not a mere possible or imaginary doubt. It is a doubt based on reason and common sense. It may arise from a careful and impartial consideration of all the evidence, or from lack of evidence. If after considering all the evidence the jury has a reasonable doubt about the Defendant's guilt, the jury must find the Defendant not guilty.

INSTRUCTION NO. 3

The subject of penalty or punishment must not in any way affect the jury's verdict. Penalty or punishment is the solely the judge's responsibility.

INSTRUCTION NO. 4

As members of the jury it is your duty to decide what the facts are and to apply the law to the facts. You are to decide the facts from the evidence presented in the case.

The evidence you are to consider consists of:

- 1) Sworn testimony of witnesses;
- 2) Exhibits which have been admitted.

INSTRUCTION NO. 5

It is alleged that the crimes charged were committed "on or about" a certain date. If you find the crime was committed, the proof need not show that it was committed on that precise date.

INSTRUCTION NO. 6

In order for the Defendant, Kingsley Ford, to be guilty of Theft by Selling Stolen Property, the State must prove each of the following:

- 1) On or between February 2021 and May 2022
- 2) in the state of Idaho
- 3) the Defendant, Kingsley Ford, knowingly sold computer chips manufactured by TaterChips,

- 4) either knowing the computer chips were stolen by another or under such circumstances as would reasonably induce the Defendant to believe the property was stolen,
- 5) such property was in fact stolen.

If any of the above has not been proven beyond a reasonable doubt, you must find the defendant not guilty. If each of the above has been proven beyond a reasonable doubt, then you must find the defendant guilty. Property is stolen when a person wrongfully takes, obtains, or withholds it from the owner with the intent to deprive the owner of the property or to appropriate it to any person other than the owner.

INSTRUCTION NO. 7

Evidence may be either direct or circumstantial. Direct evidence is evidence that directly proves a fact. Circumstantial evidence is evidence that indirectly proves the fact, by proving one or more facts from which the fact at issue may be inferred. The law makes no distinction between direct and circumstantial evidence. Each is accepted as a reasonable method of proof and each is respected for such convincing force as it may carry.

APPENDIX A – 2023 CASE QUESTIONS

- 1) The jury instructions say that the prosecution must prove that Ford “sold computer chips manufactured by TaterChips.” However, Kelly Adams explains that TaterChips is a distribution company that purchases and sells chips manufactured by other companies. Which is correct?

*Jury Instruction No. 6.3 has been changed to read, “[T]he Defendant, Kingsley Ford, knowingly sold computer chips **rightfully owned** by TaterChips”*

- 2) In lines 127-128 of Adrian Moltisanti's witness statement, Moltisanti states: "Ford claimed that Rowan found a cheap supplier of computer parts but wouldn't provide any further details." Is it Ford or Rowan who wouldn't provide any further details?

*Lines 127- 128 have been changed to read: "Ford claimed that Rowan found a cheap supplier of computer parts, but **Ford** wouldn't provide any further details."*

- 3) Exhibit 5 lists the total number of processors as 92 in the Monthly Component Inventory but the numbers actually add up to 100. Is this an intentional error?

Exhibit 5 has been changed to have the Monthly Component Inventory add up to 100.

- 4) Exhibit 5 lists the Desktops Sold as 44 in the Weekly Sales Transactions but the numbers actually add up to 46. Is this an intentional error?

Exhibit 5 has been changed to have the Weekly Sales Transactions of desktops add up to 46.

- 5) Exhibit 5 lists the Laptops Sold as 77 in the Weekly Sales Transactions but the numbers actually add up to 81. Is this an intentional error?

Exhibit 5 has been changed to have the Weekly Sales Transactions of laptops add up to 81.

- 6) Exhibit 6 lists the CPU serial numbers as M041Y6M700700 to M041Y6M700720 but in line 140 of Adrian Moltisanti's statement, Moltisanti refers to the serial number as M041Y6M7007014. Is the discrepancy in numbering intentional?

Moltisanti's statement has been changed to refer to serial number M041Y6M700714.

- 7) In line 157 of Kelly Adams statement, Kelly claims to have compiled a list of missing chips through September but Exhibit 1 only goes through August. Is this intentional?

The case materials are correct as written.

- 8) CPU stands for “central processing unit” but Kelly Adams refers to CPU as “computer processing unit”. Will this be corrected to make sure the case terminology is in line with industry standards?

While the terminology for CPU is not at issue in this case, the case materials have been updated to ensure the terminology is in line with industry standards.

- 9) Kelly Adams says that CPUs are about 3” square but our research indicates this is much larger than a real CPU. Is this size meant to be intentionally inaccurate?

While we appreciate the desire to be accurate, the size of the CPU is not at issue in this case and will not be changed.

- 10) Line 46 of Moltisanti's statement states, "In the end, Mags couldn't even make it on the force for more than a couple years and ended up leaving." But, Lines 13-14 of Magnum's statement states, "I have been a private investigator for about five years. I switched to that line of work after ten years in law enforcement." Can Magnum testify to having ten years of law enforcement service?

Each witness may testify to the information contained in their witness statement. If there is any discrepancies from another statement, it can be addressed on cross examination.