

**AFFIDAVIT
OF
LISA E. BIERLY
REQUESTING CRIMINAL CHARGES**

I, Lisa E. Bierly, do hereby request that criminal charges be brought for child kidnapping and related charges against the following individuals:

Mark Shurtleff:

Conspiracy, aiding and abetting, official misconduct, obstruction of justice, criminal responsibility for another, false or inconsistent material statements, false or inconsistent statements, written false statement, providing false information to law enforcement, subordination of perjury.

Paul Amann:

Child kidnapping, conspiracy, aiding and abetting, official misconduct, obstruction of justice, criminal responsibility for another, false or inconsistent material statements, false or inconsistent statements, written false statement, providing false information to law enforcement, perjury.

Elizabeth Knight:

Conspiracy, aiding and abetting, official misconduct, obstruction of justice, criminal responsibility for another, false or inconsistent material statements, false or inconsistent statements, written false statement, providing false information to law enforcement, perjury.

Barry Richards:

Child kidnapping, conspiracy, aiding and abetting, official misconduct, obstruction of justice, criminal responsibility for another, false or inconsistent material statements, false or inconsistent statements, written false statement, providing false information to law enforcement, perjury.

Dr. Dana Hardin:

Child kidnapping, conspiracy, aiding and abetting, official misconduct, obstruction of justice, criminal responsibility for another, false or inconsistent material statements, false or inconsistent statements, written false statement, providing false information to law enforcement, perjury.

On Sept. 28, 2000, my son Jordan was kidnapped through a conspiracy acted upon by Paul Amann and Dr. Dana Hardin and Barry Richards.

On Oct. 3, 2000, my daughter Leigh was kidnapped through an order by Paul Amann via a judicial order not issued in court. Barry Richards physically kidnapped Leigh with assistance of two Midvale Police Officers.

From those dates forward, all named individuals did participate in a conspiracy to cover up the kidnapping of the children because they actually had no authority from DCFS to remove children. Subsequent articles in the Salt Lake Tribune and Deseret News the DCFS publicly stated there was no legal reason to remove the children and this was supported by a State legislative audit.

The physical documents do exist as actual material evidence that show the criminal intent to abduct the children through false statements and contradictions.

Dated: November 26th, 2014
Signed: Lisa E. Bierly (Elizabet)
Lisa E. Bierly
5674 Hillwood Way
Taylorsville, UT 84129
801-638-6489

Witness: E.M. Lorraine Smith
Signed: E.M. Lorraine Smith
Dated: November 26th 2014

Original Complaint filed with:

Sheriff Jim Winder, Salt Lake County Sheriff,
Salt Lake County Sheriff Admin. Offices
2001 S State St # S2700,
Salt Lake City, UT 84190

Sheriff Jim Winder,
Salt Lake County Sheriff
898 E 3300 S,
Salt Lake City, UT 84106

Copies sent to the following:

Sim Gill, SLC District Attorney
2001 S State St # S3500,
Salt Lake City, UT 84190

Sean D. Reyes, Utah A.G.
Office of the Attorney General
Utah State Capitol Complex
350 North State Street, Suite 230
Salt Lake City, UT 84114-2320

Carlie Christensen
U. S. Attorney General Office
185 South State Street, Suite 300
Salt Lake City, UT 84111

Federal Bureau of Investigation
Mary Frances Rook, Spec. Agent
5425 West Amelia Earhart Drive
Salt Lake City, UT 84116

U.S. Department of Justice
Criminal Division
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Violations of Utah Criminal Code

76-5-301.1. Child kidnapping.

(1) An actor commits child kidnapping if the actor intentionally or knowingly, without authority of law, and by any means and in any manner, seizes, confines, detains, or transports a child under the age of 14 without the consent of the victim's parent or guardian, or the consent of a person acting in loco parentis.

76-4-201. Conspiracy -- Elements of offense.

For purposes of this part a person is guilty of conspiracy when he, intending that conduct constituting a crime be performed, agrees with one or more persons to engage in or cause the performance of the conduct and any one of them commits an overt act in pursuance of the conspiracy, except where the offense is a capital felony, a felony against the person, arson, burglary, or robbery, the overt act is not required for the commission of conspiracy.

76-8-201. Official misconduct -- Unauthorized acts or failure of duty.

A public servant is guilty of a class B misdemeanor if, with an intent to benefit himself or another or to harm another, he knowingly commits an unauthorized act which purports to be an act of his office, or knowingly refrains from performing a duty imposed on him by law or clearly inherent in the nature of his office.

76-8-306. Obstruction of justice in criminal investigations or proceedings -- Elements -- Penalties -- Exceptions.

(1) An actor commits obstruction of justice if the actor, with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constitutes a criminal offense:

- (d) makes, presents, or uses any item or thing known by the actor to be false;
- (j) provides false information regarding a suspect, a witness, the conduct constituting an offense, or any other material aspect of the investigation.

76-2-202. Criminal responsibility for direct commission of offense or for conduct of another.

Every person, acting with the mental state required for the commission of an offense who directly commits the offense, who solicits, requests, commands, encourages, or intentionally aids another person to engage in conduct which constitutes an offense shall be criminally liable as a party for such conduct.

76-8-502. False or inconsistent material statements.

A person is guilty of a felony of the second degree if in any official proceeding:

- (1) He makes a false material statement under oath or affirmation or swears or affirms the truth of a material statement previously made and he does not believe the statement to be true; or

76-8-503. False or inconsistent statements.

(1) Except as provided in Subsection (2), a person is guilty of a class B misdemeanor if:
(a) the person makes a false statement under oath or affirmation or swears or affirms the truth of the statement previously made and the person does not believe the statement to be true if:

(i) the falsification occurs in an official proceeding, or is made with a purpose to mislead a public servant in performing the public servant's official functions;

76-8-504. Written false statement.

A person is guilty of a class B misdemeanor if:

(2) With intent to deceive a public servant in the performance of his official function, he:

(a) Makes any written false statement which he does not believe to be true; or

76-8-506. Providing false information to law enforcement officers, government agencies, or specified professionals.

A person is guilty of a class B misdemeanor if he:

(1) knowingly gives or causes to be given false information to any peace officer or any state or local government agency or personnel with a purpose of inducing the recipient of the information to believe that another has committed an offense;

(2) knowingly gives or causes to be given to any peace officer, any state or local government agency or personnel, or to any person licensed in this state to practice social work, psychology, or marriage and family therapy, information concerning the commission of an offense, knowing that the offense did not occur or knowing that he has no information relating to the offense or danger; or

76-8-508.3. Retaliation against a witness, victim, or informant.

(1) As used in this section:

(a) A person is "closely associated" with a witness, victim, or informant if the person is a member of the witness', victim's, or informant's family, has a close personal or business relationship with the witness or victim, or resides in the same household with the witness, victim, or informant.

(b) "Harm" means physical, emotional, or economic injury or damage to a person or to his property, reputation, or business interests.

(2) A person is guilty of the third degree felony of retaliation against a witness, victim, or informant if, believing that an official proceeding or investigation is pending, is about to be instituted, or has been concluded, he:

(a) (i) makes a threat of harm; or

(ii) causes harm; and

(b) directs the threat or action:

(i) against a witness or an informant regarding any official proceeding, a victim of any crime, or any person closely associated with a witness, victim, or informant; and

(ii) as retaliation or retribution against the witness, victim, or informant

(3) This section does not prohibit any person from seeking any legal redress to which the person is otherwise entitled.