



BLUE DIAMOND INVESTIGATIONS, LLC

P O Box 6092 Grand Rapids MI 49516-6092 P 616.957.7800 F 616.957.3292

June 23, 2008

Mr./Ms. Insurance Adjuster
Insurance Company USA
P O Box 1234
Any Town USA 12345

RE:	Insured:	ABC Company
	Plaintiff:	John Doe
	Date of Loss:	11-8-04
	Case No.:	1234ABCD
	Our File No.:	S-4321

Dear Mr./Ms. Insurance Adjuster:

Please allow this report to respond to your request for surveillance of John Doe. Mr. Doe is alleging disability due to a back injury and alleges that he cannot ride in a motor vehicle for more than one hour, cannot twist his neck from side to side and cannot bend or twist his back or lift anything overhead. Due to the plaintiff's suspicious nature you authorized the use of two operatives for this assignment.

On Wednesday, June 4, 2008, surveillance was initiated. The weather was partly cloudy with temperatures in the 70's.

At 6:00 AM, two operatives departed overnight accommodations en route to the plaintiff's last known residence located at 1234 Main Street, Any Town, Michigan.

At 7:00 AM, the operatives arrived at the Main Street residence. The residence is described as a brown single story home with a detached three stall garage. The garage doors were closed upon arrival and one vehicle was parked in the driveway:

A green Ford Explorer, Michigan license plate # ABC123.

A request with the Michigan Secretary of State determined that the 1999 Ford Explorer is registered to Jane Deer, 5678 State Street, Any Town, Michigan 49000.

There was no sign of the plaintiff's known white Dodge Dakota pickup truck. No visible lights were observed on within the residence and no outside activity was noted. One operative established discreet surveillance of the residence with a distant view of the front of the property and the second from an advantageous chase position.

At 7:09 AM, the Ford Explorer was observed departing the area. A white female subject in her late 60's to early 70's was driving the vehicle. A white male child was a front seat passenger and a white female adult was in the back seat.

At 7:45 AM, the older female subject returned to the residence in the Explorer. She appeared to be alone in the vehicle.

At 7:52 AM, a blue Suzuki Verona was observed pulling into the Main Street driveway and out of view. A drive by was performed at that time.

At 7:53 AM, during the drive by, the unoccupied Suzuki was observed parked in the driveway. The license plate # was determined to be Michigan, 123ABC.

A request with the Michigan Secretary of State determined that the 2004 Suzuki Verona is registered to Jill Deer, 5678 State Street, Any Town, Michigan 49000.

From 8:38 AM to 10:46 AM, the older white female subject departed twice more alone in the Explorer and returned a short time later.

At 11:00 AM, the Ford Explorer and the Suzuki Verona remained on location. An investigation was undertaken at that time to develop any possible secondary residences for the plaintiff.

First, An Advanced Person Search was conducted for John Doe. The most recently reported address for the plaintiff was determined to be:

- **5678 State Street, Any Town, Michigan 49000, reported last in April of 2008.**

Next, a Comprehensive Search was conducted for the plaintiff. Again, the Any Town address was determined to be the most recently reported. Two vehicles with current registrations were determined to be registered to the plaintiff:

- **A 2000 Dodge Dakota, Michigan license plate # DEF456.**
- **A 1996 Ford Mustang, Michigan license plate # 456FED.**

The address of record for the plaintiff at the Michigan SOS was determined to be 5678 State Street, Any Town, Michigan 49000.

At 11:20 AM, one operative departed for a spot check of the residence located at 8765 East Road. Information received with this assignment indicated that the plaintiff once resided at this location.

At 11:25 AM, the operative arrived at 8765 East Road. One vehicle was parked in the driveway upon arrival:

A white Dodge pickup truck, Michigan license plate # A1234B.

A request with the Michigan Secretary of State determined that the 1977 Dodge pickup truck is registered to Bill Buck, 8765 East Road, Any Town, Michigan 49000.

At 11:30 AM, a call was placed to the Any County Register of Deeds office. It was determined that the taxes for the residence located at 5678 State Street, Any Town, Michigan 49000 are being paid for by Jane and Jill Deer.

At 11:40 AM, the older white female subject departed alone in the Explorer.

At 2:54 PM, the blue Suzuki departed the area. A white male subject matching the plaintiff's description was driving the vehicle and a white male child was a front seat passenger.

At 3:00 PM, the plaintiff arrived at an unidentified private residence in the 900 block of Carroll Street in Any Town. The residence is described as a white single story home with a detached two stall garage. A white Dodge Dakota pickup truck believed to be the plaintiff's was parked in the driveway. Surveillance was established of this residence.

At 3:10 PM, an on-line Any County Parcel Lookup was performed of any properties in the name of John Doe. One was found:

- **Parcel No 11-02-555-0066-000 located at 906 Carroll Street is owned by John Doe. The property was purchased by Mr. Doe on April 11, 2008.**

At 3:35 PM, the plaintiff and the male child departed in the Suzuki.

At 3:45 PM, the plaintiff arrived in downtown Any Town and pulled to the curb. Both subjects exited the vehicle and entered a nearby retail store before video footage could be secured.

At 3:54 PM, video footage was secured of the plaintiff walking back to the Suzuki. The plaintiff is described as 6'1", 200 pounds with short black hair and a moustache. He was wearing a blue sweatshirt, blue jeans and a blue baseball cap and was observed walking with a slight limp. He entered his vehicle quickly and in a normal manner and departed with the young male subject.

At 3:58 PM, the plaintiff arrived at Dairy Queen and pulled to the drive-up window.

At 4:15 PM, the plaintiff departed Dairy Queen.

At 4:25 PM, the plaintiff arrived back at the Main Street residence and surveillance was re-established.

At 5:00 PM, there had been no additional activity and surveillance was terminated. The white male subject believed to be the plaintiff remained at the Main Street residence.

Earlier that day your insured had viewed still pictures of the video secured and advised that he was quite certain the subject videotaped at 3:54 PM was the plaintiff.

On Monday, June 9, 2008, surveillance was resumed. The weather was sunny with temperatures in the 80's.

At 4:00 AM, two operatives departed the Grand Rapids office en route to the plaintiff's residence located at 906 Carroll Street, Any Town, Michigan.

At 7:00 AM, the operatives arrived at the plaintiff's residence. The residence is described the same as during the previous surveillance. The garage doors were closed upon arrival and two vehicles were on location:

A blue Suzuki Verona, Michigan license plate # 123ABC. The plaintiff had been observed driving this vehicle during the previous surveillance.

A white Dodge Dakota, license plate # unobtainable. This was believed to be the plaintiff's vehicle.

No visible lights were observed on within the residence and no outside activity was noted. Surveillance was established.

At 8:08 AM, the plaintiff departed alone in the Suzuki.

At 8:14 AM, the plaintiff arrived at his previous address on Main Street and parked in the driveway. During a drive by the plaintiff was no where in sight.

At 8:50 AM, the plaintiff departed alone in the Suzuki.

At 8:54 AM, the plaintiff arrived at East China Township Park on Recor Road and pulled into the park and out of view. He was discreetly followed into the park by one of the operatives.

At 8:55 AM, the plaintiff was observed parking his Suzuki, exiting the vehicle and walking toward a large group of children and adults who had gathered in the park. The operative located a vantage point from which video footage could be secured.

From 8:57 AM to 1:02 PM, video footage was secured of the plaintiff engaged in a variety of activities at the park with the adults and children. The following is a brief synopsis of those activities:

- At 8:57 AM – plaintiff standing with the adults and children. The plaintiff is described as a white male, 6'1", 200 pounds with short black hair and a moustache. He was wearing a brown shirt and khaki shorts.
- At 9:06 AM – plaintiff standing with another white male adult.
- From 9:17 AM to 10:34 AM – plaintiff appeared to be supervising a game with a group of children. He was observed bending to the ground and twisting his back on numerous occasions, turning his neck from side to side multiple times and standing for longer periods.
- At 10:35 AM – plaintiff jogged a short distance and dragged two nylon tubes across the field.
- At 10:40 AM – plaintiff again dragged the tubes a short distance.
- From 10:41 AM to 10:53 AM – plaintiff again observed bending to the ground and twisting his head and neck from side to side multiple times.
- At 10:53 AM – plaintiff walked out of view toward another area of park.
- From 11:09 AM to 11:34 AM – plaintiff bending to the ground picking up trash while dragging a large blue trash can behind him.
- From 11:51 AM to 12:13 PM – plaintiff observed bending and twisting back and neck, moving tubes from place to place while bent over.
- At 12:13 PM – plaintiff pulling vigorously on a pair of boots trying to remove them from a white male child.
- From 12:14 PM to 12:23 PM – plaintiff again supervising children while bending and twisting his back and neck and dragging tubes across the field.

- At 12:24 PM – plaintiff observed jogging across field to retrieve several nylon tubes then drags them back to children.
- From 12:25 PM to 12:42 PM – plaintiff again observed bending and twisting to the ground on multiple occasions.
- At 12:43 PM – plaintiff dragging a tube across field. He and other adults appeared to be cleaning up area preparing to end field day.
- At 12:45 PM – final group video of plaintiff. A short time later he walked out of view toward the parking lot.

At 1:02 PM, video footage was secured of the plaintiff walking to his vehicle, entering with apparent ease and departing.

At 1:07 PM, the plaintiff arrived at the Main Street residence and surveillance was re-established.

At 1:45 PM, during a drive by, a white Oldsmobile Bravada was observed parked in the driveway next to the Suzuki.

At 2:05 PM, the plaintiff departed alone in the Suzuki. In order to maintain discretion he was followed from a greater distance.

At 2:10 PM, visual contact was lost with the plaintiff's vehicle in heavy traffic. After canvassing the immediate area in an unsuccessful attempt to locate the Suzuki, both operatives returned to the Carroll Street residence at 2:30 PM.

At 2:45 PM, the plaintiff arrived back at the Carroll Street residence alone.

At 2:48 PM, the previously observed white Oldsmobile Bravada was observed arriving at a Marathon gas station where one operative had been set up. A white male subject the approximate age of the plaintiff was alone in the vehicle and pulled to a fuel pump. Since the plaintiff is said to have a brother, video footage was secured of this subject. The subject is described as 6', 175 pounds with short brown hair and a moustache. He was wearing a white polo shirt and khaki shorts. The license plate # of the Bravada was determined to be Michigan, EFG1234.

A request with the Michigan Secretary of State determined that the 2002 Oldsmobile Bravada is registered to Jane Deer and Jerry Doe, 5678 State Street, Any Town, Michigan 49000.

At 2:52 PM, the plaintiff's brother arrived at the Carroll Street residence in the Bravada.

At 4:00 PM, there had been no additional activity and surveillance was terminated.

On Tuesday, June 10, 2008, surveillance was resumed. The weather was mostly cloudy with temperatures in the 70's.

At 6:00 AM, two operatives departed overnight accommodations en route to the plaintiff's residence located at 906 Carroll Street, Any Town, Michigan.

At 7:00 AM, the operatives arrived at the plaintiff's residence. The residence is described the same as during the previous surveillance. The garage doors were closed upon arrival and two vehicles were on location:

A blue Suzuki Verona, Michigan license plate # 123ABC. The plaintiff had been observed driving this vehicle during the previous surveillance.

A white Dodge Dakota, license plate # unobtainable.

No visible lights were observed on within the residence and no outside activity was noted. Surveillance was established.

At 7:12 AM, the plaintiff departed alone in the Suzuki.

At 7:17 AM, the plaintiff arrived at the residence on Main Street.

At 7:30 AM, the plaintiff departed alone in the Suzuki. In order to maintain discretion, he was followed from a greater distance than normal.

At 7:31 AM, visual contact was lost with the Suzuki in heavy traffic.

At 7:34 AM, the plaintiff's unoccupied vehicle was located at a Mobile gas station on S. Parker Street at a fuel pump. Surveillance was established.

At 7:35 AM, video footage was secured of the plaintiff walking from the store toward his vehicle. The plaintiff is described as a white male, 6'1", 200 pounds with short black hair and a moustache. He was wearing white shirt and blue jeans and was carrying a beverage cup in his right hand. He entered the Suzuki quickly and with no apparent difficulty and departed.

At 7:41 AM, the plaintiff arrived at Holy Cross Elementary/ Mooney Catholic High School on S. Water Street in Any Town. Brief video footage was secured of the

plaintiff as he walked toward the school and out of view. Since the parking lot was full surveillance was established by each operative in advantageous chase positions.

At 8:34 AM, the plaintiff departed alone in the Suzuki.

At 8:36 AM, the plaintiff arrived at the Main Street residence and surveillance was re-established.

At 9:00 AM, during a drive by, a red Ford F-150 pickup truck was observed parked next to the blue Suzuki. The tailgate on the pickup truck was down and various tools and power cords were observed in the bed.

From 9:30 AM to 3:00 PM, a series of drive bys showed no change in status.

At 3:00 PM, surveillance was terminated. The blue Suzuki remained on location.

On Thursday, June 19, 2008, surveillance was resumed. The weather was mostly cloudy with temperatures in the 70's.

At 7:00 AM, two operatives departed overnight accommodations en route to the plaintiff's residence located at 906 Carroll Street, Any Town, Michigan.

At 8:00 AM, the operatives arrived at the plaintiff's residence. The residence is described the same as during the previous surveillance. The garage doors were closed upon arrival and two vehicles were on location:

A blue Suzuki Verona, Michigan license plate # 123ABC. The plaintiff had been observed driving this vehicle during the previous surveillance.

A white Dodge Dakota, license plate # unobtainable.

No visible lights were observed on within the residence and no outside activity was noted. Surveillance was established in the same manner as previously.

From 7:00 AM to 3:27 PM, there was no change in status noted.

At 3:28 PM, the plaintiff departed alone in the Suzuki.

At 3:31 PM, the plaintiff arrived at the Shangri La Village Mobile Home Park located at 6000 State Street in Any Town. For discretionary reasons he was not immediately followed into the trailer park.

At 3:35 PM, one operative entered the mobile home park and located the unoccupied blue Suzuki parked next to a gray single wide trailer on lot 700 on Paradise Blvd. The vehicle was parked next to a tan Oldsmobile Bravada and a black Ford Ranger. An older heavysset white female subject was observed in the front yard cooking on a grill.

At 4:00 PM, a final drive by was conducted and the plaintiff's blue Suzuki remained on location. Since it appeared that the plaintiff was attending a cookout where no video footage could be secured, surveillance was terminated.

On Friday, June 20, 2008, surveillance was resumed. The weather was sunny with temperatures in the 70's.

At 6:30 AM, two operatives departed overnight accommodations en route to the plaintiff's residence located at 906 Carroll Street, Any Town, Michigan.

At 7:30 AM, the operatives arrived at the plaintiff's residence. The residence is described the same as during the previous surveillance. The garage doors were closed upon arrival and two vehicles were on location:

A blue Suzuki Verona, Michigan license plate # 123ABC. The plaintiff had been observed driving this vehicle previously.

A white Dodge Dakota, license plate # unobtainable. This vehicle had been moved to a different location on the property. The tailgate was open and two large, white unidentified items were in the bed of the vehicle.

No visible lights were observed on within the residence and no outside activity was noted. Surveillance was established in the same manner as previously.

From 7:55 AM to 9:00 AM, a series of drive bys showed no change in status.

At 9:15 AM, during a drive by, the plaintiff was observed standing next to the Dodge Dakota. The garage door was now open and a motorcycle was observed inside. There was no place from which to secure discreet video footage.

At 9:55 AM, during a drive by, the tailgate of the Dakota was observed to be closed and a white washer and dryer were sitting next to the vehicle.

From 10:10 AM to 11:30 AM, a series of drive bys showed no change in status.

At 11:57 AM, during a drive by, the previously observed green Ford Explorer was observed parked in the driveway and the plaintiff was standing next to the vehicle talking with the older white female subject believed to be Jill Deer

At 11:58 AM, the older female subject departed alone in the Explorer.

At 11:59 AM, the plaintiff departed on the motorcycle. The white washer and dryer remained sitting next to the Dakota.

From 12:00 PM to 12:12 PM, the plaintiff was observed riding the motorcycle around nearby neighborhoods.

At 12:12 PM, the plaintiff arrived back at his residence.

At 12:15 PM, the plaintiff departed the area on the motorcycle. He was now followed by a second male subject on another bike.

At 12:16 PM, the plaintiff arrived at a Mobile gas station and parked next to a fuel pump and out of view.

At 12:19 PM, video footage was secured of the plaintiff walking into view toward the store. The plaintiff is described as a white male, 6'1", 200 pounds with short black hair and a moustache. He was wearing a black leather jacket over a red shirt and blue jeans and was observed twisting his head and neck to his right as he conversed with his male friend. Both entered the store.

At 12:20 PM, video footage was secured of the plaintiff walking back toward his motorcycle with his friend. Both walked behind the gasoline pumps and out of view. Moments later the plaintiff walked back into view carrying his helmet in his left hand. He bent at the waist and retrieved some paper towels which he used to clean his sunglasses. Both men then departed on their bikes.

At 12:35 PM, the plaintiff and his friend were observed driving their bikes into heavy traffic and visual contact was lost.

From 12:40 PM to 1:00 PM, the operatives canvassed the area in an unsuccessful attempt to locate the plaintiff.

At 1:00 PM, surveillance was terminated.

IN SUMMARY, John Doe presently resides at 906 Carroll Street, Any Town, Michigan. Mr. Doe is alleging disability due to a back injury and alleges that he cannot ride in a motor vehicle for more than one hour, cannot twist his neck from side to side and cannot bend or twist his back or lift anything overhead.

On 6-4-08, surveillance was performed at the plaintiff's given address of 1234 Main Street, beginning at 7:00 AM. The plaintiff was believed to have arrived at the residence in a blue Suzuki Verona at 7:52 AM. He departed in the Suzuki at 2:54 PM with a male child and traveled to 906 Carroll Street in Any Town. He was later determined to be the taxpayer of this residence. He and the child departed that location in the Suzuki at 3:35 PM and traveled to downtown Any Town where they visited a retail store and a Dairy Queen drive through. Both returned to the Main Street residence at 4:25 PM and remained there until surveillance was terminated at 5:00 PM. The plaintiff was observed walking with a very slight limp on this date.

On 6-9-08, surveillance was performed at the plaintiff's Carroll Street residence in Any Town beginning at 7:00 AM. The plaintiff departed alone in the Suzuki at 8:08 AM and traveled to the Main Street residence and then to the East China Township Park where he participated in what appeared to be a school field day with multiple other adults and children. The plaintiff was observed bending and twisting his neck and back on multiple occasions on this date as well as lifting both arms above his head and jogging across the park several times. He was also observed standing for prolonged periods of time.

On 6-10-08, surveillance was performed at the plaintiff's Carroll Street residence in Any Town beginning at 7:00 AM. The plaintiff departed alone at 7:12 AM and was observed running several errands around Any Town. He returned to his Carroll Street residence at 8:36 AM and remained there until surveillance was terminated at 3:00 PM. The plaintiff was observed walking in a normal manner at all times on this date.

On 6-19-08, surveillance was performed at the plaintiff's Carroll Street residence in Any Town beginning at 8:00 AM. The plaintiff departed alone at 3:28 PM and traveled to a nearby mobile home park where he was believed to participate in a cookout.

On 6-20-08, surveillance was performed at the plaintiff's Carroll Street residence in Any Town beginning at 7:30 AM. The plaintiff departed on two occasions on this date on a motorcycle. Visual contact was lost with the plaintiff on his bike at 12:35 PM and surveillance was terminated at short time later when his bike was unable to be reacquired.

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RECOMMENDATION:

This investigation has shown that John Doe is active on a daily basis and exhibits the ability to bend and twist his neck and head, to lift his arms above head level and to run short distances at a time. He was also observed riding a motorcycle.

STATUS:

This confirms your instructions to proceed with additional surveillance of the plaintiff sometime in July. We will contact you before that surveillance resumes.

Our file remains open. Please find enclosed our interim service invoice for your consideration as well as 3 CD copies of the video secured to date.

Very truly yours,

John Cahill
BLUE DIAMOND INVESTIGATIONS, LLC

JC/rkc

Enclosures: Michigan Secretary of State registration (4)
Advanced Person Search
Comprehensive Search
Parcel Lookup
CD of videotape
Service invoice