

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ROBERT CHRISTIAN WOLF,)
)
Plaintiff,) CIVIL ACTION FILE
vs.)
) NO. 00-CIV-1187(JEC)
JOHN BENNETT RAMSEY &)
PATRICIA PAUGH RAMSEY,)
)
Defendants.)
_____)

AFFIDAVIT OF JACQUELINE DILSON BRUNGARDT

STATE OF WYOMING

COUNTY OF CARBON

Before the undersigned officer, duly qualified to administer oaths, came Jacqueline Dilson Brungardt, who, upon being duly sworn, deposed and said:

1.

My name is Jacqueline Dilson. I am above the age of twenty-one years, and I am competent to testify to the matters stated herein. I suffer under no legal disability.

2.

The matters stated in this Affidavit are sworn to on the basis of my own personal knowledge.

3.

This Affidavit is respectfully submitted in connection with the motion for summary judgment of defendants in the case styled Robert Christian Wolf v. John Bennett Ramsey and Patricia Paugh Ramsey, Civil Action File No. 00-CV-1187, in the United States District Court for the Northern District of Georgia, and for all other proper purposes therein.

4.

I currently reside in Saratoga, Wyoming. I moved to Saratoga, Wyoming, from Lyons, Colorado, in November 1999.

5.

I became Jacqueline Dilson Brungardt on March 24, 2001. Before that, at all times pertinent to this affidavit, my name was Jacqueline ("Jackie") Dilson. The plaintiff in this case knew me for years as Jackie Dilson.

6.

In July 1993, I purchased property in Lyons, Colorado, on which I opened Dakota, a combination spa, bed and breakfast, restaurant and retreat business. The address of Dakota was 11510 N. Foothill Highway, Lyons, Colorado. Lyons is located about fifteen minutes by automobile from Boulder, Colorado. While I was working to get Dakota started I lived nearby in a second home that I owned called the Jasper House.

7.

In May 1994, I first met Robert Christian Wolf (whom I will call "Chris" throughout this affidavit) when he performed as a stripper at a bachelorette party held at Dakota for one of my employees, Misty Hall. With some reluctance, I had accepted Ms. Hall's invitation to the party, which she had begged me to let her have at my home. Afterwards, I talked for a while with Chris, and he told me that he was a journalist. We exchanged telephone numbers, and about two weeks later he called me and we went out.

8.

Chris and I started seeing each other regularly, and in August 1994 Chris moved in with me at my second home, the Jasper House. We lived at the Jasper House together until December 1995, when we separated. In August 1996 Chris moved back in with me in a trailer behind Dakota, but our relationship had changed from a sexual relationship to a relationship of good friends, and we had separate bedrooms in the trailer. At the time, my daughter Marah Dilson and her live-in boyfriend, Ricky Easley, were living in Dakota. On December 1, 1996, Chris and I moved into the Dakota ranch together, while Marah and Ricky moved to the trailer. Chris lived at Dakota until April 1997. I moved into the trailer in February 1997 after Chris tried to

strangle me. In December 1996 at Dakota, Chris and I shared a bedroom but had separate beds.

9.

In August 1996 and until December 1, 1996, Chris borrowed my white Toyota pick-up truck nearly every afternoon between 2:00 and 4:00 P.M., and many other times. Chris got his own car approximately December 1, 1996, with my help.

10.

I believe Chris Wolf killed JonBenet Ramsey. I have left Dakota and Colorado altogether because I am afraid of what Chris might do to me. I carry a handgun because I fear that Chris will come after me. In November 1999 I told him this, and that I will shoot him if he comes after me.

11.

There are many reasons why I believe Chris Wolf killed JonBenet Ramsey. Chris' strange behavior from August until Christmas 1996 and on the morning of December 26, 1996 raised my concerns about what Chris might have done on the night of December 25, 1996. Also Chris' behavioral and personality change became radical after the murder of JonBenet Ramsey. But several events that occurred before Christmas 1996, and Chris' background, also mean to me that he was capable of murdering JonBenet Ramsey.

12.

Chris' background is one reason why I became suspicious that he killed JonBenet Ramsey. Chris was adopted shortly after he was born. He was obsessed about why his natural mother had given him up for adoption. He has a terrible relationship with his adoptive mother.

13.

Chris has his Masters' degree in journalism, and has extreme political views. Many of his personal writings reflect his political views and his feeling that America and American businesses are responsible for building weapons and selling them to third world countries, where they are used to kill innocent people.

14.

Chris also was an instructor for Outward Bound, a company that specializes in wilderness adventures. Chris was trained to be self-sufficient and to survive in the wilderness for long periods at a time. He also was an avid rock-climber, and knew how to skillfully tie different knots.

15.

Chris and I engaged in fantasy sexual acts at times. On one occasion I asked Chris to have sexual intercourse with me while I pretended to be six years old. During this encounter

Chris put his hands on my neck very tightly with what I believe was a clear desire to kill. This scared me to death. Chris "freaked out" and screamed that God wouldn't want us to do something like this, as he dressed. After this encounter we rarely had sex.

16.

Chris' behavior around Christmas 1996 also raised my suspicions that he killed JonBenet Ramsey. For about two weeks before Christmas Day, 1996, Chris started parking his car at the very end of the driveway to Dakota. This was very strange because we did not have any guests and there was no reason for Chris to park so far away.

17.

Chris never enjoyed Christmas, and every Christmas I spent with him but one he was very unhappy. So when Chris joined me, my son Masen, his wife Barbara, my daughter Marah and her boyfriend Ricky to exchange presents on Christmas Day in 1996, I was surprised, because he seemed unusually happy. Masen gave Chris a long-sleeved shirt that had the words "Santa Barbara" written on it. Some people mistakenly reported that I said that this shirt had the words "Santa Barbara Tennis Club" written on it, but this was a misinterpretation of what I had said. I had

said that the shirt said "Santa Barbara" and did not look like a tennis club shirt, and that is where the misunderstanding arose.

18.

At around 2:00 P.M. on the afternoon of December 25, 1996, Chris left Dakota. He told me he was going to a Christmas party for the Boulder Daily Camera, a local newspaper. When Chris returned after 7:00 P.M., he came in through the downstairs entrance to Dakota and did not come up to join Masen, Barbara, Marah and me for Christmas dinner. He told me he was not hungry because he had eaten a lot at the party. But a few minutes later he was hungry, and I then gave him a large dinner, which he ate alone.

19.

At around 10:30 P.M. on the night of December 25, Chris and I went to our room to go to bed. Chris then told me at about 10:30 P.M. that he might be going out for the evening. I asked him if he was serious because it was extremely cold outside, and he responded "No, I'm only kidding." We had this same conversation several times that month. Another strange remark Chris made to me twice earlier in December was, "If you ever wake up in the middle of the night and I'm not here, don't worry because I'm just not sleeping right, so I'll just be out riding around." He said it again on the 25th.

20.

I went to sleep around 11:00 P.M. on the night of December 25, 1996, and at that time Chris was in our bedroom with me, in his futon bed. I awoke around 5:00 A.M. or 5:30 A.M. to the sound of the shower running. Chris was showering, and when he finished he dressed, putting on the same clothes that he had been wearing the day before, including a navy blue cotton sweater and black jeans. I noticed that his jeans and his sweater had large dirt marks on them, but when I mentioned this to him he told me that he had another day's worth of wear out of them. There was a large line of dirt on his sweater beneath his breast, and there was a line of dirt under each knee of his black Levi's. The dirt had not been there the day before, and it was out of character for him to wear clothes that were dirty. I asked him where he was going so early in the morning, and he said he was going to the coffee shop in Boulder. So I went back to sleep.

21.

Chris came back to Dakota a little after 9:00 A.M. that morning, December 26, 1996. When Chris came in he immediately asked my son Masen if he could help him delete files on his computer. Masen said sure, he'd help him some time during his visit over the next three days. Immediately after this Chris

grabbed me very hard by the arm in a way he had never done before and dragged me through the living room and down two flights of stairs to our room. I asked him what was wrong and told him that he was hurting me, but he was very agitated and began screaming at me, "Your fucking son is going to take over the fucking world with a computer system," and yelled that I was enabling another "fucker" to grow up and try to use computer knowledge to take over the world and that I had to get Masen out of the computer business. I had never seen Chris enraged like that, and I was very frightened. I told him that it was Christmas, he was in my home, with my children, and that he was not welcome there if he was going to behave that way. Chris stomped out of the house and left.

22.

At around 3:00 P.M. that same day I heard about JonBenet's murder from a friend, Barbara Lester. I asked Chris, who had come back, if he had heard that a little girl had been murdered up on "the Hill" in Boulder and he said that he had heard something about it in Boulder earlier in the day.

23.

At 5:00 P.M. on December 26 or 27, 1996, we sat down to watch the news. Chris was sitting next to me when the story about JonBenet came on. It was a very brief story, with only a

little photo of JonBenet and less than a minute of news saying that there wasn't much known about the murder.

24.

During this newscast, Chris began screaming at the television, yelling that he knew that John Ramsey killed his daughter, was sexually abusing her, and that he hoped John Ramsey got executed. He told me that Ramsey had a contract with Lockheed, that he made parts for guns that were sold to third world countries and being used to kill their women and children. I was asking him how he could know all of this and he began to scream at me, saying that I knew John Ramsey had sexually abused his daughter but I wouldn't admit it, and he asked me if I thought that he, Chris, had killed her. He was very agitated. The remark about Chris' possible involvement in this child's murder was completely out of context, there was no possible reason for him to say that, and it was utterly astonishing to me.

25.

I was terrified by Chris' behavior. I told Chris he was acting crazy, that of course I didn't think he killed JonBenet, and asked him what was the matter with him. But he was acting out of his mind, he wouldn't listen, and he just continued to yell and curse at the television about John Ramsey.

26.

After that Chris became dysfunctional. He was a different person. He didn't work. He was obsessed with reports about the murder. Every time a news report came on television he would get extremely agitated and begin screaming that the media were "fuckers," couldn't they see John Ramsey was guilty, and that he deserved to die because of his connections to Lockheed. Chris ranted continuously about the case and how John Ramsey deserved to be executed. He did this from the evening of December 26, 1996, until approximately December 31, 1996, when I began to suspect that Chris had killed JonBenet (but I wanted to be proved wrong).

27.

While I was sitting having coffee the next morning, December 27, 1996, Chris came upstairs from our room and told me, "You know, me and O.J. Simpson, we have a lot in common. We get away with everything." Then he left to go to the coffee shop at Boulder. The next day he made another strange remark. He said that if he was going to strangle someone he would always use a rope.

28.

Just two or three days later I was talking to my sister Suzanne when she asked me what was known about the murder of the

child in Boulder. Suddenly I realized that Chris might have killed her. At that moment all of the things Chris had said and his strange behavior came together in my mind and I told Suzanne that I thought Chris might have killed JonBenet Ramsey.

29.

I was in the house alone because Masen and Barbara had gone back to California, and Marah and Ricky were in the trailer. I became so terrified that I was shaking, and was afraid to answer my telephone. I thought I might be losing my mind to think that my friend, who was still living in my house, had done that.

30.

The next day I woke up and remembered that JonBenet had been strangled, and that rope had been used. I remembered that I had bought 100 feet of rope at the Home Depot earlier in the month to use as a clothesline, so I asked Ricky to measure the length of the rope. Six to eight feet of the rope were missing. Also, I had seen a package of white cord wrapped in plastic, opened, different from the rope I had purchased at Home Depot, on Chris' desk around December 20 or 21. This cord resembled the cord I saw in the crime scene photos of JonBenet Ramsey.

31.

Very soon after that I went to see Tom McGrath, the Sheriff of Lyons, Colorado. I asked him what he thought I should do if

I suspected someone of a murder. He said he would go to a lawyer. I made an appointment with a lawyer I knew, Paul McCormick, but he would not help me after I told him I didn't have any money.

32.

At one point near the end of January 1997 or early in February, I was in bed and trying to fall asleep when Chris came in and put his hands around my neck. It frightened me very much, and the next day I spoke with my children about it. We discussed going to the police and telling them about my suspicion that Chris was involved in JonBenet's death. I left Dakota to live in the trailer with Ricky and Marah.

33.

I was growing more and more terrified, so I went to a friend from Boulder, who told me to go see Father Rol Hoverstock, who was her Reverend. I told him, "Father, I think my boyfriend has killed JonBenet Ramsey." And for two hours we talked about why I think Chris killed JonBenet Ramsey. Father Rol called the church's attorney, Larry Mertis, who came over and listened to everything I had told Father Rol. When I finished speaking Larry Mertis said, "This is the guy."

34.

Larry Mertis called the Boulder Police, and we all met at Larry Mertis' office. This meeting was in late January 1997, about a month after the murder. Detective Steve Thomas, Assistant D.A. Peter Hofstrom and several other law enforcement people were at the meeting. I gave them the rope that I had bought and I told them everything I had told Father Rol and Larry Mertis, and afterwards Steve Thomas said, "Well, we've gotta check this out."

35.

Soon afterwards, by prior arrangement, I called Detective Thomas when Chris was leaving the house, and the police picked him up in North Boulder on a traffic violation and brought him in to question him about the murder. I had several phone conversations with Detective Thomas throughout the day, and at one point after they already had Chris at the police station, Detective Thomas told me to get samples of Chris' pubic hair and his handwriting. Detective Thomas told me that when they asked Wolf for handwriting samples he went "ballistic" and was so agitated and uncooperative that he had to be physically restrained by several law enforcement officers. He also told me that the police would get a warrant and come in to take evidence, which I encouraged him to do.

36.

Two hours later Detective Thomas called me back and said, "Forget it. He's not the person." They released Chris after interrogating him and keeping him in the police station much of the day. Detective Thomas never told me why he did not pursue an investigation of Chris.

37.

When Chris returned to my home that afternoon I asked him how his day was and he replied, "Oh, pretty good." He didn't mention the police questioning him in connection with the murder investigation until later that evening, and then he got very agitated.

38.

Because Chris' behavior had become more and more bizarre after the murder, I repeatedly asked him to move out of Dakota and he repeatedly refused.

39.

Chris finally left when we forced him to leave as a result of his violent behavior. In April 1997 Chris and I got into a fight, and he told me, "I should strangle you and punch you." I was very frightened that Chris was going to hurt me, so I called Ricky and Marah. Chris would not leave until Ricky used a baseball bat to chase Chris out of the house. Chris later told

me, "I will never forget getting kicked out of the house with a baseball bat."

40.

I later found among Chris' belongings a copy of a letter he sent to Carol McKinley, a FOX reporter, after the murder of JonBenet Ramsey. This letter made references to John Ramsey's affiliation with Lockheed and how he was responsible for selling "gadgets" that would be used to kill poor people in other parts of the world. In this letter Chris called John Ramsey a "Merchant of Death." This showed me the extent of Chris' obsession with John Ramsey and his company. In the letter Chris accused Burke Ramsey of killing JonBenet and John and Patricia Ramsey of covering it up. Also, this letter had the following sentence in it: "Everyone who thinks a grown man couldn't possibly ever have sex with a six-year-old girl has got their head so far buried in the sand that that's exactly where it should remain so as to spare the rest of us the tyranny of their ignorance." This letter only reinforced my belief that Chris killed JonBenet Ramsey.

41.

When it became apparent that Detective Thomas and the Boulder Police Department were not going to follow up on the information I had given them, I contacted Steve Ainsworth, a

Boulder Sheriff working with the Boulder District Attorney's Office to investigate JonBenet's murder. I gave a number of Chris' writings and date books to Steve Ainsworth, and I told him about a book I found in Chris' possessions, Mr. Murder by Dean Koontz. It is about a man who is a murderer, and it describes a murder that takes place on Christmas. I gave him a black notebook containing some very personal writings of Chris, including Chris in drag, and referring to a ransom note.

42.

I was becoming frustrated because it appeared that the police were not seriously investigating Chris, so in August 1997 I took some of his personal writings to a graphologist in Lyons, Colorado, and asked her to compare his handwriting to a copy of the ransom note found at the Ramseys' house. She compared the samples of Chris' handwriting I gave her to the ransom note and told me I should give this information to the Ramseys' investigators immediately. She told me she thought that Chris' handwriting looked very close to the handwriting on the ransom note.

43.

When I first saw a copy of the ransom note which was found at the Ramsey house, I was struck by how the handwriting in the note resembled Chris' own handwriting. I thought (and still

believe) that Chris wrote the ransom note, taking care to disguise the a's and the d's.

44.

Also in August 1997, I tried to call Nedra Paugh, but ended up talking with Pam Paugh, Patsy Ramsey's sister. I spoke with Pam for about an hour and a half that evening, and told her why I suspected that Chris murdered JonBenet. Pam asked me if Chris owned any hiking boots, and I told her that a year before I had bought Chris a pair. Pam then asked me about a black flashlight, which reminded me that I had had a black, metal flashlight which had been missing for some time. Ricky Easley has asked a few weeks earlier if I had seen it. Thereafter, the Ramseys' investigators contacted me directly.

45.

After Chris had left for the Caribbean and returned, I was terribly frightened for both my and Marah's safety. I went to Mexico with my ex-husband because I believed Chris was stalking me. In December 1997, I went to stay with my sister in Palm Beach, Florida. I spoke to Marah on the phone and she told me that Chris had been at the house asking if I'm ever coming back. Marah also told me that she had caught Chris trying to get into the dorm room on the bottom level at Dakota.

46.

I returned to Lyons, Colorado in early January because I was filing for bankruptcy. I set up an appointment to see Chief Beckner. On January 13, 1998, I arrived at the meeting only to find Detective Steve Thomas instead of Chief Beckner. The first thing Detective Thomas said to me was, "Why are you here again?" Detective Thomas was rude and dismissive. He told me that he didn't know of any handwriting analysis that had been done on Chris. He also told me that he had no knowledge of any physical evidence of Chris having been collected from me. After this meeting with Detective Thomas I realized that no one was taking my concerns about Chris' involvement in the murder of JonBenet Ramsey seriously.

47.

On January 14, 1998, Carol McKinley of FOX called and spoke with my sister. Carol told her that the police no longer considered Chris a suspect in the murder of JonBenet Ramsey. After I heard this, I became physically ill. I got so sick I felt like I couldn't move. Marah was also ill, and we were both lying in my bedroom when Marah's dog Trey began barking. Marah went to see why Trey was barking, and she found Chris in the hallway of Dakota. Chris asked where I was, and told Marah he wanted to talk to me. Marah told Chris that I was not in the

house, and that she had not seen me for some time. Chris then told Marah that he wanted to give her a "hug and a kiss," and that he'd missed her. This was very strange because Chris and Marah never got along particularly well.

48.

After Marah convinced Chris I was not at home, we decided that it was not safe to stay in Lyons, Colorado, any more. That evening I borrowed money from my accountant so that we, Marah and I, could leave Lyons.

49.

In the book written by John and Patricia Ramsey, The Death of Innocence, I understand that the following statements were made about Chris Wolf:

- (1) Jacqueline Dilson had reported to the Boulder police that she believed her live-in lover, Chris Wolf, might be the person they were seeking.
- (2) His [Chris Wolf's] strange behavior before Christmas and early on the morning after Christmas raised Dilson's concern about what Wolf had done all night.
- (3) Apparently Dilson spent Christmas Day with Wolf, but he would not stay to have supper with her and her family.
- (4) He [Chris Wolf] told Jackie that he might go out that night. If you wake up and I'm not here, he said, I'm just driving around.
- (5) At around 5:30 a.m., sounds from the bathroom woke Jackie up, and she realized that Wolf was getting out of the shower.

- (6) He [Wolf] had left dirty clothes all over the floor.
- (7) Later the next day, Dilson and Wolf watched the television news reports of JonBenet's death.
- (8) To her surprise, she [Jacqueline] observed him [Wolf] becoming quite agitated.
- (9) Wolf cursed and said he believed JonBenet had been sexually abused by her father.
- (10) For the rest of the evening, Wolf brooded over the case.
- (11) According to Dilson, Wolf hated big business and had a fascination with world political disputes and political violence.
- (12) He [Wolf] told her [Jacqueline] that John Ramsey's company designed parts for guns, which were then sold to third-world countries to kill people.
- (13) Wolf was extremely upset every time the Ramsey case was discussed on television, Dilson said.
- (14) Jacqueline Dilson said that Wolf had some photographs of JonBenet out of newspaper articles... and some pornographic photos of himself.

I was a source for, and can (and hereby do) verify the accuracy of, each of these statements. I gave all of this information to one or more investigators working on behalf of the Ramseys' attorneys before publication of The Death of Innocence.

50.

Further affiant sayeth naught.

