

FILED 29 NOV '21 10:32 USDC-ORP

**Affidavit of Service** of Affidavit of Glen Stoll in Rebuttal... (20 pages)

Re: U.S. v. Stoll in US District Court, District of Oregon No. 3:19CR00112-1 JO  
the undersigned certifies that, on the date corresponding to each party identified below:

**Acknowledgment of Service;** receipt of a copy of the above named document(s) is (are) hereby acknowledged for service on (recipient must initial the number that corresponds to proper party below):

1                    2                    3                    4                    5                    6  
initial \_\_\_\_\_ initial \_\_\_\_\_ initial \_\_\_\_\_ initial \_\_\_\_\_ initial \_\_\_\_\_ initial \_\_\_\_\_

**Proof of Service;** I personally served a copy of the above named document(s) on (add letter below) 1\_\_ 2\_\_ 3\_\_ 4\_\_ 5\_\_ 6\_\_  
by: (a) handing it to the party; or leaving it at the party's office (b) with a person in charge or (c) in a conspicuous place while open, as no one claimed to be in charge; or (d) leaving it at the party's usual place of abode with a person of suitable age and discretion residing there (a, b, c, or d to number above).

**Proof of Mailing;** I deposited a copy of the above named document(s) with the USPS in a sealed, first class postage paid envelope addressed to (circle the number that corresponds below):

1                    2                    3                    4                    5                    6

1. **Clerk of the Court** US District Court  
Date: 11/23/2021 1000 SW 3rd, MS 740, Portland, Oregon 97204

2. **Julia E. Jarrett, AUSA** US Attorney's Office, District of Oregon  
Date: 11/23/2021 1000 SW Third Ave., Suite 600, Portland, Oregon 97204


3. **Robert E. Jones, Senior Judge** US District Court, District of Oregon  
Date: 11/23/2021 1000 SW Third Ave., Portland, Oregon 97204


4. **Darcell Prescott, USPO** US Probation and Pretrial Services, Western District of Washington  
Date: 11/23/2021 2731 Wetmore Ave, Suite 420, Everett, Washington 98201

5. **John Suhocki, USPO** US Probation Office, District of Oregon  
Date: 11/23/2021 1000 SW Third Ave., Suite 340, Portland, Oregon 97204

6. **Noah Horst, Attorney at Law** 610 SW Alder St. Suite 415  
Date: 11/23/2021 Portland, Oregon 97205

This affiant acknowledges that the foregoing is true, correct and certain, materially complete, relevant and not misleading on the 23rd day of November, in the year of our Lord 2021, at Marysville, Washington, before the undersigned witnesses.

  
Affiant/Server Debbie Stoll

  
Witness

  
Witness

send mail c/o:  
16910 - 59th Ave. NE, Suite 201  
Arlington, Washington 98223



16910 - 59th Avenue NE, Suite 210  
Arlington, Washington 98223

# Administrative Church Counsel

Phone: 425-673-7762  
Fax: 425-329-4748  
[glen@churchcounsel.org](mailto:glen@churchcounsel.org)  
Mobile: 425-508-2302

October 7, 2021

Darcell Prescott, U.S. Probation Officer  
U.S. Probation and Pretrial Services  
Western District of Washington  
2731 Wetmore Avenue, Suite 420  
Everett, Washington 98201

John Suhocki, U.S. Probation Officer  
U.S. Probation Office, District of Oregon  
1000 Southwest Third Avenue, Suite 340  
Portland, Oregon 97204

Julia E. Jarrett, Assistant U.S. Attorney  
U.S. Attorney's Office, District of Oregon  
1000 SW Third Avenue, Suite 600  
Portland, Oregon 97204

Robert E. Jones, Senior Judge  
U.S. District Court, District of Oregon  
1000 Southwest Third Avenue  
Portland, Oregon 97204

**Re: US v. Stoll 3:19-CR-00112-JO  
Request to Terminate Probation**

Greetings:

Thank you Darcell Prescott and John Suhocki for the telephone conference that the two of you held yesterday morning with my former attorney, Noah Horst, and me. Since you informed me that these issues need to be taken up with the U.S. Attorney and Judge handling this case, I am addressing this letter to all four of you collectively.

One reason for yesterday's call was to address conditions of probation that are being imposed upon me in violation of the plea agreement adopted by Judge Jones. See "Correction to Judgment (2021-05-05)" attached. Suhocki assured me that no conditions will exist against me after termination of probation, and, therefore, my complaint about conditions will be moot if my Request to Terminate is granted.

The second reason for yesterday's call was to address restitution payment. My obligation to pay restitution is conditioned upon the following provisions (items 11, 12, 13, and 18) of the attached "Signed Plea Letter (2021-01-15)" beginning at the last paragraph on page 5:

**11. "Defendant does not waive, and retains any right he may have to contest civilly or administratively any findings, assessments, or collection activity by the IRS."**

Please provide me with a complete report and ledgering of all findings, assessments, and collection activity, including but not limited to the amount and when any payments were made, and by whom.

*EXHIBIT A - Page 1 of 15*



**12(1). "He meet with the IRS... to make an immediate assessment of that portion of the tax that he agrees to pay as restitution."**

Please help me accomplish this. The IRS has consistently refused to meet with me or respond to my letters. My attempts of yesterday and today were again met with no success.

**12(2). "He not file any claim for refund of taxes represented by any amount of restitution paid pursuant to this agreement."**

This tells me that I will not be able to receive a refund for any amount paid in excess of what is lawfully due, even if the result of my contest of any findings, assessments, or collection activity by the IRS determines that a refund is due. I cannot be compelled to pay what is not accurate, complete, and lawful.

**13 (paragraph 2). "Defendant expressly authorizes the U.S. Attorney's Office to obtain a credit report on defendant."**

Please provide me with complete results of the credit report I have authorized the U.S. Attorney's Office to obtain.

**13 (paragraph 6). "Defendant agrees to pay restitution in this case, up to \$1,419,932, to the IRS."**

Please confirm the current balance on this account. This clearly means that I am not to pay any more than that amount, and, since there is no minimum amount stated, it implies that I may not be expected to pay anything at all, depending on the results of my contest of the findings, assessments, or collection activity by the IRS, and possibly other factors. Mr. Horst and I found it hard to believe, when told yesterday by John Suhocki, that only \$80 has been paid against that balance by the Bradys to date.

**18. "No promises, agreements, or conditions other than those set forth in this agreement will be effective unless memorialized in writing and signed by all parties listed below or confirmed on the record before the Court."**

According to what was "confirmed on the record before the Court," the promises, agreements, and conditions as set forth in the "Signed Pea Letter (2021-01-15)" constitute the sole conditions of sentencing and probation. When I was assured of this, I was told, "There will be no surprises." No guilty plea was entered on the record in this case other than the Non Assumpsit (there was no actual crime committed) and No Mens Rea (there was no actual intent to commit a crime) form of plea that we agreed to in the "Signed Pea Letter (2021-01-15)." *EXHIBIT A - Page 2 of 15*

The Court agreed to be bound by this agreement of the parties, with the exception that the judge ordered three (3) years of probation rather than five (5), and indicated that it would be cut in half (to 1.5 years) upon request. By the time of sentencing, I had already served nearly 2 years of a pre-trial probation, which was far more restrictive and punitive than the current probation. Additionally, due to my long standing financial situation and obligation to Church service, I am not able to personally or directly make any payments against the \$1,419,932 of back taxes that my accuser, Karl Brady, has confessed to having owed and evaded. However, it is my understanding that those back taxes are to be paid by the Church on my behalf from funds that had been dedicated to the Church, as explained below.



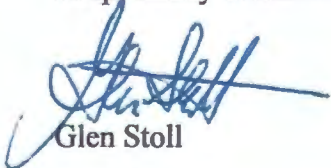
In September of 2007, Karl Brady resigned from his partnership position with Northwest Behavioral Healthcare Service (NWBHS) and assigned that position over to the Church. See attached "Signed Plea Letter (2021-01-15)" beginning at the last paragraph on page 2. Brady never donated any of his income from NWBHS to the Church. What was formerly Brady's income became Church income, derived from Church related activities in connection with NWBHS. Said income is still Church income to this day. It is to be used exclusively for the Church, and according to the Mandatory Banking Guidelines of our Ministerial Trust Service Agreement, "none of the assets shall ever inure to the benefit of any private individual, state regulated or for-profit organization."

The U.S. District Court in Portland, Oregon, the IRS, NWBHS, and Karl Brady have all agreed that the funds belonging to the Church by obtaining a partnership position with NWBHS, are to be used to pay the \$1,419,932 of back taxes that they have all agreed are owed by Karl Brady. The Church was not involved in this decision. Evidently, these back taxes need to be paid before the Church can resume its rightful claim of proceeds from its partnership position with NWBHS. Said funds are to be received and accepted by the Federal Court and the IRS on my behalf.

As a result of yesterday's conference call, I have developed the following four-point plan in order to comply with the restitution requirements of the plea agreement: 1. Submit my "Request to Terminate Probation" (this letter), 2. Request NWBHS to make payments to the IRS on my behalf (as expressed above), 3. Attempt to make an appointment with the IRS, and 4. Apply with the state employment office to determine my employability.

I hereby request that probation be terminated immediately, and that my attached "Correction to Judgment (2021-05-05)" be formally approved for the record. In the alternative, please provide me with all of the information and assistance I have requested above, in addition to my attached "Correction to Judgment (2021-05-05)" being formally approved for the record, or dismiss this case and all of its charges, due to the government violating its obligation under the judgment and plea agreement.

Respectfully Submitted,



Glen Stoll

Attachments: Correction to Judgment (2021-05-05)  
Signed Plea Letter (2021-01-15)

cc: Noah Horst, Former Defense Counsel  
610 SW Alder Street, Suite 415  
Portland, Oregon 97205

EXHIBIT A - Page 3 of 15

## Correction to Judgement and Conditions of Supervision

In *U.S. v. Stoll*, 19-CR-112 out of Portland, Oregon, Judge Robert E. Jones agreed to only require me to comply with a *Revised Plea Agreement* dated January 15, 2021, and nothing more. After assuring me of this, the U.S. Attorney added, "There will be no surprises." Otherwise, I never would have agreed to their proffer.

The case against me really should have been dismissed. That is why they offered such minimal conditions in the first place, and then agreed to some of my demands as well. Please notice that the wording was changed to remove implications that I ever knew or intended for my accuser, Karl Brady, to use my lawful and legitimate services to commit his fraud. I was advised that entering this *Non Assumpsit* or no *Mens Rea* form of guilty plea, with such easy conditions, would be better for me and the ministries I serve in the long run.

At the sentencing, Judge Jones said, "Glen Stoll is less responsible. He did not receive any money involved." and "His work is creative and not illegal." He later said to Brady's wife, "You acted because your husband demanded it." Brady apologized with "I am very sorry for all the mistakes I have made. I appreciate what the court has done, and will try to uphold the law in the future." When I complained about being hounded by U.S. Government Agents for years with no fault being found in anything I do, Judge Jones said, "Well, that's all in the past now."

As a dependent of the Church, I rely upon it for my sustenance. In response to my good-faith efforts to obtain funding for "restitution" to the IRS, the Church members have told me that they are not agreeable to their tax-deductible donations being used to pay my accuser's back taxes.

### On page 2 of the Judgement:

3. They forgot to check the box under *Mandatory Conditions* 3 for drug testing to be suspended.
5. They should not have checked condition 5 as it is not applicable because DNA was already collected by the US Marshal at arraignment in 2019.

### On page 3 of the Judgement:

It is my understanding that I am not being released from anything, but that I am now on a special probation, and only as agreed to in the *Revised Plea Agreement*. If it is to be presumed that I am being released from the two years of probation I have already served, then I request credit for that time served. Otherwise, I am not on "supervised release" from anything, and the *Standard Conditions of Supervision* that do not generally apply to me are:

3. I am not to be restricted from leaving any federal judicial district under this probation.
5. My living arrangements are not to be subject to this probation.
7. My work is not to be subject to this probation.

EXHIBIT A - Page 4 of 15



8. People I communicate or interact with are not to be subject to this probation.
10. The *Second Amendment* is not to be subject to this probation.
11. The *Right to Contract* is not to be subject to this probation.
12. Protection against *Defamation* (Libel or Slander), *Wrongful Interference with Contractual Obligation*, and the *Right to Contract* are not to be limited or restricted by this probation.
13. A *Reasonableness Standard* is not to be ignored or diminished under this probation.

**On page 4 of the Judgement:**

There are to be no *Special Conditions* other than what is contained in the *Revised Plea Agreement*. It is obvious on its face that, even though page 4 is called "Special Conditions of Supervision," they are not special at all. They are just an additional list of *Standard Conditions* that do not all apply, such as:

2. Tax return filings are not required unless they would otherwise be required (see item 10).
4. "If the judgment imposes a financial penalty..." is an uncertain statement that appears to confirm my inability to pay and the court's reluctance to require it.
8. Currently, I am not able to open a bank account in my own name. If there is any way I can open a bank account under the current circumstances, I would like to know how.
11. This item makes reference to "this agreement" but gives no explanation of what agreement it is referring to.
12. This item makes reference to "this agreement" but gives no explanation of what agreement it is referring to.

Signed and acknowledged on this 5<sup>th</sup> day of May, in the Year of Our Lord, 2021.

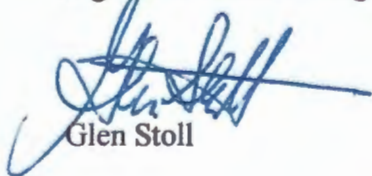
  
Glen Stoll

EXHIBIT A - Page 5 of 15

**PORTLAND MAIN OFFICE**  
1000 SW Third Avenue, Suite 600  
Portland, Oregon 97204  
(503) 727-1000  
[www.usdoj.gov/usao/or](http://www.usdoj.gov/usao/or)



**EUGENE BRANCH**  
405 E 8th Avenue, Suite 2400  
Eugene, Oregon 97401  
(541) 465-6771

**MEDFORD BRANCH**  
310 West Sixth Street  
Medford, Oregon 97501  
(541) 776-3564

Julia E. Jarrett  
Assistant U.S. Attorney  
[Julia.Jarrett@usdoj.gov](mailto:Julia.Jarrett@usdoj.gov)  
(503) 727-1000  
*Reply to Portland Office*

**U.S. DEPARTMENT OF JUSTICE**  
United States Attorney's Office  
District of Oregon  
Billy J. Williams, United States Attorney

January 15, 2021

Noah Horst  
Levi Merrithew Horst PC  
610 SW Alder Street, Suite 415  
Portland OR 97205

Re: *United States v. Glenn Stoll*, 3:19-cr-112  
Revised Plea Agreement Letter

Dear Counsel:

1. **Parties/Scope:** This plea agreement is between this United States Attorney's Office (USAO) and defendant, and thus does not bind any other federal, state, or local prosecuting, administrative, or regulatory authority. This agreement does not apply to any charges other than those specifically mentioned herein.
2. **Charges:** Defendant agrees to plead guilty to Counts 1 and 3 of the Indictment in which he is charged with conspiracy to defraud the United States in violation of 18 U.S.C. § 371 and evading the payment of federal income taxes for calendar year 2013 in violation of 26 U.S.C. § 7201.
3. **Penalties:** The maximum sentence for Counts 1 and 3 is 5 years' imprisonment, a fine of \$250,000, 3 years of supervised release, and a \$100 fee assessment. Defendant agrees to pay the \$100 fee assessment by the entry of his guilty plea or to explain to the Court why this cannot be done.
4. **Dismissal/No Prosecution:** The USAO will move at the time of sentencing to dismiss any remaining counts against defendant. The USAO further agrees not to bring additional charges against defendant in the District of Oregon arising out of this investigation, known to the USAO at the time of this agreement.

EXHIBIT A - Page 6 of 15



Noah Horst  
Re: Glenn Stoll Plea Agreement Letter  
Page 2  
January 15, 2021

5. **Elements and Factual Basis:** In order for defendant to be found guilty of **Count 1** of the Indictment, the government must prove the following elements beyond a reasonable doubt:

First, beginning on or about September 2007, and ending on or about December 2014, there was an agreement between two or more persons to defraud the United States by obstructing the lawful functions of the Internal Revenue Service by deceitful or dishonest means as charged in the indictment;

Second, the defendant became a member of the conspiracy knowing of at least one of its objects and intending to help accomplish it; and

Third, one of the members of the conspiracy performed at least one overt act on or after September 2007 for the purpose of carrying out the conspiracy.

In order for defendant to be found guilty of **Count 3** of the Indictment, the government must prove the following elements beyond a reasonable doubt:

First, Karl Brady owed more federal income tax for the calendar year 2013 than was declared due on Karl Brady's income tax return for that calendar year;

Second, defendant knew that more federal income tax was owed than was declared due on the Karl Brady's income tax return;

Third, defendant made or caused an affirmative attempt to evade or defeat such additional tax; and

Fourth, in attempting to evade or defeat such additional tax, defendant acted willfully.

Defendant admits the elements of the offense alleged in Counts 1 and 3 and agrees the following facts are true, can be proved beyond a reasonable doubt, and are sufficient to support his guilty plea to Counts 1 and 3.

In September of 2007, Karl Brady and Laurie Brady, husband and wife, began working with Stoll and Stoll's company, Remedies at Law, to evade the assessment of income taxes and to shield Karl Brady's Northwest Behavioral Healthcare Services (NWBHS) income and other assets from the Internal Revenue Service. Between September 2007 and December 2014, defendant Stoll and Karl Brady caused NWBHS to pay what had been Karl Brady's salary and other compensation to nominees. Stoll and Brady agreed to perform and did perform the following acts:

EXHIBIT A - Page 7 of 15



Revised May 2018