STATE OF SOUTH DAKOTA)) ss COUNTY OF CHARLES MIX)		IN CIRCUIT COURT FIRST JUDICIAL CIRCUIT
STATE OF SOUTH DAKOTA, Plaintiff, vs. **STACY PHELPS,** Defendant.		11 CRI 16-102 **RESPONSE TO MOTION TO SEAL AND FOR *IN CAMERA* INSPECTION**

The State of South Dakota, by and through its counsel, Brent K. Kempema and Paul S. Swedlund, Assistant Attorneys General, hereby submits this response to defendant's application for *in camera* review of, and to seal, certain documents pertinent to this case. For the reasons stated herein, the state asks that the motion be denied and that the documents in question be turned over to state investigative authorities.

1. Defendant Stacy Phelps is charged with two counts of falsifying evidence and two counts of conspiracy to offer forged or fraudulent evidence to a state agency. Specifically, Phelps and Scott Westerhuis conspired to, and did, create false, backdated contracts purporting to classify the American Indian Institute for Innovation (AIII) as a sub-contractor to Mid-Central Education Cooperative (MCEC) rather than as a sub-recipient of MCEC grant funding. The benefit of re-classifying AIII as a subcontractor would be to shield the company from a federal audit of the disposition of grant funds passed through MCEC to AIII.
2. Had AIII been audited, it would have uncovered rampant embezzlement by Westerhuis and a longstanding pattern of abusive, excessive and personal spending by Phelps. As outlined in the state's 404(b) notice, Phelps and Westerhuis kept AIII's board in the dark about the company's finances. While the AIII board believed the company was a "bare bones"

operation, Phelps was spending company funds on steak dinners, gas for and maintenance of his personal vehicle, and consumer goods.

3. The persons ostensibly "reviewing" and ratifying Phelps' spending (as claimed in defense counsel's motion) were the same two people who were embezzling money from AIII/MCEC – Scott and Nicole Westerhuis. Because the Westerhuis' kept AIII's books, they had an interest in destroying the paper trails of the financial malfeasance occurring in the company. They also had an incentive to curry Phelps' loyalty by giving him a free rein on spending. Consequently, many of the receipts and other documentation from Phelps' reimbursed company "expenses" itemized in the state's 404(b) notice have been lost. Without receipts, it is difficult, if not impossible in some cases, to discern how much of Phelps' spending in restaurants and retail outlets like Sam's Club, WalMart or Best Buy was actually for company business and, if so, how much of this unchecked spending was for company business that would be authorized and approved by an informed board of directors. At a minimum, an audit of AIII imperiled Phelps' lucrative position in the company.
4. In the aftermath of the Westerhuis murders/suicide, defense counsel obtained a box of Phelps' receipts that had not been destroyed. Defense counsel obtained these receipts from Phelps, who was given the receipts by an MCEC employee because he was AIII's then-CEO. According to defense counsel, these receipts fall into three categories:
    a. Receipts submitted by Phelps for "review" for which Phelps had not yet received reimbursement before the Westerhuis' demise;
    b. Records of expenses submitted by Phelps for "review" for which Phelps had not yet received reimbursement; and
    c. Receipts from Phelps' credit card for alleged company expenses in the year 2016 that Phelps had not yet submitted to AIII for reimbursement.

5. These documents have obvious relevance to the ongoing criminal investigation. For one, the receipts may evidence attempted theft from AIII. By submitting the receipts to his corrupt co-conspirators – the Westerhuis' – for "review and reimbursement" by them rather than objective financial auditors, Phelps was possibly attempting to obtain money from AIII by deceptive means. For another, the receipts may shed light on spending patterns at restaurants and retail outlets for which receipts no longer exist, which in turn may help reveal how much of Phelps' spending was for legitimate program expenses and how much was abusive, excessive or personal.
6. In any event, the receipts that Phelps submitted for review and reimbursement are part of AIII's company records. Phelps, who since has been fired by AIII's board from his position as CEO, no longer has a say in the disposition of those records. MCEC very obviously should have turned the records over to law enforcement, an AIII board member, or AIII's attorney – not to a person of interest in the investigation of AIII's financial schemes under Phelps' and Westerhuis' leadership. Since Phelps is no longer CEO, neither he nor his counsel had or have standing or authority to withhold evidence that did not belong to Phelps, or to petition this court for orders concerning its disposition.
7. The mock indignation in defense counsel's motion over the state's demand that he release evidence is nothing but grandstanding – and Phelps' requested relief is highly inappropriate.
8. Defense counsel is grandstanding because Rule 3.4 of the Rules of Professional Conduct prohibits him from obstructing the state's access to evidence or concealing documents having "potential evidentiary value." Though he was 100% obligated to turn the evidence over to investigative authorities, he did not. The state advised defense counsel that it hoped to avoid having to resort to legal process – such as a motion or subpoena – to compel defense counsel to do what he was ethically obligated to do without process. Defense counsel took offense and questioned whether

the state would obtain a search warrant, which the state simply said was an option. See E-MAIL EXCHANGE, Exhibit 1. An attorney, of all people, should not feel "threatened" by a warrant. Any attorney knows a warrant, like a subpoena, is a simple instrument of process; it is no more intrusive to turn a box of papers over to a law enforcement officer who stops by an attorney's office to serve a warrant than to a UPS driver who stops by to pick up a package. The notion of a licensed attorney claiming to feel "threatened" by such an innocuous encounter is positively comical. Even so, it was defense counsel himself who hypothesized that the process might entail a search warrant, and who now claims to feel "threatened" by his own suggestion.

9. Defense counsel's requested relief is highly inappropriate because it places the court in the middle of an ongoing investigation. It is akin to a defendant depositing a gun with the court and asking the court to determine if it is the murder weapon before it is turned over to law enforcement. This is not the court's function. The court does not know, nor should it at this juncture, the potential charges being investigated and, therefore cannot evaluate the relevance of the evidence to the investigation. The court does not have other evidence in the possession of investigative authorities, nor should it at this juncture, to know what pieces of the puzzle are filled in by the evidence in question. The court is not in a position to judge the probative value of the evidence, and it is highly inappropriate for defense counsel to put the court in the position of an investigator in a case now before it. Per Rule 3.4, it is enough that the receipts are "potential" evidence and, as such, defense counsel was obligated to turn them over to investigative authorities, not the court.
10. Defense counsel appears to justify his sitting on evidence because "no formal written request of [him] for these records had been made." Rule 3.4's obligation to turn over evidence is self-activating; it does not allow defense counsel to sit on evidence until requested in writing by opposing counsel, who, in some circumstances, may not even know the evidence

exists. The mock indignation in defense counsel's motion appears calculated to excuse his failure to turn over evidence after the fact, place himself in a positive light with the court or public when he knows he is in the wrong, or both.

11. Defense counsel's playing of the indignation card is grandstanding and his requested relief highly irregular. The state was not obligated to wait around while defense counsel became 100% satisfied of his ethical obligation to turn over evidence. Rule 3.4 is 100% clear – a lawyer cannot sit on evidence. Lawyers, like defense counsel, who make an appearance in a legal matter agree to accept legal process. It's an attorney's job to accept process like it's a firefighter's job to fight fires. Thus, no lawyer should feel "threatened" when process issues to procure evidence that he is obstreperously withholding. The only actual "threat" issued in this case was from defense counsel, who threatened to disparage the Attorney General in the press if he served a lawful warrant, and who has, in some respects, made good on that threat in his ridiculous motion.

ACCORDINGLY, the state requests that defendant's motion to seal and for *in camera* inspection be denied and that the subject evidence be turned over to investigating authorities.

Dated this 11th day of July 2016.

MARTY J. JACKLEY
ATTORNEY GENERAL

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11th day of July 2016 a true and correct copy of the state's response to defendant's motion to seal and for *in camera* inspection was served by e-mail on Dana Hanna at dhanna@midconetwork.com.

Paul S. Swedlund
ASSISTANT ATTORNEY GENERAL

STATE OF SOUTH DAKOTA	)	IN CIRCUIT COURT
	)SS.	
COUNTY OF CHARLES MIX	)	FIRST JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA,	*	File No.: 11CRI16-000102
	*	
Plaintiff,	*	**DEFENDANT STACY PHELPS' REPLY TO STATE'S RESPONSE TO MOTION TO SEAL AND FOR *IN CAMERA* INSPECTION**
v.	*	
	*	
STACY LEE PHELPS,	*	
	*	
Defendant.	*	

Stacy Phelps, the defendant in this case, by and through his attorney, Dana L. Hanna, hereby submits this reply to the State's Response to the defendant's Motion to Seal and For In Camera Inspection.

The Deputy Attorney General, Mr. Kempema, in telephone conversations, made an informal verbal request to undersigned defense counsel to voluntarily give credit card receipts and related records in his possession to the Attorney General's office. No legal process was served on defense counsel and no written request of any kind, even an informal written request or demand, was made for the records to counsel. Defense counsel advised the Deputy that he had to consider that request.

The recollections of Mr. Kempema and defense counsel differ as to which attorney first brought up the subject of State officers executing a search warrant to search counsel's office and seize such property, but the attorneys are in agreement that the Deputy Attorney General did advise defense counsel that a search warrant was something that the Attorney General could and might employ if defense counsel did not "voluntarily" agree to the State's informal verbal request.

The threat of a search warrant was not a mere fanciful hypothetical possibility. The Deputy Attorney General does not deny defense counsel's affirmation in the motion that he advised defense counsel that his office would certainly give defense counsel a "courtesy call" before law enforcement officers came to search his office and seize his client's records. Moreover, the Deputy informed me that the Attorney General wanted my answer by the following week.

Not having been presented with a subpoena or any formal process or even a written request for such documents, or an explanation as to how such material might reasonably be considered to be evidence or to have potential evidentiary value, and being confronted with a realistic fear that the Attorney General would use state governmental power to intrude into the law office, papers and property of defense counsel and his clients, defense counsel chose to present the records in question to the Court for an in camera inspection and a determination as to whether he is presently under any legal obligation to deliver some or all of those items to the Attorney General. If the Attorney General had chosen to serve defense counsel with a subpoena, rather than make a verbal request over the telephone, coupled with a threat of execution of a search warrant, this is essentially the same process that would then have been available to the defendant and counsel: the defense could have moved to quash the subpoena, both parties would have an opportunity to be heard before a neutral magistrate, and then the Court would decide the question.

Whether the requested items are evidence in this case and whether counsel is presently under a duty to share them with the Attorney General are not clear cut questions and it is precisely for that reason that the defense has sought a decision on those questions from this Court.

Mr. Phelps was the chief executive officer for the American Indian Institute for Innovation (AIII). The items that have been submitted to the Court are mainly credit card receipts showing expenditures made by Stacy Phelps on his own personal credit card and which he submitted, or intended to submit, to the AIII business officers—Scott and Nicole Westerhuis—for reimbursement as legitimate AIII work-related expenditures. One set of receipts consists of receipts that were submitted to AIII by Mr. Phelps, for which he never received a response to his request for reimbursement. They were not reimbursed. These would have been receipts dated before 2016. There is another set of receipts from 2016 that were never submitted to AIII for reimbursement; these were never in the possession, custody or control of AIII. The 2016 receipts are solely the exclusive property of Mr. Phelps, which he had turned over to defense counsel for his review, along with the receipts that had been actually submitted to AIII. There is also a set of records generated by AIII reflecting expenses submitted to AIII by Mr. Phelps and which were not reimbursed.

Whether or not those credit card receipts for Mr. Phelps' personal credit card, including receipts that were never turned over to AIII for reimbursement, and the AIII documents are evidence or potential evidence would seem to depend on whether they have any probative value as to the charges brought against Mr. Phelps.

Mr. Phelps is charged with two counts of falsifying evidence and two counts of conspiracy to falsify evidence. The alleged "false evidence" are two contracts. Mr. Phelps signed two contracts that provided for AIII to perform services for Mid-Central Education Cooperative (MCEC). Those contracts showed work that had been already fully performed and delivered in full, and were back-dated with dates showing when the terms of those contracts actually began. At Scott Westerhuis' request, Mr. Phelps signed those two contracts, on behalf of AIII, because

he had been told by Westerhuis that the original contracts, which had been earlier signed and entered into, had to be amended for technical compliance reasons. The back-dated contracts were, according to what Mr. Phelps was told and believed, nothing more than an accurate memorialization of the agreement that had previously been entered into and for which services had already been performed. The evidence in trial will show that in signing two contracts that he believed were in essence nothing more than re-creations of two contracts that had already been signed and whose services had been performed, Mr. Phelps had no intent to defraud the State. If Scott Westerhuis had his own ulterior reasons for having Stacy Phelps sign those two back-dated contracts, whether to avoid a legislative audit or for some other purpose, he did not share those reasons with Mr. Phelps or any of the other people whom Westerhuis manipulated, used, and "conned."

In it response, the State speculates that the receipts provided to the Court "may evidence attempted theft from AIII." The State speculates that by submitting receipts to the Westerhuises, who were financial officers of AIII, Mr. Phelps was possibly engaged in a conspiracy with the Westerhuises to allow Mr. Phelps to have AIII pay for his own personal, non-AIII related expenditures.

Recently, the Attorney General has filed a notice of his intent to offer certain evidence under Rule 404(b), which he asserts is probative of Mr. Phelps's motives in signing the contracts in question, the theory of the prosecutor evidently being that Mr. Phelps's motive in signing the AIII-MCEC contracts was to avoid an audit where, supposedly, his purported "abuse" of AIII reimbursements would be discovered. The items that the Attorney General would offer into evidence consists largely of records showing expenditures, over a period of about 5 years, by Mr. Phelps on his own personal credit card that were later reimbursed by AIII. Without providing any

proof whatsoever that these expenditures were *not* legitimate AIII business-related expenditures, the Attorney General has deposited dozens of pages of lists of credit card expenditures, and has asserted, without any supporting proof, that those expenditures were not for AIII related expenses, thus burying the presumption of innocence and putting the burden of proof on the accused to prove that these expenditures were all work-related.

When the appropriate time comes to address the Rule 404(b) question, the defendant Mr. Phelps will present evidence to show that it was the regular approved practice for AIII staff members and employees to have staff meetings at restaurants in Rapid City, since AIII did not have an office in this part of the state; that over the years, when hundreds of Indian students came to the School of Mines in Rapid City from Indian reservations throughout the state to participate in the summer GEAR UP college preparatory session, Stacy Phelps would regularly use his credit card and AIII's card to buy them needed clothing, personal items, computers and I-Pads and other items at Best Buy, Walmart, and other stores; that it was the regular and approved practice of AIII that when Stacy Phelps drove 20,000 to 40,000 miles a year on his own personal vehicles for AIII related travel, rather than request repayment for mileage, AIII would pay for regular automotive maintenance on his vehicles, since the travel and wear on his vehicles was all for AIII travel. The defense will present evidence to the Court, at the appropriate time, that the expenditures referenced in the State's Rule 404(b) were all legitimate, AIII work-related expenditures, and all were properly submitted to and approved by AIII's administrative board and the State Department of Education.

The whole credit card issue has very little, if any, real probative connection to the actual charges brought against Mr. Phelps. When the time comes, the Attorney General will have to try to convince this Court that his purpose in offering Mr. Phelps's credit card expenditures is to

show some relevance to the question of his intent in signing two contracts for services that had in fact already been performed, rather than to smear Mr. Phelps in the public eye and to prejudice any hope he may have for an unbiased jury that can presume him innocent.

When Mr. Jackley, the Attorney General, filed his Rule 404(b) notice, replete with lists of expenditures for meals and accusations that the defendant had actually eaten in "swanky" restaurants, the prosecutor was not content with filing that notice with the court. He not only released that notice to the media, by making it a public filing, knowing it would be a news story that same day, the Attorney General actually gave interviews, including televised interviews, to the media in which he publicly stated that the items he had provided to the court in his notice proved that Mr. Phelps had spent 200,000 dollars of state funds for his own personal use. The Attorney General could have done his duty to protect Stacy Phelps's right to a fair trial and an unbiased jury by filing the notice and its exhibits under seal. But that was not his choice. Rather, he deliberately exploited that notice and made the issue a public one, by his calculated use of extrajudicial statements to the press, to the great prejudice of the accused.

The results were foreseeable and immediate and extremely prejudicial to Mr. Phelps's right to a fair trial. The story told by the Attorney General in the Rule 404(b) notice immediately was front page news and the lead television news story throughout the state. Front page headlines in Mr. Phelps's home town newspaper, the Rapid City Journal, were typical of the media message generated by the Attorney's General's stoking of the public flames of prejudice: "**GEAR UP funding diverted from kids**—Prosecutors accuse Phelps with spending $60K at Wal-Mart." Mr. Jackley gave an interview to the Argus Leader, the newspaper that is the most read paper throughout the area from which the jury will come, in which he stated that notice he provided the court "shows that Phelps spent tens of thousands of dollars at steakhouse, hotels and

casinos, and at Best Buy. The money was supposed to be spent on enhancing education opportunities for Native American youth, but Jackley said the receipts indicated that it was spent on personal expenses." Mr. Jackley gave a televised interview to KELO-TV, again repeating his unproven and unfounded accusations that Mr. Phelps had spent 200,000 dollars that should have gone to Indian children's educations on himself.

Not content with making prejudicial accusations of uncharged crimes in the media, the Attorney General went so far as to announce to the media that he intended to seek a prison sentence against Mr. Phelps if is convicted, in spite of the statute's presumptive probation for the offenses charged. [Exhibit "A", attached: Argus Leader on-line news article: "Jackley wants prison time for Gear Up defendants."]

Rule 3.6 (a) of the South Dakota of the Attorneys' Rules of Professional Conduct governs trial publicity and is directed toward public prosecutors.

> A lawyer who is participating or has participated in the investigation or litigation of a matter shall not make an extrajudicial statement that the lawyer knows or reasonably should know will be disseminated by means of public communication and if the lawyer knows or reasonably should know that it will have a substantial likelihood of materially prejudicing an adjudicative proceeding in the matter.

Given the prejudicial, at times almost hysterical, publicity that has surrounded this case from the day that Mr. Jackley announced the indictment of Mr. Phelps and the codefendants at a press conference in Platte, to which the Attorney General brought a clergyman with whom he prayed before television cameras and potential jurors.

This case, which involves the signing of two contracts, has been linked in the public imagination and media with the slaughter of a family by Scott Westerhuis. This linking in the

public's mind is the foreseeable result of, among other things, a prosecutor calling a press conference in the home town of the murder victims to announce indictments for non-violent crimes. Rather than trying to preserve the accused's rights to a trial by an impartial jury, from the outset, Mr. Jackley has fanned the flames and continues to do so.

Trial judges regularly instruct juries that a person is presumed to have intended the foreseeable consequences of his actions. With that common-sense axiom in mind, there is only one reasonable conclusion that can be drawn from Mr. Jackley's actions and his recent public comments: he had to have foreseen the poisonous and unfair press coverage that his interviews would have naturally generated and any trial lawyer with any experience would know that such publicity was going to severely prejudice Stacy Phelps's right to a fair and unbiased jury.

With the Attorney General's recent actions in mind, and being keenly aware of the prejudice which the State's lawyer has already caused to the defendant's right to a fair trial, all of which could have been avoided by filing his documents under seal until the court ruled on their admissibility, defense counsel was not eager or willing to acquiesce to the Attorney General's informal request without a ruling by the Court, given the foreseeable probability that the Attorney General would use such items in his ongoing attempt to prejudice the public against the defendant Stacy Phelps.

The Attorney General's assertion that defense counsel "was 100% obligated to turn the evidence over to investigative authorities" is without any basis in law. An attorney is not "obligated" to do anything in response to an informal request/threat made over the telephone by a government lawyer.

The Deputy Attorney General's accusation that defense counsel is "grandstanding" by asking this Court to decide a contested legal question is extremely disingenuous, given the

Attorney General's recent extrajudicial statements to television news and newspaper reporters that he knew or reasonably should know would be disseminated by means of public communication, when he knew or reasonably should know that his statements would have a substantial likelihood of materially prejudicing the triers of fact in this matter.

Whether or not these credit card receipts and records are evidence in this case and whether counsel is under a duty to provide them to the Attorney General at this juncture in the case are legal questions that, for all the foregoing reasons, defense counsel has submitted to this Court for decision, rather than have that decision made for him by the Attorney General. Accordingly, defense counsel has submitted these questions to the sound discretion of this Court, and will abide by whatever decision this Court makes in the matter.

DATED this 14th day of July, 2016.

STACY PHELPS, Defendant

BY: */s/ Dana L. Hanna*

Dana L. Hanna
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of July, 2016, I have served a true and correct copy of the foregoing Defendant Stacy Phelps' Reply to State's Response to Motion to Seal and for *In Camera* Inspection was placed in the U.S. Mail, first-class, postage prepaid to the listed individuals below:

Brent Kempema
Attorney General's Office
1302 E. Hwy. 14 #1
Pierre, SD 57501

Michael J. Butler
100 S. Spring Ave. #210
Sioux Falls, SD 57104

Clint Lee Sargent
Meierhenry Sargent
315 S. Phillips Ave.
Sioux Falls, SD 57104

/s/ Dana L. Hanna

Kempema, Brent

From: Kempema, Brent
Sent: Wednesday, June 29, 2016 3:42 PM
To: 'dhanna@midconetwork.com'
Cc: Swedlund, Paul
Subject: RE: vehicle mileage-All

Dana,

As we discussed, I believe that the box of receipts and mileage logs are evidence of crimes this office is currently investigating. You have acknowledged that you are in possession of that evidence. You are now refusing to turn the evidence over to investigative authorities, this despite your claim to me that you are 90% sure you would be willing to cooperate in the turning over of this evidence without the necessity of court involvement. You now appear to have reversed course based upon what you call a "threat." I would remind you that I in no way threatened you. I simply informed you that if we did not reach an agreement with respect to the evidence I would seek the evidence through legal process. It was you who brought up having a search warrant served to which I indicated that was an option but it was my preference to work something out amicably. If anybody was making threats, it was you when you threatened that if the state sought legal process, you would run to the media besmirching the Attorney General.

As an experienced attorney you know the state does not have to prove the probative value of the evidence to defense counsel in order to seize it. The state need only satisfy a neutral judicial officer of the probative value of the evidence and I do not believe that will be a difficult showing to make.

If you have any authority that entitles you to withhold evidence, please so advise me promptly. In the meantime, this office will be moving forward on getting this evidence into the hands of proper investigative authorities.

I look forward to your prompt response.

Brent Kempema
Assistant Attorney General
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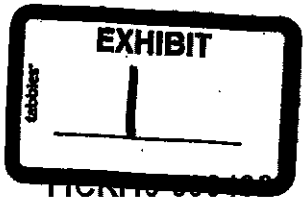
Fax: (605) 773-4106



From: dhanna@midconetwork.com [mailto:dhanna@midconetwork.com]
Sent: Wednesday, June 29, 2016 2:00 PM
To: Kempema, Brent
Subject: Fw: vehicle mileage-All

Brent: here is the mileage record for Stacy's vehicles. This is all AIII travel. On the Infinity, as you can see, he drove that vehicle for about 60,000 miles of AIII related work travel. Since Stacy did not seek reimbursement for mileage, he was entitled to have AIII pay for vehicle maintenance. That actually cost AIII lest than it would have if he had submitted mileage reimbursement, which he would have otherwise been entitled to do.

My client's understanding is that these vehicle maintenance expenditures and any other expenses and expenditures that were related to GEAR-UP were submitted for approval to Mid Central and if Mid Central approved these GEARUP grant expense then they were submitted to the State of South Dakota for approval. My client's understanding is that there were State Department of Education personnel that would approve any and all reimbursements. From his perspective the State had any and all opportunity to approve or disapprove of any expenses.

As to your request for receipts and other documents that are currently in my possession, that you have requested me to provide for you, I wish to reassure you that I will preserve those documents, which include receipts Stacy submitted to MCEC for reimbursement, but which he was not reimbursed for. You have passed along a threat to me from the Attorney General that he may have a search warrant issued to search my office if I do not "voluntarily" provide you with those documents. Given that threat, I am requesting that you please make your request in writing, along with any legal basis for why the Attorney General believes these documents contain evidence of crime or why the State would have the lawful authority to demand production of my client's records. Once I have received a request from you detailing what it is you seek and why you seek it and why you believe I have an obligation to disclose it to you, I will consider and respond to the Attorney General's request.

Dana Hanna

Hanna Law Office, PC

From: Stacy Phelps
Sent: Wednesday, June 22, 2016 11:13 PM
To: Dana Hanna
Subject: vehicle mileage-All