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FIRST CIRCUIT
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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

STATE OF HAWAII,	)	CASE NO. 1CPC-24-0000150
	)	
Plaintiff,	)	<u>COUNTS 1 AND 2: MURDER IN THE</u>
	)	SECOND DEGREE
VS.	)	<u>COUNTS 3 AND 4: KIDNAPPING</u>
	)	<u>COUNTS 5, 6 AND 7: CONSPIRACY TO</u>
	)	COMMIT KIDNAPPING
	)	<u>COUNTS 8 AND 9: UNLAWFUL</u>
BRANDY BLAS,	)	IMPRISONMENT IN THE FIRST
THOMAS BLAS SR.,	)	DEGREE
DEBRA GERON,	)	<u>COUNTS 10, 11 AND 12: CONSPIRACY</u>
	)	TO COMMIT UNLAWFUL
Defendant.	)	IMPRISONMENT IN THE FIRST
	)	DEGREE
	)	<u>COUNTS 13 AND 14: ENDANGERING</u>
	)	THE WELFARE OF A MINOR IN THE
	)	FIRST DEGREE
	)	<u>COUNTS 15 AND 16: HINDERING</u>
	)	PROSECUTION IN THE FIRST DEGREE
	)	<u>COUNT 17: ENDANGERING THE</u>
	)	WELFARE OF A MINOR IN THE
	)	SECOND DEGREE
	)	<u>COUNT 18 AND 19: PERSISTENT</u>
	)	NONSUPPORT
	)	
	)	DEFENDANT BRANDY BLAS'S
	)	MOTION TO SUPPRESS EVIDENCE;
	)	DECLARATION OF COUNSEL;
	)	PROPOSED WITNESSES AND EXHIBITS
	)	
	)	
	)	
	)	

[NOTICE BY SERVICE OF ELECTRONIC FILING GENERATED BY JEFS]

) HONORABLE PAUL B.K. WONG

) TRIAL WEEK: 04/20/2026

) PTM: 12/31/2025

) HEARING DATE: TBD

) HEARING TIME: TBD

) APPROXIMATE TIME: 2.0 HOURS

DEFENDANT BRANDY BLAS’S MOTION TO SUPPRESS EVIDENCE

COMES NOW Defendant BRANDY BLAS, by and through court appointed counsel, HARRISON L. KIEHM, and respectfully moves the HONORABLE PAUL B.K. WONG for an Order suppressing all physical evidence and information seized from the residence located at 33 Karsten Drive, Wahiawa, Hawaii; and, all electronic data obtained from electronic devices seized from the residence, including cellular phones and Secure Digital (“SD”) cards. Defendant further requests the suppression of all evidence derived therefrom as fruit of the poisonous tree. In the alternative, Defendant requests an in camera review of the seized electronic data to determine its relevance and admissibility, and an order compelling the return or destruction of all non-responsive private data.

This motion respectfully presents the following issues for the Court’s determination:

1. Whether law enforcement conducted any warrantless searches of the Defendant’s residence between January 18, 2024, and February 2, 2024, and, if so, whether any exception to the warrant requirement applies.
2. Whether the affidavits submitted in support of the search warrants for the residence, Defendant’s person, seized electronic devices, and third-party electronic accounts established probable cause for the searches.
3. Whether the warrants described with sufficient particularity the places to be searched and the items to be seized, or were instead impermissibly overbroad, particularly concerning the

scope of the electronic data authorized for the search.

4. Whether any and all evidence derived from the allegedly unlawful searches must be suppressed as fruit of the poisonous tree.

This Motion is made pursuant to Hawaii Rules of Penal Procedure, Rule 47 and is based on the Fourth Amendment to the United State's Constitution and Article I, Section 7 of the Hawaii Constitution, the Declaration of Counsel attached hereto, the records and files and any evidence and arguments as may be presented at a hearing.

DATED: Honolulu, Hawaii, December 31, 2025.

/s/ Harrison L. Kiehm
HARRISON L. KIEHM
Attorney for Defendant
BRANDY BLAS

DECLARATION OF COUNSEL

1. By order filed February 23, 2024, effective February 12, 2024 (Dkt. 69 OAC), I, HARRISON L. KIEHM, am court appointed counsel for Defendant BRANDY BLAS in the above-entitled case.

2. I have reviewed the records and files of the above-entitled case, and am informed and believe as follows:

3. This case arises from an investigation initiated by the Honolulu Police Department on January 18, 2024, concerning events at the residence of 33 Karsten Drive, Wahiawa, Hawaii. In the days and weeks that followed, law enforcement sought and obtained search warrants to gather physical and electronic evidence.

4. On February 1, 2024, a search warrant was issued (S.W. 2024-042) authorizing a search of 33 Karsten Drive. The warrant authorized the seizure of numerous categories of property, including electronic records. The warrant was executed on February 2, 2024.

5. During the investigation, law enforcement also recovered several electronic storage devices and sought warrants to search their contents:

a. On February 4, 2024, a search warrant was issued (S.W. 2024-062) authorizing a search of SD and micro SD cards. The warrant was executed on February 6, 2024.

b. On February 4, 2024, a search warrant was issued (S.W. 2024-063) authorizing a search of iPhones. The warrant was executed that same day.

6. Warrants were also directed at third-party technology companies for cloud-stored data.

a. On February 1, 2024, a warrant was issued and directed to Apple, Inc. for records associated with brandyblas@icloud.com and debra.geron@icloud.com.

b. Warrants were also obtained and directed to Google LLC for the account of brandyblas64@gmail.com.

7. The physical evidence seized from Defendant's residence at 33 Karsten Drive must be suppressed because it was obtained in violation of the Fourth Amendment of the U.S. Constitution and Article 1, Section 7 of the Hawaii Constitution. The search suffered from multiple constitutional defects, including an affidavit to establish probable cause, a lack of particularity, and questions regarding the legality of its execution.

8. The vast troves of electronic data seized from Defendant's cloud accounts and personal devices—representing years of private communications, photographs, location history, and personal thoughts—were obtained and searched in violation of the Fourth Amendment of the U.S. Constitution and Article 1, Section 7 of the Hawaii Constitution. The warrants were founded on stale

information, lacked particularity, and authorized a boundless digital dragnet.

9. Defendant intends to submit a memorandum in support of her motion to suppress evidence.

10. Defendant respectfully requests that this court enter an Order:

a. Suppressing all physical evidence seized from the residence at 33 Karsten Drive.

b. Suppressing all electronic materials and data obtained from Apple, Inc., and Google LLC.

c. Suppressing all data extracted from the forensic examination of cellular phones.

d. Excluding all evidence, information, and testimony derived from the unlawful searches as fruit of the poisonous tree.

e. In the alternative, ordering an in camera review of all seized electronic data and compelling the government to return or permanently destroy all non-responsive private information.

f. Granting such other and further relief as the Court deems just and proper.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge and belief.

DATED: Honolulu, Hawaii, December 31, 2025.

/s/ Harrison L. Kiehm
HARRISON L. KIEHM
Attorney for Defendant
BRANDY BLAS

PROPOSED WITNESSES AND EXHIBITS

WITNESSES

1. HPD Detective Blake Davidson.
2. HPD Detective Thomas Inuma.
3. Any other HPD officer or evidence specialist involved in the seizure, custody, and documentation of the evidence at issue.

EXHIBITS

To be determined.