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4 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
5 IN AND FOR THE COUNTY OF CHELAN

6 STATE OF WASHINGTON,

7 Plaintiff,

8 vs.

9 RYAN HELL,

10 Defendant.

CASE NO.: 24-1-00253-04

11 STATEMENT AND MOTION FROM  
12 DEFENDANT TO PRESERVE  
13 EVIDENCE, DISPATCH, CELL,  
14 PHONE, TEXT, RADIO

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**I. MOTION**

**A. Motion to Preserve Evidence and Address Potential Spoliation**

The Defense moves to preserve the following evidence, given concerns about potential tampering due to the case's implications of civil rights violations under color of law and ADA violations:

1. All 911 call audio from July 4, 2024, specifically the defendant's initial call to Rivercom 911 requesting emergency medical services for their passenger, a type 1 diabetic with chronic illnesses, including failing kidneys and a brain tumor, legally disabled under federal law and a Social Security recipient.

This call establishes the defendant's sole intent was to secure urgent medical help, explicitly declining roadside assistance despite dispatch's insistence. The defense is concerned this audio may no longer exist, as it has not been provided or acknowledged.

1           2. Computer-Aided Dispatch (CAD) files from Rivercom 911 for the July 4, 2024, incident,  
2 including call classification, timestamps, and dispatcher notes, to verify the call's existence and  
3 handling, especially if the audio has been lost. Washington State law requires CAD files to be  
4 retained for three years, and with one year elapsed, preservation is urgent.  
5

6           3. Chelan County Sheriff's communication records from July 4, 2024, including radio logs,  
7 phone call logs, text messages, emails, and any other communication records that may document  
8 interactions with Rivercom 911 regarding the defendant's medical emergency call. These records  
9 are critical to confirm Rivercom's acknowledgment of the defendant's request for an ambulance  
10 and any coordination with the Sheriff's office, which may have declined involvement, as a  
11 secondary precaution against the prosecution's claim that no such call occurred.  
12

13           4. Video evidence metadata and access logs, as described above, to ensure integrity and  
14 detect tampering.  
15

16           5. Records confirming the employment status of the alleged victims as Rivercom 911  
17 dispatchers, not private citizens or firefighters, to expose potential bias or misconduct.  
18

19           The defense has eyewitness testimony that these individuals work for Rivercom and  
20 transported the defendant and their passenger to a private residence outside cell service under  
21 questionable pretenses.  
22

23           Failure to preserve this evidence risks spoliation, especially given the high propensity  
24 for tampering in a case involving allegations of misconduct by Rivercom personnel who failed to  
25 secure an ambulance for a disabled passenger.  
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1 **Motion to Address Denial of Effective Counsel and Civil Rights Violations**

2 The defense moves to address the denial of effective legal counsel, constituting a  
3 violation of the defendant’s Sixth Amendment rights.

4 The defendant’s first attorney resigned within three days, citing corruption and  
5 refusing involvement. The second attorney failed to provide evidence, communicate, or act on the  
6 case for nearly eight months, effectively denying representation.  
7

8 The current attorney, while filing this motion due to the defendant’s inability to  
9 afford private counsel and the distance between Seattle and Chelan County, has not denied  
10 allegations of being influenced by opposing parties, raising concerns about compromised  
11 representation.  
12

13 This pattern of ineffective counsel has obstructed access to exculpatory evidence  
14 critical to the defense.  
15

16 Additionally, the defense raises serious civil rights violations under color of law  
17 and ADA violations.  
18

19 The defendant’s passenger, a disabled woman, was denied emergency medical services  
20 despite multiple 911 calls, exacerbating her life-threatening condition.  
21

22 The defense alleges the incident involved misconduct by Rivercom dispatchers, who  
23 assaulted the defendant and demanded \$1,000, as partially captured in the video.  
24

25 The defense requests an investigation into these violations, including the conduct of  
26 Rivercom dispatchers and the handling of the medical emergency call, to ensure justice and protect  
27 the defendant’s constitutional rights.  
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1 **Summary and Urgent Relief Requested**

2 The defense respectfully requests the following immediate actions:

3 1. Compel the prosecution to disclose all video evidence from the July 4, 2024, Malaga  
4 incident, including metadata, forensic data, and access logs.

5  
6 2. Preserve all 911 call audio, CAD files, Chelan County Sheriff’s communication records  
7 (radio logs, phone logs, texts, emails), video evidence, and records confirming the alleged victims’  
8 employment as Rivercom 911 dispatchers, with associated metadata and access logs, to prevent  
9 tampering.  
10

11 3. Investigate the denial of effective counsel, civil rights violations under color of law,  
12 and ADA violations stemming from the failure to provide emergency medical services to the  
13 defendant’s disabled passenger.  
14

15 4. Issue an order to expedite these motions due to the imminent trial date and the  
16 defendant’s residence in Seattle, which limits their ability to file independently without counsel.  
17

18 Given the severity of the allegations, including evidence tampering and misconduct,  
19 the defense urges the Court to act swiftly to ensure a fair trial and uphold justice.

20 To ensure justice and transparency, I respectfully move this Court to issue an order  
21 preserving the following evidence related to the incident:  
22

23 1. All 911 call audio recordings from July 4, 2024, related to the incident at 7599 Colockum  
24 Rd, Malaga, WA, to verify the nature of the communications.

25 2. All Computer-Aided Dispatch (CAD) files associated with the incident, including call  
26 classifications, timestamps, and dispatcher notes.  
27

28 3. All RiverCom 911 correspondence, including radio chatter, telephone calls, text  
29 messages, emails, and any other communications, particularly those between dispatcher Jeremiah  
30

1 and deputies, including any conducted via personal cell phones, which is irregular for official  
2 business.

3 4. All law enforcement body camera and dash camera footage from the incident, including  
4 unedited versions, along with all forensic metadata, access logs, and chain of custody records to  
5 verify potential tampering and ensure evidence integrity.  
6

7 5. All records related to the hit-and-run by the red Toyota Tacoma (license plate C204747),  
8 including any communications referencing the VIP or her departure from the scene.  
9

10 6. All records documenting RiverCom 911 call center logs and procedures to identify any  
11 tampering or alterations.

12 Preservation of these materials is critical to substantiate my claims of excessive force, false  
13 accusations, evidence tampering, and potential misconduct, given the unusually long dispatch  
14 response time, which local discussion attributes to deputies waiting roadside for approximately ten  
15 minutes before approaching the property, likely to allow the VIP to leave.  
16  
17

## 18 **II. STATEMENT**

19 On July 4, 2024, at approximately, at 7599 Colockum Rd, Malaga, WA, I, Ryan Hell, was  
20 subjected to an unconstitutional stop and arrest by Chelan County sheriff's deputies, involving  
21 excessive force, conflicting orders, and false claims that I was holding a firearm.  
22  
23

24 Despite no weapon being present in broad daylight with no obstructions, one deputy  
25 claimed to see a specific make, model, and caliber of a pistol in my hand, asserting the safety was  
26 off, while another deputy questioned if a gun was visible, escalating the situation.  
27  
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1 Deputies threatened to shoot me, stating, “You’ve got five seconds,” “My hammer’s  
2 back,” and “One more word and you’re dead,” while issuing conflicting orders: one instructed me  
3 to get on my knees and cross my ankles, while another shouted not to move or he would kill me.  
4

5 I attempted to de-escalate, identifying myself as cooperative and unarmed, but collapsed  
6 due to severe heat exhaustion and a muscle cramp, which likely prevented an unjustified shooting,  
7 as I was prone and non-combative.  
8

9 I possess photographs of dispatcher Jeremiah using his personal cell phone, allegedly  
10 communicating with deputies, which is irregular for official business and suggests potential  
11 misconduct.  
12

13 I overheard deputies discussing a VIP, code-named “Mustang” or similar, believed to be  
14 Sally Bagshaw, former Seattle councilwoman, who struck me in a hit-and-run with a red Toyota  
15 Tacoma (Washington license plate C204747, 2022 or 2024 TRD Pro, dark maroon with black  
16 accent alloy wheels).  
17

18 My photographs show the driver, attempting to cover her face, getting closer to me as I  
19 held up my phone to capture the incident, before she floored the vehicle and fled.  
20

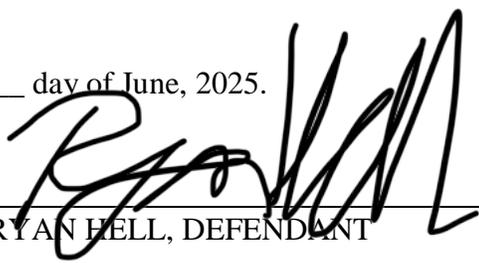
21 Dash camera footage, viewed at my attorney’s office, appears altered, with suspicious  
22 lighting, shading, jittering loops, and segments where individuals seem to engage in animated  
23 conversations with no one present, suggesting edited-out characters.  
24

25 As a former visual analyst at Google in Kirkland, Washington, in 2010, with expertise in  
26 graphics development, software engineering, user interface design, and video editing since the  
27 1990s, I can confirm these anomalies indicate tampering.  
28

29 My attorney intended to hire a forensics expert to examine the footage, but the expert is  
30 unavailable due to unpaid fees from a prior Chelan County case unrelated to mine.

1 Evidence suggests RiverCom 911 may also be altering call center logs and procedures to  
2 conceal critical communications.

3  
4 Respectfully submitted this 2 day of June, 2025.

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8 RYAN HELL, DEFENDANT  
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