

HARRISON L. KIEHM 6171
8 South King Street, Suite 202-B
Honolulu, Hawaii 96813
Telephone: (808) 538-1700
Attorney for Defendant
BRANDY BLAS

Electronically Filed
FIRST CIRCUIT
1CPC-24-0000150
05-JUN-2026
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Dkt. 417 MES

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
	)	
	)	SUPPLEMENTAL DECLARATION OF
	)	COUNSEL TO DEFENDANT BRANDY
	)	BLAS'S MOTION TO SUPPRESS
	)	EVIDENCE FILED DECEMBER 31, 2025
	)	(DKT. 291); MEMORANDUM IN
	)	SUPPORT; AND AMENDED
	)	STATEMENT OF PROPOSED
	)	WITNESSES AND EXHIBITS

[NOTICE BY SERVICE OF ELECTRONIC FILING GENERATED BY JEFS]

) HONORABLE PAUL B.K. WONG
)
)

) TRIAL WEEK: 01/25/2027
)
)

) HEARING DATE: 06/19/2026
)
)

) HEARING TIME: 9:00 a.m.
)
)

**SUPPLEMENTAL DECLARATION OF COUNSEL
TO DEFENDANT BRANDY BLAS'S MOTION TO
SUPPRESS EVIDENCE FILED DECEMBER 31, 2025 (DKT. 291)**

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. In my declaration attached to Defendant Brandy Blas's Motion to Suppress Evidence filed December 31, 2025 (Dkt. 291), I contemplated three categories of search warrants subject to challenge by Defendant Brandy Blas: (1) The predicate residential/person warrant -- S.W. 2024-042, (2) Follow-up warrants for digital and electronic information -- S.W. 2024-062 and S.W. 2024-063, and (3) Warrants directed to Apple, Inc. and Google LLC -- S.W. 2024-048 and S.W. 2024-137, and a related Google photos and Google drive warrant -- S.W. 2024-075.

4. Upon further investigation, Defendant Brandy Blas submits that the search warrant (S.W. 2024-125) directed to Child Welfare Services is also subject to challenge under the Fourth Amendment to the U.S. Constitution and Article I, Section 7 of the Hawaii Constitution.

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

DATED: Honolulu, Hawaii, June 5, 2026.

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

MEMORANDUM IN SUPPORT

COMES NOW Defendant BRANDY BLAS, by and through court appointed counsel, HARRISON L. KIEHM, and respectfully submits this memorandum in support of Defendant Brandy Blas's Motion to Suppress Evidence filed December 31, 2025 (Dkt. 291).

Defendant Brandy Blas challenges four related warrant categories: (1) **S.W. 2024-042**, the February 1, 2024 residential/person warrant for 33 Karsten Drive; (2) **S.W. 2024-062 and S.W. 2024-063**, the follow-on digital warrants for SD/micro-SD cards and iPhones; (3) **S.W. 2024-048 and the Google warrants of S.W. 2024-075 and S.W. 2024-137**, which sought broad Apple and Google provider records and a search of Google photos and drive accounts; and (4) **S.W. 2024-125**, the Child Welfare Services records warrant.

Defendant Brandy Blas contends that these warrants, individually and collectively, lacked particularized probable cause, failed to satisfy the particularity requirement, authorized overbroad searches of persons, containers, digital devices, cloud accounts, and confidential agency files, and generated derivative evidence that must be suppressed unless the State proves an independent source or sufficient attenuation.

Thus, the Court should suppress the evidence obtained under the challenged warrants, or at minimum sever the unsupported portions and suppress the specific physical, digital, provider, CWS, and derivative evidence obtained through those invalid portions.

I. Search Warrant issued February 1, 2024--S.W. 2024-042.

S.W. 2024-042 is the predicate residential/person warrant in this suppression litigation--the first link in the evidentiary chain. The suppression issues presented here are whether the affidavit established particularized probable cause for the searches authorized, whether the warrant satisfied the particularity requirement, whether the closed compartments/container and device provisions were overbroad, and whether any evidence later developed from items seized under S.W. 2024-042 must be suppressed as derivative fruit. S.W. 2024-042 fails on those grounds, and suppression of the evidence seized under the warrant and suppression of later device, cloud, and other derivative evidence traceable to it is required.

A. Background.

S.W. 2024-042 authorized a search of the residence at 33 Karsten Drive, Wahiawa, Hawaii 96786, including its curtilage, interior or exterior storage areas, storage-type structures, sheds, and kennels. The warrant also authorized searches of the persons of Brandy K. Blas, Thomas A. Blas, and Debra D. Geron, and any and all closed compartments and/or containers on the premises or on those persons.

The affidavit was made by Detective Blake Davidson and identified suspected offenses of kidnapping, unlawful imprisonment in the first degree, endangering the welfare of a minor in the first degree, endangering the welfare of a minor in the second degree, and persistent nonsupport. Among the many items requested, the affidavit requested seizure of clothing associated with G.B. and A.B., adhesive tapes, and photographs of G.B.

The affidavit's probable-cause narrative included the January 18, 2024 emergency response to 33 Karsten Drive involving ten-year-old G.B. The affidavit states that EMS personnel reported that G.B. was cold, stiff, had significant injuries and bruising, and had a significant wound to the nose area. The affidavit also attributes statements to Brandy Blas that she was G.B.'s legal guardian, that G.B. had behavioral issues, that G.B. had been removed from school about two years earlier, and that G.B. had a history of self-inflicted injuries.

The affidavit's Attachment 2 contains generalized affiant-opinion language concerning suspects' possession of evidence in residences, personal property, enclosed containers, and mobile devices. That generalized training-and-experience language does not itself supply a case-specific nexus to search Brandy Blas's person or every closed compartment/container authorized by S.W. 2024-042.

B. Law and Authority.

Hawaii Constitution Article I, Section 7 requires warrants to be supported by probable cause, by oath or affirmation, and to particularly describe the place to be searched and the persons or things to be seized. Hawaii Revised Statutes (HRS) § 803-33 provides that a search warrant may issue only on an affidavit setting forth sufficient facts to justify issuance. Hawaii Rules of Penal Procedure (HRPP), Rule 41(c) requires a warrant to issue only on sworn affidavits establishing the

grounds for issuance and requires the warrant to identify the property and name or describe the person or place to be searched.

In *State v. Kealoha*, 613 P.2d 645 (1980), the Hawaii Supreme Court held that the particularity requirement prevents general searches and prevents officers from exercising discretion over what is to be seized. *Kealoha* further explains that broad warrant language is constitutionally suspect when it lacks examples or other limiting signposts to guide the executing officers and the reviewing court. *Kealoha* also recognizes severance as a possible remedy, while cautioning that a warrant that is essentially general in character remains subject to total invalidation.

HRPP, Rule 41(f) authorizes suppression of anything unlawfully obtained. In *State v. Poaipuni*, 49 P.3d 353 (2002), the Hawaii Supreme Court held that evidence obtained by exploitation of an unlawful search warrant must be suppressed unless the prosecution proves an independent source or sufficient attenuation.

C. Argument.

1. The affidavit may support a limited residential search, but it does not establish probable cause for every person, container, device, and data category authorized.

Probable cause must be tested by search target and by evidence category. The issue is not only whether officers had reason to search 33 Karsten Drive for some evidence. This issue is whether the affidavit justified the full scope authorized: the residence, curtilage, storage structures, all closed containers, three persons, electronic devices, storage media, and downstream digital data.

2. The affidavit did not establish a particularized nexus to search Defendant Brandy Blas's person.

S.W. 2024-042 authorized officers to search Brandy Blas's person, while also separately authorizing searches of the residence, Thomas Blas's person, Debra Geron's person, and closed compartments and containers located on the premises or on the identified persons.

The affidavit's Brandy Blas specific facts were residence and guardianship based. It identified Brandy Blas as G.B.'s legal guardian and recounted Brandy Blas's statements concerning G.B.'s behavioral history, school removal, alleged self-inflicted injuries, and the

events of January 17–18, 2024. Those allegations may support a limited search of the residence for evidence related to G.B.’s care, condition, clothing, or living circumstances. They do not supply a separate nexus to search Brandy Blas’s body.

The constitutional defect is that the affidavit did not bridge the gap between probable cause to search a residence and probable cause to believe that seizable evidence would be found on Brandy Blas’s person at the time the warrant was executed. The warrant authorized a body search without limiting the search to a specific item expected to be on Brandy Blas’s person, without identifying observed concealment, without alleging that Brandy Blas carried relevant physical evidence on her body, and without explaining why the listed categories would likely be found on her person rather than, if anywhere, in the residence. That transforms Brandy Blas’s status as guardian and occupant into a search authorization for her body.

Accordingly, the Court should suppress any evidence seized from Brandy Blas’s person under S.W. 2024-042. At minimum, the Court should sever the Brandy Blas-person authorization from any valid residential-search portion of the warrant.

3. The “any and all closed compartments and/or containers” clause was overbroad and insufficiently particular.

S.W. 2024-042 authorized the search of “any and all closed compartments and/or containers” located in or on the residence and on the persons of Brandy Blas, Thomas Blas, and Debra Geron. The warrant’s listed property included broad physical categories of clothing, adhesive tapes commonly found in residences, school-style photographs of G.B., and more.

That container clause is not a meaningful limitation. It does not identify which containers may contain which items. It does not distinguish containers capable of holding clothing from containers capable of holding photographs, tape, documents, digital devices, or other materials. It does not limit the search by room, ownership, relationship to G.B., relationship to A.B., or any facts in the affidavit.

The State may argue that some listed items, such as clothing or photographs, can reasonably be stored in containers. That argument supports only a tailored container search. It does not justify a blanket authorization to search every closed compartment and every container on the premises and on three persons.

The container clause created the same constitutional risk identified in *Kealoha*: officers were left to open closed places first and decide later whether anything inside might fit a broad evidence category. The Court should suppress evidence seized from closed compartments or containers under S.W. 2024-042 or, at minimum, sever the overbroad container clause and suppress all evidence obtained under it.

4. The electronic-device and storage-media seizures lacked sufficient limiting principles.

S.W. 2024-042 is challenged as to electronic devices, cameras, surveillance equipment, SD cards, micro-SD cards, CD/DVD discs, laptops, tablets, and related storage media. HRPP Rule 41(c) permits a warrant to authorize seizure of electronic storage media or electronically stored information, but later review must remain consistent with the warrant.

The affidavit did not establish probable cause to seize every phone, computer, laptop, surveillance device, and storage medium in the home. Nor did the warrant provide meaningful limitations by user, date range, offense, file type, search protocol, account, application, or case-specific subject matter. Without such limits, the seizure of devices and later forensic searches operated as a digital general search.

II. Follow-On Digital Warrants--S.W. 2024-062 and S.W. 2024-063.

Defendant Brandy Blas challenges S.W. 2024-062 and S.W. 2024-063 as follow-on digital warrants that depended on devices and storage media first seized pursuant to the challenged residential/container search under S.W. 2024-042. HRPP, Rule 41(c) permits a warrant to authorize the seizure of electronic storage media or electronically stored information, and HRPP, Rule 41(f) authorizes suppression of anything unlawfully obtained.

A. S.W. 2024-062--SD and micro-SD cards seized as Items 40 and 41.

S.W. 2024-062 authorized the search of two SD cards and two micro-SD cards marked as Item 40, and one SD card and three micro-SD cards marked as Item 41, under HPD Report No. 24-022317. The warrant identified Item 40 as media recovered from the top pocket of a camera case and Item 41 as media recovered from the main compartment of a camera case. The return for S.W. 2024-062 states that digital files were recovered.

Although S.W. 2024-062 contains narrower digital-search language than S.W. 2024-042, that later warrant does not cure the threshold taint. Items 40 and 41 were obtained through a camera-case/container search under S.W. 2024-042. Defendant Blas therefore requests suppression of all digital files, images, videos, metadata, forensic images, reports, extracted data, and investigative leads obtained from Items 40 and 41 unless the State proves an independent source or sufficient attenuation as to those specific items.

B. S.W. 2024-063--iPhones first seized through the earlier warrant chain.

S.W. 2024-063 concerned an application for a warrant authorizing the search of three white iPhones and one red iPhone, supported by Detective Davidson's February 4, 2024 affidavit. The S.W. 2024-063 affidavit states that, given digital information including texts, photos, videos, and surveillance snapshots referencing G.B. and A.B., the affiant believed examination of cellular phones and storage media recovered during execution of S.W. 2024-042 and S.W. 2024-043 would reveal additional evidence regarding the care, confinement, education, medical treatment, and death of G.B. and the care, confinement, education, and medical treatment of A.B.

That stated reliance on phones and storage media recovered during the earlier warrants establishes the derivative link. S.W. 2024-063 did not arise independently from S.W. 2024-042; it was built on evidence already obtained through the earlier seizure chain. Defendant Brandy Blas therefore requests suppression of all forensic extractions, downloads, reports, screenshots, images, videos, metadata, messages, communications, user-identification data, and derivative investigative leads obtained from the iPhones searched under S.W. 2024-063 to the extent those phones were first seized under S.W. 2024-042.

III. February 1, 2024 Warrant Directed to Apple Inc.--S.W. 2024-048; February 7, 2024 Google Photos/Google Drive Warrant--S.W. 2024-075; and March 13, 2024 Google LLC Warrant--S.W. 2024-137.

A. The Apple and Google provider warrants sought broad account-level returns and reserved narrowing for later police review.

The February 1, 2024 Apple warrant, S.W. 2024-048, directed Apple to produce subscriber information, transactional records, and extensive iCloud content for the specified Apple ID accounts, including email content, My Photo Stream, iCloud Photo Library, iCloud Drive,

Contacts, Calendars, Bookmarks, Safari Browsing History, Maps Search History, Messages, and iOS Device Backups for the period from October 1, 2022 through January 18, 2024.

The Google warrant materials include a March 13, 2024 Google LLC warrant, S.W. 2024-137, directing Google to produce subscriber information, transactional records, and broad Google-account records and data, including Gmail content and other Google Cloud content, photographic images, digital images, video recordings, location data, emails, metadata related to associated files, and communications regarding Geanna Bradley for the period from October 1, 2022 through January 18, 2024.

Both warrant sets purported to limit later review through court-ordered search protocols using date restrictions and lengthy lists of case-specific terms. The Apple protocols required that the records be examined by a sworn HPD officer designated as the “Examiner,” that the Examiner seize only items authorized by the warrant, and that the Examiner use narrowing tools such as keyword, date/time, file-type, and data-type filters and document the procedures used. The Google materials likewise contemplated that Google would create an exact duplicate of the specified account, provide that duplicate to the affiant, and that the records would then be examined under the court’s search protocols.

B. Hawaii law required category-specific probable cause, real limiting principles, and compliance with the court-ordered review protocols.

Article I, Section 7 of the Hawaii Constitution requires probable cause and particular description of the persons or things to be seized. HRS §§ 803-33 and 803-34, and HRPP Rule 41, likewise require sworn facts sufficient to justify issuance and require later review of electronically stored information to remain consistent with the warrant. In *State v. Kealoha*, 613 P.2d 645 (1980), the Hawaii Supreme Court held that particularity must be assessed with close attention to breadth, privacy interests, and whether greater specificity was feasible, and that the constitutional purpose is to prevent general searches and to keep discretion over what may be taken from the executing officers.

Those principles apply with special force to provider warrants that seek broad account returns and defer the actual sorting to later police review. The Apple warrant expressly required that the records be examined by a sworn HPD officer designated as the “Examiner,” that the

Examiner seize only items specifically authorized by the warrant, that the Examiner use narrowing procedures such as keyword, date-and-time, file-type, data-type, sorting, and email-header review, and that the Examiner document the procedures used to limit the scope of the search. The Google warrants likewise required police to conduct any later review in accordance with Exhibit A search protocols, and the March 13, 2024 Google affidavit contemplated that Google would create an exact duplicate of the account and provide it to the affiant for later review under those court-ordered protocols.

The protocol issue is therefore part of the particularity inquiry, not an afterthought. When the State seeks broad provider returns but relies on a later Examiner review to supply the practical limits, the State must show who performed the review, whether that person was authorized under the warrant, what narrowing methods were actually used, and whether the review remained within the warrant's scope. If the State cannot make that showing, the Court cannot determine whether the Apple and Google searches complied with Article I, Section 7 of the Hawaii Constitution and HRPP, Rule 41.

C. The Apple warrant lacked a sufficiently particularized nexus for the full range of cloud records sought.

At most, S.W. 2024-048 may have supported a narrower request for subscriber or account-attribution records, or for discrete communications or photographs tied to the investigation. But the warrant went much further. It authorized seizure from the specified Apple ID accounts of subscriber information, transactional records, and iCloud records and data including email content, My Photo Stream, iCloud Photo Library, iCloud Drive, Contacts, Calendars, Bookmarks, Safari Browsing History, Maps Search History, Messages, and iOS Device Backups for the period from October 1, 2022 through January 18, 2024.

Those categories do not stand on the same footing. Subscriber and log-in records may bear on account attribution, but content categories such as messages, browsing history, map searches, contacts, calendars, and full backups required their own factual bridge. The warrant did not meaningfully differentiate among them. Instead, it treated identifying records, communications content, cloud-stored files, and complete backup data as though the same showing justified all of them.

The overbreadth is most evident as to iOS Device Backups. The warrant expressly sought iOS Device Backups from the targeted Apple accounts. A request of that breadth reaches a large volume of intensely private account material, yet the warrant did not limit the seizure by specific device, application, file class, or narrower evidentiary category.

Nor did the later review protocol cure the defect. Exhibit A required a sworn HPD “Examiner” to review the Apple records, seize only items authorized by the warrant, use keyword, date-and-time, file-type, data-type, and sorting filters, examine e-mail header fields, and document the procedures used to limit the search. Those execution rules may constrain how the return is reviewed, but they do not supply the missing probable-cause nexus for the broad categories of records Apple was ordered to produce in the first instance.

The same is true of the keyword list. The warrant limited the later police search to records within the date range that contained, included, reflected, or otherwise referenced a lengthy list of terms, including “Geanna,” “Gianna,” “food,” “feed,” “water,” “bucket,” “container,” “hands,” “tie,” “box,” “school,” “tape,” “camera,” “surveillance,” “doctor,” “medication,” and many others. A lengthy list of mixed specific and commonplace terms may narrow later review at the margins, but it does not convert a broad demand for email content, messages, browsing history, map history, contacts, calendars, and device backups into a category-specific warrant supported by particularized probable cause.

For those reasons, Defendant Brandy Blas respectfully submits that S.W. 2024-048 was overbroad to the extent it authorized seizure and review of broad Apple account contents beyond the categories actually supported by particularized probable cause, and that the Apple-produced content, metadata, backups, and derivative evidence obtained under that authority should be suppressed.

D. The February 7 Google Photos/Drive warrant and S.W. 2024-137 carried forward the same cloud-search defects.

The record includes a February 7, 2024 warrant application seeking authorization to search the Google Photos and Google Drive accounts of Brandy Blas (S.W. 2024-075), and it also includes the March 13, 2024 Google LLC warrant, S.W. 2024-137, directed to the Google account assigned to brandyblas64@gmail.com.

S.W. 2024-137 sought user or subscriber information, session and log-in records, and broad categories of Gmail and other Google Cloud content, including photographic images, digital images, video recordings, location data, emails, metadata related to associated files, and communications regarding G.B., for the period from October 1, 2022 through January 18, 2024.

The Google materials contemplated a two-step process: Google would create an exact duplicate of the specified account, provide that duplicate to the affiant, and the records would then be examined under the court's Exhibit A search protocols.

The affidavit justified that request with generalized assertions that Google records may identify suspects, link suspects to conduct, reveal the nature and scope of activities, preserve evidence, and trace transactions, events, and communications. The affidavit also asserted that the records may reveal information regarding the health and welfare of G.B. and A.B. and may corroborate or disprove claims made by Brandy Blas and Debra Geron regarding activities at the residence.

As with Apple, that showing did not establish a category-specific nexus for the full sweep of Gmail content, Google Cloud files, photographs, videos, emails, metadata, and location data. Nor did it justify obtaining a provider-created account duplicate first and leaving the real narrowing to later police review.

The warrant's supposed limits did not meaningfully cure that breadth. The Google search protocols used a date range and a lengthy list of terms including "Geanna," "Gianna," "food," "water," "bucket," "box," "Brandy," "school," "tape," "camera," "surveillance," "doctor," and "medication," among many others. A keyword list of that sort is not a substitute for particularized probable cause directed to specific categories of Google account content.

The later-review structure also raises the same protocol-compliance concern present with Apple. The State should be required to identify who conducted the Exhibit A review of the Google returns and to establish that the review remained within the warrant-authorized limits. That issue is especially important where the warrant sought whole-account cloud content and location data without identifying a narrower set of files, communications, or account activities for seizure.

Accordingly, Defendant Brandy Blas submits that S.W. 2024-075 and S.W. 2024-137 were overbroad to the extent they authorized or implemented whole-account Google production

without a sufficiently particularized, category-by-category nexus, and that Google-produced content, metadata, location information, reports, screenshots, summaries, and derivative evidence obtained under that overbroad authority should be suppressed.

E. The provider warrants do not purge taint if Apple and Google were reached through S.W. 2024-042 items.

Because S.W. 2024-048 sought Apple iCloud records and data for specified Apple ID accounts and required later police review under Exhibit A search protocols, and the Google warrants addressed in this section sought broad Google account returns through the same duplicate-and-later-review structure, those provider warrants remained part of the same digital-evidence chain rather than a genuinely separate source. If the State identified the Apple IDs, the Google account, or the factual basis for those provider applications by exploiting phones, storage media, account identifiers, or other digital items first seized under S.W. 2024-042, the later Apple and Google returns are fruits of that earlier seizure. The later use of search protocols does not cure that threshold taint.

IV. Search Warrant Issued March 5, 2024--S.W. 2024-125 (Child Welfare Services Records).

A. S.W. 2024-125 sought sweeping CWS files, not narrowly defined record categories.

On March 5, 2024, the District Court issued S.W. 2024-125 directing a search of State of Hawaii Child Welfare Services, 420 Waikamilo Road #300B, Honolulu, Hawaii. The warrant authorized seizure of “any and all records, investigations, and other documents” relating to G.B. from October 4, 2013 through January 18, 2024, “any and all records, investigations, and other documents” relating to A.B. from February 5, 2019 through March 4, 2024, and “any and all records, investigation, and other documents” for any minors placed in the care of Thomas Blas Sr. or Brandy Blas by Child Welfare Services. On its face, the warrant thus reached more than ten years of records as to G.B., more than five years of records as to A.B., and an unlimited third category for other minors placed with Thomas Blas Sr. or Brandy Blas. The return and inventory for S.W. 2024-125 state only: “Digital files recovered.”

The affidavit’s stated rationale was materially narrower than that sweeping command. Detective Davidson averred that he sought G.B.’s and A.B.’s CWS records to determine their

condition at placement and any reported incidents to CWS, and sought Brandy's and Thomas's CWS records to identify other children placed in their care and potential witnesses, and documentation concerning the requirements for obtaining any adoption or foster care monies that were provided. But the warrant did not confine the seizure to placement records, incident reports, referral histories, custody-related documents, or any other defined subset of CWS materials. Instead, it used the broadest possible formulation—"any and all records, investigations, and other documents"—and paired that language with lengthy date ranges and an open-ended third-party category.

B. S.W. 2024-125 was overbroad because it lacked meaningful signposts for the requested agency files.

Even if the affidavit supported a narrower request for placement-related and incident-related information, S.W. 2024-125 did not tell Child Welfare Services or the police what subset of the agency files could be taken. It authorized "any and all records, investigations, and other documents" for G.B. over more than ten years, "any and all records, investigations, and other documents" for A.B. over multiple years, and the same sweeping category for any minors placed in the care of Thomas Blas Sr. or Brandy Blas.

Those commands lacked the limiting signposts that *Kealoha* requires. The warrant did not confine seizure to placement records, intake materials, incident reports, service plans, visitation records, funding records, named third-party minors, identified placement episodes, or any other defined subcategory of CWS files. The affidavit articulated a narrower purpose--determining the children's condition at placement, reported incidents, possible witnesses and funding records--while the warrant authorized wholesale production of confidential agency records far beyond those stated purposes.

That mismatch matters most as to the third-party category. At minimum, the Court should sever the facially overbroad category seeking records for "any minors placed in the care of Thomas Blas Sr. or Brandy Blas." But because the same "any and all records, investigations, and other documents" formula was used for the identified children as well, the Court should also consider whether the warrant, as executed, functioned as a general records warrant over confidential CWS files.

V. Requested Ruling.

Defendant respectfully requests that the Court rule as follows:

1. S.W. 2024-042 was invalid or unlawfully executed to the extent it lacked particularized probable cause, lacked particularity, authorized overbroad person, device, or closed compartment/container searches, or was executed beyond its lawful scope.
2. All evidence seized pursuant to S.W. 2024-042 must be suppressed, including physical evidence from 33 Karsten Drive, its curtilage, storage areas, storage-type structures, the persons of Brandy Blas, Thomas Blas Sr., and Debra Geron, and any devices, storage media, papers, or containers searched under that warrant.
3. All evidence obtained under S.W. 2024-062 and S.W. 2024-063 must be suppressed to the extent it was derived from items first seized under S.W. 2024-042, including all data obtained from Items 40 and 41 and all data obtained from the iPhones searched under S.W. 2024-063.
4. All provider evidence obtained under S.W. 2024-048, the February 7, 2024 Google Photos/Google Drive warrant S.W. 2024-075, and S.W. 2024-137 must be suppressed to the extent those warrants lacked particularized probable cause, were executed outside the court-ordered Examiner/search protocols, or were derived from information or items first obtained under S.W. 2024-042.
5. All Child Welfare Services records and derivative evidence obtained under S.W. 2024-125 must be suppressed, or, at minimum, the Court should sever and suppress the overbroad category seeking records for any minors placed in the care of Thomas Blas Sr. or Brandy Blas and suppress any CWS materials seized beyond properly limited placement- or incident-related records.
6. If the Court declines to suppress all evidence obtained under S.W. 2024-042, Defendant requests that the Court suppress, at minimum, HPD Report No. 24-022317 Items 32–35, 37–41, 61–63, 67–79, 94–97, 132–156, and 160.
7. The suppressed evidence should include all cellular phones, tablets, laptops/notebooks, computer bags, cameras, surveillance cameras, SD cards,

micro-SD cards, CD/DVD discs, computer accessories, school papers, clothing, tape, documents, and related physical or digital evidence within those item numbers.

8. The suppressed evidence should also include all forensic extractions, downloads, copied data, images, photographs, videos, metadata, reports, summaries, screenshots, communications, testimony, investigative leads, follow-on warrant evidence, and any other derivative evidence obtained from or through those items.

DATED: Honolulu, Hawaii, June 5, 2026.

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

AMENDED STATEMENT OF PROPOSED WITNESSES AND EXHIBITS

(Amended to Proposed Witnesses and Exhibits filed December 31, 2025)

WITNESSES

1. HPD Detective Blake Davidson.
2. HPD Detective Thomas Inuma.
3. (Lead or supervising officer for the execution of S.W. 2024-042.)
4. (Officer(s) who located, opened, searched or seized HPD evidence items 38, 40, and 41.)
5. (Evidence custodian(s).)
6. (Digital forensic examiner(s) who processed or reviewed phones, tablets, laptops, cameras, SD/micro-SD cards, CD/DVD discs, or other electronic media.)
7. (Designated HPD "Examiner" under S.W. 2024-048.)
8. (Designated HPD "Examiner" under S.W. 2024-137.)
9. (Any HPD officer, prosecutor, or other person who accessed, searched, summarized, or exported Apple or Google provider-return data.)
10. (Custodian of records for Apple Inc.)
11. (Custodian of records for Google LLC.)
12. (Custodian of records for Child Welfare Services.)
13. (Officer or analyst who reviewed the CWS production.)
14. [Additional witnesses to be determined.]

EXHIBITS

1. Warrants, affidavits, attachments, returns, inventory, and related documents for S.W. 2024-042, S.W. 2024-048, S.W. 2024-062, S.W. 2024-063, S.W. 2024-075, S.W. 2024-125 and S.W. 2024-137.
2. HPD Report No. 24-022317.

3. Any photographs, video, body-worn camera, scene diagrams, or search-scene documentation showing where the challenged items were found at 33 Karsten Drive.
4. Digital forensic work requests and related documents.
5. Chain of custody records.
6. Apple "Examiner" documentation.
7. Google "Examiner" documentation.
8. All records showing who accessed, searched, exported, copied, summarized, or reviewed Apple Google provider-return data.
9. CWS records and related documents produced under S.W. 2024-125.
10. [Additional exhibits to be determined.]