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7 Attorney for Plaintiffs

8 **IN THE UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**

10 **Paul Gancarz, an individual; Daniel Turechi,**)
11 **an individual; Colton Brown, an individual;**) **CASE NO. 2:23-cv-1113**
12 **James Johnson and Amelia Johnson,**)
13 **individually and husband and wife,**) **DECLARATION OF**
14 **Plaintiff(s),**) **STEPHEN ROBINSON**
15 **v.**) **Hearing Date: February 14,**
16 **David Alan Capito II, aka Vyacheslav**) **2024 - Without Oral**
17 **Arkangelskiy, an individual,**) **Argument**
18 **Defendant(s).**)

19 THE UNDERSIGNED hereby declares:

20 1. I am a Private Investigator, licensed to practice in the State of Washington since 1996. I
21 have more than twenty-seven years of experience in locating and serving individuals.

22 2. In November 2023, attorney for the Plaintiffs hired me to locate and serve the Defendant
23 with the original service of process in the above captioned cause of action.

24 3. I am unable to locate and personally serve the Defendant.

25 4. I was able to identify the Defendant by his birthname, David Alan Capito, Jr., as a 35-year-
26 old White male, 6'4", 220lbs, date-of-birth 01/01/1988. However, Defendant legally changed his
27 name to Avenir David Capito (06/2017), then to Vyacheslav Arkadyevich Arkangelskiy and most
28 recently to Ryan Michael Smith (05/2022).

5. Through the Department of Licensing, I was able to determine that Defendant has one
vehicle registered in his name; a bronze colored 2002 Mazda Protégé 4-door sedan, WA license
BPM5993, VIN JM1BJ225720627680. Per DOL, the vehicle was transferred out-of-state. I located
the vehicle as licensed in South Dakota with plate 2CP676, (prior 2AB960) and registered to the
Defendant at 514 Americas Way, Box Elder, SD 57719. This is a private mail box. I have never
seen the vehicle at any location.

1 6. I used the following information sources in my attempts to locate and serve Defendant:

2 a) DISCIS and SCOMIS, the Odyssey Portal, King County Superior Court Portal, King
3 County District Court Portal, Seattle Municipal Court Information Portal, DISCIS/SCOMIS, and
4 court search engines maintained by the Washington State Administrator for the Courts.

5 b) International Research Bureau, Incorporated (IRB), a comprehensive commercial
6 compiler providing data from the three major credit-reporting agencies and many other
7 governmental and private sources. Access to this database is limited to groups such as law
8 enforcement and licensed private investigators.

9 c) King, Snohomish, Pierce, Jefferson and Thurston County jail registers and the
10 Washington Department of Corrections inmate search.

11 e) Washington Department of Licensing, drivers, vehicle and professional licensing.

12 f) Washington State Secretary of State Corporations and Department of Revenue.

13 g) Washington State Department of Health Credential Verification.

14 h) Washington State Digital Archives records.

15 i) King, Snohomish, Jefferson, Pierce, Thurston County recorders and assessors.

16 j) Various Internet resources, including but not limited to, Google, Bing, Facebook,
17 Twitter, Instagram, and Spokeo, and Facebook accounts.

18 7. During November 2023 through January 2024, I physically checked the following
19 addresses on multiple occasions. I did not locate the Defendant at any of these addresses:

20 a) **625 Queen Anne Avenue N., Apt. 208, Seattle, Washington 98109**

21 Defendant uses this address for his Washington driver license. It appears numerous times on
22 databases as his current address. The building was emptied of tenants, gutted and rebuilt into
23 modern apartments. I learned from management that the Defendant voluntarily and unilaterally
24 ended his lease in 2017. They have no forwarding address.

25 b) **8911 Vernon Road, Lake Stevens, Washington 98258**

26 This address appears often as Defendant's current home address. However, it is a storage facility
27 and is unsuitable for housing. Management declined to provide any information.

28 c) **502 S "L" St, #D, Tacoma Washington 98405**

This address appears often as Defendant's current home address and that of the 2002 Mazda.
However, the unit is occupied by Ms. Christy Withrow, who has never heard of the Defendant.

c) **9003 Fremont Ave N, Seattle, WA 98103**

This address appears often as Defendant's current home address. However, the unit is occupied
by 30ish women Taylor and Christi. Neither has heard of the Defendant.


1 9. I developed phone numbers (206) 866-4451 and (425) 689-4095 as the Defendants.
2 Calls to the 206 number go directly to a fast busy signal. Calls to the 425 number ring and then go
3 to a loud, extended beep.

4 10. Defendant was listed by the Corporations section of the Washington State Secretary of
5 State as Governor and Registered Agent for Liberty Plus Foundation, UBI 604048974. However,
6 the Corporation was administratively dissolved by the SOC in 2021 for failure to file an annual
7 report since 2017.

8 11. I have been unable to locate and serve the Defendant.

9 **I HEREBY DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE**
10 **STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.**

11 Signed at **Des Moines, Washington, on January 28, 2024.**

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13 Stephen Robinson, WAPI Lic 1695
14 WA Private Investigator License 1695
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