

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WESLEY TRENT SNIPES,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No.
)	
CITY OF NEW YORK, a Municipal)	
Corporation; COUNTY OF NEW YORK, a)	
Municipal Corporation; Family Law Court of)	
New York; LAPORTE COUNTY, a)	
Municipal Corporation; PRISCILLA JO)	
BECKMAN; ROBERT BECKMAN;)	
MARJORIE WEINER; and)	
DAVID KIRSHBLUM,)	
)	
Defendants.)	
)	

DECLARATION OF BILL E. BRANSCUM

I, Bill. E Branscum, a licensed Private Investigator, proffer this Declaration, prepared by me in the State of Florida, County of Collier, under penalty of perjury, based upon my personal knowledge and observation, to which I will credibly testify, in which I declare as follows:

Preliminary Matters

1. On March 14, 2004, the Law Firm of Robert G. Bernhoft [the Firm], 207 E Buffalo Street, Suite 600, Milwaukee, WI 53202, contacted me with regard to this case, and retained me to investigate the facts and circumstances that gave rise to it.
2. I interviewed Lanise Pettis, members of her family including the grandmother who raised her, and a former boyfriend, who all provided sworn statements. They maintain that Lanise Pettis is profoundly delusional, and the former boyfriend testified that he long ago met with Indiana authorities, and provided them with a sworn statement to that effect.

Background of Declarant

3. I am a Private Investigator employed by Oracle International, an investigative agency that I established following my career as a Special Agent, U.S. Department of the Treasury.
4. I am the father of four children, I am their custodial parent, and I have been since three of them were preschoolers. I have served my community as a Guardian ad Litem.
5. As a Private Investigator, my casework has related primarily to financial matters and securities issues. In addition to investigating a number of high profile frauds, contributed to numerous successful criminal prosecutions, and testified as an expert witness.
6. As a federal agent, I initiated and conducted investigations involving violations of federal law, prepared case prosecution summaries, and participated in successful criminal prosecutions and civil forfeiture actions in state and federal courts. While assigned to the FBI Organized Crime Strike Force in Miami, I investigated foreign and domestic “boiler rooms,” where telemarketing con artists perpetrated international schemes to defraud.
7. My experience relates primarily to violations of the United States Code, including, but without limitation, violations of Title 12 (Banking), Title 18 (general), Title 19 (smuggling), Title 21 (narcotics), Title 26 (taxation) and Title 31 (money laundering); I have also conducted investigations related to the unlawful exportation of critical technology (Exodus violations), the sexual exploitation of children, and contract murder.
8. In addition to the knowledge and experience I acquired consequent to my employment, I have an academic background upon which I rely. I attended Eastern Kentucky University and was awarded a B.S. Degree in Criminal Justice upon graduating “With Distinction.”
9. I subsequently attended the United States Department of the Treasury, Federal Law Enforcement Training Center in Glynco, Georgia; I was the Class Honor Graduate.

Declarant's Narrative

10. On March 14, 2004, the Law Firm of Robert G. Bernhoft, 207 E Buffalo Street, Suite 600, Milwaukee, WI 53202; (414) 276-3333 Voice, (414) 276-2822 Fax, contacted me with regard to a paternity action, New York City Family Court Case No. U-8716/01, styled Lanise Pettis, Petitioner v. Wesley Snipes, Respondent, formerly filed as Laporte, Indiana Cause Number 46D01-0106-RS-143.
11. Atty. Bernhoft reported that Petitioner Pettis filed a request for public assistance in Indiana regarding her minor child Israel Pettis. Petitioner Pettis reportedly identified "her cousin," Wesley Snipes as the most likely putative father, but he denies any possibility of paternity, declares that Petitioner Pettis' claims are wild fabrication, and specifically maintains that he does not know her, they are not related, and they have never met.
12. Upon review of the case, I was struck by the apparent lack of investigation by Indiana authorities. As an investigator, I could not imagine leaving this matter to resolve as, "*He said, she said;*" Lanise Pettis' parents, and any number of other people, should have been able to refute Wesley Snipes' claim that he did not know her – particularly in light of her claim that they are related.
13. On April 21, 2004, I traveled to Chicago, IL, where I liaisoned with William "Bill" Wagner, an Illinois Private Investigator who retired from the Chicago Police Department, Dennis Hyten, an Indiana Private Investigator who retired from the FBI and Gary Somerville, an Illinois process server with good contacts on Chicago's West Side.
14. With their assistance, I initiated the appropriate investigative inquiries, and collected evidence including a series of sworn statements. In so doing, I determined that it is common knowledge that Lanise Pettis is, and has long been, completely delusional.

15. On April 24, 2004, Inv. Hyten, Inv. Wagner and I met with Lanise Pettis at her residence located at 3456 Salem Ct., Michigan City, Indiana and recorded her sworn statement.
16. Ms. Pettis was extraordinarily polite, notwithstanding the fact that she apparently believed that we represented a villain who married and impregnated her as a child, separated her from six of their nine children, refuses to contribute to the support of three of those children who have not yet been spirited away, and persists in denying their relationship.
17. Inv. Hyten, Inv. Wagner and I are convinced that Ms. Pettis is entirely innocent of evil intent. Absent any hint of self-consciousness or discomfort, she alleges that she has been the victim of various plots, claiming to have given birth to numerous children that were inexplicably spirited away to places unknown, and she freely describes purported personal relationships with several celebrities and politicians, including; Wesley Snipes, Michael Jordan, Denzel Washington, Oprah Winfrey, Prince, and former President, Bill Clinton – with whom she claims to be biologically related.
18. Ms. Pettis is fully aware that others believe she has a mental disorder – note that she confirms the family’s statements to the effect that the issues began in 1998. Also note that she demonstrates a peculiar honesty and openness in admitting that there are things she cannot make sense of:

93 What has happened throughout the years I have absolutely no idea. Everyone absolutely
94 says that I have a *mental* disorder. I have never had a mental problem. The accusations against
95 me that I have a mental disorder, didn't come about until 1998, when I became pregnant with
96 Mahogany Snipes.

19. Ms. Pettis reports that she and Wesley Snipes have nine children, but her efforts to identify and account for them are objectively bizarre.

20. Ms. Pettis believes that her sexual relationship with Wesley Snipes began when she was twelve, and she gave birth to the first of their nine children when she was thirteen.

58 [Inv. Branscum] How many children do you have?
59 [L. Pettis] There's nine of them. I became involved with the actor Wesley Snipes at the age of
60 12, I became impregnated at 12 and gave birth to my first child at 13. My parents sent me away
61 to a maternity camp in the lower part of the state in Illinois. Now that is the real story. I

21. Ms. Pettis claims to have had her second child by Wesley Snipes when she was sixteen.

76 I swear to *you* that he's the one who's lying, not me. I had my second child by the time I
77 turned sixteen...

22. Ms. Pettis claims to have given birth to their third child, whom she identifies as being the celebrity actor Brandon Hammond, when she was 18 years old (1989) She states that his real name is Rashan Almadillo.

82 So now I believe you are up to 1989 when Brandon Hammond was born, the actor –
83 that's my son too. His real name is Rashan Almadillo, OK? Now Lauren ...

23. Ms. Pettis is clear in her mind that Wesley Snipes is the father of these children.

86 [Inv. Branscum] OK so the first three children were all born of . . . Wesley Snipes was the
87 father?
88 [L. Pettis] Wesley Snipes is the father, OK, and this is something that I know for sure.

24. According to her family, Lanise Pettis' eldest daughter is named Lauren, and they know who the father is. Lanise Pettis claims that Lauren has a twin sister that the family [who were present at Lauren's birth] deny knowing anything about. According to Ms. Pettis, Wesley Snipes is the father of these children and he "*has the twin.*"

144 OK, now this is what the issue his--I'm going to have to give you the paternity of all of
145 my kids. Lauren Johnson, the young – the little girl that you met at my grandmother's house, she
146 is biologically Wesley Snipes' daughter. Lauren has a twin named Lanar, their names are Lanar
147 Zachariah Estradas Snipes and Lauren's name is Lorena Adorier Zion Estradas Snipes, they're
148 twins.
149 He has the twin.

25. That accounts for five children. Ms. Pettis believes she is the victim of extraordinary conspiracy. She states that the sixth child was the result of some sort of medical "violation" where here egg was stolen and implanted in someone else, allowing Wesley Snipes to have child number six, identified as Donatia Noel Estradas Snipes.

156 who is a candidate to be infertile, for them to use my fertility. So as a way of intimidation once
157 before, one of my eggs was implanted with Wesley Snipes sperm, someone else carried her but
158 that child is alive, now that baby was born in 95, her name is Donatia Noel Estradas Snipes.

26. Child number seven is identified as being Mahogany, but Ms. Pettis represents that her name was changed to Marguerite. Her name is Mahogany Snipes; I have obtained a copy of her Birth Certificate and determined that Ms. Pettis was involuntarily committed to a psychiatric facility following her birth.

166 along the line there is a literal name change. I spoke of Mexico, so this is going to have to go
167 basically country to country, international, Mahogany's name is Marguerite Mahogany Eljaha
168 Snipes. That is her real name.

27. Although Ms. Pettis claims to have had nine children, Israel, the child whose paternity is at issue here, was identified as being child number eight - Ms. Pettis expresses some confusion as to what his name actually is.

169 Now we get down to Israel. Now to the best of my knowledge, Israel's real name is
170 probably filed as, Israel Prophesia Terrell Estradas Snipes, or Israel Prophesia Wesley, but I
171 think it's Terrell.

28. Ms. Pettis did not name a ninth child, but she did identify another pregnancy. She stated that Wesley Snipes' Asian girlfriend was pregnant by virtue of an egg taken from Ms. Pettis.

403 denials. I was told that, you know, he's got a girlfriend now, she's Asian and she's pregnant-- I'm
404 like, "*OK with my egg though.*"

29. As bizarre as Petitioner Pettis' claims regarding her alleged relationship with Wesley Snipes are, it is very difficult to imagine that anyone could be gullible enough to believe them. When you factor in her statements related to other celebrities and politicians, it becomes incomprehensibly ridiculous. For example, Ms. Pettis claims to have had some sort of relationship with Michael Jordan.

443 Yeah, I have met Michael Jordan before, personally, I do not like Michael Jordan, I do
444 not get along with him. On the occasion that we met, I disagree with his philosophy, I think that

30. Ms. Pettis also claims to have met Oprah Winfrey.

478 [L. Pettis] I have met Oprah Winfrey before.

31. Ms. Pettis also claims to have met Former President Bill Clinton; in fact, she goes on to claim that she and President Clinton are related.

530 [Inv. Branscum] Had you met Bill Clinton?

531 [L. Pettis] Yes, I've met Bill Clinton too!!!!

533 [L. Pettis] Bill Clinton is related to us; I'm related to Bill Clinton.

534 [Inv. Branscum] Really?

32. This goes on and on and I see no reason to “beat a dead horse.” The point I would make is, there is nothing subtle about Ms. Pettis’ problem. When she discusses the facts and circumstances surrounding this case, it is immediately obvious that she is delusional.

33. I also respectfully draw the Court’s attention to the fact that this statement was derived consequent to mere inquiry – this was not an interrogation. I simply asked her to tell me what happened, and allowed her to talk; the other investigators rarely said anything at all.

34. In other words, this remarkably bizarre, “Alice in Wonderland” statement is an accurate rendition of what *anyone* can expect to hear when they ask Ms. Pettis to tell them her story – “anyone,” including those who instituted the Indiana and New York actions against Wesley Snipes..

35. Although they remain inexplicably silent about it, Indiana authorities are aware that there is more than one child involved.

99 [Inv. Branscum] Now let me ask you, and I don't mean to interrupt you, but are the Beckman's
100 aware that there is actually more than one child involved in this?
101 [L. Pettis] I discussed Brandon with them. At the time that I spoke to attorney Beckman, I was

36. Curiously, Ms. Pettis attributes a statement to Robert Beckman to the effect that the Beckmans were the only people familiar with this case who supported pursuing it, “*even if just for technical reasons.*”

131 Rob Beckman has stated to me also that they are the only ones, basically who knew of the
132 case who were in support of getting it done, even if just for technical, technical reasons.

37. In addition to the story regarding the paternity of Brandon Hammond, Ms. Pettis reported other bizarre claims to Atty. Robert Beckman as well.

262 I've already spoke of these possibilities, I've told Rob Beckman there was a level of abuse
263 that was happening. I've told them that I've been abused, I've told him that I was also threatened
264 regarding music, that my endeavors in music or television would never come true if I spoke of
265 things that were happening in the doctor's offices, or things that happened behind, basically, the
266 casting couch ...

38. Although Indiana authorities represent to this Court that they believe Lanise Pettis, Ms. Pettis tells a dramatically different story, attributing a very negative posture to them.

594 *“Alright, let me put my career on the line here as the prosecuting attorney for the*
595 *county and make a fool out of myself, and waste my time, and not go out here and get some*
596 *bum off the street whose your real baby Daddy.”* You understand, this is the type of mentality
597 I'm dealing with.

39. As I stated previously, when I reviewed the case file, the statements of supportive family members seemed conspicuous in their absence. If Indiana authorities actually believed Lanise Pettis' claim that she was related to Wesley Snipes, it seemed unthinkable to me that they would have allowed his denial to stand unchallenged as the supporting statements of third party relatives should have been readily available.

40. On April 22, 2004, accompanied by “Bill” Wagner and Gary Somerville, I interviewed Lanise Pettis' Grandmother, Ms. Anna Roberts, at her residence in Chicago, Illinois.

41. Ms. Roberts was very cooperative. She expressed apparently heartfelt regret that Wesley Snipes has been put in this position.

42. Ms. Roberts reported that she raised Ms. Pettis since she was seven years old, until she recently relocated to Michigan City, Indiana.

18 **[Ms. A. Roberts]** She is my granddaughter, my oldest son's daughter, I raised her from seven
19 years old. She stayed with me, up until she went to Michigan City, let's see, after she had
20 Mahogany. [Unintelligible].

43. Grandmother Roberts was able to pinpoint the time that Ms. Pettis began exhibiting delusional behavior – immediately after she went to see the Wesley Snipes’ movie, “Blade.”

21 [Inv. Branscum] OK, now did there come a time when you heard her begin making references to
22 her relationship with an individual named Wesley Snipes?

23 [Ms. A. Roberts] Only after she went to see that movie that Wesley Snipes was in, Blade. I had
24 never heard her call Wesley Snipes name, mention him, nothing about Wesley Snipes before
25 then.

44. When asked about Israel Pettis, the child whose paternity is at issue, Grandmother Roberts does not believe that Wesley Snipes is the father.

85 [Inv. Branscum] Do you believe that Wesley Snipes is the father of that child?

86 [Ms. A. Roberts] No.

45. In fact, Grandmother Roberts claims to know who the father is.

87 [Inv. Branscum] Who do you believe the father of that child is?

88 [Ms. A. Roberts] It's a fella by the name of, Billy. I don't know his last name, but she been
89 knowing him for a long time. He was nice to her, he tried to keep her away from drugs, while
90 she was pregnant with Mahogany, her second oldest daughter.

97 [Inv. Branscum] So he is, he has specifically claimed that he is the father?

98 [Ms. A. Roberts] Yes, he has.

46. Although Grandmother Roberts is the obvious person to ask about Lanise Pettis' claims, neither the Beckmans, nor anyone from their office, have contacted her.

109 [Inv. Branscum] OK. Have the attorneys that are representing this case, has anybody named
110 Beckman talked to you about this case?
111 [Ms. A. Roberts] No, nobody.

47. If anyone had contacted her, Grandmother Roberts would have told them the truth. She expressed sympathy for Wesley Snipes and the belief that Lanise Pettis "needs help."

179 [Ms. A. Roberts] I haven't seen no Wesley Snipes, I only seen him on television. I feel sorry for
180 the man, because I don't think it's right, you know, but Lanise needs help. I told her hospital that,
181 and I have told the people here in Illinois that she needs help.

48. Grandmother Roberts went on to say that Lanise Pettis had been admitted to a psychiatric facility, but she did not feel that her granddaughter had received all the help she needed.

127 [Inv. Branscum] Did there ever come a time when she had some help?
128 [Ms. A. Roberts] Yes, but I think she need a little longer care, you know, that wasn't long
129 enough.

130 [Inv. Branscum] Where was it that she got some help before?
131 [Ms. A. Roberts] The name of that hospital, it was on, it was on West, St. Elizabeth's.

49. It is truly curious that Indiana authorities did not contact Lanise Pettis' grandmother – especially since Grandmother Roberts has lived at the same address, with the same phone number, for about forty years.
50. On April 22, 2004, accompanied by “Bill” Wagner and Gary Somerville, I interviewed Ms. Pettis' sister, Nikki Garrett. In the transcript of this interview, Ms. Garrett spoke about her love for her sister with apparent sincerity while describing her delusional behavior and maintaining that she needs help.
51. Ms. Garrett related that, in addition to her delusions regarding Wesley Snipes, Lanise Pettis: 1) claimed to have been married to Michael Jordan; 2) claimed to have had some sort of relationship with Denzel Washington; 3) insisted that Tyra Banks (who is 30) is actually her daughter; 4) claimed to have been cheated by Prince and Oprah Winfrey, and 5) claimed to have “partied” with former President Bill Clinton.
52. From an investigative perspective, the statements that Sister Garrett and Grandmother Roberts attribute to Lanise Pettis support the contention that Ms. Pettis is truly delusional. If Ms. Pettis was deliberately attempting to execute some sort of scheme directed at Wesley Snipes, she would not have added the representations regarding the other celebrities, as they served no purpose other than to dramatically diminish her credibility.
53. I have appended the statements of Lanise Pettis' grandmother, Anna Roberts, and her sister, Nikki Garrett, for the Court's review.
54. It is troubling that obvious witnesses, whose statements were readily available, were not interviewed, but “sloppy” became sinister in light of the statement of Keith Cowans, Lanise Pettis former boyfriend.

55. On April 21, 2004, accompanied by “Bill” Wagner and Gary Somerville, I interviewed Keith Cowans at his residence in Chicago, Illinois. As was the case with others, Cowans made it clear that he does not believe, and has never believed, her representations regarding her alleged relationship with Wesley Snipes. He reports that the first time she told him these stories, he *“laid her down and put cold rags on her head.”*

56. Most significantly, Cowans reports that he contacted the Office of the District Attorney, Michigan City, Indiana, and spoke with the prosecutors handling the case. He states that he spoke with them approximately five times and ultimately met with them and provided them with a sworn statement regarding Lanise Pettis’ history of delusional behavior. He reports that the Beckman’s indicated that they *“didn’t believe Lanise Pettis because she wasn’t making any sense.”*

76 [Inv. Branscum] Now, when you referred to her attorneys, who are you talking about?
77 [K. Cowans] The Beckman's of Indiana, the DA, district attorneys of Indiana,...

80 [Inv. Branscum] How many times have you spoken to the Beckman's?
81 About, anyplace from three to five times on the phone, and once personally.

82 [Inv. Branscum] When you spoke to them personally, did you give him any sort of a statement?
83 [K. Cowans] Yes.
84 [Inv. Branscum] Was it is a sworn statement?
85 [K. Cowans] Yes.

94 [K. Cowans] I told 'em, I don't think so, it just doesn't make any sense. They said it is not
95 making any sense, they told me they didn't really believe her, I said, "*Shit, no one does.*" We
96 laughed, I said, "*No one she has ever told that to does.*"

57. Mr. Cowans reports that the Beckmans shared bizarre stories with him too. He relates that they told him the story about Ms. Pettis giving birth at her grandmother's house to Wesley Snipes' baby many years ago, when she was very young, as well as the fact that Wesley Snipes returned in a helicopter and spirited this baby away.

72 [K. Cowans] Yeah, her attorneys told me a story that she told them, about Wesley Snipes.
73 When she was young, much younger, very young, at the beginning of their rendezvous or
74 however you want to term that, when she got pregnant, and he came with a helicopter and took
75 the baby away, when she birthed at her grandmother's house. As absurd as that sounds,...

58. I found this significant as Mr. Cowans asserts that the Beckmans have long been aware that Lanise Pettis' claims are not limited to the baby at issue here, and they have good reason to interview Ms. Pettis' Grandmother, which they have conspicuously failed to do.

59. No matter what they believed, or when they came to believe it, Lanise Pettis' former boyfriend alleges that the Beckman's are in possession of his sworn, exculpatory statement, which they have failed to acknowledge the existence of, or produce.

60. This Declaration is intended to serve the interests of Wesley Snipes, and address the issues before this Court, but if I might be permitted to speak openly, as person who has been both a single parent, and a Guardian Ad Litem, there are collateral issues that I would beg leave to address.

61. I have met Lanise Pettis, I have met her children including her son Israel, and I have spent a considerable amount of time in their home. In contrast to the way she has been represented elsewhere, Ms. Pettis appears to be clean, straight and sober, her home is neat and tidy, her son is clean, well groomed, and appropriately dressed.
62. Ms. Pettis is functioning better as a mother than might be expected in light of the issues that confront her. Although she is profoundly delusional, her belief system is circumscribed to the point that she can function in society; she is able to hold a job, and she is managing to make do.
63. Frankly, I fear for her welfare as those who should have helped her, have encouraged her to believe in her delusions instead.
64. Further, it occurs to me that persons of no particular professional integrity might find it self-servedly face saving at this point to initiate a “false statements” related prosecution. I recognize that there are jurisdictional issues, and matters of jurisprudence that I may not comprehend, but I pray that this Court will make an effort to protect her interests.

FURTHER DECLARANT SAYETH NOT.

I declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. §1746, and Florida Law, that all of the statements made in this Declaration are true and correct to the best of my information, knowledge, and belief.

Executed this 14th day of December, 2004, in Collier County, Florida.



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