

# ERIC RYAN

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## HAND DELIVERED

September 12, 2011

Florence T. Nakakuni  
United States Attorney  
Room 6-100  
PJKK Federal Building  
300 Ala Moana Blvd.  
Honolulu, HI 96850

RE: **PUBLIC CORRUPTION COMPLAINT AGAINST REP. KYM PINE: Bribery, Extortion, Theft, Harassment, Wire Fraud, Money Laundering, Election Fraud and Additional Criminal Acts by State Representative Kymberly “Kym Pine” Ryglowski for the Express Purpose of Directing Taxpayer Funds from the City Payroll to Her Campaign Chairman by Forcing the Hiring of Pine’s Top Aide by City Councilmember Tom Berg’s Office**

Dear Ms. Nakakuni:

From reading your website, I understand that you are in charge of prosecuting violations of Federal law and that you also have a Fraud and Financial Crimes Section which prosecutes financial crimes, public corruption, and cybercrime among other offenses. If true, then it seems I am filing my complaint with the right office, as I have witnessed a state official committing the above-referenced offenses and more. Fighting public corruption, especially when it has been this well-documented, appears to be a top priority for you and your department and you can count on me to assist.

The purpose of this letter is to file an official report and formal complaint about crimes of public corruption committed by Hawaii State Representative Kymberly “Kym Pine” Ryglowski. The reason for my complaint is that Rep. Pine is a public official who, only months ago, engaged in upwards of twenty serious criminal acts in violation of Federal, State and City laws, including extortion, attempted extortion, bribery, and attempted bribery of a public official for whom I worked until I was recently fired for whistleblowing, to include this matter I am bringing to your attention. The official in question is Honolulu City Councilman Tom Berg, who himself was still in Pine’s employ as one of her staffers at the Hawaii State Legislature when the illegal acts first began taking place, as Berg had just been elected to the City Council. Pine’s criminal acts, which continued even after Berg was sworn into office, were for the express purpose of illegally obtaining control over tens of thousands of dollars in City taxpayer money by forcibly rigging Berg’s staff hiring process to unlawfully obtain a paid job for her crony.



As the evidence will show, within hours after Councilman-elect Berg's victory in the special election for a vacant City Council seat on 29 December 2010, Pine's urgent goal was to exploit Berg's ability to hire staff members with his City Council payroll budget in order for Pine to reward Mr. John Gollner (*pictured here with Rep. Pine*), the chairman of her own political campaign and her then legislative chief of staff, with a paid job in Berg's City Council office. [Gollner served in a dual capacity for Pine as he had with City Councilmember Duke Bainum, for whom Gollner simultaneously served on the late council member's staff as a legislative aide while also serving as Bainum's deputy campaign manager.] Pine used illegal

intimidation and inducements to terrorize the politically insecure Berg so as to affect Berg's performance of his public duty, and with the intent of committing the fraud of depriving Honolulu's citizenry of their newest council member's honest services. In addition to Pine's many criminal acts (to include cyber-crime) in furtherance of her illicit goal, Pine was actively seeking to exchange her and Berg's integrity for a valuable financial kickback which would free up of a paid position in her state office then being held down by longtime aide Gollner for someone she deemed to be more productive and more to her liking.

As the chief political consultant to both Councilman Berg and Representative Pine in 2010, as well as Berg's transition director for three weeks which established Berg's new office at City Hall, and then as Berg's full-time chief of staff at City Hall from January through July of this year, I am now providing you with a wealth of irrefutable, direct evidence of Pine's crimes (*enclosed*) as well as my own eyewitness testimony to corroborate the charges I am bringing to your attention in this complaint. I am also presenting you with evidence of the powerful and lasting effect that Pine's



'shakedown' had on the manner in which Berg's official business was conducted over the next six months in office. I was there when this all happened. I saw the crimes for myself. Pine put the squeeze on Berg and was probably sure that she'd get away with having Berg quietly fork over tens of thousands of dollars of taxpayer money to make her go away. Pine's core corrupt conduct embodies the very reason why the public is not getting what it deserves: honest, faithful, disinterested service from public officials. Now justice needs to be served.

Due to my close official and political involvement with the players in this sordid, tense and highly-documented affair, and because Pine also aimed her illegal threats of retaliation and unlawful solicitations at me while simultaneously offering ME a part-time job in her State Capitol office, Pine's criminal acts affected me directly. As a voter, a taxpayer and a lifelong resident of Hawaii, and as one who was victimized directly by Rep. Pine's extortion and bribery and other related crimes, I hereby demand swift action in order to obtain justice against this corrupt and ambitious politician who unlawfully preyed on a weak politician and ultimately victimized taxpayers.



In a nutshell, here's what happened. Starting on 30 December 2010, just hours after Tom Berg was elected to the Honolulu City Council in the 29 December 2010 Special Election, Rep. Pine intentionally and repeatedly attempted to bribe and extort and intimidate and harass Councilman-elect Berg (who was also her staffer at the State Capitol) on threat of retaliation and promise of reward into hiring Pine's then chief of staff at the State Capitol (also her political campaign's chairman) John Gollner to work at City Hall on Berg's City Council staff; with this payoff estimated to cost tens of thousands of dollars annually to Honolulu taxpayers for Gollner's annual salary plus fringe benefits. A major exchange of phone calls and e-mails and meetings were related to Pine's threats of retaliation

and her willingness to break at least twenty serious laws, including extortion and bribery, in order to get Berg to hire Pine's chief of staff John Gollner at City Hall. This flurry of communication is captured in the exhibits within this complaint.

Rep. Pine's sleazy utilization of extortion and bribery and her other criminal acts alleged herein to exact a payoff in the form of financial control over City funds, some of which comes from unsegregated Federal funds in the City's budget, came after an exasperated and desperate Pine failed to persuade Berg to hire Gollner AND after she failed (*using increasing amounts of pressure and threats*) to recruit and utilize third parties, including me, to repeatedly attempt to persuade newly-elected public official Berg to hire Gollner as well as to repeat Pine's illegal inducements and threats to Berg. Rep. Pine was acutely aware of her own strengths and of Mr. Berg's weaknesses when she willfully, knowingly and explicitly threatened to run against Mr. Berg for his Council seat in 2012 unless he hired Mr. Gollner. As the superior candidate and as Berg's employer and fellow campaigner, Rep. Pine was also acutely aware of Mr. Berg's insecurities when she attempted to bribe Berg by offering to move to another district in order for her to run for another seat on the City Council in exchange for Berg's hiring of Gollner.



Gollner, Pine's chairman and top aide, campaigning with Pine at Ewa Beach's 2008 Christmas Parade

Why was Pine so eager to move Gollner from her staff to Berg's? Why was she desperate enough to break laws in order to do so? Well, despite his being intelligent and well-intentioned, Gollner's co-worker Berg and employer Pine had each told me about Gollner's excessive absenteeism from Pine's office at the State Legislature due to medical condition(s) relating to his military service in the Middle East several years ago. Gollner, a current member of the Ewa Neighborhood Board, has also told me about his chronic absenteeism and the impact of his condition on his work at the State Capitol. Gollner's declining

eyesight was just one of the many reasons why Gollner was frequently away from work and why he was either at the hospital or at home recuperating. Moreover, on the days Gollner was at Pine's office, both

Pine and Berg described the unfortunate scenario of Gollner operating far, far less than 100% on most days.

It should be noted that an additional theory is worth exploring about why Pine wanted Gollner out of her office AND why Gollner himself wanted to join Berg's staff: Gollner resigned in disgust from Pine's office on the morning of 03 January 2011, just hours after Pine fired Berg. It seems that not all was rosy in the relationship between Pine and her campaign chairman. Gollner's own words from his resignation are as follows: "I am resigning from your employ because of a pattern of unprecedented treatment in which it is obvious to me that no matter how diligently, resourcefully and faithfully I support you, the situation continues to become more divisive, even as I continue to become more contrite and attempt to mitigate what has become an increasingly unreasonable work environment. I am a 12 year Marine Corps Veteran, and I've served you for over 6 years. I have never endured such treatment from a superior, not even as a junior enlisted Marine." So whatever the reason(s), the evidence clearly shows that Pine was determined after Berg's election victory to move Gollner to City Hall, using whatever means necessary, legal or illegal; shifting the burden of her political campaign chairman's employment to City taxpayers while freeing up her State office's staffing budget in a 'guilt-free' way by transferring a not-very-productive employee (*but a valuable campaign chair*) away from her office. However, as you'll see, Berg was steadfastly opposed to hiring his co-worker from Pine's office as doing so would effectively undermine Berg's desire for his City Hall staff to work at 100% capacity toward Berg's own re-election in 2012.

As the evidence shows, Pine's unrelenting pressure and her extortion and bribery began the day after the special election while Berg was still Pine's employee and when Berg told Pine "no" to her face at a meeting in her office just hours after winning the special election for City Council. That's right, Berg was still Pine's employee and she wasted no time threatening him and illegally telling Berg himself to do something which would violate City ethics laws by giving special treatment in exchange for something of value. Indeed, Pine was violating State ethics laws herself by trying to get something of value from her employee while promising something in return. Pine's illegal threats of retaliation and unlawful promises of reward continued the very next day, on 31 December 2010, this time with Pine putting her demands in writing. I was actually on the phone with Berg when he received this explicit e-mail from Pine. I was still on the phone with him when he wrote back to Pine to refuse her demand. And I was still on the phone when she wrote back to him again, withdrawing her bribe and instead promising to follow through on her threat to run against Berg. These e-mails and more are included in the evidence provided.

For the next two days, the evidence shows that Berg and I tried to work with Pine to withdraw her unlawful demand of forcing Gollner onto Berg's City Hall staff at political gunpoint. However, just hours after Berg sent Pine a new and very 'diplomatic' message that I co-wrote with Berg – *a message which said "no" in a nice and thoughtful way to Pine's extortion and bribery* – Pine fired Berg and ordered him to immediately clean out his desk at the State Capitol on the very morning that Berg had been invited by then City Council Chairman Nestor Garcia to a private meeting at City Hall followed by an inauguration ceremony for several new council members. After contacting Garcia's office on Berg's behalf to cancel that meeting, Berg barely arrived at City Hall in time for the inauguration ceremony as he spent the morning moving all of his belongings from his desk area at Pine's office into his car in the State Capitol basement, then wearing his business suit Berg had to run on foot in the hot sun to City Hall with barely enough time to dry himself off with paper towels in the public restroom while standing next to the mayor's press secretary. That's how spiteful Rep. Pine became.

But the story doesn't end there. Pine's demands continued even after Berg was fired by Pine. Pine's threats were also made to me, in my position as Berg's first hire for City Hall and as the person Berg



entrusted to interview, hire and negotiate salaries and job descriptions. Pine's threats to both Berg and me even continued after Berg was sworn into office as a City Councilman, as the evidence will show, with Pine trying to financially exploit Berg's relatively weaker political standing in order to force Berg's performance an official act which he did not want to do.

The implications of Pine's criminal acts and her illegal threats to Berg's finances, both personal and political, as well as his political standing were extremely clear and highly credible. With regard to the "pecuniary benefit" arising from Pine's bribery and extortion of Berg, if Berg were to lose his position on the City Council to the better funded and more organized and more politically adept Pine, Berg would not only lose the annual \$52,446 city council salary and many thousands of dollars in annual fringe benefits, but he would also lose the valuable position of political incumbency which served to improve his prospects of holding fundraisers to pay off his current political campaign debt of \$29,356.46 (according to the State Campaign Spending Commission) . . . owed almost entirely to himself. In other words, if Berg (and I) did not meet Pine's demands, Berg could face a stronger, better-funded, better-organized, better-known, more widely-endorsed candidate in 2012 and lose hope for retiring Berg's nearly \$30,000 in campaign debt to himself and lose the \$52,446 per year City Council job and our City Council staff jobs, or we could choose to accept Pine's terms . . . if indeed the terms Pine dictated could even be guaranteed as her only terms ever. [NOTE: In separate pleadings I have filed with the State Campaign Spending Commission, you will discover that Berg greatly underreported his campaign debt by thousands of dollars which Berg failed to document in his filings with that agency.]

The gist of Pine's formidable threat was clear to us: Berg and I and others on Berg's staff would surely be out of a job if a big name like Pine got in the race in 2012 against Berg. That's why, as mentioned above, Councilman-elect Berg and I attempted to diplomatically rebuff Pine's threats and solicitations, but lived each day with the knowledge that by not doing her bidding and hiring anyone she wanted to get a City job, she would likely live up to her threat to run against Berg in 2012. For this reason, Berg soon became very determined to utilize Gollner in some capacity on Berg's City Hall staff in hopes of placating Pine. After first resisting, Berg eventually gave in to Pine's demands, but he still prepared for his spiteful former boss to carry out her threat anyway, as the climate of fear has lasted to this very day.

Berg's inauguration date of 19 January 2011 would be the very first official opportunity for Berg to put one or more people of Pine's choosing on the City Council payroll, whether or not such an individual would be chosen by merit or instead by threats of political retaliation combined with promises of political protection. As the evidence shows, a little more than two weeks into Berg's term of office, on 10 February 2011, Berg e-mailed me and instructed me to hire Gollner as an event coordinator for Council District 1, at a rate of \$500 per event. Gollner was in fact quite involved in event coordination for Berg's office after that. Indeed, below is a photo of Gollner operating the slideshow equipment while Berg speaks from the podium at Berg's City-sponsored anti-rail community townhall meeting at Ewa Makai Middle School on 15 June 2011. In addition, where one non-coincidence follows another, it appears that Berg has recently hired another Pine crony to work at City Hall: Mr. Jon Launer, who has worked on Pine's political campaigns for years and years.



Based on everything I witnessed, it seems to me that Berg must have bowed to the pressure of Pine's extortion and/or succumbed to Pine's inducement to accept her bribe of not running against him by awarding a position to Gollner and authorizing a degree of the very favoritism and payoff and kickback that Pine had been demanding. However, neither Berg nor I were delusional enough to think that giving Pine anything less than 100% of what she wanted could bring any hope of avoiding a political confrontation. That's why preparations for the worst had already begun, by spending thousands of man hours at City Hall at Berg's direction working on political research, strategies, tactics, operations, and the like in preparation for 2012, as well as using City resources to promote Berg and position him for his re-election bid in 2012.

Naturally, for Pine to be successful in her bribery and extortion, Berg himself would be subject to prosecution for violation of various laws, including City ordinances pertaining to ethics. Following the inducements and threats from Pine, Berg would have failed to meet the "highest standards of ethical conduct" called for in the City Charter and in Section 11-101 of the Revised Ordinances of Honolulu, as Berg's self-interested protection of his own personal, financial and political positions through the hiring of Gollner in order to meet Pine's demands would certainly not amount to "faithful discharge (of Berg's duties) regardless of personal considerations." According to the Honolulu Ethics Commission's own Chuck Totto, "the Charter of the City & County of Honolulu and RCH Sec. 11-104 prohibits the use of city resources for non-city projects or to give special treatment to one person that is not available to all others." In addition, RCH Section 11-102 and Section 11-104 prohibits the very conflicts of interest, special treatment and quid pro quo witnessed in the exchange of Pine's "gift" of not running against Berg in exchange for the "special treatment" and "advantage" of Berg using his official position in the

“performance of his official duties” to hire Gollner under the very real and substantial threat of retaliation from Pine.

As the top political consultant to both of these candidates for public office, I can tell you with absolute certainty that Rep. Pine’s threat to Councilman-elect Berg was a very, very substantial, credible, and influential one, based on her strong political campaign record of organizing. In addition to being in office longer, Pine is well known and is a proven fundraiser with a large volunteer base and a healthy campaign surplus, whereas Berg is lesser known and is an extremely poor fundraiser, with virtually no volunteer operation, no donor base, hardly any endorsements, and a massive campaign deficit.

Berg’s above-referenced political vulnerabilities were all very well known to the politically-strong Pine, as the evidence shows, along with her knowledge of Berg’s financial and personal liabilities. Berg had no outside income, no savings, he was living paycheck to paycheck with a large amount of personal debt, he would be making less money as a council member than Pine was paying him as a staffer, he was living with his girlfriend Edlynn Taira in a tiny, 400 square foot, single-story townhouse behind Foodland Ewa Beach which his girlfriend owned when Berg moved in with her, and Berg had already told Pine and Ryan that his girlfriend would kick him out of her apartment if she ever found out how much debt he had amassed from his mostly unsuccessful political campaigns. As this and other evidence will show, with Pine sleazily threatening to retaliate against Berg by running against him, and by corruptly offering Berg an option by which she wouldn’t run against him, Pine was effectively going for Berg’s jugular over this Gollner issue.

It should be noted that the evidence will show that Pine herself had a strong and well-known desire to run in the special election for the open City Council seat from the very same council district as Berg, as they live just blocks away from each other in Ewa Beach. Moreover, you’ll see from the evidence that Pine’s desire to run for Council, combined with her considerable regret at the political impracticality of doing so (*due to the timing of being in the middle of her own re-election campaign for the State House seat she currently holds*), her lack of respect for Berg’s candidacy, her reluctance to support Berg’s campaign, and her extremely unenthusiastic, last minute endorsement of Berg (*at my request*) just days before ballots were counted all created an atmosphere in which it was not very difficult for Pine to resort to extortion and bribery and other criminal acts within hours of Berg’s resentment-inducing victory.

In the matter described in this complaint, I believe the evidence will show that Pine’s criminal acts include, but are not limited to:

- **Extortion & Attempted Extortion:** Pine’s scheme to obtain a job for her aide Gollner involved the illegal threat of retaliation, deliberately intended and calculated to harm Berg’s reputation, financial condition and political position;
- **Bribery & Attempted Bribery:** Pine’s scheme to obtain a job for her aide Gollner involved the illegal offer of a bribe, by which Pine would not run against Berg in 2010 rather for another City Council seat (*per Pine, Councilman Nestor Garcia’s seat*) than the one Berg occupies;
- **Theft or Bribery Concerning Programs Receiving Federal Funds:** As with the federal conviction of Honolulu City Councilmember Andy Mirikitani, Pine’s scheme involved using bribery to obtain unauthorized control through Berg over property belonging to city government, which obtains millions of dollars annually from the Federal government in the form of grants and programs for capital and operating expenses;
- **Theft & Attempted Theft:** Pine’s scheme to obtain a job for her aide Gollner involved obtaining unauthorized control over property belonging to city government and taxpayers;

- **Money Laundering & Intent to Launder Money:** Pine's scheme to obtain a job for her aide Gollner involved conducting a financial transaction involving the proceeds of unlawful activity;
- **Harassment & Attempted Harassment:** Pine's scheme to obtain a job for her aide Gollner involved repeatedly communicating with the intent to alarm Berg and Ryan without purpose of legitimate communication;
- **Use of a Computer in the Commission of a Separate Crime:** Pine's scheme to obtain a job for her aide Gollner involved intentionally using a computer to obtain control over property to commit theft;
- **Wire Fraud & Attempted Wire Fraud:** Pine's scheme to obtain a job for her aide Gollner involved use of electronic mail to defraud the City and its taxpayers;
- **Honest Services Fraud:** Pine's scheme to obtain a job for her aide Gollner involved the willful and intentional deprivation of the people of Honolulu of their intangible right of honest services;
- **Extortion via Interstate Communications:** Pine's scheme to obtain a job for her aide Gollner involved extortion transmitted via the use of an electronic mail system with the threat concerning the unlawful theft of property from the City and its taxpayers;
- **Terroristic Threatening:** Pine's scheme to obtain a job for her aide Gollner involved threatening to commit a felony with the intent to terrorize public servants in regard to the performance of their official duties;
- **Election Fraud & Attempted Election Fraud:** Pine's scheme to obtain a job for her aide Gollner involved her offer and her delivery on that offer to withdraw from being a candidate at an election in consideration of any valuable inducement;
- **Violations of State Ethics Laws:** Pine's scheme to obtain a job for her aide Gollner involved unfair treatment by using her official position to obtain special treatment for Gollner and also involved soliciting a gift intended as a reward for official action on the legislator's and/or employee's part. Pine also punished Berg by terminating his employment after Berg rejected the scheme, which was first promulgated through workplace harassment in order to gain an unfair and illegal advantage in securing control over City funds from her then State employee.
- **Failure to Register as a Lobbyist with the City Ethics Commission:** Pine's scheme to obtain a job for her aide Gollner involved failing to register as a lobbyist, yet proceeding to ignore the prohibition against unregistered lobbyists engaging City employees for the purpose of influencing any legislative or administrative action of the city.

The relevant statutes and ordinances are set forth in the enclosed exhibit entitled "Lawmaker Kym Pine is Accused of Committing At Least Twenty Serious Crimes in Violation of Federal, State and County Laws." I believe that these criminal acts by Rep. Pine must not go unpunished and meet every legal test for violations of the relevant laws. Additional crimes related to Rep. Pine's actions probably involve more criminal acts that I simply do not recognize as a layman and will rely on you and your colleagues at the U.S. Attorney's office and your colleagues throughout the law enforcement community to determine. As you know, even if Berg had never met Pine's terms and even if nothing of value had changed hands, Pine may still be found guilty of extortion and bribery because of her well-documented intent to collect a kickback from Berg through voluntarily and intentionally devising and participating in a scheme to defraud the City by extorting and bribing Berg (*and through attempting to recruit me, his top aide*) to assist in the extortion and bribery. Pine's moral turpitude and gross immorality, her cost to taxpayers, and her denial of honest services to the people of Honolulu are the main reasons why Pine should be swiftly prosecuted for her egregious, improper, unethical and unlawful conduct.

I have divided and sorted the evidence chronologically into three sections to facilitate the investigation, indictment, prosecution and conviction of Rep. Pine for every one of the crimes I have alleged herein. First, the 'lead up' in 2010 to Pine's criminal acts which will provide you with necessary background



information. Second, the very evidence of Pine's criminal acts themselves in 2010 and 2011. Thirdly, the 'aftermath' in 2011 and beyond brought about by Pine's criminal acts. This last section shows you how the incredibly severe impact of Pine's unlawful pressuring of Berg to hire Gollner is almost too great to measure, as Pine's corrupt scheme of blackmail and racketeering and tempting of this newly-elected public official turned these former political allies, Berg and Pine, into political enemies overnight and with lasting effect.



It is important to understand that in late 2010, Pine, Berg, Gollner and I were all still part of a close-knit team of Republicans in West Oahu. There was never any possibility for any one on our team to run against each other. But all that changed when Pine extorted and bribed Berg for a financial payoff with her shameless shakedown of threats and inducements in order to get a job at City Hall for her political campaign chairman. The absolute fear aroused and inspired by Pine's blackmail and bribery was so intense that Berg, from that day forward, has been willing to risk breaking the law daily in order to preserve his personal,

financial and political positions through having his City Hall staff do endless amounts of non-City business, to include political research, deliberation, promotion, coordination, promotion and more in large measure to fend off or fend against a political challenge from Pine in 2012; pursuing district politics rather than district solutions.

Indeed, the evidence will show that since Pine's harassment began on 30 December 2010 Berg has been obsessed about the prospect that his former mentor, friend, and political ally is running against him. Without question, Pine's illegal threats and inducements have haunted Berg to this very day, leading to Berg's ever-present fixation with fighting off a challenge from Pine, even if it means running afoul of the law and turning his City Hall staff and resources into a political campaign machine. For example, desperate to make an impression in Pine's Ewa Beach stronghold, Berg recklessly used more than \$400 in funds from his City Council contingency fund to pay the \$200 sponsorship fee to have a campaign booth at the annual Pride4Ewa event in Ewa Beach on 30 April 2011, as well as to pay for \$206 in tax-funded "Team Berg" polo shirts for his paid City staff to wear. The photo says it all: Berg using tax money, City staff and City resources to get re-elected. Dozens upon dozens of additional examples will be shown in my next report/complaint about how Berg embraced illegal uses of the resources available to him as a City Council member in the wake of Pine's highly threatening criminal acts and Pine's credible and heightened political threat.



LEFT: Berg staffer John Bond, Tom Berg, Berg staffer Gemma Espresion, Berg staffer Eric Ryan, two sons of Berg staffer Philmund Lee (who is taking these photos). RIGHT: Berg staffer John Bond, Tom Berg, Franklin Souza (husband of Berg staffer Evelyn Souza), and Evelyn Souza.

Putting a fine point on it, Pine's multiple threats deliberately and recklessly struck absolute terror in Berg from that day forward, clearly knowing that she had the upper hand against the vastly weaker politician. With the prospect of Pine running against him, Berg told me on more than one occasion that he was sure he'd end up pulling weeds again for the Ewa Gentry community association, which was his job before being hired eleven years ago by Willie Espero to work at the State Legislature, as Berg had no college degree when he moved to Hawaii from the mainland with just a few dollars in his pocket.

As you can see from the evidence provided, Kym Pine's illegal political and financial threats pushed Tom Berg over the edge and caused him to illegally squander his time and resources at City Hall on politics and non-City business. The situation was so intense that Pine's strong-arm tactics immediately turned her from being Berg's mentor, friend, employer and political ally into a graft-seeking political enemy, community rival and persona non grata who was threatening to punish Berg personally, financially and politically. Her misdeeds come at great public expense. I know this because I was there for every part of this; from the build up, to the crimes, to the aftermath and the daily impact at City Hall. Pine's criminal behavior appeared to cause Berg to freak out and to think politically to such an extreme that virtually everything we did at City Hall on Berg's staff, as City employees, was impacted by politics . . . including doing an overwhelming and highly documented amount of political work on taxpayer time and with taxpayer resources.

Please note that the evidence provided is not all of the documentation I possess. More potentially useful evidence does exist, including voice recordings, internal memos, voicemails, e-mails, notes, additional documents, affidavits and eyewitness statements. In addition, please know that I can provide digitally-verifiable electronic copies of these e-mails, which can be compared against the personal and work computer records of Rep. Pine, Councilmember Berg, Pine's chief of staff Gollner, and other the other senders/recipients of these e-mails. In addition, phone records will validate that conversations took place which are noted in the enclosed evidentiary timeline. Additional sworn witness accounts should be fairly easy to obtain. When you are ready, I can also point you in the direction of additional corroborating evidence of her crimes.

As an elected government official, Pine's engagement in the bribery and extortion of a fellow public servant is particularly egregious and should be treated as such by law enforcement. Berg's failure to report Pine to authorities clearly indicates that he became complicit in Pine's illegal schemes and/or that Berg was still fearful of Pine. And since Pine has not turned herself into authorities and admitted to her crimes, and because Berg lives in fear of Pine and does not wish to antagonize her by reporting her crimes, and because Gollner is too loyal to Pine so as not to create trouble, that leaves it to me to report how Pine threatened Berg so severely in a manner so threatening and terrorizing to Berg's personal, financial and political well-being that the illegality of her extortion and bribery and other crimes of public corruption must be dealt with swiftly.

Please accept my offer to cooperate fully with your investigation. You can reach my via the contact information on the first page of this letter. I look forward to your earliest possible reply and the speediest possible justice.

Sincerely,

ERIC S. RYAN