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Electronically Filed
FIRST CIRCUIT
1CPC-24-0000150
14-FEB-2024
12:46 PM
Dkt. 1 IND

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAI'I

STATE OF HAWAI'I

v.

BRANDY BLAS,
THOMAS BLAS SR.,
DEBRA GERON,

Defendants.

CASE NO. 1CPC-24-0000150

COUNT 1:

MURDER IN THE SECOND DEGREE
(§707-701.5, 706-656, 702-203, and 663-1.6
HRS)

COUNT 2:

MURDER IN THE SECOND DEGREE
(§707-701.5, 706-656, 702-203, and 663-1.6
HRS)

COUNT 3:

KIDNAPPING
(§707-720(1)(d) and/or 707-720(1)(e) HRS)

COUNT 4

KIDNAPPING
(§707-720(1)(d) and/or 707-720(1)(e) HRS)

COUNT 5:

CONSPIRACY TO COMMIT
KIDNAPPING
(§705-520, 707-720(1)(d) and/or 707-
720(1)(e) HRS)

COUNT 6:

CONSPIRACY TO COMMIT
KIDNAPPING
(§705-520, 707-720(1)(d) and/or 707-
720(1)(e) HRS)

COUNT 7:

CONSPIRACY TO COMMIT
KIDNAPPING

(§705-520, 707-720(1)(d) and/or 707-720(1)(e) HRS)

COUNT 8:

UNLAWFUL IMPRISONMENT IN THE FIRST DEGREE

(§707-721 HRS)

COUNT 9:

UNLAWFUL IMPRISONMENT IN THE FIRST DEGREE

(§707-721 HRS)

COUNT 10:

CONSPIRACY TO COMMIT

UNLAWFUL IMPRISONMENT IN THE FIRST DEGREE

(§705-520, 707-721 HRS)

COUNT 11:

CONSPIRACY TO COMMIT

UNLAWFUL IMPRISONMENT IN THE FIRST DEGREE

(§705-520, 707-721 HRS)

COUNT 12:

CONSPIRACY TO COMMIT

UNLAWFUL IMPRISONMENT IN THE FIRST DEGREE

(§705-520, 707-721 HRS)

COUNT 13:

ENDANGERING THE WELFARE OF A MINOR IN THE FIRST DEGREE

(§709-903.5(1)(a) HRS)

COUNT 14:

ENDANGERING THE WELFARE OF A MINOR IN THE FIRST DEGREE

(§709-903.5(1)(a) HRS)

COUNT 15:

HINDERING PROSECUTION IN THE FIRST DEGREE

(§710-1029 and 710-1028(5) HRS)

COUNT 16:

HINDERING PROSECUTION IN THE FIRST DEGREE

(§710-1029 and 710-1028(5) HRS)

COUNT 17:

ENDANGERING THE WELFARE OF A MINOR IN THE SECOND DEGREE

(§709-904(2)HRS)

COUNT 18:

PERSISTENT NONSUPPORT
(§709-903(1) HRS)

COUNT 19:

PERSISTENT NONSUPPORT
(§709-903(1) HRS)

INDICTMENT

INDICTMENT

The Grand Jury charges:

COUNT 1: On or about January 16, 2024, to and including January 18, 2024, in the City and County of Honolulu, State of Hawaii, BRANDY BLAS and/or THOMAS BLAS SR. and being the parents or guardians or any other persons having legal or physical custody of G.B. (2013), did intentionally or knowingly cause the death of G.B. (2013), a person less than eighteen years of age, by intentionally or knowingly inflicting injury on G.B. (2013) and/or by intentionally or knowingly omitting to perform a duty imposed by law, to wit, BRANDY BLAS and/or THOMAS BLAS SR., while at the scene of a crime, and knowing that G.B. (2013), the subject of the crime was suffering from serious physical harm, did intentionally or knowingly fail to obtain or attempt to obtain aid from law enforcement or medical personnel though BRANDY BLAS and/or THOMAS BLAS SR. could have done so without danger or peril to any person, thereby committing the offense of Murder in the Second Degree in violation of Sections 707-701.5, 706-656, 702-203, and 663-1.6 of Hawaii Revised Statutes.

BRANDY BLAS is subject to sentencing in accordance with Section 706-657 of the Hawaii Revised Statutes where the murder was especially heinous, atrocious, or cruel, manifesting exceptional depravity. The phrase "especially heinous, atrocious, or cruel, manifesting exceptional depravity" means a conscienceless or pitiless crime which is unnecessarily torturous to a victim.

If convicted of this offense or any included felony offense, BRANDY BLAS may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that he is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

THOMAS BLAS SR., is subject to sentencing in accordance with Section 706-657 of the Hawaii Revised Statutes where the murder was especially heinous, atrocious, or cruel, manifesting exceptional depravity. The phrase "especially heinous, atrocious, or cruel, manifesting exceptional depravity" means a conscienceless or pitiless crime which is unnecessarily torturous to a victim.

If convicted of this offense or any included felony offense, THOMAS BLAS SR., may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that he is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 2: On or about January 16, 2024 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, DEBRA GERON, did intentionally or knowingly cause the death of G.B. (2013), by intentionally or knowingly inflicting injury on G.B. (2013) and/or by intentionally or knowingly omitting to perform a duty imposed by law, to wit, DEBRA GERON, while at the scene of a crime, and knowing that G.B. (2013), the subject of the crime was suffering from serious physical harm, did intentionally or knowingly fail to obtain or attempt to obtain aid from law enforcement or medical personnel though DEBRA GERON could have done so without danger or peril to any person, thereby committing the offense of Murder in the

Second Degree in violation of Sections 707-701.5, 706-656, 702-203, and 663-1.6 of Hawaii Revised Statutes.

DEBRA GERON is subject to sentencing in accordance with Section 706-657 of the Hawaii Revised Statutes where the murder was especially heinous, atrocious, or cruel, manifesting exceptional depravity. The phrase "especially heinous, atrocious, or cruel, manifesting exceptional depravity" means a conscienceless or pitiless crime which is unnecessarily torturous to a victim.

If convicted of this offense or any included felony offense, DEBRA GERON may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that he is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 3: On or about May 9, 2023 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, BRANDY BLAS and/or THOMAS BLAS SR. being the parent or guardian or any other person having legal or physical custody of G.B. (2013), did intentionally and or knowingly restrain G.B. (2013), a person less than eighteen years of age, with the intent to terrorize G.B. (2013), and/or with intent to inflict bodily injury upon G.B. (2013) thereby committing the offense of Kidnapping, in violation of Section 707-720(1)(d) and/or 707-720(1)(e) of the Hawaii Revised Statutes.

“Restrain” means to restrict a person’s movement in such a manner as to interfere substantially with the person’s liberty.

If convicted of this offense or any included felony offense, BRANDY BLAS, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the

Hawai‘i Revised Statutes where she is a multiple offender in that she is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

If convicted of this offense or any included felony offense, THOMAS BLAS SR., may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai‘i Revised Statutes where they are a multiple offender in that they are being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 4: On May 9, 2023 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, DEBRA GERON, did intentionally or knowingly restrain G.B. (2013), with the intent to terrorize G.B. (2013), and/or with intent to inflict bodily injury upon G.B. (2013), thereby committing the offense of Kidnapping, in violation of Section 707-720(1)(d) and/or 707-720(1)(e) of the Hawaii Revised Statutes.

“Restrain” means to restrict a person’s movement in such a manner as to interfere substantially with the person’s liberty.

If convicted of this offense or any included felony offense, DEBRA GERON, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai‘i Revised Statutes where they are a multiple offender in that they are being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 5: On or about October 1, 2022 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, BRANDY BLAS, with the intent to promote or facilitate the commission of a crime, to wit, Kidnapping, did agree with co-conspirator

THOMAS BLAS SR. and/or co-conspirator DEBRA GERON, that they or one or more of them would engage in and/or solicit the conduct and/or solicit the result specified by the definition of the offense of Kidnapping, as defined by Section 707-720(1)(d) and/or 707-720(1)(e) of the Hawaii Revised Statutes.

BRANDY BLAS commits the offense of Kidnapping if she did intentionally and or knowingly restrain G.B. (2013), with the intent to terrorize G.B. (2013), and/or with intent to inflict bodily injury upon G.B. (2013).

1. It was part of said conspiracy that the Defendants and co-conspirators would intentionally or knowingly restrain G.B. (2013) with the intent to terrorize her and/or inflict bodily injury upon her.

2. It was further a part of said conspiracy the Defendant and co-conspirators would conceal the existence of the conspiracy and would take steps designed to prevent disclosure of their activities.

In furtherance of the conspiracy and to the effect of the objects thereof, the following overt acts were committed on or about October 1, 2022 to and including January 18, 2024, with the City and County of Honolulu, State of Hawaii:

OVERT ACTS

1. At all relevant times, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were the legal guardians of G.B. (2013). Co-conspirator Defendant BRANDY BLAS lives at 33 Karsten Drive located in the City and County of Honolulu with her husband, co-conspirator Defendant THOMAS BLAS SR., her mother, co-conspirator Defendant DEBRA GERON, and her father William Geron.

2. The house located at 33 Karsten Drive is approximately eight hundred and thirty seven (837) square feet (pursuant to the Honolulu City and County Tax Map), has three bedrooms and two bathrooms, and as of January 18, 2024, housed six (6) minor children and four (4) adults.
3. Attached to the kitchen, and immediately next to the refrigerator, is a, small, covered, enclosed room-like structure, approximately seven (7) feet in length and three (3) feet and ten (10) inches wide. The structure appears to have been porch that is now enclosed by four walls and a roof. It has two doors, one that opens into the kitchen and another that opens into the back laundry area.
4. During the month of October of the year 2022, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. withdrew G.B. (2013) from Iliahi Elementary School under the guise that they were going to homeschool her. The decision to withdraw G.B. (2013) was against the opinions of both G.B.'s (2013) third grade teacher and school counselor.
5. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in the exchange of messages that appear to reference G.B. (2013) and the various methods in which they would restrict her physical movement, interfere with her liberties, and deny access to sufficient basic necessities.
6. The methods referenced in the text message include, but are not limited to the following: feeding her minimally and/or denying her food and water, getting rid of her waste, tying her up, keeping her confined in the small structure described in paragraph 3,

watching/communicating with her via surveillance while she was bound, providing minimal care for her, and punishing her using physical force.

7. The texts included back and forth messages regarding the following: having G.B. (2013) defecate in a bucket, giving her water only during specified times of the day, withholding water if she would urinate too much, who would tend to cleaning her area, feeding her food that was almost expired, withholding food if G.B. (2013) was not compliant, sleeping when she had been told to stand, tying her hands in specific ways (i.e. front or back), G.B. (2103) asking not to have her hands tied in the style of a strait jacket, threats to G.B. (2103) including striking her and/or using violence against her if she talked or made noises, G.B. (2013) trying to get “out,” hiding G.B. (2013) when workers would come to the residence, putting a box over her head, having her sleep in a box, and “shooting” her.
8. Texts also included back and forth messages regarding co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON’s viewing of G.B. (2013) from an unknown surveillance system. Based on the messages between co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON the surveillance system appeared to be accessible to co-conspirator Defendant BRANDY BLAS.
9. A Review of images recovered from co-conspirator Defendant BRANDY BLAS’s and co-conspirator Defendant DEBRA GERON’s cellular phones indicate that surveillance systems were accessible to them via their cellular phones and that they discussed the systems and G.B.’s (2013) movements on the systems.

10. Co-conspirator Defendant THOMAS BLAS SR. was the named person for the login information of at least one of the home surveillance systems used by co-conspirator Defendant BRANDY BLAS, to watch G.B. (2013) who was in the room located off their kitchen (as described in paragraph 3).
11. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a series of text messages that appear to reference G.B. (2013) and instructions for co-conspirator Defendant THOMAS BLAS SR. to take specific actions. The instructions to co-conspirator Defendant THOMAS BLAS SR. include, but are not limited to the following actions: to ignore G.B. (2013), to put G.B.'s (2013) hands a certain way, clean out G.B.'s (2013) toilet, and to check on G.B. (2013) and the box in which she was sleeping.
12. From at least October 10, 2018 through January 18, 2024, co-conspirator Defendant THOMAS BLAS SR., as a legal guardian of G.B. (2013), would often appear on zoom therapy visits with G.B.'s (2013) psychiatrist when co-conspirator Defendant BRANDY BLAS could not attend. At times he would appear for the therapy sessions by himself without G.B. (2013). Each session would last approximately fifteen minutes and G.B. (2013) appears to have never attended a session alone.
13. On or about July 15, 2023 to and including July 16, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON exchanged a photo of what appears to be G.B. (2013) bound with what appears to be duct tape in a small enclosed area with white and green painted interior walls. G.B. (2013) has duct tape around her arms and torso binding them to her sides and her hands are behind her. G.B.'s (2013) eyes have a black covering duct taped to her head. The duct tape is wrapped

around her eyes and forehead area as well as over the top of her head. G.B. (2013) is wearing a yellow crop top shirt with no sleeves and lavender bottoms. There are apparent injuries to G.B.'s (2013) shoulders and lower face.

14. On that date, after the photo was sent, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a discussion about whose idea it was to tie G.B. (2013) up that way.
15. An image was recovered from co-conspirator Defendant BRANDY BLAS' phone, which appears to be dated January 13, 2024, and shows a screenshot of a surveillance system managed via the Geeni mobile application. Geeni appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and has the login credentials of co-conspirator Defendant THOMAS BLAS SR. The image shows what appears to be G.B. (2013) wearing a long sleeve purple shirt with some type of yellow covering over her head. The yellow covering is wrapped with duct tape around G.B.'s (2013) head. G.B. (2013) appears to be in the structure accessed from the kitchen (as described in paragraph 3). G.B. (2013) is facing one of the walls in a standing position. In front of G.B. (2013) on the ground is a bucket. A male that appears to be co-conspirator Defendant THOMAS BLAS SR. standing in front of G.B. (2013). The date and time stamp in the upper left corner of the image display "2024-01-13 07:05:02". Metadata from the image indicates that the image was created on January 13, 2024 at 7:05:07 AM and subsequently deleted from the device on January 13, 2024 at 7:36:27 AM.
16. An image recovered from co-conspirator Defendant BRANDY BLAS's phone, which appears to be dated January 16, 2024, shows a screenshot of a surveillance system known as Geeni. This appears to be accessed from co-conspirator Defendant BRANDY BLAS's

phone and also has the login credentials of co-conspirator Defendant THOMAS BLAS SR. It is a black and white image of what appears to be G.B. (2013) standing in the structure off of the kitchen, as described in paragraph 3. G.B. (2013) has what appears to be duct tape wrapped around her head. G.B. (2013) is in a standing position with her head facing the ground. It also appears that G.B.'s (2013) hands may be bound behind her back. The date and time stamp in the upper left corner of the image display "2024-01-16 20:15:09". Metadata from image indicates that the image was created on January 16, 2024 at 8:15:14 PM and then deleted from the device on January 18, 2024 at 9:05:30 AM.

17. On or about November 14, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR., engaged in text messaging regarding the sleeping conditions of G.B. (2013). Specifically that they needed "another bucket for idiot to sleep in the bucket broke."
18. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, did not immediately notify police and/or emergency services when they found G.B. (2013) unresponsive.
19. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS, while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, participated in giving Emergency Management Services and Honolulu Fire Department Workers an inaccurate account about where G.B. (2013) lived, slept, and the true nature of her

condition, despite knowing that she was kept bound and in the room off of their kitchen (as described in paragraph 3).

20. After police arrival at 8:35 a.m., co-conspirator Defendant DEBRA GERON appeared to have deleted all text messages and photos between herself and co-conspirator Defendant BRANDY BLAS.
21. A review of BRANDY BLAS' phone between January 22, 2024 and January 24, 2024 showed none of the text messages between co-conspirator DEBRA GERON and herself, and appear to have been deleted.
22. Between January 1, 2024 and January 18, 2024, co-conspirator Defendant BRANDY BLAS, co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, failed to obtain medical treatment for G.B. (2013) even after G.B. (2013) sustained a large avulsion to the bridge of her nose.
23. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. failed to obtain regular medical and dental care for G.B. (2013) and/or medical treatment for specific conditions such as the open sores found on her body on January 18, 2024, and conditions related to lack of nutrition.
24. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were receiving approximately \$1,961.00 per month from the State of Hawaii for G.B. (2013). A review of a bank statement dated August 14, 2023 in conjunction with recovered text messages between all co-conspirator Defendants demonstrate agreements and plans regarding the purchase of various foods and eating at restaurants. The residence at 33 Karsten Drive on January 18, 2024 possessed a sufficient food supply to feed many people.

25. From January 18, 2024 and to date January 22, 2024 co-conspirator Defendant BRANDY BLAS, along with co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, as well as three (3) of the biological minor children of co-conspirator Defendants BRANDY BLAS and THOMAS BLAS SR. have persisted in the same narrative about G.B. (2013). The narrative consists of statements that G.B. (2013) suffered from behavioral issues, but was nonetheless treated well, treated the same as the other children, that she was very active, and that she slept, ate, and played normally, as well as played with the other children.

Therefore, Defendant BRANDY BLAS has committed the offense of Conspiracy to Commit Kidnapping, a class B felony, in violation of sections 705-520 and 707-720(1)(d) and 707-720(1)(e) of the Hawai'i Revised Statutes

If convicted of this offense or any included felony offense, BRANDY BLAS, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that she is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 6: On or about October 1, 2022, to and including January 18, 2024, in the City and County of Honolulu, State of Hawaii, THOMAS BLAS SR., with the intent to promote or facilitate the commission of a crime, to wit, Kidnapping, did agree with co-conspirator DEBRA GERON and/or co-conspirator BRANDY BLAS, that they or one or more of them would engage in and/or solicit the conduct and/or solicit the result specified by the definition of the offense of Kidnapping, as defined by Section in violation of Section 707-720(1)(d) and/or 707-720(1)(e) of the Hawaii Revised Statutes.

THOMAS BLAS SR., commits the offense of Kidnapping if he intentionally or knowingly restrains G.B. (2013), with the intent to terrorize her, and/or with intent to inflict bodily injury upon her.

1. It was part of said conspiracy that the Defendants and co-conspirators would knowingly restrain G.B. (2013) for the purposes of terrorize and/or inflict bodily injury upon G.B. (2013).

2. It was further a part of said conspiracy the Defendant and co-conspirators would conceal the existence of the conspiracy and would take steps designed to prevent disclosure of their activities.

In furtherance of the conspiracy and to the effect of the objects thereof, the following overt acts were committed on or about October 1, 2022 to and including January 18, 2024, with the City and County of Honolulu, State of Hawaii:

OVERT ACTS

1. At all relevant times, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were the legal guardians of G.B. (2013). Co-conspirator Defendant BRANDY BLAS lives at 33 Karsten Drive located in the City and County of Honolulu with her husband, co-conspirator Defendant THOMAS BLAS SR., her mother, co-conspirator Defendant DEBRA GERON, and her father William Geron.
2. The house located at 33 Karsten Drive is approximately eight hundred and thirty seven (837) square feet (pursuant to the Honolulu City and County Tax Map), has three bedrooms and two bathrooms, and as of January 18, 2024, housed six (6) minor children and four (4) adults.

3. Attached to the kitchen, and immediately next to the refrigerator, is a, small, covered, enclosed room-like structure, approximately seven (7) feet in length and three (3) feet and ten (10) inches wide. The structure appears to have been porch that is now enclosed by four walls and a roof. It has two doors, one that opens into the kitchen and another that opens into the back laundry area.
4. During the month of October of the year 2022, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. withdrew G.B. (2013) from Iliahi Elementary School under the guise that they were going to homeschool her. The decision to withdraw G.B. (2013) was against the opinions of both G.B.'s (2013) third grade teacher and school counselor.
5. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in the exchange of messages that appear to reference G.B. (2013) and the various methods in which they would restrict her physical movement, interfere with her liberties, and deny access to sufficient basic necessities.
6. The methods referenced in the text message include, but are not limited to the following: feeding her minimally and/or denying her food and water, getting rid of her waste, tying her up, keeping her confined in the small structure described in paragraph 3, watching/communicating with her via surveillance while she was bound, providing minimal care for her, and punishing her using physical force.
7. The texts included back and forth messages regarding the following: having G.B. (2013) defecate in a bucket, giving her water only during specified times of the day, withholding water if she would urinate too much, who would tend to cleaning her area, feeding her

food that was almost expired, withholding food if G.B. (2013) was not compliant, sleeping when she had been told to stand, tying her hands in specific ways (i.e. front or back), G.B. (2103) asking not to have her hands tied in the style of a strait jacket, threats to G.B. (2103) including striking her and/or using violence against her if she talked or made noises, G.B. (2013) trying to get “out,” hiding G.B. (2013) when workers would come to the residence, putting a box over her head, having her sleep in a box, and “shooting” her.

8. Texts also included back and forth messages regarding co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON’s viewing of G.B. (2013) from an unknown surveillance system. Based on the messages between co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON the surveillance system appeared to be accessible to co-conspirator Defendant BRANDY BLAS.
9. A Review of images recovered from co-conspirator Defendant BRANDY BLAS’s and co-conspirator Defendant DEBRA GERON’s cellular phones indicate that surveillance systems were accessible to them via their cellular phones and that they discussed the systems and G.B.’s (2013) movements on the systems.
10. Co-conspirator Defendant THOMAS BLAS SR. was the named person for the login information of at least one of the home surveillance systems used by co-conspirator Defendant BRANDY BLAS, to watch G.B. (2013) who was in the room located off their kitchen (as described in paragraph 3).
11. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a series

of text messages that appear to reference G.B. (2013) and instructions for co-conspirator Defendant THOMAS BLAS SR. to take specific actions. The instructions to co-conspirator Defendant THOMAS BLAS SR. include, but are not limited to the following actions: to ignore G.B. (2013), to put G.B.'s (2013) hands a certain way, clean out G.B.'s (2013) toilet, and to check on G.B. (2013) and the box in which she was sleeping.

12. From at least October 10, 2018 through January 18, 2024, co-conspirator Defendant THOMAS BLAS SR., as a legal guardian of G.B. (2013), would often appear on zoom therapy visits with G.B.'s (2013) psychiatrist when co-conspirator Defendant BRANDY BLAS could not attend. At times he would appear for the therapy sessions by himself without G.B. (2013). Each session would last approximately fifteen minutes and G.B. (2013) appears to have never attended a session alone.
13. On or about July 15, 2023 to and including July 16, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON exchanged a photo of what appears to be G.B. (2013) bound with what appears to be duct tape in a small enclosed area with white and green painted interior walls. G.B. (2013) has duct tape around her arms and torso binding them to her sides and her hands are behind her. G.B.'s (2013) eyes have a black covering duct taped to her head. The duct tape is wrapped around her eyes and forehead area as well as over the top of her head. G.B. (2013) is wearing a yellow crop top shirt with no sleeves and lavender bottoms. There are apparent injuries to G.B.'s (2013) shoulders and lower face.
14. On that date, after the photo was sent, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a discussion about whose idea it was to tie G.B. (2013) up that way.

15. An image was recovered from co-conspirator Defendant BRANDY BLAS' phone, which appears to be dated January 13, 2024, and shows a screenshot of a surveillance system managed via the Geeni mobile application. Geeni appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and has the login credentials of co-conspirator Defendant THOMAS BLAS SR. The image shows what appears to be G.B. (2013) wearing a long sleeve purple shirt with some type of yellow covering over her head. The yellow covering is wrapped with duct tape around G.B.'s (2013) head. G.B. (2013) appears to be in the structure accessed from the kitchen (as described in paragraph 3). G.B. (2013) is facing one of the walls in a standing position. In front of G.B. (2013) on the ground is a bucket. A male that appears to be co-conspirator Defendant THOMAS BLAS SR. standing in front of G.B. (2013). The date and time stamp in the upper left corner of the image display "2024-01-13 07:05:02". Metadata from the image indicates that the image was created on January 13, 2024 at 7:05:07 AM and subsequently deleted from the device on January 13, 2024 at 7:36:27 AM.
16. An image recovered from co-conspirator Defendant BRANDY BLAS's phone, which appears to be dated January 16, 2024, shows a screenshot of a surveillance system known as Geeni. This appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and also has the login credentials of co-conspirator Defendant THOMAS BLAS SR. It is a black and white image of what appears to be G.B. (2013) standing in the structure off of the kitchen, as described in paragraph 3. G.B. (2013) has what appears to be duct tape wrapped around her head. G.B. (2013) is in a standing position with her head facing the ground. It also appears that G.B.'s (2013) hands may be bound behind her back. The date and time stamp in the upper left corner of the image display "2024-01-16

20:15:09". Metadata from image indicates that the image was created on January 16, 2024 at 8:15:14 PM and then deleted from the device on January 18, 2024 at 9:05:30 AM.

17. On or about November 14, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR., engaged in text messaging regarding the sleeping conditions of G.B. (2013). Specifically that they needed "another bucket for idiot to sleep in the bucket broke."
18. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, did not immediately notify police and/or emergency services when they found G.B. (2013) unresponsive.
19. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS, while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, participated in giving Emergency Management Services and Honolulu Fire Department Workers an inaccurate account about where G.B. (2013) lived, slept, and the true nature of her condition, despite knowing that she was kept bound and in the room off of their kitchen (as described in paragraph 3).
20. After police arrival at 8:35 a.m., co-conspirator Defendant DEBRA GERON appeared to have deleted all text messages and photos between herself and co-conspirator Defendant BRANDY BLAS.

21. A review of BRANDY BLAS' phone between January 22, 2024 and January 24, 2024 showed none of the text messages between co-conspirator DEBRA GERON and herself, and appear to have been deleted.
22. Between January 1, 2024 and January 18, 2024, co-conspirator Defendant BRANDY BLAS, co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, failed to obtain medical treatment for G.B. (2013) even after G.B. (2013) sustained a large avulsion to the bridge of her nose.
23. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. failed to obtain regular medical and dental care for G.B. (2013) and/or medical treatment for specific conditions such as the open sores found on her body on January 18, 2024, and conditions related to lack of nutrition.
24. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were receiving approximately \$1,961.00 per month from the State of Hawaii for G.B. (2013). A review of a bank statement dated August 14, 2023 in conjunction with recovered text messages between all co-conspirator Defendants demonstrate agreements and plans regarding the purchase of various foods and eating at restaurants. The residence at 33 Karsten Drive on January 18, 2024 possessed a sufficient food supply to feed many people.
25. From January 18, 2024 and to date January 22, 2024 co-conspirator Defendant BRANDY BLAS, along with co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, as well as three (3) of the biological minor children of co-conspirator Defendants BRANDY BLAS and THOMAS BLAS SR. have persisted in the same narrative about G.B. (2013). The narrative consists of statements that G.B. (2013)

suffered from behavioral issues, but was nonetheless treated well, treated the same as the other children, that she was very active, and that she slept, ate, and played normally, as well as played with the other children.

Therefore, Defendant THOMAS BLAS SR. has committed the offense of Conspiracy to Commit Kidnapping, a class B felony, in violation of sections 705-520 and 707-720(1)(d) and 707-720(1)(e) of the Hawai'i Revised Statutes

If convicted of this offense or any included felony offense, THOMAS BLAS SR., may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where he is a multiple offender in that he is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 7: On October 1, 2022 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, DEBRA GERON, with the intent to promote or facilitate the commission of a crime, to wit, Kidnapping, did agree with co-conspirator THOMAS BLAS SR. and/or co-conspirator BRANDY BLAS, that they or one or more of them would engage in and/or solicit the conduct and/or solicit the result specified by the definition of the offense of Kidnapping, as defined by Section in violation of Section 707-720(1)(d) and/or 707-720(1)(e) of the Hawaii Revised Statutes.

DEBRA GERON commits the offense of Kidnapping if she intentionally or knowingly restrains G.B. (2013), with the intent to terrorize her and/or with intent to inflict bodily injury upon her.

1. It was part of said conspiracy that the Defendants and co-conspirators would intentionally or knowingly restrain G.B. (2013) with the intent to terrorize and/or inflict bodily injury upon her.

2. It was further a part of said conspiracy the Defendant and co-conspirators would conceal the existence of the conspiracy and would take steps designed to prevent disclosure of their activities.

In furtherance of the conspiracy and to the effect of the objects thereof, the following overt acts were committed on or about October 1, 2022 to and including January 18, 2024, with the City and County of Honolulu, State of Hawaii:

OVERT ACTS

1. At all relevant times, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were the legal guardians of G.B. (2013). Co-conspirator Defendant BRANDY BLAS lives at 33 Karsten Drive located in the City and County of Honolulu with her husband, co-conspirator Defendant THOMAS BLAS SR., her mother, co-conspirator Defendant DEBRA GERON, and her father William Geron.
2. The house located at 33 Karsten Drive is approximately eight hundred and thirty seven (837) square feet (pursuant to the Honolulu City and County Tax Map), has three bedrooms and two bathrooms, and as of January 18, 2024, housed six (6) minor children and four (4) adults.
3. Attached to the kitchen, and immediately next to the refrigerator, is a, small, covered, enclosed room-like structure, approximately seven (7) feet in length and three (3) feet and ten (10) inches wide. The structure appears to have been porch that is now enclosed by

four walls and a roof. It has two doors, one that opens into the kitchen and another that opens into the back laundry area.

4. During the month of October of the year 2022, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. withdrew G.B. (2013) from Iliahi Elementary School under the guise that they were going to homeschool her. The decision to withdraw G.B. (2013) was against the opinions of both G.B.'s (2013) third grade teacher and school counselor.
5. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in the exchange of messages that appear to reference G.B. (2013) and the various methods in which they would restrict her physical movement, interfere with her liberties, and deny access to sufficient basic necessities.
6. The methods referenced in the text message include, but are not limited to the following: feeding her minimally and/or denying her food and water, getting rid of her waste, tying her up, keeping her confined in the small structure described in paragraph 3, watching/communicating with her via surveillance while she was bound, providing minimal care for her, and punishing her using physical force.
7. The texts included back and forth messages regarding the following: having G.B. (2013) defecate in a bucket, giving her water only during specified times of the day, withholding water if she would urinate too much, who would tend to cleaning her area, feeding her food that was almost expired, withholding food if G.B. (2013) was not compliant, sleeping when she had been told to stand, tying her hands in specific ways (i.e. front or back), G.B. (2103) asking not to have her hands tied in the style of a strait jacket, threats

to G.B. (2103) including striking her and/or using violence against her if she talked or made noises, G.B. (2013) trying to get “out,” hiding G.B. (2013) when workers would come to the residence, putting a box over her head, having her sleep in a box, and “shooting” her.

8. Texts also included back and forth messages regarding co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON’s viewing of G.B. (2013) from an unknown surveillance system. Based on the messages between co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON the surveillance system appeared to be accessible to co-conspirator Defendant BRANDY BLAS.
9. A Review of images recovered from co-conspirator Defendant BRANDY BLAS’s and co-conspirator Defendant DEBRA GERON’s cellular phones indicate that surveillance systems were accessible to them via their cellular phones and that they discussed the systems and G.B.’s (2013) movements on the systems.
10. Co-conspirator Defendant THOMAS BLAS SR. was the named person for the login information of at least one of the home surveillance systems used by co-conspirator Defendant BRANDY BLAS, to watch G.B. (2013) who was in the room located off their kitchen (as described in paragraph 3).
11. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a series of text messages that appear to reference G.B. (2013) and instructions for co-conspirator Defendant THOMAS BLAS SR. to take specific actions. The instructions to co-conspirator Defendant THOMAS BLAS SR. include, but are not limited to the following

actions: to ignore G.B. (2013), to put G.B.'s (2013) hands a certain way, clean out G.B.'s (2013) toilet, and to check on G.B. (2013) and the box in which she was sleeping.

12. From at least October 10, 2018 through January 18, 2024, co-conspirator Defendant THOMAS BLAS SR., as a legal guardian of G.B. (2013), would often appear on zoom therapy visits with G.B.'s (2013) psychiatrist when co-conspirator Defendant BRANDY BLAS could not attend. At times he would appear for the therapy sessions by himself without G.B. (2013). Each session would last approximately fifteen minutes and G.B. (2013) appears to have never attended a session alone.
13. On or about July 15, 2023 to and including July 16, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON exchanged a photo of what appears to be G.B. (2013) bound with what appears to be duct tape in a small enclosed area with white and green painted interior walls. G.B. (2013) has duct tape around her arms and torso binding them to her sides and her hands are behind her. G.B.'s (2013) eyes have a black covering duct taped to her head. The duct tape is wrapped around her eyes and forehead area as well as over the top of her head. G.B. (2013) is wearing a yellow crop top shirt with no sleeves and lavender bottoms. There are apparent injuries to G.B.'s (2013) shoulders and lower face.
14. On that date, after the photo was sent, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a discussion about whose idea it was to tie G.B. (2013) up that way.
15. An image was recovered from co-conspirator Defendant BRANDY BLAS' phone, which appears to be dated January 13, 2024, and shows a screenshot of a surveillance system managed via the Geeni mobile application. Geeni appears to be accessed from co-

conspirator Defendant BRANDY BLAS's phone and has the login credentials of co-conspirator Defendant THOMAS BLAS SR. The image shows what appears to be G.B. (2013) wearing a long sleeve purple shirt with some type of yellow covering over her head. The yellow covering is wrapped with duct tape around G.B.'s (2013) head. G.B. (2013) appears to be in the structure accessed from the kitchen (as described in paragraph 3). G.B. (2013) is facing one of the walls in a standing position. In front of G.B. (2013) on the ground is a bucket. A male that appears to be co-conspirator Defendant THOMAS BLAS SR. standing in front of G.B. (2013). The date and time stamp in the upper left corner of the image display "2024-01-13 07:05:02". Metadata from the image indicates that the image was created on January 13, 2024 at 7:05:07 AM and subsequently deleted from the device on January 13, 2024 at 7:36:27 AM.

16. An image recovered from co-conspirator Defendant BRANDY BLAS's phone, which appears to be dated January 16, 2024, shows a screenshot of a surveillance system known as Geeni. This appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and also has the login credentials of co-conspirator Defendant THOMAS BLAS SR. It is a black and white image of what appears to be G.B. (2013) standing in the structure off of the kitchen, as described in paragraph 3. G.B. (2013) has what appears to be duct tape wrapped around her head. G.B. (2013) is in a standing position with her head facing the ground. It also appears that G.B.'s (2013) hands may be bound behind her back. The date and time stamp in the upper left corner of the image display "2024-01-16 20:15:09". Metadata from image indicates that the image was created on January 16, 2024 at 8:15:14 PM and then deleted from the device on January 18, 2024 at 9:05:30 AM.

17. On or about November 14, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR., engaged in text messaging regarding the sleeping conditions of G.B. (2013). Specifically that they needed “another bucket for idiot to sleep in the bucket broke.”
18. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, did not immediately notify police and/or emergency services when they found G.B. (2013) unresponsive.
19. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS, while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, participated in giving Emergency Management Services and Honolulu Fire Department Workers an inaccurate account about where G.B. (2013) lived, slept, and the true nature of her condition, despite knowing that she was kept bound and in the room off of their kitchen (as described in paragraph 3).
20. After police arrival at 8:35 a.m., co-conspirator Defendant DEBRA GERON appeared to have deleted all text messages and photos between herself and co-conspirator Defendant BRANDY BLAS.
21. A review of BRANDY BLAS’ phone between January 22, 2024 and January 24, 2024 showed none of the text messages between co-conspirator DEBRA GERON and herself, and appear to have been deleted.

22. Between January 1, 2024 and January 18, 2024, co-conspirator Defendant BRANDY BLAS, co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, failed to obtain medical treatment for G.B. (2013) even after G.B. (2013) sustained a large avulsion to the bridge of her nose.
23. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. failed to obtain regular medical and dental care for G.B. (2013) and/or medical treatment for specific conditions such as the open sores found on her body on January 18, 2024, and conditions related to lack of nutrition.
24. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were receiving approximately \$1,961.00 per month from the State of Hawaii for G.B. (2013). A review of a bank statement dated August 14, 2023 in conjunction with recovered text messages between all co-conspirator Defendants demonstrate agreements and plans regarding the purchase of various foods and eating at restaurants. The residence at 33 Karsten Drive on January 18, 2024 possessed a sufficient food supply to feed many people.
25. From January 18, 2024 and to date January 22, 2024 co-conspirator Defendant BRANDY BLAS, along with co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, as well as three (3) of the biological minor children of co-conspirator Defendants BRANDY BLAS and THOMAS BLAS SR. have persisted in the same narrative about G.B. (2013). The narrative consists of statements that G.B. (2013) suffered from behavioral issues, but was nonetheless treated well, treated the same as the other children, that she was very active, and that she slept, ate, and played normally, as well as played with the other children.

Therefore, Defendant DEBRA GERON has committed the offense of Conspiracy to Commit Kidnapping, a class B felony, in violation of Sections 705-520, 707-720(1)(d) and/or 707-720(1)(e) of the Hawaii Revised Statutes.

If convicted of this offense or any included felony offense, DEBRA GERON may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that she is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 8: On or about May 9, 2023, to and including January 18, 2024, in the City and County of Honolulu, State of Hawaii, BRANDY BLAS and THOMAS BLAS SR. being the parent or guardian or any other person have legal or physical custody of G.B. (2013) ,did knowingly restrain G.B. (2013), a person less than eighteen years of age, under circumstances which exposed G.B. (2013) to the risk of serious bodily injury, thereby committing the offense of Unlawful Imprisonment in the First Degree, in violation of Section 707-721 of the Hawai'i Revised Statutes.

“Restrain” means to restrict a person’s movement in such a manner as to interfere substantially with the person’s liberty.

"Serious bodily injury" means bodily injury which creates a substantial risk of death or which causes serious, permanent disfigurement, or protracted loss or impairment of the function of any bodily member or organ.

If convicted of this offense or any included felony offense, BRANDY BLAS, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that he is being sentenced for two

or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

If convicted of this offense or any included felony offense, THOMAS BLAS SR., may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where they are a multiple offender in that they are being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 9: On May 9, 2023 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, DEBRA GERON, did knowingly restrain G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury, thereby committing the offense of Unlawful Imprisonment in the First Degree, in violation of Section 707-721 of the Hawai'i Revised Statutes.

“Restrain” means to restrict a person’s movement in such a manner as to interfere substantially with the person’s liberty.

"Serious bodily injury" means bodily injury which creates a substantial risk of death or which causes serious, permanent disfigurement, or protracted loss or impairment of the function of any bodily member or organ.

If convicted of this offense or any included felony offense, DEBRA GERON, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that he is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 10: On October 1, 2022 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, BRANDY BLAS, with the intent to promote or facilitate the commission of a crime, to wit, Unlawful Imprisonment in the First Degree, did agree with co-conspirator THOMAS BLAS SR. and/or co-conspirator DEBRA GERON, that they or one or more of them would engage in and/or solicit the conduct and/or solicit the result specified by the definition of the offense of Unlawful Imprisonment in the First Degree as defined by Section 707-721 of the Hawai'i Revised Statutes.

BRANDY BLAS commits the offense of Unlawful Imprisonment in the First Degree if she knowingly restrains G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

1. It was part of said conspiracy that the Defendants and co-conspirators would knowingly restrain G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

2. It was further a part of said conspiracy the Defendant and co-conspirators would conceal the existence of the conspiracy and would take steps designed to prevent disclosure of their activities.

In furtherance of the conspiracy and to the effect of the objects thereof, the following overt acts were committed on or about October 1, 2022 to and including January 18, 2024, with the City and County of Honolulu, State of Hawaii:

OVERT ACTS

1. At all relevant times, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were the legal guardians of G.B. (2013). Co-conspirator Defendant BRANDY BLAS lives at 33 Karsten Drive located in the City and County of

Honolulu with her husband, co-conspirator Defendant THOMAS BLAS SR., her mother, co-conspirator Defendant DEBRA GERON, and her father William Geron.

2. The house located at 33 Karsten Drive is approximately eight hundred and thirty seven (837) square feet (pursuant to the Honolulu City and County Tax Map), has three bedrooms and two bathrooms, and as of January 18, 2024, housed six (6) minor children and four (4) adults.
3. Attached to the kitchen, and immediately next to the refrigerator, is a, small, covered, enclosed room-like structure, approximately seven (7) feet in length and three (3) feet and ten (10) inches wide. The structure appears to have been porch that is now enclosed by four walls and a roof. It has two doors, one that opens into the kitchen and another that opens into the back laundry area.
4. During the month of October of the year 2022, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. withdrew G.B. (2013) from Iliahi Elementary School under the guise that they were going to homeschool her. The decision to withdraw G.B. (2013) was against the opinions of both G.B.'s (2013) third grade teacher and school counselor.
5. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in the exchange of messages that appear to reference G.B. (2013) and the various methods in which they would restrict her physical movement, interfere with her liberties, and deny access to sufficient basic necessities.
6. The methods referenced in the text message include, but are not limited to the following: feeding her minimally and/or denying her food and water, getting rid of her waste, tying

her up, keeping her confined in the small structure described in paragraph 3, watching/communicating with her via surveillance while she was bound, providing minimal care for her, and punishing her using physical force.

7. The texts included back and forth messages regarding the following: having G.B. (2013) defecate in a bucket, giving her water only during specified times of the day, withholding water if she would urinate too much, who would tend to cleaning her area, feeding her food that was almost expired, withholding food if G.B. (2013) was not compliant, sleeping when she had been told to stand, tying her hands in specific ways (i.e. front or back), G.B. (2103) asking not to have her hands tied in the style of a strait jacket, threats to G.B. (2103) including striking her and/or using violence against her if she talked or made noises, G.B. (2013) trying to get “out,” hiding G.B. (2013) when workers would come to the residence, putting a box over her head, having her sleep in a box, and “shooting” her.
8. Texts also included back and forth messages regarding co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON’s viewing of G.B. (2013) from an unknown surveillance system. Based on the messages between co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON the surveillance system appeared to be accessible to co-conspirator Defendant BRANDY BLAS.
9. A Review of images recovered from co-conspirator Defendant BRANDY BLAS’s and co-conspirator Defendant DEBRA GERON’s cellular phones indicate that surveillance systems were accessible to them via their cellular phones and that they discussed the systems and G.B.’s (2013) movements on the systems.

10. Co-conspirator Defendant THOMAS BLAS SR. was the named person for the login information of at least one of the home surveillance systems used by co-conspirator Defendant BRANDY BLAS, to watch G.B. (2013) who was in the room located off their kitchen (as described in paragraph 3).
11. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a series of text messages that appear to reference G.B. (2013) and instructions for co-conspirator Defendant THOMAS BLAS SR. to take specific actions. The instructions to co-conspirator Defendant THOMAS BLAS SR. include, but are not limited to the following actions: to ignore G.B. (2013), to put G.B.'s (2013) hands a certain way, clean out G.B.'s (2013) toilet, and to check on G.B. (2013) and the box in which she was sleeping.
12. From at least October 10, 2018 through January 18, 2024, co-conspirator Defendant THOMAS BLAS SR., as a legal guardian of G.B. (2013), would often appear on zoom therapy visits with G.B.'s (2013) psychiatrist when co-conspirator Defendant BRANDY BLAS could not attend. At times he would appear for the therapy sessions by himself without G.B. (2013). Each session would last approximately fifteen minutes and G.B. (2013) appears to have never attended a session alone.
13. On or about July 15, 2023 to and including July 16, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON exchanged a photo of what appears to be G.B. (2013) bound with what appears to be duct tape in a small enclosed area with white and green painted interior walls. G.B. (2013) has duct tape around her arms and torso binding them to her sides and her hands are behind her. G.B.'s (2013) eyes have a black covering duct taped to her head. The duct tape is wrapped

around her eyes and forehead area as well as over the top of her head. G.B. (2013) is wearing a yellow crop top shirt with no sleeves and lavender bottoms. There are apparent injuries to G.B.'s (2013) shoulders and lower face.

14. On that date, after the photo was sent, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a discussion about whose idea it was to tie G.B. (2013) up that way.
15. An image was recovered from co-conspirator Defendant BRANDY BLAS' phone, which appears to be dated January 13, 2024, and shows a screenshot of a surveillance system managed via the Geeni mobile application. Geeni appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and has the login credentials of co-conspirator Defendant THOMAS BLAS SR. The image shows what appears to be G.B. (2013) wearing a long sleeve purple shirt with some type of yellow covering over her head. The yellow covering is wrapped with duct tape around G.B.'s (2013) head. G.B. (2013) appears to be in the structure accessed from the kitchen (as described in paragraph 3). G.B. (2013) is facing one of the walls in a standing position. In front of G.B. (2013) on the ground is a bucket. A male that appears to be co-conspirator Defendant THOMAS BLAS SR. standing in front of G.B. (2013). The date and time stamp in the upper left corner of the image display "2024-01-13 07:05:02". Metadata from the image indicates that the image was created on January 13, 2024 at 7:05:07 AM and subsequently deleted from the device on January 13, 2024 at 7:36:27 AM.
16. An image recovered from co-conspirator Defendant BRANDY BLAS's phone, which appears to be dated January 16, 2024, shows a screenshot of a surveillance system known as Geeni. This appears to be accessed from co-conspirator Defendant BRANDY BLAS's

phone and also has the login credentials of co-conspirator Defendant THOMAS BLAS SR. It is a black and white image of what appears to be G.B. (2013) standing in the structure off of the kitchen, as described in paragraph 3. G.B. (2013) has what appears to be duct tape wrapped around her head. G.B. (2013) is in a standing position with her head facing the ground. It also appears that G.B.'s (2013) hands may be bound behind her back. The date and time stamp in the upper left corner of the image display "2024-01-16 20:15:09". Metadata from image indicates that the image was created on January 16, 2024 at 8:15:14 PM and then deleted from the device on January 18, 2024 at 9:05:30 AM.

17. On or about November 14, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR., engaged in text messaging regarding the sleeping conditions of G.B. (2013). Specifically that they needed "another bucket for idiot to sleep in the bucket broke."
18. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, did not immediately notify police and/or emergency services when they found G.B. (2013) unresponsive.
19. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS, while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, participated in giving Emergency Management Services and Honolulu Fire Department Workers an inaccurate account about where G.B. (2013) lived, slept, and the true nature of her

condition, despite knowing that she was kept bound and in the room off of their kitchen (as described in paragraph 3).

20. After police arrival at 8:35 a.m., co-conspirator Defendant DEBRA GERON appeared to have deleted all text messages and photos between herself and co-conspirator Defendant BRANDY BLAS.
21. A review of BRANDY BLAS' phone between January 22, 2024 and January 24, 2024 showed none of the text messages between co-conspirator DEBRA GERON and herself, and appear to have been deleted.
22. Between January 1, 2024 and January 18, 2024, co-conspirator Defendant BRANDY BLAS, co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, failed to obtain medical treatment for G.B. (2013) even after G.B. (2013) sustained a large avulsion to the bridge of her nose.
23. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. failed to obtain regular medical and dental care for G.B. (2013) and/or medical treatment for specific conditions such as the open sores found on her body on January 18, 2024, and conditions related to lack of nutrition.
24. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were receiving approximately \$1,961.00 per month from the State of Hawaii for G.B. (2013). A review of a bank statement dated August 14, 2023 in conjunction with recovered text messages between all co-conspirator Defendants demonstrate agreements and plans regarding the purchase of various foods and eating at restaurants. The residence at 33 Karsten Drive on January 18, 2024 possessed a sufficient food supply to feed many people.

25. From January 18, 2024 and to date January 22, 2024 co-conspirator Defendant BRANDY BLAS, along with co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, as well as three (3) of the biological minor children of co-conspirator Defendants BRANDY BLAS and THOMAS BLAS SR. have persisted in the same narrative about G.B. (2013). The narrative consists of statements that G.B. (2013) suffered from behavioral issues, but was nonetheless treated well, treated the same as the other children, that she was very active, and that she slept, ate, and played normally, as well as played with the other children.

Therefore, Defendant BRANDY BLAS has committed the offense of Conspiracy to Commit Unlawful Imprisonment in the First Degree, a class C felony, in violation of Sections 705-520 and 707-721 of the Hawaii Revised Statutes.

If convicted of this offense or any included felony offense, BRANDY BLAS may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that he is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 11: On October 1, 2022 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, THOMAS BLAS SR., with the intent to promote or facilitate the commission of a crime, to wit, Unlawful Imprisonment in the First Degree, did agree with co-conspirator BRANDY BLAS and/or co-conspirator DEBRA GERON, that they or one or more of them would engage in and/or solicit the conduct and/or solicit the result specified

by the definition of the offense of Unlawful Imprisonment in the First Degree as defined by Section 707-721 of the Hawai'i Revised Statutes.

THOMAS BLAS SR. commits the offense of Unlawful Imprisonment in the First Degree if he knowingly restrains G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

1. It was part of said conspiracy that the Defendants and co-conspirators would knowingly restrain G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

2. It was further a part of said conspiracy the Defendant and co-conspirators would conceal the existence of the conspiracy and would take steps designed to prevent disclosure of their activities.

In furtherance of the conspiracy and to the effect of the objects thereof, the following overt acts were committed on or about October 1, 2022 to and including January 18, 2024, with the City and County of Honolulu, State of Hawaii:

OVERT ACTS

1. At all relevant times, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were the legal guardians of G.B. (2013). Co-conspirator Defendant BRANDY BLAS lives at 33 Karsten Drive located in the City and County of Honolulu with her husband, co-conspirator Defendant THOMAS BLAS SR., her mother, co-conspirator Defendant DEBRA GERON, and her father William Geron.
2. The house located at 33 Karsten Drive is approximately eight hundred and thirty seven (837) square feet (pursuant to the Honolulu City and County Tax Map), has three

bedrooms and two bathrooms, and as of January 18, 2024, housed six (6) minor children and four (4) adults.

3. Attached to the kitchen, and immediately next to the refrigerator, is a, small, covered, enclosed room-like structure, approximately seven (7) feet in length and three (3) feet and ten (10) inches wide. The structure appears to have been porch that is now enclosed by four walls and a roof. It has two doors, one that opens into the kitchen and another that opens into the back laundry area.
4. During the month of October of the year 2022, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. withdrew G.B. (2013) from Iliahi Elementary School under the guise that they were going to homeschool her. The decision to withdraw G.B. (2013) was against the opinions of both G.B.'s (2013) third grade teacher and school counselor.
5. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in the exchange of messages that appear to reference G.B. (2013) and the various methods in which they would restrict her physical movement, interfere with her liberties, and deny access to sufficient basic necessities.
6. The methods referenced in the text message include, but are not limited to the following: feeding her minimally and/or denying her food and water, getting rid of her waste, tying her up, keeping her confined in the small structure described in paragraph 3, watching/communicating with her via surveillance while she was bound, providing minimal care for her, and punishing her using physical force.

7. The texts included back and forth messages regarding the following: having G.B. (2013) defecate in a bucket, giving her water only during specified times of the day, withholding water if she would urinate too much, who would tend to cleaning her area, feeding her food that was almost expired, withholding food if G.B. (2013) was not compliant, sleeping when she had been told to stand, tying her hands in specific ways (i.e. front or back), G.B. (2103) asking not to have her hands tied in the style of a strait jacket, threats to G.B. (2103) including striking her and/or using violence against her if she talked or made noises, G.B. (2013) trying to get “out,” hiding G.B. (2013) when workers would come to the residence, putting a box over her head, having her sleep in a box, and “shooting” her.
8. Texts also included back and forth messages regarding co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON’s viewing of G.B. (2013) from an unknown surveillance system. Based on the messages between co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON the surveillance system appeared to be accessible to co-conspirator Defendant BRANDY BLAS.
9. A Review of images recovered from co-conspirator Defendant BRANDY BLAS’s and co-conspirator Defendant DEBRA GERON’s cellular phones indicate that surveillance systems were accessible to them via their cellular phones and that they discussed the systems and G.B.’s (2013) movements on the systems.
10. Co-conspirator Defendant THOMAS BLAS SR. was the named person for the login information of at least one of the home surveillance systems used by co-conspirator

Defendant BRANDY BLAS, to watch G.B. (2013) who was in the room located off their kitchen (as described in paragraph 3).

11. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a series of text messages that appear to reference G.B. (2013) and instructions for co-conspirator Defendant THOMAS BLAS SR. to take specific actions. The instructions to co-conspirator Defendant THOMAS BLAS SR. include, but are not limited to the following actions: to ignore G.B. (2013), to put G.B.'s (2013) hands a certain way, clean out G.B.'s (2013) toilet, and to check on G.B. (2013) and the box in which she was sleeping.
12. From at least October 10, 2018 through January 18, 2024, co-conspirator Defendant THOMAS BLAS SR., as a legal guardian of G.B. (2013), would often appear on zoom therapy visits with G.B.'s (2013) psychiatrist when co-conspirator Defendant BRANDY BLAS could not attend. At times he would appear for the therapy sessions by himself without G.B. (2013). Each session would last approximately fifteen minutes and G.B. (2013) appears to have never attended a session alone.
13. On or about July 15, 2023 to and including July 16, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON exchanged a photo of what appears to be G.B. (2013) bound with what appears to be duct tape in a small enclosed area with white and green painted interior walls. G.B. (2013) has duct tape around her arms and torso binding them to her sides and her hands are behind her. G.B.'s (2013) eyes have a black covering duct taped to her head. The duct tape is wrapped around her eyes and forehead area as well as over the top of her head. G.B. (2013) is

wearing a yellow crop top shirt with no sleeves and lavender bottoms. There are apparent injuries to G.B.'s (2013) shoulders and lower face.

14. On that date, after the photo was sent, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a discussion about whose idea it was to tie G.B. (2013) up that way.
15. An image was recovered from co-conspirator Defendant BRANDY BLAS' phone, which appears to be dated January 13, 2024, and shows a screenshot of a surveillance system managed via the Geeni mobile application. Geeni appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and has the login credentials of co-conspirator Defendant THOMAS BLAS SR. The image shows what appears to be G.B. (2013) wearing a long sleeve purple shirt with some type of yellow covering over her head. The yellow covering is wrapped with duct tape around G.B.'s (2013) head. G.B. (2013) appears to be in the structure accessed from the kitchen (as described in paragraph 3). G.B. (2013) is facing one of the walls in a standing position. In front of G.B. (2013) on the ground is a bucket. A male that appears to be co-conspirator Defendant THOMAS BLAS SR. standing in front of G.B. (2013). The date and time stamp in the upper left corner of the image display "2024-01-13 07:05:02". Metadata from the image indicates that the image was created on January 13, 2024 at 7:05:07 AM and subsequently deleted from the device on January 13, 2024 at 7:36:27 AM.
16. An image recovered from co-conspirator Defendant BRANDY BLAS's phone, which appears to be dated January 16, 2024, shows a screenshot of a surveillance system known as Geeni. This appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and also has the login credentials of co-conspirator Defendant THOMAS BLAS

SR. It is a black and white image of what appears to be G.B. (2013) standing in the structure off of the kitchen, as described in paragraph 3. G.B. (2013) has what appears to be duct tape wrapped around her head. G.B. (2013) is in a standing position with her head facing the ground. It also appears that G.B.'s (2013) hands may be bound behind her back. The date and time stamp in the upper left corner of the image display "2024-01-16 20:15:09". Metadata from image indicates that the image was created on January 16, 2024 at 8:15:14 PM and then deleted from the device on January 18, 2024 at 9:05:30 AM.

17. On or about November 14, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR., engaged in text messaging regarding the sleeping conditions of G.B. (2013). Specifically that they needed "another bucket for idiot to sleep in the bucket broke."
18. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, did not immediately notify police and/or emergency services when they found G.B. (2013) unresponsive.
19. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS, while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, participated in giving Emergency Management Services and Honolulu Fire Department Workers an inaccurate account about where G.B. (2013) lived, slept, and the true nature of her

condition, despite knowing that she was kept bound and in the room off of their kitchen (as described in paragraph 3).

20. After police arrival at 8:35 a.m., co-conspirator Defendant DEBRA GERON appeared to have deleted all text messages and photos between herself and co-conspirator Defendant BRANDY BLAS.
21. A review of BRANDY BLAS' phone between January 22, 2024 and January 24, 2024 showed none of the text messages between co-conspirator DEBRA GERON and herself, and appear to have been deleted.
22. Between January 1, 2024 and January 18, 2024, co-conspirator Defendant BRANDY BLAS, co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, failed to obtain medical treatment for G.B. (2013) even after G.B. (2013) sustained a large avulsion to the bridge of her nose.
23. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. failed to obtain regular medical and dental care for G.B. (2013) and/or medical treatment for specific conditions such as the open sores found on her body on January 18, 2024, and conditions related to lack of nutrition.
24. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were receiving approximately \$1,961.00 per month from the State of Hawaii for G.B. (2013). A review of a bank statement dated August 14, 2023 in conjunction with recovered text messages between all co-conspirator Defendants demonstrate agreements and plans regarding the purchase of various foods and eating at restaurants. The residence at 33 Karsten Drive on January 18, 2024 possessed a sufficient food supply to feed many people.

25. From January 18, 2024 and to date January 22, 2024 co-conspirator Defendant BRANDY BLAS, along with co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, as well as three (3) of the biological minor children of co-conspirator BRANDY BLAS and THOMAS BLAS SR. have persisted in the same narrative about G.B. (2013). The narrative consists of statements that G.B. (2013) suffered from behavioral issues, but was nonetheless treated well, treated the same as the other children, that she was very active, and that she slept, ate, and played normally, as well as played with the other children.

Therefore, Defendant THOMAS BLAS SR. has committed the offense of Conspiracy to Commit Unlawful Imprisonment in the First Degree, a class C felony, in violation of Sections 705-520 and 707-721 of the Hawaii Revised Statutes.

If convicted of this offense or any included felony offense, THOMAS BLAS SR. may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where he is a multiple offender in that he is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 12: On October 1, 2022, to and including January 18, 2024, in the City and County of Honolulu, State of Hawaii, DEBRA GERON, with the intent to promote or facilitate the commission of a crime, to wit, Unlawful Imprisonment in the First Degree, did agree with co-conspirator BRANDY BLAS and/or co-conspirator THOMAS BLAS SR., that they or one or more of them would engage in and/or solicit the conduct and/or solicit the result specified by the

definition of the offense of Unlawful Imprisonment in the First Degree as defined by Section 707-721 of the Hawai‘i Revised Statutes.

DEBRA GERON commits the offense of Unlawful Imprisonment in the First Degree if she knowingly restrains G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

1. It was part of said conspiracy that the Defendants and co-conspirators would knowingly restrain G.B. (2013) under under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

2. It was further a part of said conspiracy the Defendant and co-conspirators would conceal the existence of the conspiracy and would take steps designed to prevent disclosure of their activities.

In furtherance of the conspiracy and to the effect of the objects thereof, the following overt acts were committed on or about October 1, 2022 to and including January 18, 2024, with the City and County of Honolulu, State of Hawaii:

OVERT ACTS

1. At all relevant times, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were the legal guardians of G.B. (2013). Co-conspirator Defendant BRANDY BLAS lives at 33 Karsten Drive located in the City and County of Honolulu with her husband, co-conspirator Defendant THOMAS BLAS SR., her mother, co-conspirator Defendant DEBRA GERON, and her father William Geron.
2. The house located at 33 Karsten Drive is approximately eight hundred and thirty seven (837) square feet (pursuant to the Honolulu City and County Tax Map), has three

bedrooms and two bathrooms, and as of January 18, 2024, housed six (6) minor children and four (4) adults.

3. Attached to the kitchen, and immediately next to the refrigerator, is a, small, covered, enclosed room-like structure, approximately seven (7) feet in length and three (3) feet and ten (10) inches wide. The structure appears to have been porch that is now enclosed by four walls and a roof. It has two doors, one that opens into the kitchen and another that opens into the back laundry area.
4. During the month of October of the year 2022, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. withdrew G.B. (2013) from Iliahi Elementary School under the guise that they were going to homeschool her. The decision to withdraw G.B. (2013) was against the opinions of both G.B.'s (2013) third grade teacher and school counselor.
5. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in the exchange of messages that appear to reference G.B. (2013) and the various methods in which they would restrict her physical movement, interfere with her liberties, and deny access to sufficient basic necessities.
6. The methods referenced in the text message include, but are not limited to the following: feeding her minimally and/or denying her food and water, getting rid of her waste, tying her up, keeping her confined in the small structure described in paragraph 3, watching/communicating with her via surveillance while she was bound, providing minimal care for her, and punishing her using physical force.

7. The texts included back and forth messages regarding the following: having G.B. (2013) defecate in a bucket, giving her water only during specified times of the day, withholding water if she would urinate too much, who would tend to cleaning her area, feeding her food that was almost expired, withholding food if G.B. (2013) was not compliant, sleeping when she had been told to stand, tying her hands in specific ways (i.e. front or back), G.B. (2103) asking not to have her hands tied in the style of a strait jacket, threats to G.B. (2103) including striking her and/or using violence against her if she talked or made noises, G.B. (2013) trying to get “out,” hiding G.B. (2013) when workers would come to the residence, putting a box over her head, having her sleep in a box, and “shooting” her.
8. Texts also included back and forth messages regarding co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON’s viewing of G.B. (2013) from an unknown surveillance system. Based on the messages between co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON the surveillance system appeared to be accessible to co-conspirator Defendant BRANDY BLAS.
9. A Review of images recovered from co-conspirator Defendant BRANDY BLAS’s and co-conspirator Defendant DEBRA GERON’s cellular phones indicate that surveillance systems were accessible to them via their cellular phones and that they discussed the systems and G.B.’s (2013) movements on the systems.
10. Co-conspirator Defendant THOMAS BLAS SR. was the named person for the login information of at least one of the home surveillance systems used by co-conspirator

Defendant BRANDY BLAS, to watch G.B. (2013) who was in the room located off their kitchen (as described in paragraph 3).

11. Between the days of May 9, 2023 and January 18, 2024, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a series of text messages that appear to reference G.B. (2013) and instructions for co-conspirator Defendant THOMAS BLAS SR. to take specific actions. The instructions to co-conspirator Defendant THOMAS BLAS SR. include, but are not limited to the following actions: to ignore G.B. (2013), to put G.B.'s (2013) hands a certain way, clean out G.B.'s (2013) toilet, and to check on G.B. (2013) and the box in which she was sleeping.
12. From at least October 10, 2018 through January 18, 2024, co-conspirator Defendant THOMAS BLAS SR., as a legal guardian of G.B. (2013), would often appear on zoom therapy visits with G.B.'s (2013) psychiatrist when co-conspirator Defendant BRANDY BLAS could not attend. At times he would appear for the therapy sessions by himself without G.B. (2013). Each session would last approximately fifteen minutes and G.B. (2013) appears to have never attended a session alone.
13. On or about July 15, 2023 to and including July 16, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON exchanged a photo of what appears to be G.B. (2013) bound with what appears to be duct tape in a small enclosed area with white and green painted interior walls. G.B. (2013) has duct tape around her arms and torso binding them to her sides and her hands are behind her. G.B.'s (2013) eyes have a black covering duct taped to her head. The duct tape is wrapped around her eyes and forehead area as well as over the top of her head. G.B. (2013) is

wearing a yellow crop top shirt with no sleeves and lavender bottoms. There are apparent injuries to G.B.'s (2013) shoulders and lower face.

14. On that date, after the photo was sent, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant DEBRA GERON participated in a discussion about whose idea it was to tie G.B. (2013) up that way.
15. An image was recovered from co-conspirator Defendant BRANDY BLAS' phone, which appears to be dated January 13, 2024, and shows a screenshot of a surveillance system managed via the Geeni mobile application. Geeni appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and has the login credentials of co-conspirator Defendant THOMAS BLAS SR. The image shows what appears to be G.B. (2013) wearing a long sleeve purple shirt with some type of yellow covering over her head. The yellow covering is wrapped with duct tape around G.B.'s (2013) head. G.B. (2013) appears to be in the structure accessed from the kitchen (as described in paragraph 3). G.B. (2013) is facing one of the walls in a standing position. In front of G.B. (2013) on the ground is a bucket. A male that appears to be co-conspirator Defendant THOMAS BLAS SR. standing in front of G.B. (2013). The date and time stamp in the upper left corner of the image display "2024-01-13 07:05:02". Metadata from the image indicates that the image was created on January 13, 2024 at 7:05:07 AM and subsequently deleted from the device on January 13, 2024 at 7:36:27 AM.
16. An image recovered from co-conspirator Defendant BRANDY BLAS's phone, which appears to be dated January 16, 2024, shows a screenshot of a surveillance system known as Geeni. This appears to be accessed from co-conspirator Defendant BRANDY BLAS's phone and also has the login credentials of co-conspirator Defendant THOMAS BLAS

SR. It is a black and white image of what appears to be G.B. (2013) standing in the structure off of the kitchen, as described in paragraph 3. G.B. (2013) has what appears to be duct tape wrapped around her head. G.B. (2013) is in a standing position with her head facing the ground. It also appears that G.B.'s (2013) hands may be bound behind her back. The date and time stamp in the upper left corner of the image display "2024-01-16 20:15:09". Metadata from image indicates that the image was created on January 16, 2024 at 8:15:14 PM and then deleted from the device on January 18, 2024 at 9:05:30 AM.

17. On or about November 14, 2023, co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR., engaged in text messaging regarding the sleeping conditions of G.B. (2013). Specifically that they needed "another bucket for idiot to sleep in the bucket broke."
18. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, did not immediately notify police and/or emergency services when they found G.B. (2013) unresponsive.
19. On the early morning of January 18, 2024, co-conspirator Defendant BRANDY BLAS, while in the same approximately 837 square foot home as co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, participated in giving Emergency Management Services and Honolulu Fire Department Workers an inaccurate account about where G.B. (2013) lived, slept, and the true nature of her

condition, despite knowing that she was kept bound and in the room off of their kitchen (as described in paragraph 3).

20. After police arrival at 8:35 a.m., co-conspirator Defendant DEBRA GERON appeared to have deleted all text messages and photos between herself and co-conspirator Defendant BRANDY BLAS.
21. A review of BRANDY BLAS' phone between January 22, 2024 and January 24, 2024 showed none of the text messages between co-conspirator DEBRA GERON and herself, and appear to have been deleted.
22. Between January 1, 2024 and January 18, 2024, co-conspirator Defendant BRANDY BLAS, co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, failed to obtain medical treatment for G.B. (2013) even after G.B. (2013) sustained a large avulsion to the bridge of her nose.
23. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. failed to obtain regular medical and dental care for G.B. (2013) and/or medical treatment for specific conditions such as the open sores found on her body on January 18, 2024, and conditions related to lack of nutrition.
24. Co-conspirator Defendant BRANDY BLAS and co-conspirator Defendant THOMAS BLAS SR. were receiving approximately \$1,961.00 per month from the State of Hawaii for G.B. (2013). A review of a bank statement dated August 14, 2023 in conjunction with recovered text messages between all co-conspirator Defendants demonstrate agreements and plans regarding the purchase of various foods and eating at restaurants. The residence at 33 Karsten Drive on January 18, 2024 possessed a sufficient food supply to feed many people.

25. From January 18, 2024 and to date January 22, 2024 co-conspirator Defendant BRANDY BLAS, along with co-conspirator Defendant THOMAS BLAS SR. and co-conspirator Defendant DEBRA GERON, as well as three (3) of the biological minor children of co-conspirator Defendants Brandy and THOMAS BLAS SR. have persisted in the same narrative about G.B. (2013). The narrative consists of statements that G.B. (2013) suffered from behavioral issues, but was nonetheless treated well, treated the same as the other children, that she was very active, and that she slept, ate, and played normally, as well as played with the other children.

Therefore, Defendant DEBRA GERON has committed the offense of Conspiracy to Commit Unlawful Imprisonment in the First Degree, a class C felony, in violation of Sections 705-520 and 707-721 of the Hawaii Revised Statutes.

If convicted of this offense or any included felony offense, DEBRA GERON may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that she is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 13: On or about October 1, 2022, to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, BRANDY BLAS having care or custody of G.B. (2013), a minor, did intentionally or knowingly allow DEBRA GERON and/or THOMAS BLAS SR. to inflict serious or substantial bodily injury on G.B. (2013), thereby committing the offense of Endangering the Welfare of a Minor in the First Degree, in violation of Section 709-903.5(1)(a) of the Hawai'i Revised Statutes

"Serious bodily injury" means bodily injury which creates a substantial risk of death or which causes serious, permanent disfigurement, or protracted loss or impairment of the function of any bodily member or organ.

"Substantial bodily injury" means bodily injury which causes (1) A major avulsion, laceration, or penetration of the skin, (2) A burn of at least second degree severity, (3) A bone fracture, (4) A serious concussion, or (5) A tearing, rupture, or corrosive damage to the esophagus, viscera, or other internal organs.

If convicted of this offense or any included felony offense, BRANDY BLAS, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that she is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 14: On or about October 1, 2022 to and including January 18, 2024 in the City and County of Honolulu, State of Hawaii, THOMAS BLAS SR. having care or custody of G.B. (2013), a minor, did intentionally or knowingly allow DEBRA GERON and/or BRANDY BLAS to inflict serious or substantial bodily injury on G.B. (2013), thereby committing the offense of Endangering the Welfare of a Minor in the First Degree, in violation of Section 709-903.5(1)(a) of the Hawai'i Revised Statutes.

"Serious bodily injury" means bodily injury which creates a substantial risk of death or which causes serious, permanent disfigurement, or protracted loss or impairment of the function of any bodily member or organ.

"Substantial bodily injury" means bodily injury which causes (1) A major avulsion, laceration, or penetration of the skin, (2) A burn of at least second degree severity, (3) A bone

fracture, (4) A serious concussion, or (5) A tearing, rupture, or corrosive damage to the esophagus, viscera, or other internal organs.

If convicted of this offense or any included felony offense, THOMAS BLAS SR., may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where they are a multiple offender in that they are being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 15: On or about January 18, 2024 to and including January 20, 2024, in the City and County of Honolulu, State of Hawai'i, BRANDY BLAS, with the intent to hinder the apprehension, prosecution, conviction, or punishment of DEBRA GERON for Murder in the Second Degree and/or Kidnapping, and/or Unlawful Imprisonment in the First Degree, or any included felony offense, did render assistance to DEBRA GERON by suppressing, by an act of concealment, alteration, or destruction of any physical evidence that might aid in the discovery, apprehension, prosecution, or conviction of DEBRA GERON, thereby committing the offense of Hindering Prosecution in the First Degree, in violation of Sections 710-1029 and 710-1028(5) of the Hawai'i Revised Statutes.

DEBRA GERON commits the offense of Murder in the Second Degree in violation of Sections 707-710.5, 706-656, 702-203, and 663-1.6 of the Hawai'i Revised Statutes if she intentionally or knowingly caused the death of G.B. (2013), by intentionally or knowingly inflicting injury on G.B. (2013) and/or by intentionally or knowingly omitting to perform a duty imposed by law, to wit, DEBRA GERON, while at the scene of a crime, and knowing that G.B. (2013), the subject of the crime was suffering from serious physical harm, did intentionally or knowingly fail to obtain or attempt to obtain aid from law enforcement or medical personnel

though DEBRA GERON could have done so without danger or peril to any person

DEBRA GERON commits the offense of Kidnapping in violation of Section 707-720(1)(d) and/or 707-720(1)(e) of the Hawai‘i Revised Statutes if she intentionally and or knowingly restrains G.B. (2013), with the intent to inflict bodily injury upon her.

DEBRA GERON commits the offense of Unlawful Imprisonment in the First Degree in violation of Section 707-721 of the Hawai‘i Revised Statutes if she knowingly restrains G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

If convicted of this offense or any included felony offense, BRANDY BLAS, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai‘i Revised Statutes where she is a multiple offender in that she is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 16: On or about January 18, 2024 to and including January 20, 2024, in the City and County of Honolulu, State of Hawai‘i, DEBRA GERON, with the intent to hinder the apprehension, prosecution, conviction, or punishment of BRANDY BLAS for Murder in the Second Degree and/or Kidnapping, and/or Unlawful Imprisonment in the First Degree, or any included felony offense, did render assistance to BRANDY BLAS by suppressing, by an act of concealment, alteration, or destruction of any physical evidence that might aid in the discovery, apprehension, prosecution, or conviction of BRANDY BLAS, thereby committing the offense of Hindering Prosecution in the First Degree, in violation of Sections 710-1029 and 710-1028(5) of the Hawai‘i Revised Statutes.

BRANDY BLAS commits the offense of Murder in the Second Degree in violation of Sections 707-710.5, 706-656, 702-203, and 663-1.6 of the Hawai‘i Revised Statutes if she

intentionally or knowingly caused the death of G.B. (2013), by intentionally or knowingly inflicting injury on G.B. (2013) and/or by intentionally or knowingly omitting to perform a duty imposed by law, to wit, BRANDY BLAS, while at the scene of a crime, and knowing that G.B. (2013), the subject of the crime was suffering from serious physical harm, did intentionally or knowingly fail to obtain or attempt to obtain aid from law enforcement or medical personnel though BRANDY BLAS could have done so without danger or peril to any person.

BRANDY BLAS commits the offense of Kidnapping in violation of Section 707-720(1)(d) and/or 707-720(1)(e) of the Hawai'i Revised Statutes if she intentionally and or knowingly restrains G.B. (2013), with the intent to terrorize her, and/or with intent to inflict bodily injury upon her.

BRANDY BLAS commits the offense of Unlawful Imprisonment in the First Degree in violation of Section 707-721 of the Hawai'i Revised Statutes if she knowingly restrains G.B. (2013) under circumstances which exposed G.B. (2013) to the risk of serious bodily injury.

If convicted of this offense or any included felony offense, DEBRA GERON, may be subject to sentencing in accordance with Section 706-661 and Section 706-662(4)(a) of the Hawai'i Revised Statutes where she is a multiple offender in that she is being sentenced for two or more felonies, and an extended term of imprisonment is necessary for the protection of the public.

COUNT 17: On or about October 7, 2019, to and including January 18, 2024, in the City and County of Honolulu, State of Hawai'i, BRANDY BLAS and/or THOMAS BLAS SR., having care or custody of A.B. (2019), a minor, did knowingly endanger the physical or mental welfare of A.B. (2019), by violating or interfering with any legal duty of care or protection owed

A.B. (2019), a minor, thereby committing the offense of Endangering the Welfare of a Minor in the Second Degree, in violation of Section 709-904(2) of the Hawai‘i Revised Statutes.

COUNT 18: On or about October 1, 2022, to and including January 18, 2024, in the City and County of Honolulu, State of Hawai‘i, BRANDY BLAS and/or THOMAS BLAS SR. did knowingly and persistently fail to provide support which BRANDY BLAS and/or THOMAS BLAS SR. could provide and which BRANDY BLAS and/or THOMAS BLAS SR. knew they were legally obliged to provide to a child or other dependent, to wit, G.B. (2013), thereby committing the offense of Persistent Nonsupport in violation of Section 709-903(1) of the Hawai‘i Revised Statutes.

Pursuant to Section 709-903(2) of the Hawai‘i Revised Statutes, “support” includes but is not limited to food, shelter, clothing, education, and other necessary care as determined by law.

In committing the offense of Persistent Nonsupport, BRANDY BLAS and/or THOMAS BLAS SR. acted pursuant to one continuous scheme and course of conduct committed during the dates referenced above.

COUNT 19: On or about October 7, 2019, to and including January 18, 2024, in the City and County of Honolulu, State of Hawai‘i, BRANDY BLAS and/or THOMAS BLAS SR. did knowingly and persistently fail to provide support which BRANDY BLAS and/or THOMAS BLAS SR. could provide and which BRANDY BLAS and/or THOMAS BLAS SR. knew they were legally obliged to provide to a child or other dependent, to wit, A.B. (2019), thereby committing the offense of Persistent Nonsupport in violation of Section 709-903(1) of the Hawai‘i Revised Statutes.

Pursuant to Section 709-903(2) of the Hawai‘i Revised Statutes, “support” includes but is not limited to food, shelter, clothing, education, and other necessary care as determined by law.

In committing the offense of Persistent Nonsupport, BRANDY BLAS and/or THOMAS BLAS SR. acted pursuant to one continuous scheme and course of conduct committed during the dates referenced above.

A True Bill found this day: February 14, 2024



Erika K. Candelario
Deputy Prosecuting Attorney
City and County of Honolulu



Foreperson of the Grand Jury