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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN FRANCISCO

10
11 In re Matter of:

12 STEPHEN RUSSELL,

13 Petitioner,

14 v.

15 TARA WALSH,

16 Respondent.

Case No. FPT-18-377425

**RESPONDENT TARA WALSH'S
DECLARATION IN SUPPORT OF
RESPONSE TO PETITIONER'S EX
PARTE REQUEST FOR TEMPORARY
EMERGENCY CUSTODY ORDER AND
ORDER SHORTENING TIME FOR
HEARING**

Date: 7-10-18
Time: 1:30 p.m.
Dept.: 404

17
18
19 1. I, TARA WALSH, am the Respondent in this action. All of the information
20 contained herein is true to the best of my knowledge, and I would offer the same if called to
21 testify.

22 2. I respectfully request that the Court make the following orders:

- 23 1) Deny Petitioner STEPHEN RUSSELL's ("Steve") request for emergency temporary
24 physical and legal custody;
- 25 2) Permit me and our daughter, Evelyn Walsh ("Evie"), to stay in New York with my
26 family and support network until the jurisdictional issue is resolved;
- 27 3) Grant my request for attorney's fees prior to any long cause hearing;

- 1 4) Defer speaking with the Westchester County Court until my attorney is able to file a
2 reply to Steve's Opposition to my Motion to Dismiss or, in the alternative, Motion to
3 Quash Service of Summons;
- 4 5) Deny Steve's request for an order shortening time for the parties to attend mediation
5 and a custody hearing.

6 3. In my declaration in support of my Motion to Dismiss or, in the alternative,
7 Motion to Quash Service of Summons (*which I refer the Court to for additional pertinent*
8 *information*), I provided relevant background facts to demonstrate how petitioner forced me to
9 stay in California longer than I had wished or anticipated. I left out several details regarding
10 instances of domestic violence I suffered at the hands of Steve, as I felt these facts would be
11 better addressed in the restraining order matter in New York. However, now that Steve has put
12 my mental health at issue, I need to provide the Court with more detailed evidence demonstrating
13 how mentally unstable, delusional and paranoid Steve is and that he is not fit to care for Evie.

14 4. Petitioner STEPHEN RUSSELL's ("Steve") declaration is wrought with false
15 statements and mischaracterizations. He has never cared to be more than a financial provider to
16 our daughter. He does not know the first thing about caring for her, especially given how young
17 she is. Awarding Steve sole physical and legal custody, even on a temporary basis, would be
18 extremely detrimental to Evie.

19
20 **PETITIONER HAS PRESENTED NO EVIDENCE WARRANTING SUPERVISED**
21 **VISITATION**

22 5. The only allegation Steve makes in his entire 10-page declaration regarding my
23 ability to care for Evie is that she fell off the bed and had to go to the hospital. The reason she fell
24 off the bed is because Steve was yelling at me in front of Evie, and as I tried to push him out of
25 the bedroom, Evie rolled off the bed. It was a complete accident due to Steve's irrational
26 behavior. We were in an argument regarding him telling me we had to move apartments (again)
27 because of security breaches, which is corroborated by the declaration of Bryan Crutcher. As
28 Bryan points out, I stated: "I am not leaving this apartment until we are packed up and moved out.

1 He's had us moving like crazy. I am totally exhausted, and I just can't move somewhere else. I
2 have a baby, it is not fair." Clearly, once security moved the crib, I became upset. This resulted in
3 an argument, me trying to get Steve to leave the room and Evie accidentally rolling off the bed.

4 6. Evie was not taken to the hospital. She was taken to her pediatrician and was fine.
5 (See texts between me and the pediatrician the day after accident attached hereto as **Exhibit A.**)

6 7. As the letters from my therapist and psychiatrist indicate, Evie is being well cared
7 for by me, I am committed to being a dedicated mother and I have demonstrated an ability to care
8 for Evie and provide her with a loving environment. (See letters from my therapist and
9 psychiatrist attached hereto as **Exhibit B.**)

10
11 **PETITIONER FALSELY CLAIMS THAT I HAVE THREATENED SUICIDE ON
MULTIPLE OCCASIONS**

12 8. The only time I had suicidal thoughts was after Steve broke up with me for the
13 fourth or fifth time during my pregnancy and left New York with his new romantic interest. I was
14 heartbroken. I promptly saw a psychiatrist specializing in motherhood who treated my thoughts
15 and highly suggested getting an order of protection against Steve.

16 **I HAVE BEEN IN TREATMENT FOR MY MENTAL HEALTH FOR SEVERAL YEARS**

17 9. As the letters from my psychiatrist and therapist indicate, I have been receiving
18 treatment and am committed to improving the quality of my life (**Exhibit B**). I recently enrolled
19 in a formal outpatient Dialectical Behavior Therapy ("DBT") program with one of the senior
20 psychologists at Columbia University. I am also taking prescribed medications from my
21 psychiatrist. I recognize that I have a history of mental health issues but I have always sought
22 treatment for them and been dedicated to improving my health.

23 10. Contrary to Steve's assertion, I was never told by Dr. Gopal that I needed in
24 patient treatment. My long-term therapist in New York, Rita, who specializes in borderline
25 personality disorder, was adamant with Dr. Gopal and Steve that inpatient treatment would only
26 harm me.

1 11. I in no way ever stopped being a caring, thoughtful, loving mother to my daughter
2 because of my mental health. Anytime spent away from Evie was to get a solid night's sleep
3 (recommended by doctors), work so I could save money or protect her from Steve.

4 12. Steve is not a mental health professional and is not qualified to make statements
5 regarding my DBT treatment and what behaviors it is used to treat.

6
7 **PETITIONER'S TEXT MESSAGES DEMONSTRATE HIS CONTROLLING ABUSIVE**
8 **BEHAVIOR TOWARDS ME**

9 13. As evidenced by the text messages submitted by Steve, he controls me with threats
10 to leave me, withhold money for support or to take away Evie and he is verbally abusive: "I will
11 not break up with her as long as she follows her doctor's orders"; "If Tara fails to make agreed
12 improvements, I may decide to end our relationship"; "Our residences will be in SF paid for by
13 me"; "If we can't come to an agreement, I will end our relationship and limit my contact with
14 you;" "You are dumb lie"; "You are dumb to be self-centered and self-obsessed"; "Stupid is as
15 stupid does;" "Goodbye Tara. Every moment with you is a moment wasted;" "Get your butt back
16 here;" "I have never met anyone who only talks about herself like you;" "This is BPD in a
17 nutshell;" "The truth is if you don't shape up and give me some hope I am going to move on, but
18 I haven't yet, so don't make things worse."

19 14. Besides the very text messages submitted by Steve, I have several other text
20 messages that demonstrate his verbal abuse. The abuse became worse during my pregnancy: "If
21 you decide to keep the child I'll want there to be a paternity test"; "I will be blocking you on this
22 phone and my email;" "I think it's early enough that you should probably not keep the baby";
23 "Your stuff is thrown out and you should not keep this child. You are a self-destructive moron";
24 "You can't go a day without imploding your life"; "I'm blocking you and I'll check in in seven
25 weeks. It's also fairly clear since you are only 4 weeks pregnant the child is not mine;" "You are
26 not a partner. You are a selfish parasite;" "I'm leaving you;" "You aren't even human enough to
27 have the self control to stop talking when you know you should;" "stop talking. Stop talking. Stop
28

1 talking.” (See true and correct copy of text messages during pregnancy attached hereto as **Exhibit**
2 **C.**)

3 15. After the baby was born, Steve continued to berate and threaten me: “You are your
4 own worst enemy. You are uninvited from coming to SF;” “I can take her from you and raise her
5 without you;” “You will leave first week of March;” “I just asked you to stop talking. It is still my
6 primary requirement of you.” (See true and correct copy of text messages attached hereto as
7 **Exhibit D.**) There are several other text messages but I did not have time to gather them all.

8 16. Any mean names or angry things I said to Steve were 100% reacting to an insane
9 environment. Steve had us moving constantly as he believed there was active threats. He was also
10 physically and verbally abusive. He acted psychotic and was highly delusional. He used
11 techniques like “gaslighting” me. My current therapist also said I had “Stockholm syndrome”
12 (which two friends said I had for months). Steve was keeping me in an environment I did not
13 want to be in and prevented me from going home.

14 17. Steve found out I had called the domestic abuse hotline and he was eavesdropping
15 on a conversation I had with a concerned friend. Out of fear, I told him I only called one time and
16 did not mean it. However, I called/messaged a few times at the encouragement of friends and
17 family. I called/chatted with the hotline to find the courage to leave Steve. They confirmed with
18 me his behavior was classic abuse, such a coercion.

19 **PETITIONER HAS PHYSICALLY ABUSED ME**

20 18. Steve became enraged one day and said he was breaking my laptop and my
21 cellphone. As I asked him to calm down, he became violent and smashed me around the kitchen
22 pulling me up and down against the center island and the floor with full force to remove my
23 laptop from my arms. Steve was able to finally remove the laptop and smashed it on the ground.
24 I had bruises all over my leg and backside and had trouble walking/running for close to two
25 weeks. (See picture of the bruise I suffered from attached hereto as **Exhibit E**).

26 ///

27 ///

28

1 **PETITIONER IS UNSTABLE, DELUSIONAL AND PARANOID AND SUFFERS FROM**
2 **HIS OWN MENTAL HELATH DISORDERS**

3 19. See letters from family, text messages from the Nanny, "Abby" and text
4 messages from Steve's Mother, Linda attached hereto as **Exhibit F**.

5 20. See pictures of Steve and staff searching for spying devices and tearing
6 the apartment apart attached hereto as **Exhibit G**.

7 21. See my journal of Steve's major mental health episodes that I prepared
8 for Dr. Gopal attached hereto as **Exhibit H**.

9 **PETITIONER'S CLAIM THAT I HAVE BEEN DRUGGING HIM IS FALSE**

10 22. On two occasions when Steve acted delusional and had psychotic episodes, I was
11 forced to protect myself. I put Seroquel, a medication regularly taken by him, in his wine. (See
12 text message from me to Dr. Gopal confirming this attached hereto as **Exhibit I**.)

13 **PETITIONER FILED FOR AN EMERGENCY PROTECTIVE ORDER AND REQUEST**
14 **FOR EMERGENCY CUSTODY ORDER IN RETALIATION**

15 23. It was not until I filed for an order of protection, that Steve filed for an emergency
16 protective order and emergency custody. He would have filed these sooner if he believed I was so
17 mentally unstable.

18 **THE DECLARATIONS SUBMITTED BY PETITIONER'S STAFF AND THERAPIST**
19 **ARE COMPLETELY BIAS AND NOT CREDIBLE**

20 24. The security guards and nanny are on Steve's payroll and are paid extremely well.
21 Clearly, they will say whatever Steve asks them to.

22 **THE TEXT MESSAGES I SENT TO PETITIONER IN MID JUNE WERE SENT OUT OF**
23 **FEAR OF WHAT PETITIONER WOULD DO**

24 25. Any texts sent to Steve up until the order of protection were 1) Lies to appease
25 him; 2) Confusion in my love for him which is common in abusive relationships; 3) Fear of his
26 money and power to take my daughter away – a daughter he did not even want. I also said things
27 to Steve encouraging him to come visit us and that I still loved him, as I was very torn about
28

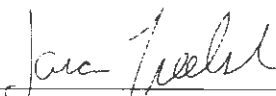
1 leaving him. I have always been scared of leaving him. (See text messages to friend attached
2 hereto as **Exhibit J.**)

3 26. Once I got order for protection I stopped communicating with him

4 27. I have additional evidence demonstrating Steve's abuse, my capacity to care for
5 Evie and the fact that New York has always been mine and Evie's home. However, I did not have
6 time to fully respond to Steve's emergency request submitted yesterday.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9 Dated: July 10, 2018

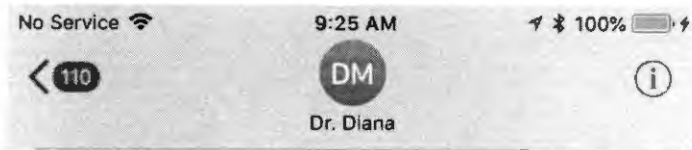


Respondent Tara Walsh

BY FAX

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EXHIBIT A



Ok sounds good- but even if she's sleeping on her side I know that is fine as well. Her crib doesn't have any slats anyway. I'll try out the sleep sack.

Great. How's she doing today? I assume no ill effects from her tumble yesterday. 🙌

She seems fine! Not even that bad of a mark on her face. Thank you for seeing us so quickly yesterday!

Great - glad to hear it. And we're always happy to see you and Evie!!

Wed, May 30, 2:37 PM

Hi after our visit today we were going to go on a mini vacation to Bottega Bay bc they are punting our apartment. However someone mentioned Evie might get sick today from the vaccines and might be better to postpone- would be



TE Text to pediatrician regarding Evie's fall. Evie was not taken to the "emergency room" as Steve's testimonies. I took her doc alone.

EXHIBIT B

*RITA J. MERCANTE, LMHC
Psychotherapist
141 East 55th Street
Suite 9G
New York, NY 10022
516-507-9061*

June 24, 2018

To Whom This May Concern:

I have been working with Tara Walsh beginning in June 2016 when she was referred to me through one of her friends that was in treatment with me. At that time, Tara reported suffering from panic attacks, middle insomnia as well as depression. Importantly, due to her childhood history, Tara experiences abandonment anxiety that is triggered when she perceives abandonment. Despite these symptoms, Tara continued to work diligently at her consulting business, Vital Branding. She attributed the recent exacerbation of these symptoms to the tumultuous relationship she had with Steve Russell

At that point, Tara had been dating Steve for 3 years often commuting between New York and San Francisco. When she was away from Steve, he often threatened to leave her manifest in his telling her about other women he was interested in; conversely, when she was in San Francisco, he would behave in paranoid and verbally cruel ways towards Tara. Consequently, she found herself experiencing feeling uncomfortable and extremely anxious whether she was in New York or San Francisco.

During her treatment, Tara worked on learning mindfulness, emotion regulation, distress tolerance and interpersonal effectiveness skills. She practiced these in sessions as well as in her business and personal interactions. However, she reported finding her relationship with Steve so intensely emotional that she was unable to use these skills effectively. Yet, she persisted as she was hopeful she and Steve could work things out. This turned out to be challenging as Steve often behaved in ways that undermined her trust in him.

At the time Tara found herself pregnant with Steve's baby, she was unsure where their relationship was. As she was determined to provide her baby with a healthy, love and stable home, Tara attempted to work on their relationship. This proved to be difficult given the level of ambivalence Steve exhibited over the course of her pregnancy. The incidences of this have been documented by Tara and provided to her attorney.

Throughout her pregnancy, Tara demonstrated complete responsibility for her baby (Evie). She worked with a perinatal psychiatrist, took her medications compliantly and attended regular weekly DBT-informed psychotherapy. Yet, she was continually worried and anxious that Steve was going to leave her if she did not do exactly as he demanded. Moreover, she reported he was abusing Adderall; often behaving paranoid as well as delusional inasmuch as he told Tara that Russians were spying on him. In fact, Tara reported he had hired a security team to keep him safe. Whenever Tara suggested he seek psychiatric help, he dismissed her as crazy.

Once Evie arrived January 27, 2018, Tara worked with her baby nurse to insure the best day and night care of her. She demonstrated a healthy, loving attachment and connection to Evie evidenced by her caring for Evie's daily and nightly needs. Although Tara has had emotional difficulties in coping with Steve and where their relationship is headed, she has remained steadfast in her commitment to being a dedicated mother to Evie. When Tara informed me Steve had demanded she return to San Francisco to raise Evie and that she had gone there, I recognized she was ambivalent about this due to knowing that Steve consistently threatened to leave her and in his home city and state, she would be more vulnerable to this.

In an effort to work with Steve, Tara began seeing Dr. Gopal for treatment for Bipolar and Borderline Personality Disorder. During this treatment, Tara experienced feeling as if she were being held solely responsible for the difficulties between herself and Steve. Subsequently, she discontinued seeing him although Steve continues to be in treatment with him.

Presently, Tara has agreed to work in a formal outpatient DBT program with one of the senior psychologists at Columbia University DBT. She has committed to once weekly DBT therapy and once weekly DBT life skills training. After having worked with Tara for over 2 years, I am confident she will participate fully in this program as well as utilize the skills she learns to improve the quality of her life and develop healthier ways of being in relationships. Moreover, Tara has demonstrated the ability to care for Evie and provide her with a loving environment.

Best regards,
Rita J. Mercante, LMHC

James G. Katis, M.D., F.A.P.A.

145 Old Mill Road
Greenwich, Connecticut 06831
Telephone 203 622-1213

1215 Fifth Ave.
New York, NY 10029
Telephone 212 427-6300

ATTY AUDREY COURSON
FAX: 415 745 3301

JULY 9, 2018
RE: TARA WALSH
DOB 9/10/1984

Dear Ms. Courson:

Tara Walsh has been in psychiatric treatment with me since June 13, 2018. My diagnostic impression is that of Anxiety Disorder F41.9; Rule Out Bipolar II Disorder F31.9. She has a history of being treated with stimulants for Attention Deficit-Hyperactivity Disorder since age 14. She is currently on a regimen of lamotrigine 200mg, guanfacine 150mg and bupropion XL 300mg. She is living with her parents and her mother is helpful in her caring for her 5 1/2 month old daughter.

My impression is that her daughter is being well cared for, and any change in status would not be in her best interest.

Very Truly Yours,

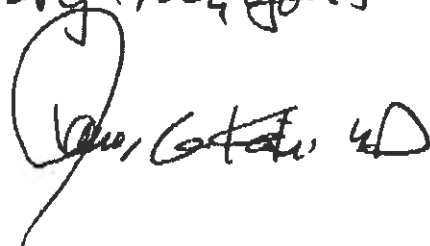
 J. G. Katis MD

EXHIBIT C

Throughout this time, Tara consistently begged Steve to stop creating traumatic situations for Tara, coming and going, professing love then hate, as it was terrible stress to put her under for the baby.



Touch to return to call 02:41

< 92

SR



Stephen

You did not take the adderall to help me- you don't give a shit about me or your child

Everyone in my life is horrified at how you have treated me- Caleb was so confused he doesn't get how a man can treat a pregnant women like you do

Good job honey. Horrifying everyone. And that is one of the reasons I am leaving you.


You are not a partner. You are a selfish parasite.

And you aren't even human enough to have the self control to stop talking when you know you should.




How dare you talk to me like that- I have treated you so well this week. I've been sick and tired and I tried my best. I kept telling the baby I'm

Camera App Store iMessage Microphone



Search 

10:10 AM

  52% 

 94



Steve



Thank you for the apology

Are you coming here this weekend?

Wed, May 31, 5:44 PM

No. I thought a lot about it and decided sincerely not to see you again. I really can't be with someone like you that makes everything so hard and terrible.

I actually might be coming but I will not see you if I do.

If you decide to keep the child I'll want there to be a paternity test before taking about any support or custody sharing arrangement.

In any case, I will be blocking you on this phone and in my email, so please use postal mail to my home address for any necessary communication.

Thu, Jun 1, 10:02 AM



Text Message





Steve

Thank u. U too.

Oh stop it

Let's talk in a few days

I will say a prayer for you

No. I am blocking you and I'll check in in 7 weeks.

It's also fairly clear since you are only 4 weeks pregnant the child is not mine.

Child is def yours- this has your name written all over it

You lie and lie and lie and lie.

But I don't. You are making me feel so sad for you.

I am texting Steve Kemler now.

Ok please don't do that



Text Message



T-Mobile LTE

2:45 PM

69%

103

SR



Steve

I'm also 99% sure your sperm is defected 😬

Can I just please have my stuff back? Just let that go I can send ups tomorrow

I am literally insane.

Andy my sperm is defected.

And your stuff is thrown out.

And you should not keep this child.

You are a self-destructive moron.

Ok stop it

You can't go one day without imploding your life.

Just stop

I don't want to have to block your number



iMessage





Steve

day.

You just need to kick me when I am down. I hate you right now

Okay I am going to block you.

I'm fucking pregnant- really?

What is wrong with you? I have literally done nothing. You are being cruel

I can't be with you when you don't listen.

This is so hard and now I'm crying

I didn't do anything wrong

If you can't apologize and stop repeating old patterns this won't work.

Apologize for what?

I am blockina vou now.



iMessage



94

SR



Steve

Thank you for the apology

Are you coming here this weekend?

Wed, May 31, 5:44 PM

No. I thought a lot about it and decided sincerely not to see you again. I really can't be with someone like you that makes everything so hard and terrible.

I actually might be coming but I will not see you if I do.

If you decide to keep the child I'll want there to be a paternity test before taking about any support or custody sharing arrangement.

In any case, I will be blocking you on this phone and in my email, so please use postal mail to my home address for any necessary communication.

Thu, Jun 1, 10:02 AM



Text Message





Steve



Not yet. I also thought about it and really don't feel comfortable shipping you the adderall- it's a felony if I am caught. That's a lot to risk.

Ok don't worry about it. I think it's early enough you should probably not keep the baby.

We don't live together we don't see each other and you are still in your rut.

You also continue to lie and associate with bad people and you are still on a lot of meds.

I also am fairly certain I don't want to get back into a relationship with you.

You just have the most terrible judgement.

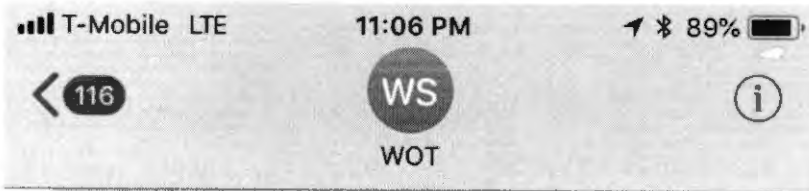
You just asked me if I wanted to come out there. Your being really cruel that I won't ship you adderall



iMessage



EXHIBIT D



It doesn't feel to me like you ever really understood my proposal, and that you just reacted emotionally to terms you didn't fully get.

*functional

That's so not true- if you understood the love I have for Evie- if you understood I've done 90% of it on my own- then you wouldn't threaten to take her away.

I see I am not getting anywhere with you.

Our relationship is officially over as of today.

I intend to move on and find a good partner.



Example of Steve threatening to break up with me if I did not agree to his terms of agreement to having full custody of Evie.



Steve

It would be nice if you one time could do what you say you are going to do.

I don't know how to fix this. If you aren't here tomorrow I am going to block you for 3-4 weeks.

Today 11:09 AM

I am beyond beyond stressed out. Your behavior is appalling

I am barely getting by and you somehow feel like I deserve to be beaten down more

You are your own worst enemy. You are uninvited from coming to SF.

I have no intentions of coming there anymore you are being a total jerk

I'm not going to enforce insane behavior

Delivered



iMessage





WRI

Wot Russell (iPhone)

Tap here for settings



During treatment you can live where ever your doctors say is best, but after that we need to think about how to split time between NY and SF.

Because it's important that Evie know her father.

It's not all about you, my selfish selfish little girl.

I'm a little girl? You've seriously put me through hell Steve

You come and go, abandon me then come back- but it's enough now there's a child involved

She needs a steady normal environment to be in

Read

You are a little girl bc you only think about what others put you through, and never about what you put them through.

Well then I can take her from you and raise her with out you.



New Message



116

WS



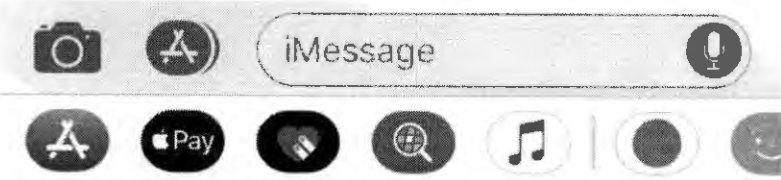
WOT



You were beautiful in this picture

Is that from my iPhone photos you have?

Send them to me!



Picture from Iphone of mine Steve fixed (from breaking) and download all my information to his computer- such as images like this.

my sister

Stop making things worse :)

I am arranging jet, nanny, and doctor.

I just feel like everything she does for me I'm indebted

I'm fine I went for long walk with baby

Delivered

You will leave first week of March

Camera App Store iMessage Voice

Ok Yeah No

Q W E R T Y U I O P
A S D F G H J K L
↑ Z X C V B N M ↵
123 😊 🎤 space return

You may be surprised what happens in court.

If we are never together bc of this then so be it

I'm getting better at social media I can do it

You are not the fittest of mothers and you would be better with the family life and help I am offering you. To have a tantrum and give that up for your daughter because you thought you could score on child support is a terribly short sighted thing.

Okay fine Tara. You never fail to pull defeat from the jaws of victory. Have your attorney call me anytime.

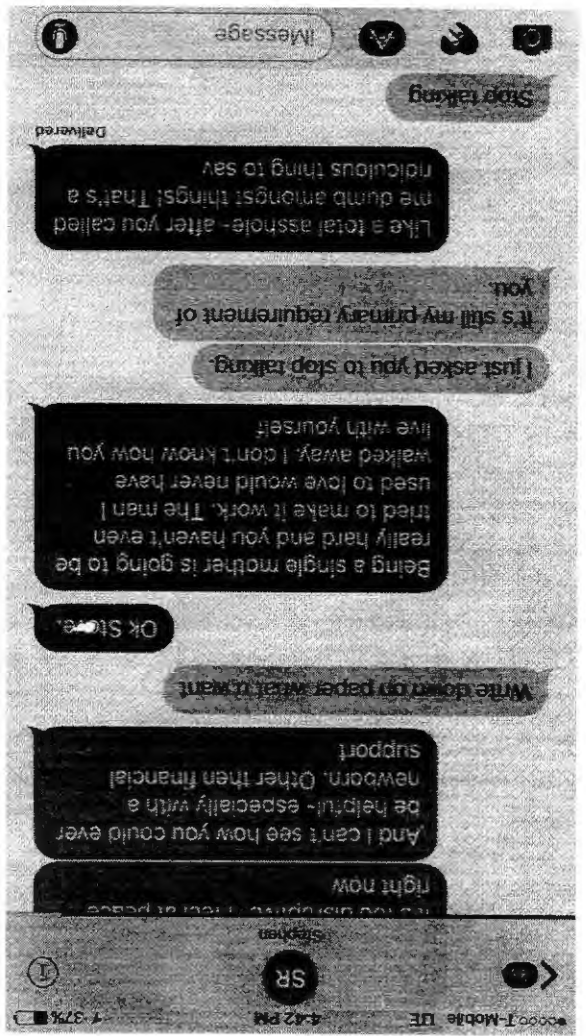
Ok there we go- now my decision is made- you just slipped in telling me I'm not the fittest of mothers

You know nothing about my mothering skills



iMessage





Message

Stop talking

Delivered
Like a total asshole - after you called me dumb amongst things! That's a ridiculous thing to say

it's still my primary requirement of you

I just asked you to stop talking

Being a single mother is going to be really hard and you haven't even tried to make it work. The man I used to love would never have walked away. I don't know how you live with yourself

OK Stop

Write down on paper what I want

And I can't see how you could ever be helpful - especially with a newborn. Other than financial support

right now

EXHIBIT E



EXHIBIT F

Subject: Fwd: Steve Russell

Date: Tuesday, July 10, 2018 at 8:06:20 AM Pacific Daylight Time

From: sw052382

To: Audrey Courson

Sent from my Sprint Samsung Galaxy Note8.

Sir/Madam - Tara has been living in our home with Evie for the past 4 1/2 weeks, and I'm confident that it's the best environment for both. Our concerns for their well-being while in San Francisco were numerous. Steve Russell, though apparently successful in business, lacks stability in his personal life. The very concept of raising Evie surrounded by bodyguards and paranoia is immensely upsetting to Tara's family. I have witnessed Steve in his delusional state and it's both scary and unnerving to watch. Their apartment in Brooklyn was filled with holes in the wall that were drilled apparently to undercover wire taps and cameras from 'Ukrainian' sources. The entire time Steve was in NY he was accompanied by security personnel, all who agreed discretely that they were only humoring his fantasies. From pictures I've seen the S.F. apartment was considerably worse. He is a man in need of dire help but, unfortunately, surrounded by people who lean on him financially and want to keep the spigots running. As a result, he cannot be relied on to produce credible 'witnesses'.

He is absolutely not in the frame of mind to either raise or supervise the care of Evie. Ceding him custody would be a tragic mistake in my opinion. Currently Tara has the support of her family and is doing fine. She's seeing doctors and maintaining a healthy lifestyle. Evie is surrounded by an extended family and getting the best care possible. She is a happy and flourishing child. I am strongly convinced that her current situation is the possible solution.

Many thanks, Steve Walsh

Sent from my Sprint Samsung Galaxy Note8.

Subject: Letter from Tara's Mother

Date: Tuesday, July 10, 2018 at 10:00:35 AM Pacific Daylight Time

From: Maura Walsh

To: Audrey Courson

To the judge,

My name is Maura Walsh. I am 58 years old. I have been married to my husband, Stephen Walsh, for 36 years. I have six children — Brienne (35), Tara (33), Michael (30), Brendan (22), Mariah (16) and Kiara (14). I have two granddaughters — Cleo (22 months) and Evelyn (5 months). I live in Chappaqua, New York. I was trained as a registered nurse, and I have devoted my entire life to raising my family.

As you know, a month ago, my daughter returned from San Francisco with her daughter, Evelyn, to live with us. As a mother, I was devastated to see the condition she was in. She had been subjected to physical and verbal abuse. Even though she was recovering from a C-section, she was forced to move four different times while she was living with the father of the baby. She was in desperate need of support.

Even more upsetting was the state that Evelyn was in. A happy, beautiful, and easy-going baby, she frequently woke in the night screaming from horrible nightmares. Over the past month, I have been helping my daughter Tara to care for Evelyn. In that period, there has been a marked change. No longer does she wake up screaming from nightmares. She has adjusted well to the life we lead here, and every day, she is happy.

Our home is a stable and sober one. My husband and I do not drink, or take drugs. Currently, Tara, Brendan, Mariah and Kiara are living in our house. My daughter, Brienne, and my son, Michael, live close by, as do Evelyn's great-aunts and uncles, numerous cousins, as well as her great-grandmother. They all come visit frequently. She is constantly held, and surrounded by love. Her cousin, Cleo, loves to push her stroller, and give her kisses. We have a beautiful eight acres of land, and we take Evelyn for walks daily in nature. There are daily visits to the pool, family barbecues, and trips to the library.

Even more importantly, Evelyn has a stable routine. We insure that she is fed regularly, naps, and is put down for bed at the same time every night. She sleeps for a full 12 hours — she is a wonderful sleeper! I am the primary caretaker when my daughter is working. It is a role that I fill naturally, and with great joy. I love babies. As a mother of six children, all of whom are healthy, I have plenty of experience taking care of them.

I am devastated at the idea of Evelyn being uprooted from a stable environment just as she is getting used to it. This strikes me as a particularly cruel fate for a child, especially knowing that if she is taken back to San Francisco, she will no longer have her family, but instead, will be cared for by a full time nanny. I will let others present evidence against Stephen Russell—my concern is mainly for Evelyn, whom I love with all my heart, and want the best for.

I implore you, as her mother and grandmother, not to uproot her from her family, but instead, to allow her to

remain with us, where she is safe and happy. I have taken care of children for my entire life — not only my own, but also children from various charities, including one for children whose mothers were in the Bedford Women's Prison. I currently volunteer at the Greenwich Audubon Society, where I teach pre-school aged children about birds and the environment. I am able to devote myself full time to raising and caring for Evelyn Grace. It's a job that I am happy to do, because I love her with all of my heart.

Sincerely,

Maura Walsh.

Subject: Tara Walsh

Date: Tuesday, July 10, 2018 at 9:25:59 AM Pacific Daylight Time

From: Kathleen Ruiz

To: Audrey Courson

Dear Audrey -

Tara Walsh worked for me at Saks Fifth Avenue for 4.5 years. During her tenure at Saks Fifth Avenue she excelled in all aspects of creative and business execution. She was extremely productive, well liked and developed strong relationships.

In addition, Tara continued to perform at a high level which resulted in added responsibilities during her time at Saks Fifth Avenue.

Currently Tara is working with me at my Marketing Consulting firm - KRW Consulting. She will be managing several high level projects focused on digital and creative marketing. I am delighted to be working with Tara again and sought her out when she relocated back to New York because of her great skill set and knowledge of digital marketing. This position will allow Tara the flexibility to work from home and have work life balance.

Lastly, I have known Tara for almost ten years. She is a kind, loving person with an amazing heart and thoughtful spirit. Recently I have had the opportunity to spend time with her with her beautiful daughter Evie. Tara is a loving nourishing Mom and has an amazing support system around her to provide Evie with a great loving environment and foundation.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely -

Kathleen

Kathleen Ruiz

KRW Consulting
Founder & CEO
12 E. 49th Street, 11th Floor
New York, NY 10017
kruiz@krwconsultingnyc.com
646.533.4150

www.krwconsulting.nyc

To the judge,

My name is Brienne Walsh. I am the elder sister of Tara Walsh, and the aunt to Evelyn Grace. I am 35 years old, and married. I live in Brooklyn with my husband, Caleb Zipperer, and my daughter, Cleo Anne Zipperer. I am 20 weeks pregnant with our second child, a boy.

When my sister was 20 weeks pregnant herself, she moved to an apartment across the street from ours in Brooklyn. Stephen Russell had told her that he didn't want to be in a relationship with her, and that he intended on dating other women. **This despite the fact that he had had unprotected sex with her not once, but on multiple occasions. She had multiple miscarriages, and when she finally got pregnant with Evelyn, he actively encouraged her to keep the baby. He told her that he would take care of her and the baby, and that they would be in a relationship together.**

As you can imagine, after multiple miscarriages, and then being abandoned in the midst of her pregnancy, my sister was devastated. She was almost comatose with grief. She was physically uncomfortable, and exhausted. It was difficult for her to function. My husband, Caleb, and I spent every day taking care of her. I helped her to find Dr. Rhoads, her psychiatrist, and took her to her appointments. I also accompanied her to all of her doctor's appointments and ultrasounds throughout the whole pregnancy. To my recollection, even if Stephen Russell was in New York, he did not come to a single appointment.

Stephen would occasionally show up at Tara's apartment to stay. He was heavily drinking, and using drugs. One time, when she refused to give him some of her Adderall, he punched a hole in her wall using a remote control, stole the Adderall anyway, and binged on it for 3 days in a hotel.

Another time, he had a friend hook him up with women, and told my sister that he was going on dates while he was staying in her apartment. He never drew clear boundaries, so she was constantly confused if he was in her life, or if she should move on. He threatened and kept her under control using money, and by telling her that he loved her when she threatened to kick him out.

It is worth noting that during this time, Stephen Russell was unemployed, having been fired by the board of his company. He had plenty of time to help my sister, and to go to the doctor's appointments, but showed no interest.

He had no concern, at any time, for the health or happiness of my sister; and by extension, the health and happiness of his daughter. He took care of himself, and was otherwise uninterested in how his behavior, and the stress it was causing my sister, would affect the health of his child.

During the entire time that I have known Stephen Russell, he has been unstable. He believed that there were Russian spies following him, and he hired a 24-hour

security team. The security team would stay for entire days in my sister's tiny, two-bedroom New York apartment, even while she needed to rest and prepare for the birth of Evelyn. Additionally, there was a security guard posted outside of her house in a car, which completely freaked the neighbors, and the local business owners, out. It also freaked out my sister for obvious reasons.

Stephen Russell spent his time not preparing for the birth, but instead, ripping the apartment apart looking for spyware devices, and obsessively watching the security cameras he had installed on his house in San Francisco.

During this period, Stephen Russell slept very little. It is very easy to speculate that some of these delusions might have been drug fueled, considering his history of Adderall and cocaine abuse. My sister was advised by both her psychiatrist and her doctors at Columbia to take as much distance from him as possible. I was present for many phone calls between my sister and Stephen Russell's mother in which his mother stated that he was crazy, he was out of control, and he needed to go to rehab because he was addicted to drugs.

At multiple points, the security team confessed that in good conscious, they could not take Stephen Russell's money because they did not think that he was being followed by Russian spies, and moreover, thought that he was delusional and potentially dangerously mentally ill.

Things got even worse when my sister gave birth. Stephen Russell showed up at the hospital with a security guard, who waited outside the labor room with our family. My mother, my father, my husband, and my two sisters were all in the room — no one from Stephen Russell's family attended.

In the hospital, Stephen Russell was drinking. He bought champagne. He frequently left to go get drinks with his security guard. My sister had a c-section. Evelyn Grace was a beautiful and happy baby. Our family was with her every day in the hospital, holding the baby, and helping her to recover.

Two days after Evelyn was born, Stephen Russell disappeared. He allegedly went on a psychotic binge fueled by access to drugs.

On the day Evelyn Grace was supposed to be brought home, Stephen Russell tore apart my sister's apartment. He ripped out the kitchen cabinets, dismantled the lights, and tore holes in the wall. The security team called my sister in the hospital, and told her that in good conscious, they could not allow her to bring a newborn back to the apartment. They said that it was an unstable environment, and moreover, that Stephen Russell was a dangerous threat to her and the child.

He fired them soon after, and because convinced that the entire New York Police Department was colluding with the Russian spies that were after him. As I mentioned earlier, he was unemployed, and had no access to any information that

would make him a vulnerable target. Have I mentioned yet that he believed he was a fairy?

Over the next few days, my sister, my parents, and I became desperate. Fortunately, my husband and I have a safe apartment where Tara and Evelyn could rest. Stephen Russell was increasingly psychotic. I took my sister and Evelyn to all of their early pediatrician appointments. Stephen Russell was nowhere to be found. **My father and husband helped to put back together my sister's apartment, and helped her to move into the space she had prepared for her daughter.**

My sister forbid Steve from coming up into the apartment. Instead, he would sit downstairs in the restaurant next to her building, and drink alcohol, intimidating my sister and my family. **The security guards let her know that they would protect her from him, and that if he tried to break into the apartment, they would call the cops.** Before one of the pediatrician appointments, Stephen Russell's security guards called my sister and told her that he had jumped out of their car at a stoplight. They didn't know where he was, but they believed he was headed in her direction.

My sister and I were panicked, devastated and frightened out of our minds. We tried not to betray this to the pediatrician, and instead, concentrate on Evelyn's care. I am the fulltime caretaker of my daughter, Cleo, so she accompanied us to an appointment. While we were concentrating on Evelyn, my daughter took my sister's bag. A curious toddler, she found a piece of a blue pill at the bottom of it, and put it in her mouth. The pill turned out to be an Adderall. Fortunately, we were at a pediatrician's office, and they advised us to go to the emergency room immediately. My daughter did not ingest the pill, and after 8 hours of observation, we went home. **My sister was absolutely devastated, and in no way was the situation her fault. She barely had the bandwidth to take care of a newborn — forget about dealing with a psychotic ex-boyfriend who was threatening to invade her home. She was in a state of absolute stress. If she had been safe, she would have immediately taken the bag away from my daughter.**

What happened next continues to haunt me. Stephen Russell returned to San Francisco. From there, he began to threaten my sister that he would cut off all funds from both her and Evelyn Grace if she did not fly to San Francisco at his whim.

My sister needed help. She needed to recover from major abdominal surgery. She needed to be with her family and friends, and those who love her. She needed a stable home.

Evelyn Grace needed that even more than she did.

And Stephen Russell denied it to both of them. Instead, using threats and coercion, he forced her to return to San Francisco. Devastated, I cut off contact. Over the next three months, Stephen Russell threatened to send security guards to my house, threatened to sue me, and threatened my whole family. He is a selfish, cruel and

immature person. He is dangerous. He has a lot of money, and he is able to hide his true nature behind it all.

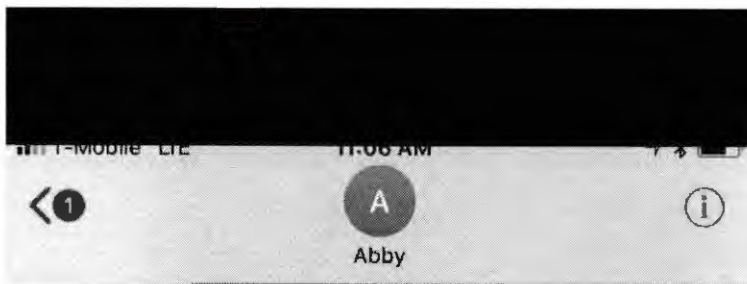
The worst was when my 22-year-old brother received a phone call from my sister saying that Stephen Russell had beaten her unconscious. My brother called the cops; Stephen Russell retaliated with threats to sue him, which made my entire family back off from the entire situation.

Since she has been living with my parents, Evelyn Grace has been so happy. She is just surrounded by love. My parents have miraculously raised six healthy and happy children. We have all received great educations. We were exposed to music, art, books, and all forms of nature. My parents devoted their entire lives to raising us in the best way possible. I am so grateful to them for all that they have done.

The best place for Evelyn Grace is with her family. It is not with Stephen Russell, and a nanny, in San Francisco. Since Evelyn Grace has been home, I have seen her multiple times a week. My daughter is over the moon in love with her cousin, and talks about her constantly.

We love, and we will take care of Evelyn Grace for her entire life. We love, and will take care of my sister as well, and support her in her role as mother. Neither Tara nor Evelyn could be in a better place than they are right now.

Sincerely,
Brienne Walsh



Like I said there is something wrong with her I feel like she have 2 personality form what i saw. Don't worry about me, I feel bad for u the way treats are ,yes I'm coming what time should I come

My bad what I meant to say was I feel bad for u the way she treats u

Yeah I know it's not easy- I'm not sure Steve fully understands

I'm nothing but nice to her

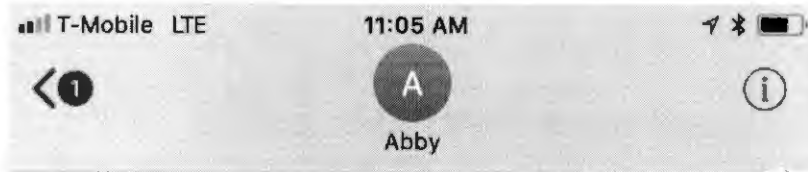
Like 3pm again?

Or 4pm whatever works best for you

Ok sounds good . I know I seen u

It is not u it is her

Text from nanny (Abby) telling me about how Steve's mom was unkind to me and there was something wrong with her- and how it was not "me" that was crazy, but her.

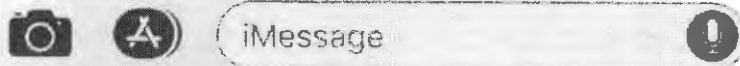


Yeah I'm try to do my best but after yesterday when she slapped her face that scared me just got up left to the bedroom I'm sorry but there is something wrong with her one minute she is nice and the 2nd minuet she switches of becomes mean I don't know what to say

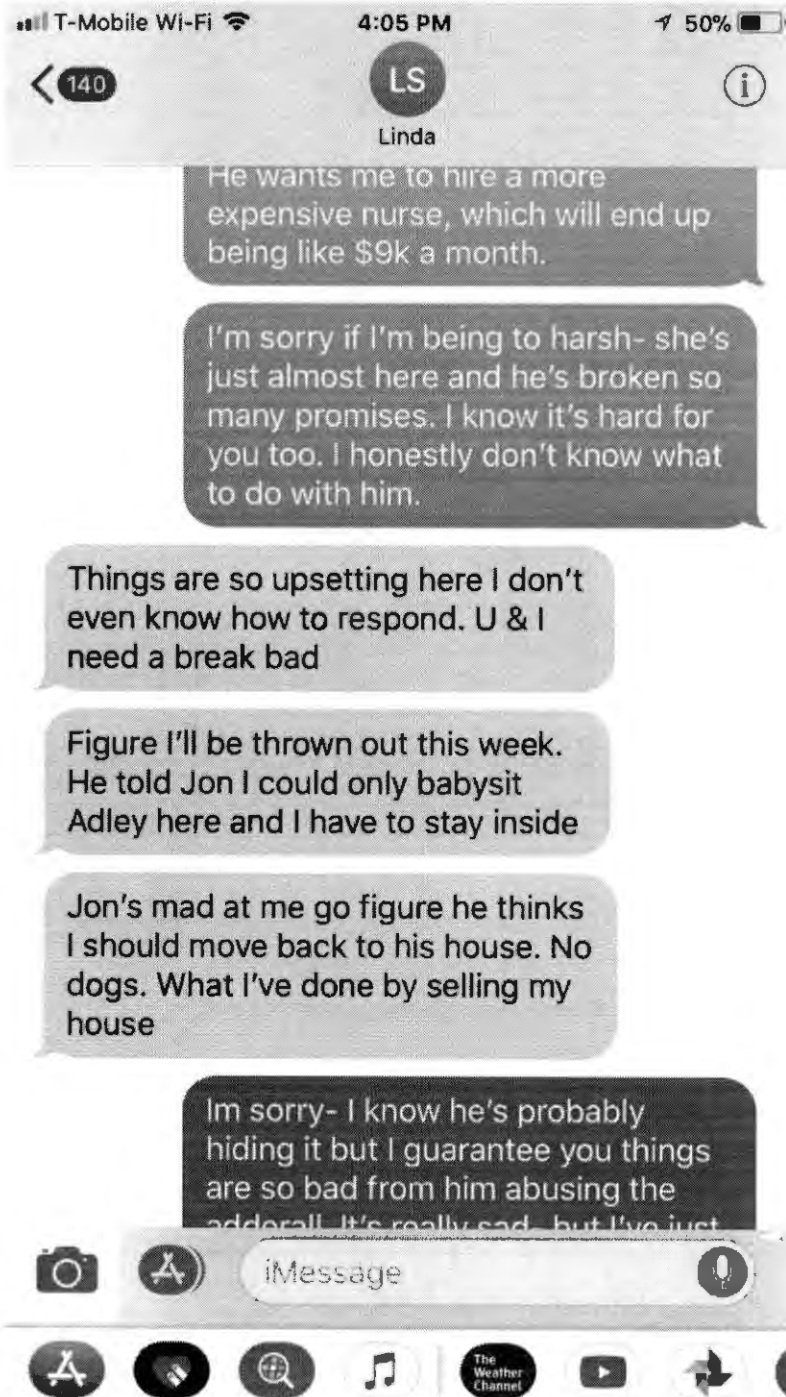
By the way if she was talking about me I don't care because I speak 3 languages ,but her she only speaks one language

No I think she was talking about me- she even said to me the other night she "doesn't know how intelligent I am". I have to be careful what I tell Steve bc he repeats everything to her. I'm going online now to look at places

Yeah u should because it is not good for u to leave in the same house because I notice she picks on u every time u said something I don't understand why she is very mean



Text from nanny showing how she was "scared" of Steve's mom when we lived with her- she "slapped" herself in the face and even alluded Evie was "dumb." Also shows how environment we were in was not safe.



Text from Steve's mom Linda that things were "so upsetting" from living with Steve (she frequently confided in me and we were trying to get him committed). Also shows Steve's abusive nature that he would "kick her out." Also shows how she is also afraid of Steve, in which ant testimony from her out of fear bc she is financially dependent on him.

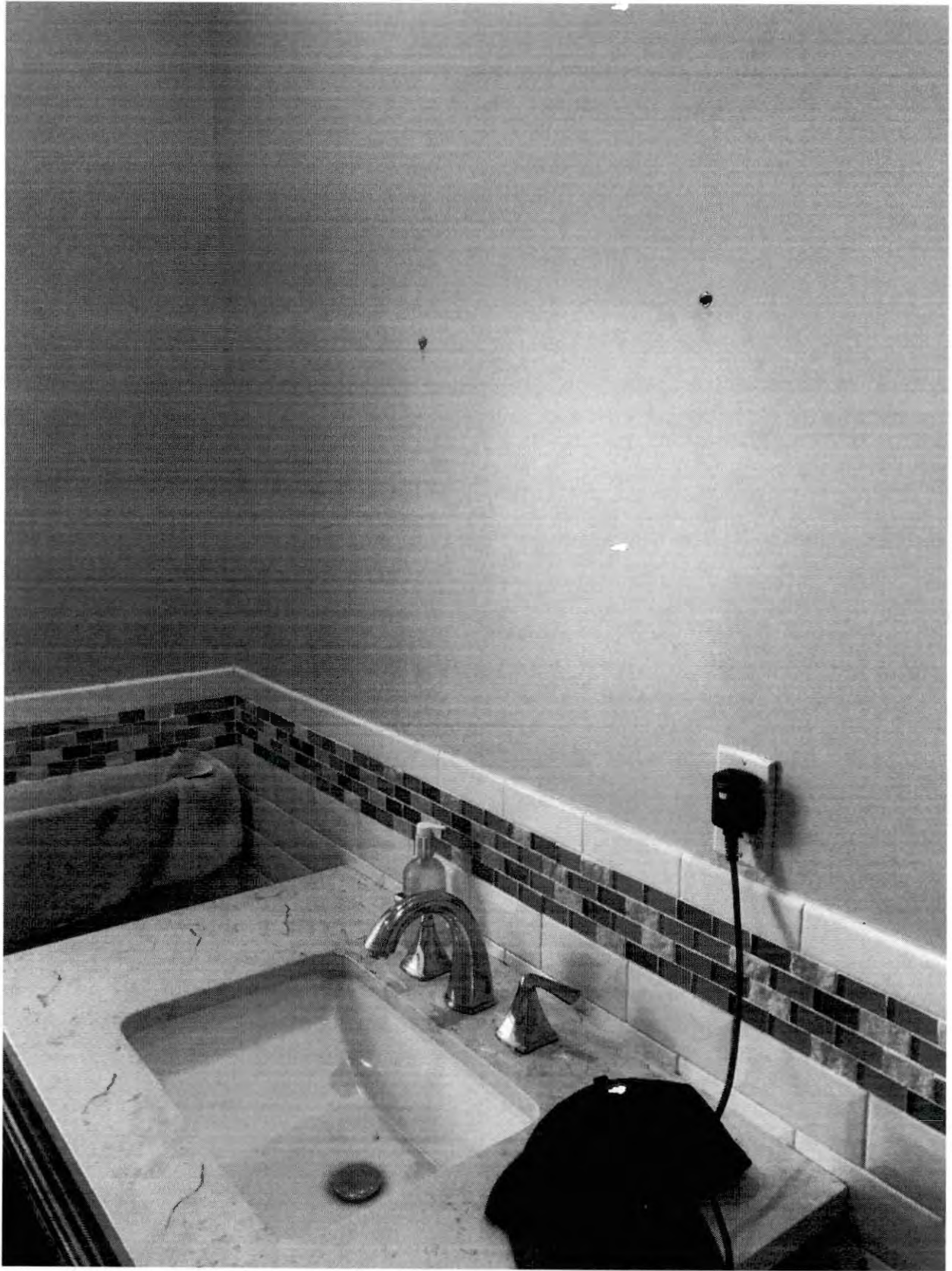
EXHIBIT G



Company in apartment looking for spying devices



Steve in ER night he believed he was poisoned in April 2018



Mirror broken/removed in Tara's apartment by Steve during psychotic episode





Box of broken Tara's belongings covered in tin foil to be tested by Steve's security for spying devices, January 2018

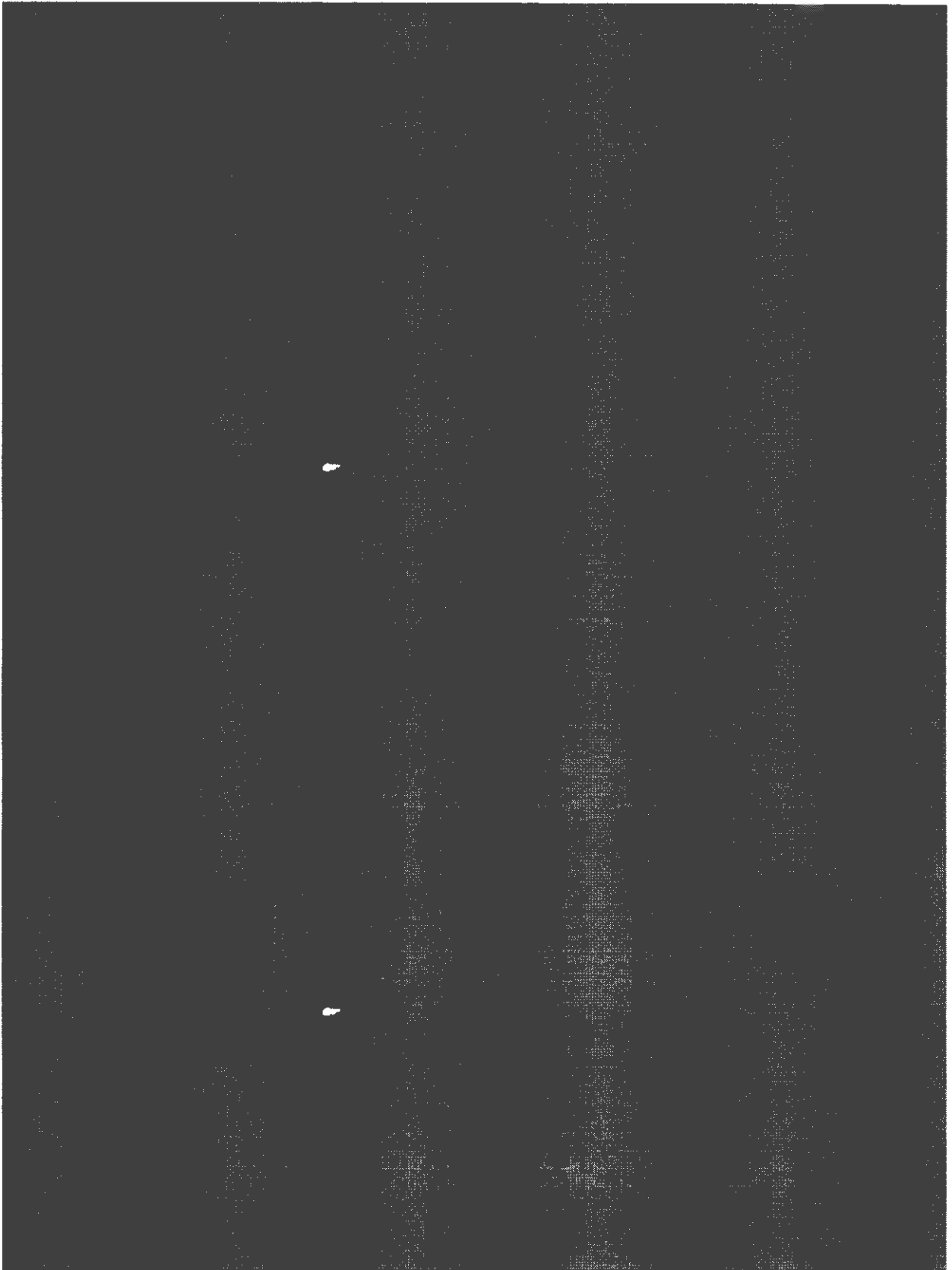


Steve's lasers he puts on some nights to prevent some sort of spying devices in Tara's apartment. January 2018



Marked in pink tape

to be removed by Steve as thought to be spying device. May 2018



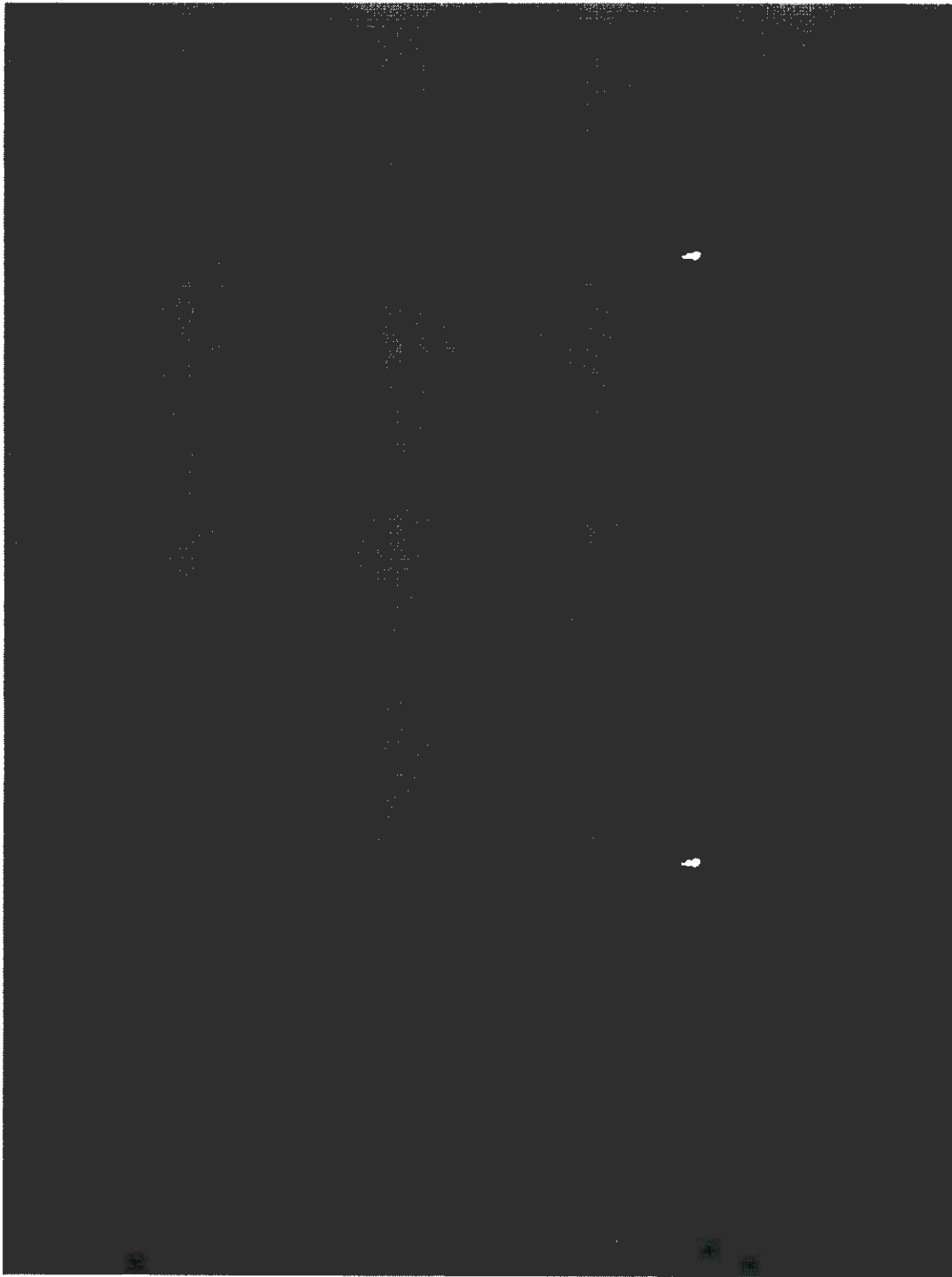


Broken

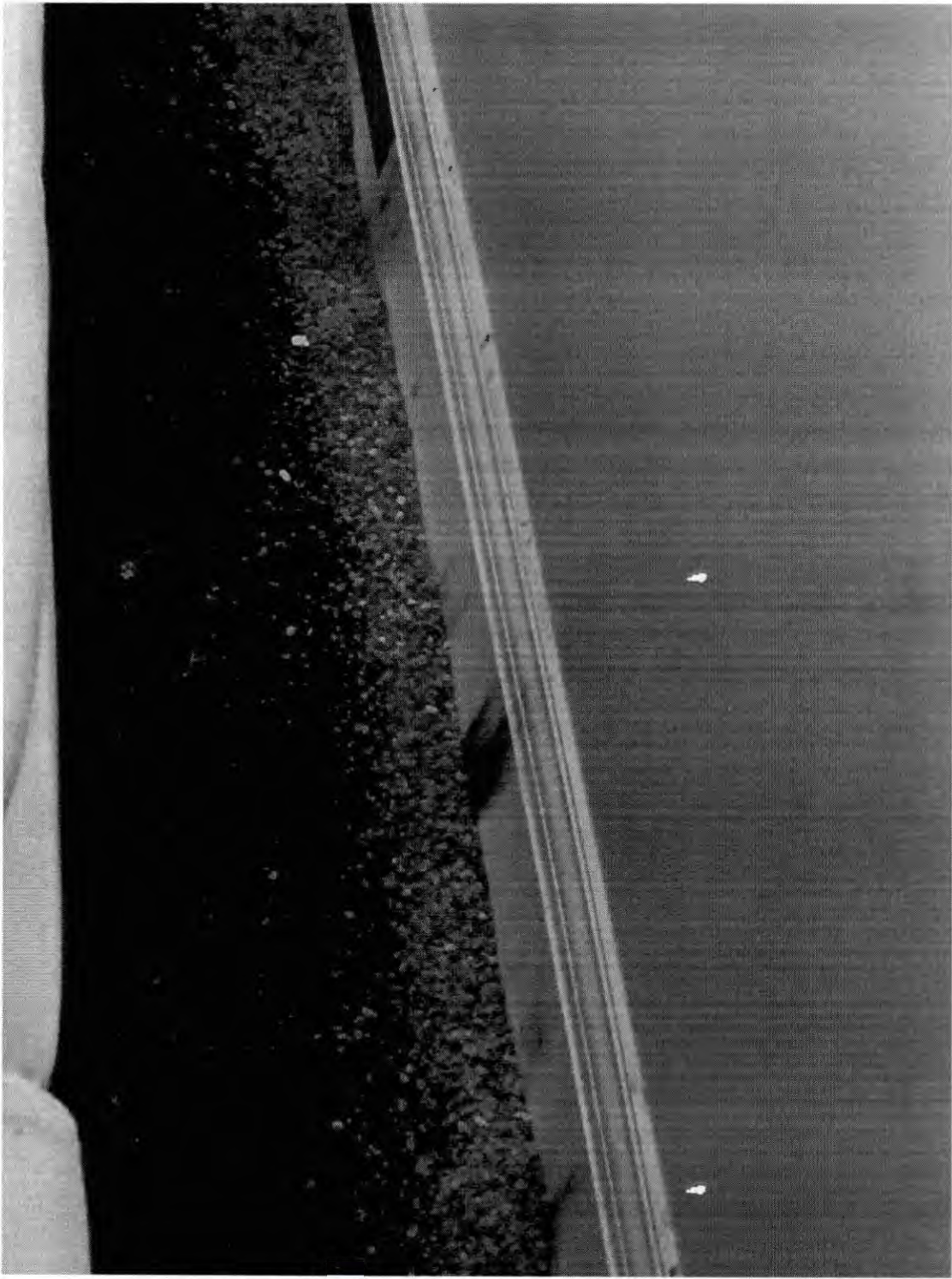
mirror by Steve thought to be spying device with laser. May 2018.



Steve in EMF protecting clothes examing wall/testing for spying devices May 2018.



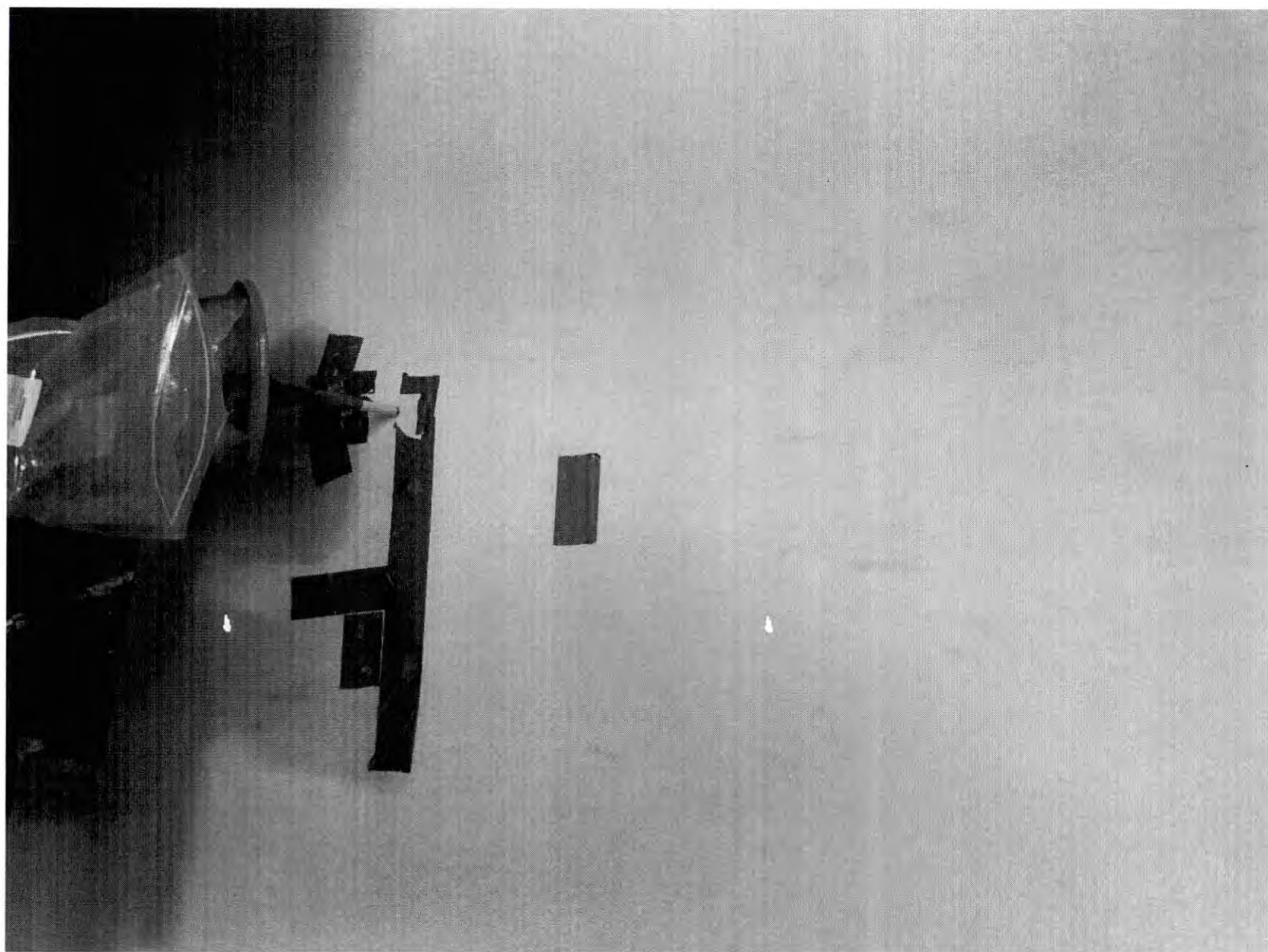
Holes in wall by Steve looking for spying devices. Believed gas was pouring out of hole in wall to poison him. May 2018



Sea salt against wall to protect from spying devices or gas by Steve. May 2018.



Device made by Steve to catch poison gases in holes in wall. May 2018.





Drawer in apartment with spying devices wrapped in aluminum foil by Steve. June 2018.

EXHIBIT H

Steve Journal Incidents of Major Mental Health Episodes

December 2016 – July 2017

Steve began acting extremely paranoid, delusional and psychotic. Steve believed he had fibers of metal that were coming out of his skin. He self-diagnosed himself with having Morgellons. Started to believe he was being targeted by what he called "agents." Steve started believing everyone close to him could be "agents" planted to harm him- even including Tara at one point. Steve started to become certain people were following him, worked for the CIA and were targeting him. Steve also frequently referred to his security threat individuals being "agents" and frequently changed belief of whom these "agents" were affiliated with. Steve began to feel very unsafe in his home. Believed white vans and other vehicle parked outside house in parking lot were there to spy on him.

Steve's mother began telling Tara she believed Steve's condition may be related to brain damage from a time he overdosed on cocaine in late 2015 and seizure in the house. Steve believed during this overdose he died and began telling Tara he was still dead.

Steve began telling Tara she was a "fairy" based on her Irish lineage and started to believe Tara had magical powers from being a "fairy."

Steve also began placing numerous cameras around the house and analyzing videos. Pointed out lights and shadows in videos were spying devices, sometimes saying they were aliens or fairies.

8/26/17

Steve up all night previous. Tara left house in afternoon for NY. Steve took apart hood over stove and found "spying equipment." Convinced neighbors in CIA- spying on him for months because they believed he was a Russian spy. Steve went to park across house telling neighbors in park he was being spied on and people were broken into his house. Also reported break in and watching people in his house to Tara- said "something very bad" was going to happen to him that night. Steve went around San Francisco, where he reported he was approached by three groups of people who worked for the CIA (twice at The Battery, once at Four Season Hotel.)

9/13/17

Claimed women in backyard of San Francisco house holding knife. Repeatedly pointed out women to mother, who confirmed she did not see a women with the knife. Steve followed the "women with the knife" to the garage, where she "crawled into a box and disappeared".

9/15/17

Steve reported crawling around floor of house attempting to decode "message" left for him on floor. Mother confirmed no message on the floor. Steve found a piece of wood from the outside of the house, showed it to his mother because he believed it had a camera in it. Mother confirmed no camera. Mother told Steve that what he was seeing was not real. Steve left the house in anger at his mother, next day texted her to move out.

9/17/17

Steve returned to San Francisco house in early am. Found marks in garbage Sheetrock walls that "were not there." Believed they were left by the neighbor and confronted neighbor. Mother confirmed no way neighbor left marks in garage door.

Steve went to ER for rapid heart rate and nauseous. Was given fluids, left after a few hours. Assumed Steve believed he was poisoned by security threat individuals.

Steve told mother house not safe- to leave and come stay at brothers.

Steve went to SFO to fly somewhere unknown- claims he was drugged with fentanyl by Russians and reportedly requested medical help, brother ending up picking him up from the airport. Steve refused to be

treated by EMS as believed he was being watched and set-up- if he was seen could ruin his reputation.

9/22/17

Steve in NYC at room rented from friend Chris Ochoa. Tara stayed with Steve all night and he did not sleep, which she assumed was from large Adderall consumption, Tara went to breakfast with Steve at Lafayette restaurant in downtown NYC- he asked to leave right as the food arrived because he thought he was poisoned. Returned to apartment where Steve stated he had radioactive poisoning from his adderall. He had a device to test the adderall's radioactivity (reference video) where he stated a few pills were radioactive. Steve stated he need to go to the emergency room. Tara selected Bellevue Hospital due to mental health treatment, as Steve was clearly in a psychotic state from lack of sleep and adderall. Steve finally was admitted into the ER for his thought poisoning, where Tara informed attendants at front desk he struggled with drug abuse and had a current history of psychosis. Steve was brought to the mental health section of ER and was not considered a threat and released.

December 2017

Steve hired a professional security firm in San Francisco to guard his home and him. First private investigator he worked with told him after a few weeks he would no longer take his money as he needed other help.

According to mother, Steve disassembled new apartment he had just bought to the point she told him she would move out if he didn't stop. He was looking for spying devices, ECT, which his new security team supported him in doing. Tore apart his new closet, broke the heating system, broke the WiFi, ECT. New security team began having an member stationed out of the house 24/7 to guard the house- cost of security each day started to be around \$9,000.

December 27, 2017

Steve came to stay with Tara in NYC for Christmas. About three days after arriving, one night he stopped talking to her and said he was leaving to go stay at a hotel. They had had a nice evening, so Tara got upset and asked why and when he was coming back. Steve just told her to "stop talking" over and over as she pleaded him to not leave her heavily pregnant (in third trimester around 34 weeks). Steve was enraged and threw remote against the wall so hard it left a whole.

Next morning after he left, Tara realized her entire prescription bottle of Adderall was missing. Tara confronted Steve about taking the bottle and he admitted to taking it for "her best interests."

Approximately January 12, 2018

Steve arrived in NYC to be with Tara in final week of pregnancy. Arrived at night with security guard, Bryan. Bryan pulled out his gun and loaded in in front after Tara about 20 minutes after arriving, which made her very uncomfortable being heavily pregnant. Steve stayed with Tara, but felt "unsafe" in her apartment. He started using a NY based security firm affiliated with his San Francisco firm. A security guard was stationed in a car outside of Tara's house starting the day Steve arrived. Made Tara uncomfortable and the neighbors were concerned.

Living in Tara's apartment for a few days (Tara around 37 weeks pregnant) Steve felt increasingly unsafe. Steve Switched out all of the electrical sockets in Tara's apartment with security guard Bryan. Steve also installed shades and had them closed at all times. Steve left a Christmas light machine on all night in the kitchen (something to prevent spying). Tara had to be careful about anything she said to Steve in the apartment or else he would be angry as he believed people were constantly listening. After a few days Steve demanded apartment was unsafe and Tara had to accompany him to a Brooklyn hotel. Tara didn't want to leave being heavily pregnant, but complied after a fight.

Steve rented two hotel rooms adjacent in Williamsburg Hotel. One for security guard and one for Tara and himself. One night after arriving Steve demanded to Tara one night they leave the hotel immediately (he believed hotel room had spying devices and unsafe) and go stay with her parents in Chappaqua, NY. Tara phoned parents and they would not allow Tara and Steve to come given his psychotic state and there being two teenagers living at home (Tara's sisters). When Tara told Steve they could not go to her parents, Steve

threatened to "smash" his cellphone in her face unless she texted her Dad they were coming. Tara got very upset and asked him to leave- eventually he left the room.

Tara eventually went back to her apartment as Steve stayed in the hotel. On January 26th Steve accompanied Tara to obgyn pregnancy appointment, where doctors told her her blood pressure was too high and she had to go to the hospital (blood pressure being high was highly correlated to stress from Steve). Tara ending up delivering early via c-section due to preeclampsia on January 27th.

Steve stayed with Tara in hospital and slept on couch as she recovered. Tara watched him closely with the baby and hospital was aware of his condition. On third day, Steve decided to get an adderall refill- he took unknown amounts and stayed up all night in the hospital room with Tara (baby in nursery). Steve was convinced all night there were spying devices in the hospital room, had flashlight out inspecting corners, vents, closet, ECT. Steve also believed the huge wardrobe in the room was moving on its own. In the morning Steve had a security guard come to the room, where he expressed his concern of cameras in the walls. Security guard said it was nothing. Tara told Steve he couldn't stay in the hospital if he was taking adderall. Steve agreed to go stay at her apartment in Brooklyn and set it up for the baby to come home the next day.

January 30, 2018

Tara received three way call from two security team members in the afternoon. They inferred Steve was in a psychotic state, hadn't slept and had completely trashed Tara's apartment. They were adamant they would not allow Tara to return to her apartment with an infant the following day. They suggested Tara go stay at her parents.

Tara elected to stay an extra night in the hospital as she felt she could not return home.

January 31, 2018

Tara was discharged from hospital. Given she had a night nurse scheduled and all of her baby supplies she had spent months preparing for at her apartment, she still wanted to return home. Tara was in constant contact with security team. Tara and her father entered her apartment (mother stayed in car with infant) to inspect conditions. Steve was there with guard clearly in a maniac/delusional state. Apartment was a mess, freezing cold, smelt of fumes, ECT. Tara became very upset and demanded Steve leave immediately and return keys- which he did. Steve insisted on bringing a box with him with broken appliances, mirrors from the walls- random pieces of property he had destroyed. A bunch of pieces were covered in tin foil- Tara remembers thinking contents of the box demonstrated how sick Steve was.

Tara and father spent next hours cleaning the apartment to bring baby back.

February 1-March 3

Approximately 1 week after Evie's birth, Steve returned to San Francisco. He said he has work and meetings. The verbal agreement when Tara was pregnant is that Tara would reside in NYC with Evie (daughter) following her birth. Steve verbally agreed to fully financially support Tara and Evie, encouraging Tara to not work (once promised to give \$10k a month in lost income). Steve reinforced over and over Tara did not ever have to worry about money. Due to difficult pregnancy and recent birth, Tara lost ¾ clients of Vital Branding shortly after Evie's birth. Tara required having a night nurse by doctors to care for Evie at night while she slept. Steve was in full agreement to pay for nurse and fully support Tara.

Once Steve returned to San Francisco, he promptly stated Tara needed to come there immediately. Tara told him she needed to stay in her home to be close to family, all set up for baby and had excellent support. Steve stated he would then no longer financially support her at all- not even for the nanny. For two weeks Tara tried to build back her business while caring for Evie 16 hours a day primarily on her own and paying for night nurse. She continued to beg Steve to let her remain in NYC and keep his promise. Steve refused any financial support and said Tara would get very little in court.

After two weeks of feeling exhausted with the prospect of building back a business immediately, caring for Evie and paying for a night nurse Tara caved and agreed to return to San Francisco. The loose plan was to stay

there until she had enough money saved and better footing on care for Evie. Tara very reluctantly and sadly came to San Francisco with Evie on March 3, 2018.

Approximately March 7

Steve and Tara got into argument on the women he left her while she was pregnant. Tara left Steve at restaurant and returned to mothers house. Steve came back and Tara was upset on her phone talk to friends. Steve grew very angry Tara talking to friends. Steve removed Tara's cellphone from her hands and smashed it on the floor- no longer operatable

Approximately March 8

Tara was sitting on couch in living room on computer, Evie (daughter) sleeping in her room. Steve came into room and told Tara she could not use her computer that it was bugged. Tara said don't be ridiculous. Steve grew very angry and disconnected the only wifi in the house. Steve said he was taking a shower and leaving her to go to work. Tara was then left with no wifi, in a strange house, no cellphone- no way to do work or communicate with anyone. Sitting on the couch Tara grew very angry at the bad situation and the fact Steve would willingly leave her alone in a house with no way to contact the outside world or do work. She didn't even want to be in San Francisco and felt forced against her will. Tara went to Steve's bedroom and broke one of his several cellphone and his iPad. Steve came out of the shower and saw what she did. He came up to the living room to where she was in full rage. He said he was breaking her laptop and her spare (very old) cellphone that only had wifi. Tara begged him not to and apologized. She grasped on to her laptop begging Steve to calm down. He was very violent- he smashed her around the kitchen (next to living room) pulling her up and down against the center island and the floor with full force to remove her laptop from her arms. Tara just grasped her laptop and closed her eyes begging him to stop. Steve was able to finally remove laptop and smashed it on the grown. Tara felt physically injured and scared and locked herself in bedroom with daughter. Steve called his security team to residence- Tara wanted to call police to report being physically hurt but security people talked her out of it. Tara resulting had bruises all over her leg and backside and had trouble walking/running for close to two weeks- did not receive any medical attention.

March 18, 2018

Tara, Steve and Evie moving to new apartment. Old apartment was on a very low level and new apartment was on the 55th floor. Tara in hallway outside new apartment without baby when the nanny came up in the elevator without baby. Nanny stated she left baby alone in the apartment with Steve- Tara immediately started to worry and told nanny she can never ever leave Steve alone with baby. After a few moments Steve exited service elevator on 55th floor- Tara immediately asked him where the baby was. Steve said he forget baby was in the apartment, leaving her unattended. Tara immediately rushed to lower level apartment to be with daughter.

March 20, 2018

Last night Steve came home and demanded Tara give him adderall. Tara keeps the drug locked in a security box with a key. He stated we no longer could be together and Tara had to move out when Tara said she wouldn't give him a drug. Steve said he would go to a hotel and find a date. When Tara started crying to him begging him not to leave, Steve said "stop it or I will throw your cellphone in your face." Tara felt somewhat physically threatened by him as his urge for drugs are so strong he could hurt her again.

February 2018-March 2018

Steve continuing to work with security team he met at end of January 2018 in New York. Security team referenced to Steve from friend Adeo. Security team acting more like "life coaches" then security. Team working with Steve to keep him off drugs, bring to work everyday and have normal routine. Security team did tell Tara that Steve did indeed have a real threat at one point, saying only it was a foreign government. Said risk was under control. Very vague about what risk entailed.

Around three security men staying in SF with Steve (from out of town) at any given point. Security stays at hotel, present with Steve throughout entire day. Main security person named George- in Tara's opinion he is

the main person who confirms Steve's security threats are real. Other security team do not seem to believe all threats are real.

Steve stated to Tara that he was paying security team \$9,000 per day to work for him. Steve also told Tara at beginning of April he wrote security team a check for \$1,000,000 for continued support (later ending up realizing he was being coned by this firm and took legal action to get back \$1,000,000).

April 4, 2018

Steve refilled adderall prescription earlier in day and stayed up all night in apartment. Was looking through apartment for spying device. Was non-violent but nanny witnessed him staying up. Was looking through apartment for spying devices. Nanny started to become concerned about his state and infant in apartment.

April 5, 2018

When Tara woke up in morning Steve was still awake and in agitated state looking for spying devices. Steve told Tara the previous day he was followed by CIA agents in the elevator of psychiatrist while picking up meds- he recognized the CIA agents from previous encounters. Steve told Tara the night before that he could see agents dropping down the windows of the apartment- he believed they used devices to make him feel "microwaved"- he also mentioned noticing a foam in the door that was not there. Steve stated the night before he was so sick from the experience he was nauseous. Steve also said he felt like whatever devices were used on him through the windows made him feel very heated. Steve mentioned he had particles in his body from previous encounters with spys that made him susceptible to their devices- told Tara her and the baby were safe from the devices.

Steve security team came to apartment and removed Steve for the night where he was brought to redwood city hotel. They told Tara they wanted him to get some rest, Tara informed them he likely was in state of psychosis and stayed up all night from taking Adderall.

April 6, 2018

Security team sent team of people to Tara/Steve apartment to test for spying/surveillance devices in apartment. Team did not find any devices. Steve returned to apartment and got some sleep- was still in a very out of it state. Steve appeared to be very distracted and not present. Was continuing to look for devices in apartment. Security team told Tara Steve had a sensitivity to high electromagnetic fields in the apartment.

At this time, Steve self-diagnosed himself with having sensitivity to EMF- he believed EMF was intentionally being targeted at him to cause him discomfort. Steve began covering himself at night with EMF metallic blanket and wearing EMF protective clothing.

April 7, 2018

Tara and Steve attended event at Palace hotel. Steve still acting distracted and not present for day leading up to event. While at table at event, Steve started acting very uncomfortable. Took Tara to bathroom and told her he likely was just poisoned at the event. Steve mentioned one of his suspected followers (has a list of images of all the people that follow him) named Baldy was at the event. Steve said there was an orchestrated action at the event where Baldy walked by and another man put a chemical on Steve's jacket. Steve said he tasted the chemical in his mouth after on coat. Steve and Tara left event and decided with security team to bring Steve to Zuckerberg Emergency Room. In car ride to hospital Steve was clearly in pain- face very red- stated to Tara he thought he would likely die. In ER Tara told check-in attendant and nurse privately Steve had history of psychosis and amphetamine abuse. Steve only concerned vital was high blood pressure. Steve ending up calming down and left ER before being seen by a doctor.

Security team escorted Steve and Tara to ER and security member agreed with Tara in confidence Steve was clearly psychotic and needed mental help.

April 18-20, 2018

Steve took Adderall on two consecutive nights- first night 80 mg, second night 130 mg. Started acting very psychotic and believed apartment was bugged and unsafe. Dismantled door insulation, took off top pieces of lamps, took off legs of chase lounge (he said had camera in it), covered hinges on doors (also assumed cameras). Steve asked Tara for aluminum foil to cover legs of chase lounge (said it had to be metal). Steve should various cracks in apartment walls and floor that were "not there before." Steve mentioned being sprayed in face with chemicals from the wall. Steve stated Adderall was not the problem. Steve stated George from security team confirmed there was a threat for Steve (later learned George was a con artist and started law suit against him).

May 1-May 17 2018

Exact dates Steve refilled Adderall prescription unknown, but entire months supply was approximately consumed in 1.5 weeks. Steve's psychosis has peaked this month, in which the following has happened:

- Workmen have been constantly in apartment to change ever single socket, door handle, hinge, light fixture, toilet paper holder- basically anything metal- in the entire apartment. Appliances removed as they are thought to have spying devices in them by Steve.
- Steve has stayed up all night for numerous nights consuming large amounts of Adderall. In one such night, he put two massive holes in the wall in the living room area. Steve believed there was a spraying device in the wall that was poisoning him. Steve set up a tube coming out of the huge halls in the room to remove chemicals he believed to be in wall.
- Steve began using his ozone generator on numerous occasions in various rooms of the apartment. Ozone generators are proven to be toxic to animals and humans (<https://www.nachi.org/ozone-generator-hazards.htm>). Tara has asked Steve over and over to not use generators in apartment because of baby.
- Steve's security detail began to be stationed 24 hours a day at a desk placed at the front of the apartment.
- Steve broke the locks on the door to Tara and Steve's bedroom, as well as their bathroom. Tara now has no place to hide out if feeling unsafe.
- Steve has increased yelling and shouting in anger at Tara as she has made it aware she wants to move back to NYC. On one such occasion. Tara had baby in bedroom on bed- Steve came in yelling, Tara begged him to stop in front of baby. Tara tried to physically push Steve out of the room, leaving baby unattended for 30 seconds. Baby ending up falling off of bed, but had no real injuries (Evie was promptly brought to her pediatrician for evaluation, in which it was confirmed her only injury, was slight bruising that disappeared in two days).
- Steve's mother gave Steve a loaded hand gun she believes may be in the apartment with Tara and baby. Tara is starting to feel very unsafe. (Steve later stated no handgun in apartment, but Tara unsure if he was lying).
- In Tara stating she would like to leave, Steve has started raising his voice and hand (as if to throw something) arguing with Tara. Stated he will break her cellphone again or "smash" it in her face.

- Steve constantly closing shades to apartment, as he believed laser and other high tech equipment was being sent into the apartment to activate the metal particles that the “agents” had placed in his body to make him sick.
- Nanny told Tara on two separate nights she woke up and found out Steve had left the stove on in the kitchen. Nanny was very concerned about safety. Tara confronted Steve and he denied leaving stove on.

June 2018

Steve had entire apartment painted in EMF protective black paint covered by white paint. Began “testing” and showing security he could consume Adderall at night and “not be psychotic” despite his ongoing belief he was being targeted and needed full time security. Steve started seeing psychiatrist to establish he was not mentally ill or psychotic. Tara witnessed sessions with this psychiatrist (Dr. Gopal) in which Steve was dishonest about his mental condition and drug usage. Steve said he used cocaine and Adderall infrequently to treat his lack of energy from Lyme Disease. Tara believes Steve was being dishonest to Dr. Gopal to establish he was not a drug addict, suffering from amphetamine induced psychosis and not mentally ill to prove he was a “fit parent.”

Tara woke up one morning to take a shower and realized there was a large amount of feces covering the drain of the shower. Steve later confirmed it was his feces. Tara not sure if he defected over drain to prevent some sort of spying device.

EXHIBIT I



Tue, May 22, 12:20 AM

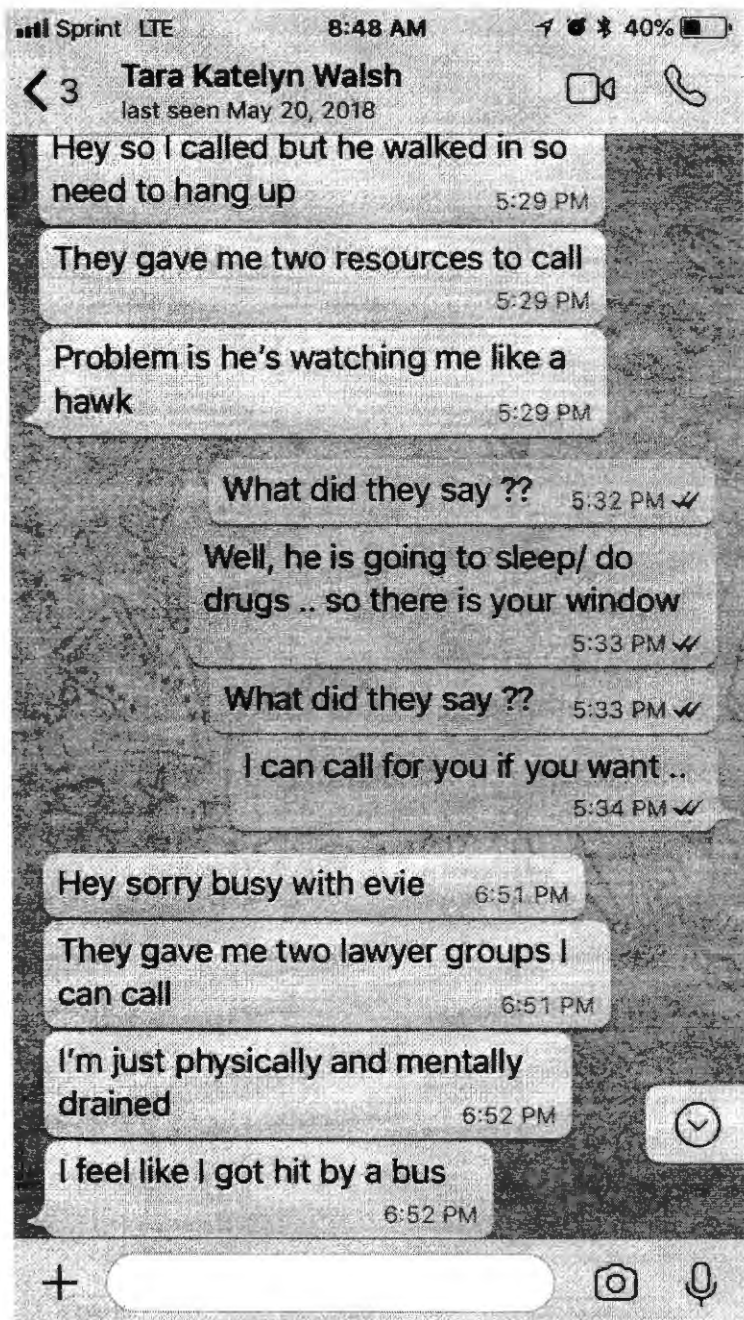
So I came home and the nanny told Steve about another thing I had told her in confidence- sometimes when he is out of his mind on drugs and won't sleep I have put seroquel in his wine- bc I don't know what to do. The nanny has been throwing me under the bus every night- last night she told him I wanted her to say he was a bad dad. I told Steve I was sick of the nanny throwing me under the bus to him, didn't feel comfortable with her working her and sent her home.

So Steve is saying I'm having another episode- but I am totally calm, not emotional. I don't feel comfortable with someone taking care of my daughter who is looking to throw me under the bus to Steve- also for a bunch of other reasons I've been asking to get rid of her for like a month.



Text to Dr. Gopal pleading with him the situation was unstable with Steve and to understand my position. All of which Dr. Gopal ignored.

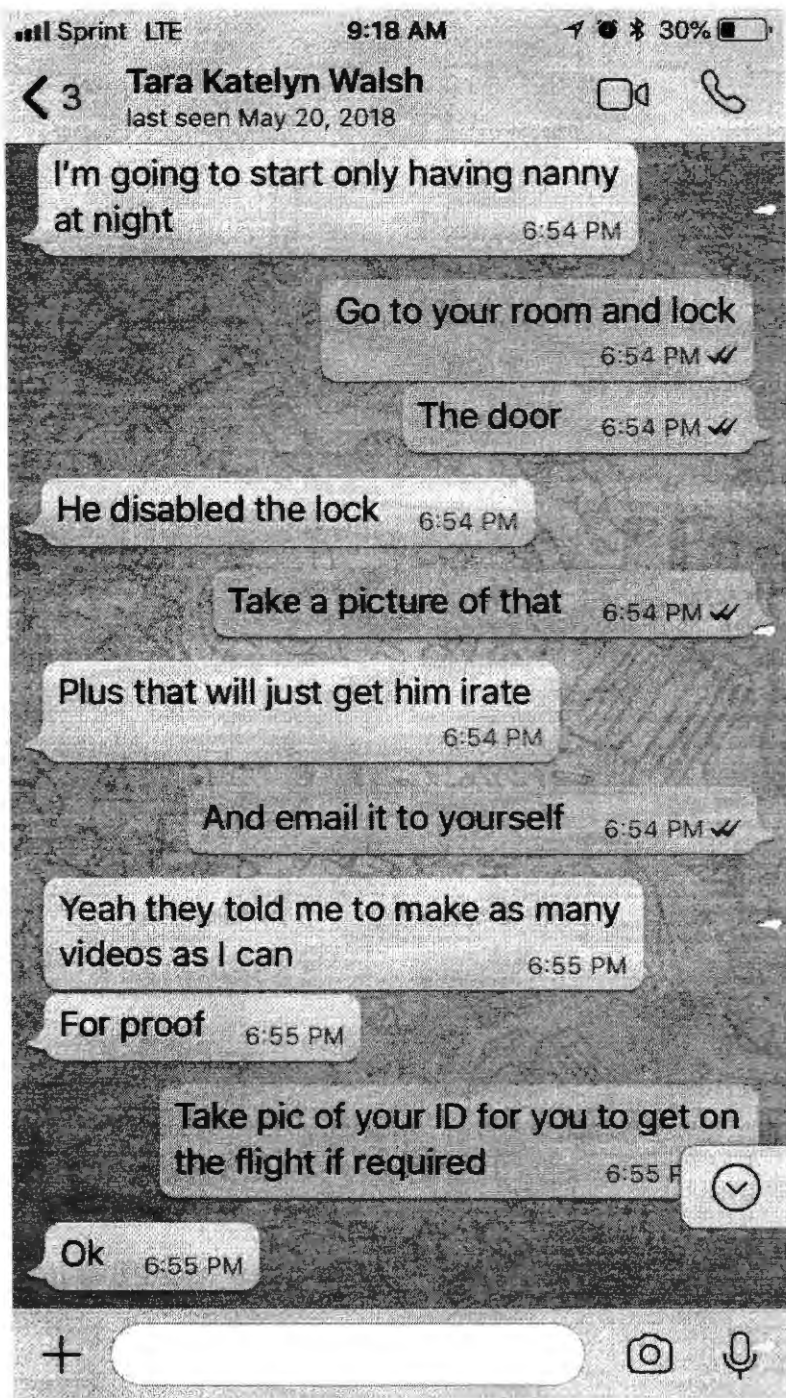
EXHIBIT J



Wed, May 16th, 2018 - SF

We started communicating on What'sapp , because Tara felt watched and unsafe
And felt her phone wasn't safe.

Feeling watched ; feeling drained .



Wed, May 16th, 2018 - SF

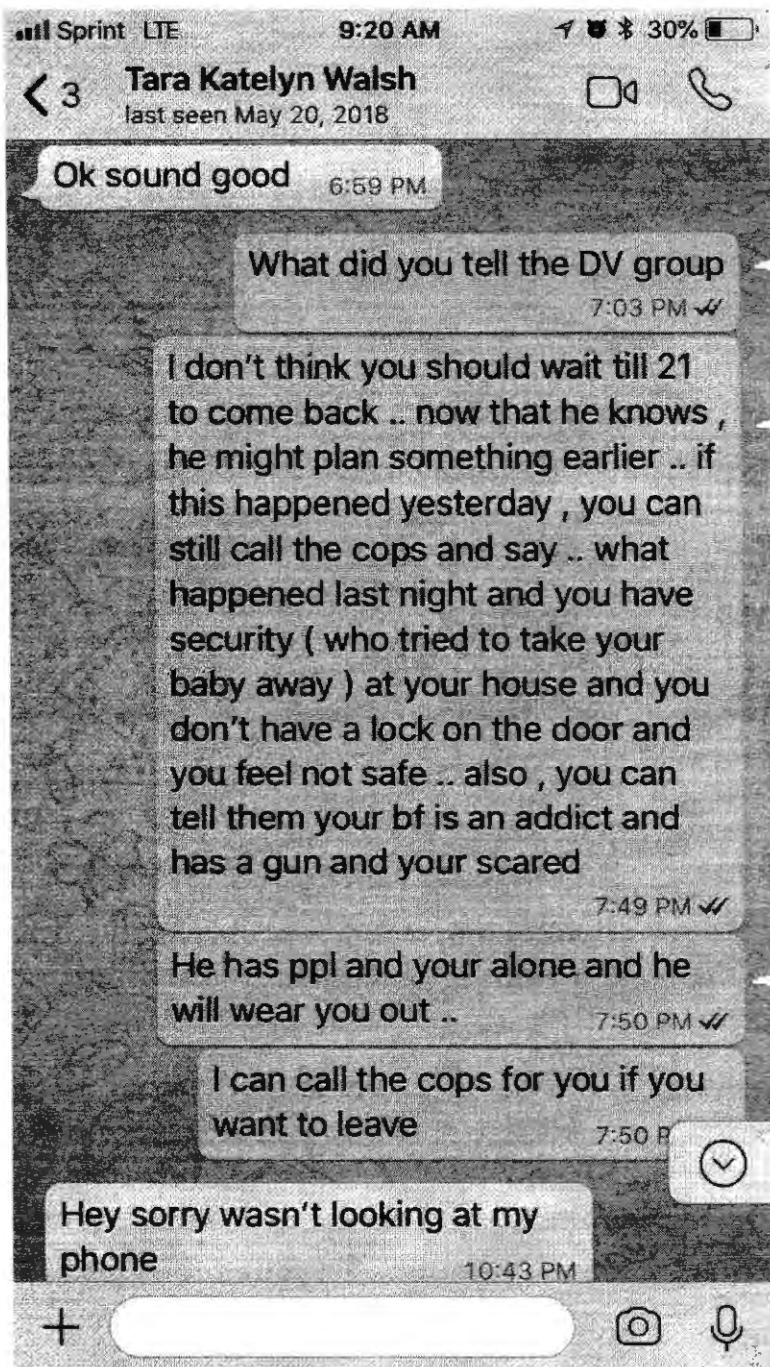
- He disabled the bedroom door and tara trying to keep peace not get Steve angry Or trigger him. (I suggested she call Domestic violence helpline earlier)



Wed, May 16th, 2018 - SF

I took down Tara's address because I felt the situation had been escalating for a while
We decided on a code word / safe word - if she needed me to call 911 for her.

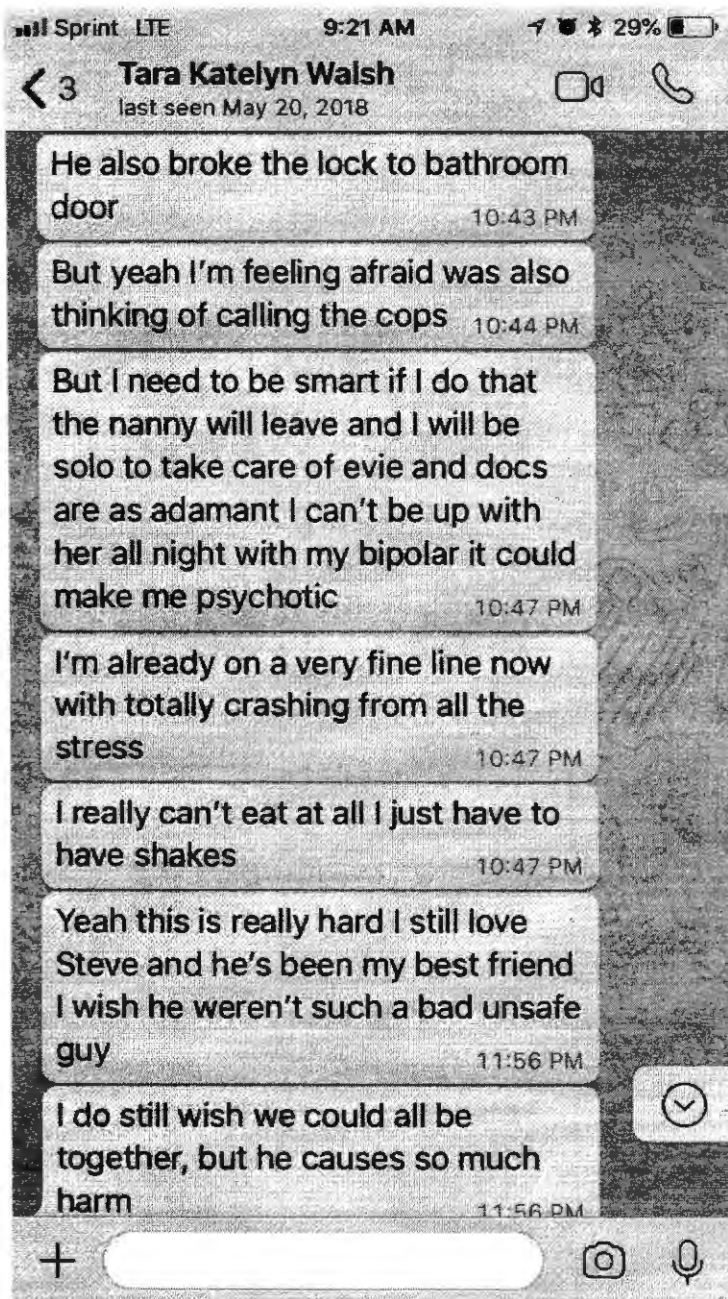
Also here Tara mentions Steve had a gun/ firearm and she is scared .



Wed, May 16th, 2018 - SF

Tara mentioned that the security and the Nanny had tried to take her baby away from Her forcefully to a different place .

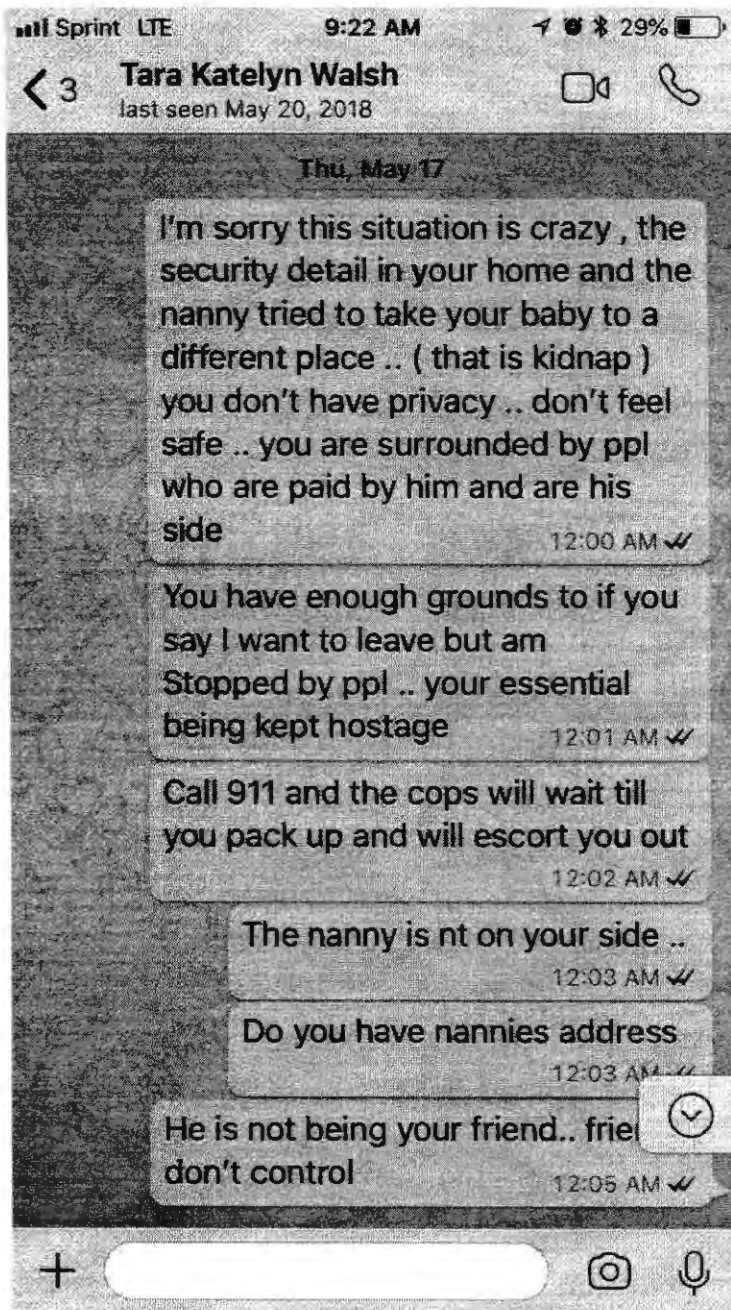
I was getting her to see that she is in danger and need to get out to safety above all.



Wed, May 16th, 2018 - SF

Tara mentions Steve also disabled the bathroom door , he has threatened her the previous day About taking away Evie and calling Child protective services as coercion and intimidation.

Tara, also has conflicting emotions .. though she is afraid .. she also loves Steve and really wants it work out between them and wants a happy family.



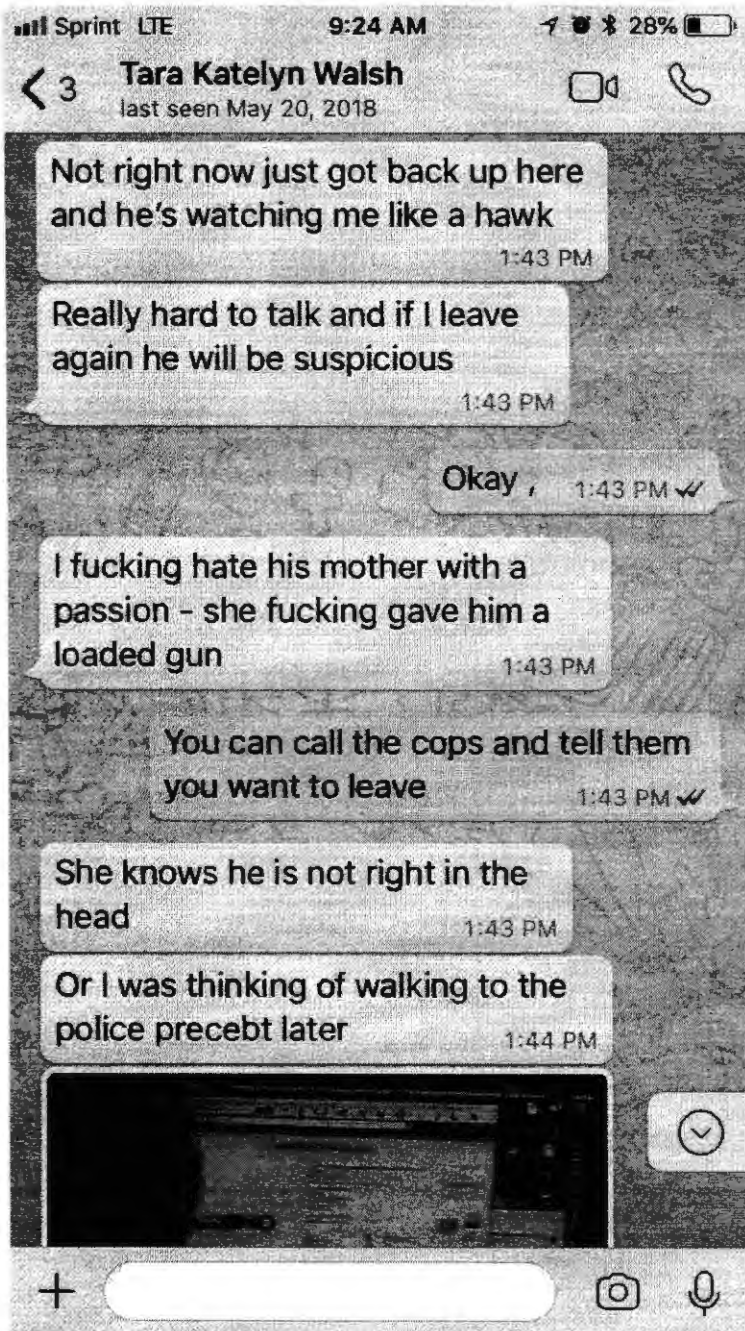
Wed, May 17th, 2018 - SF

NOT YOUR BEST FRIEND:

I was advising Tara, Steve is nt her best friend, if he is trying to control her.

He is essentially keeping her hostage against her will.

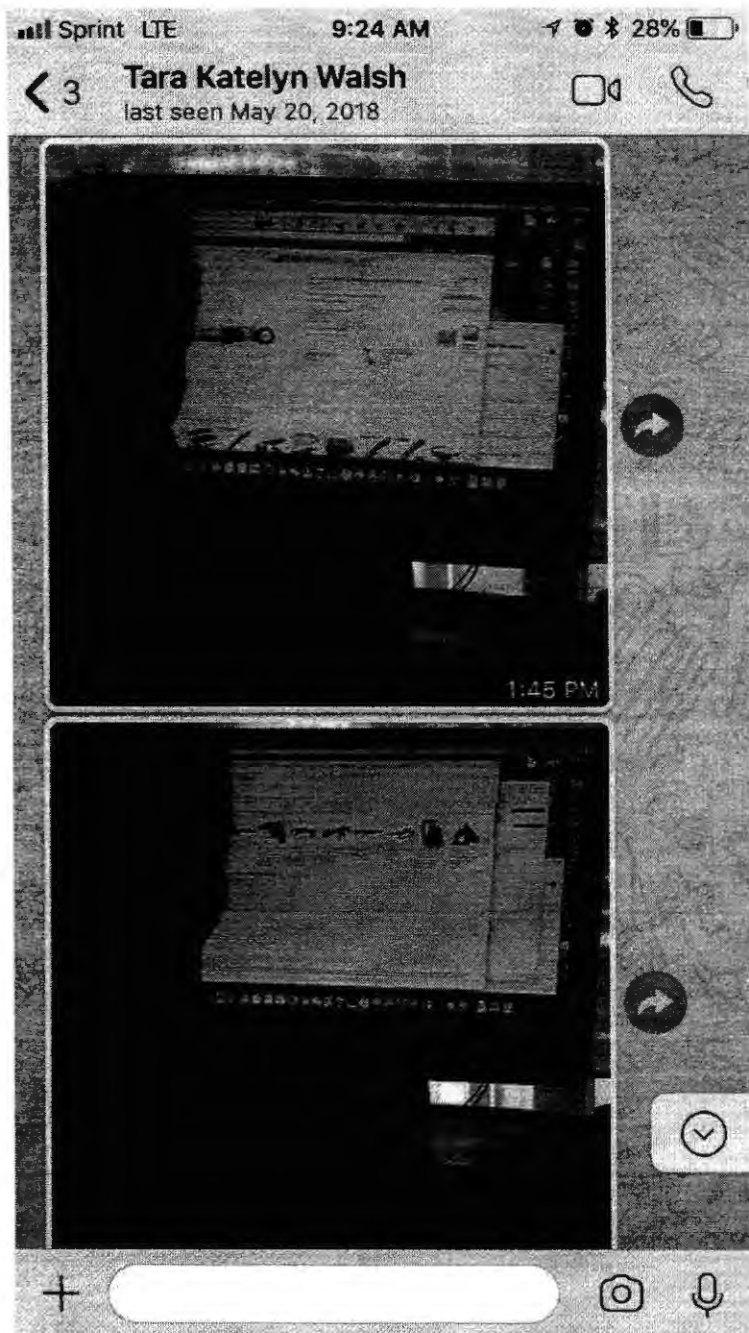
She is surrounded by people who are paid by him and they are not her support system either.



Wed, May 17th, 2018 - SF

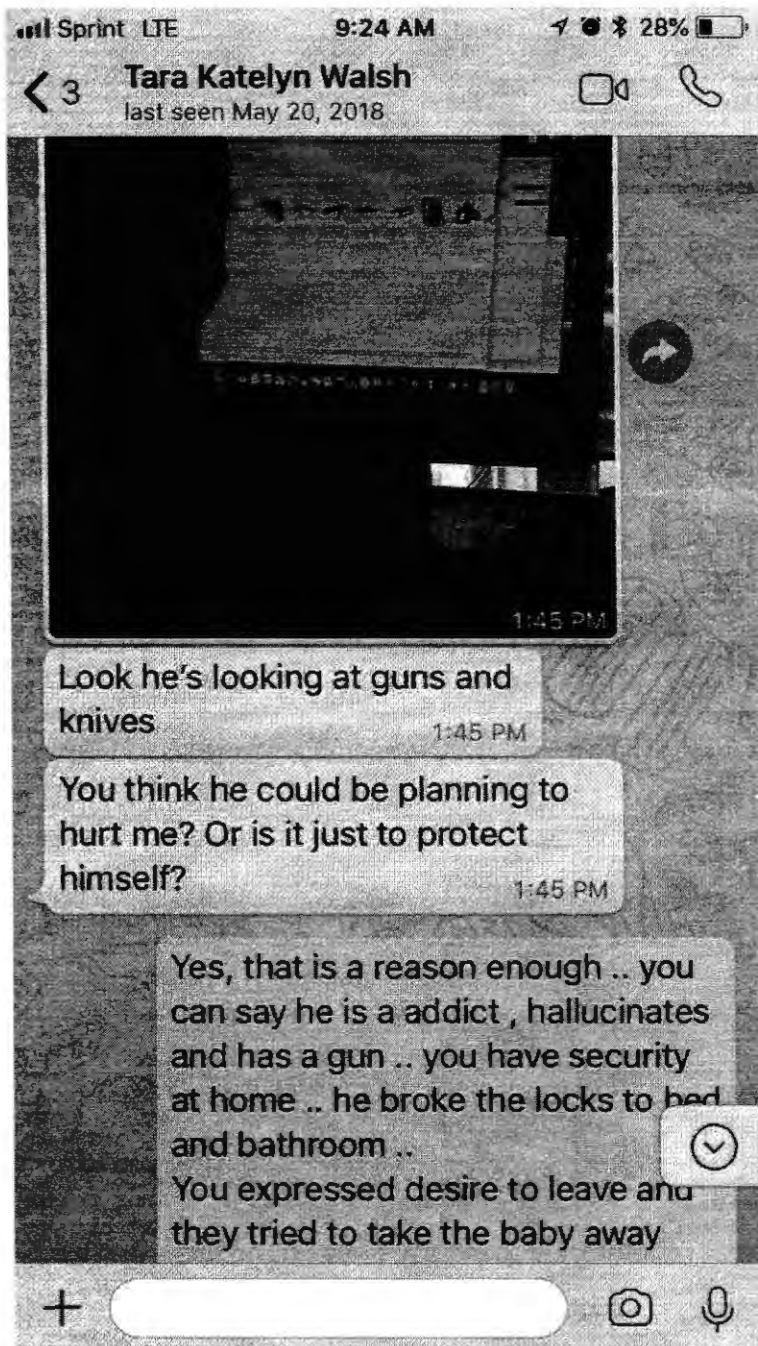
Tara is afraid to talk in front of Steve, mentions he is watching her like hawk.

And mentions how his mom gave him a loaded gun, when she knows he is emotionally unstable.



Wed, May 17th, 2018 - SF

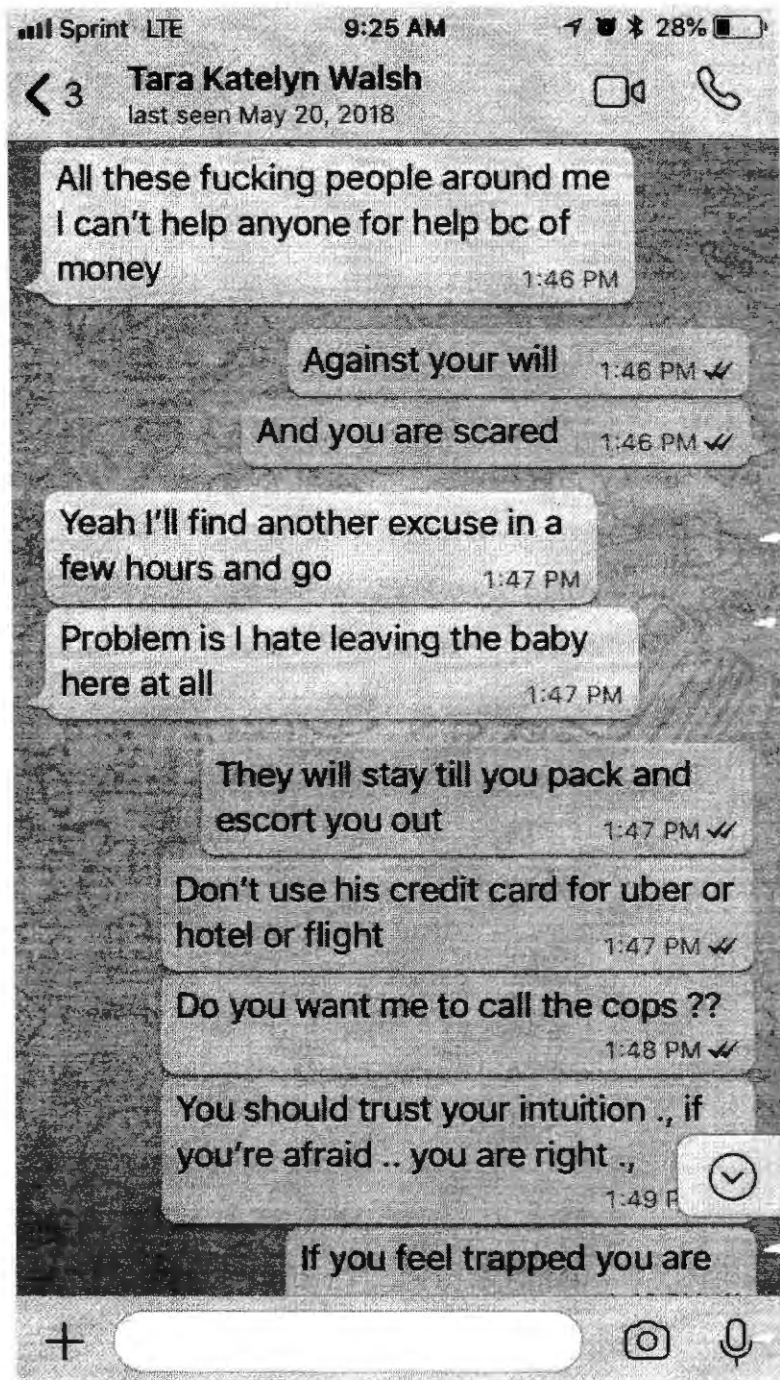
Tara sends me pictures of Steve looking at knives and guns on his desktop in Her plain sight. Tara was both shaken and afraid and feared she will be harmed.



Wed, May 17th, 2018 - SF

Tara questioning , if he trying to protect himself or is this to hurt her.

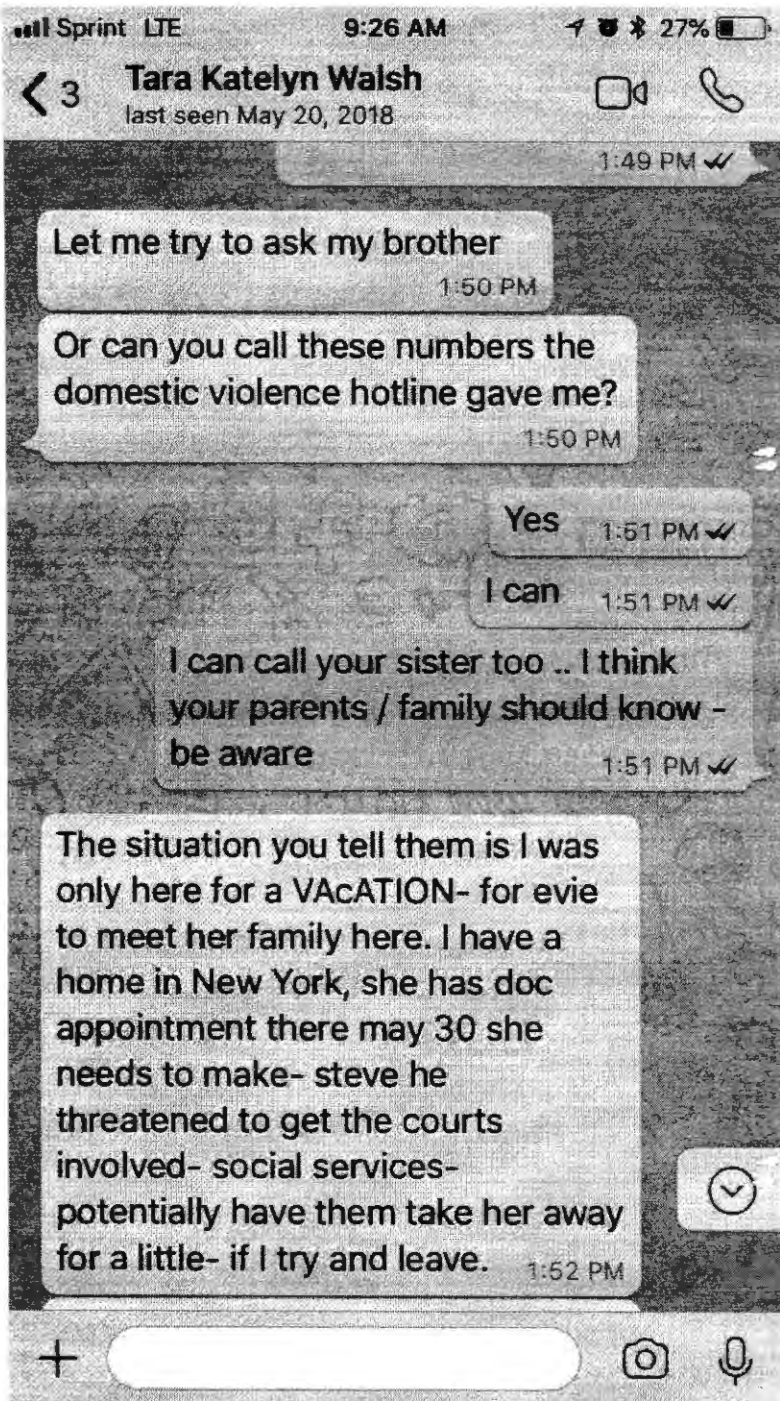
And me, Rashmi Narendra trying to tell her she really needs to get out.



Wed, May 17th, 2018 - SF

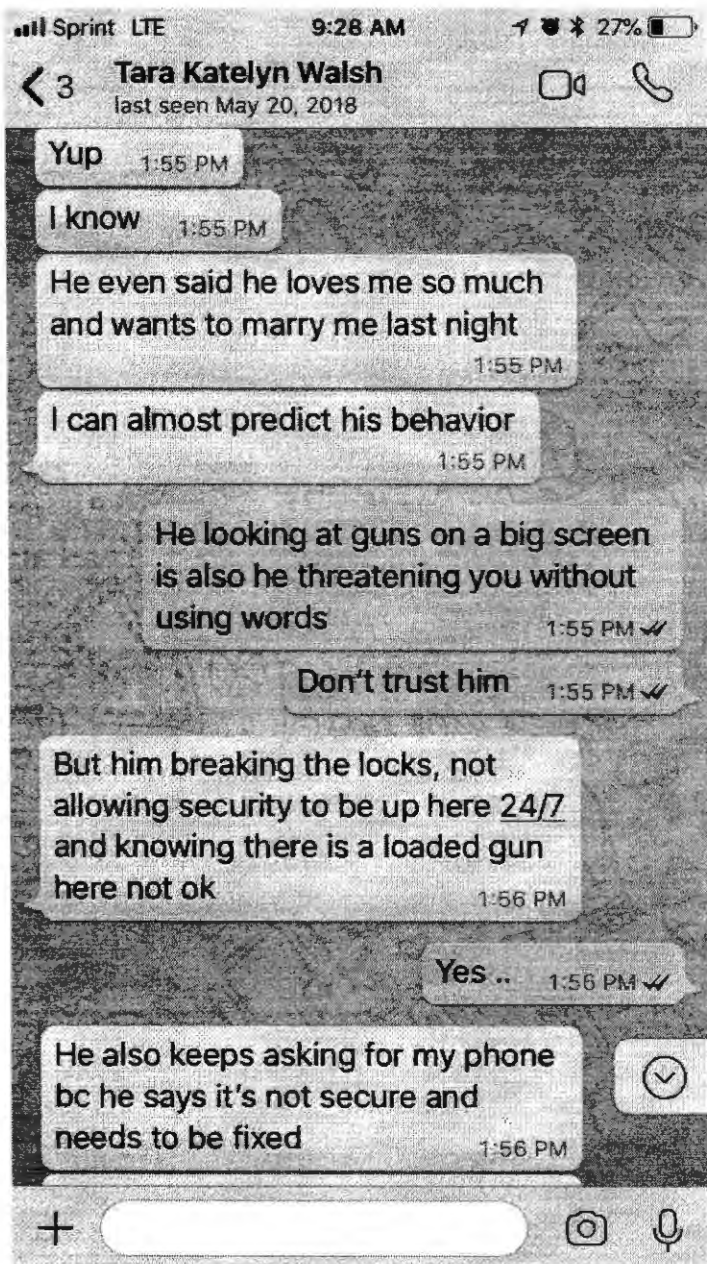
Tara distrusting all the support around her , security detail and the nanny. She felt alone , helpless and trapped.

And I was advising her to trust her intuition and call the cops and get out.



Wed, May 17th, 2018 - SF

Tara asked me to call DV helpline for her . Tara was also afraid that Steve will unleash the court system against her and take her daughter evie away from her , if she tried to leave.



Wed, May 17th, 2018 - SF

Tara mentions Steve was sweet to her after the incident when the security and nanny tried to take Evie from her. And she rebelled - Saying he loves her and wants to marry her .

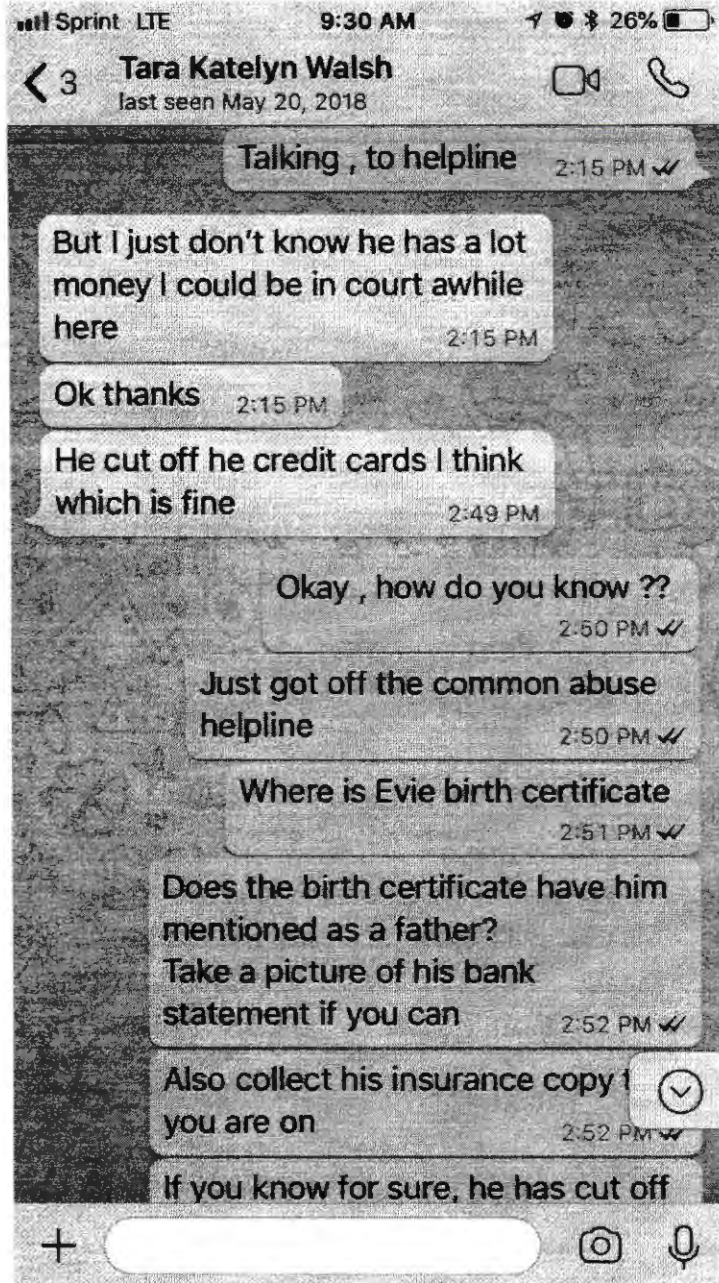
Tara also mentions she does trust him (honeymoon period) and mentions he wanted her phone

As it was not secure . (Isolation)



Wed, May 17th, 2018 - SF

Tara mentions she felt Steve got someone to break into her phone .



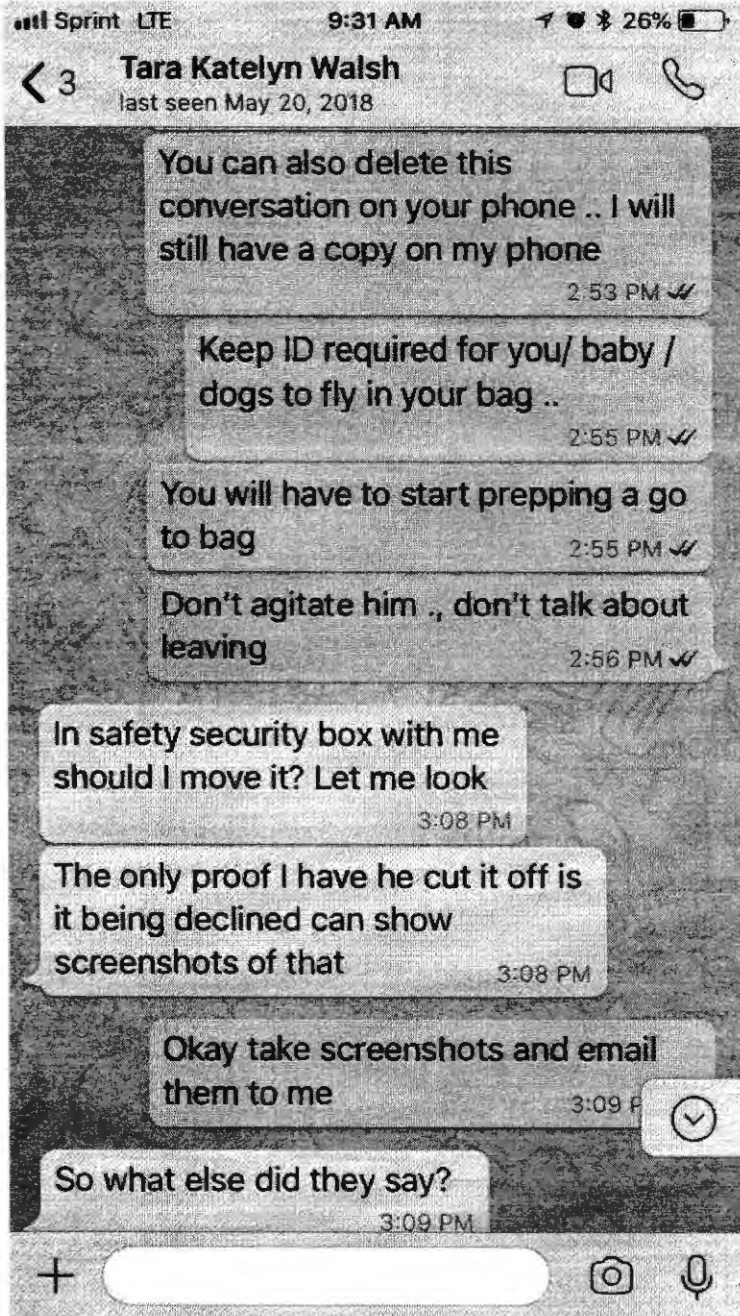
Wed, May 17th, 2018 - SF

I called Domestic Violence Helpline for Tara on her request.

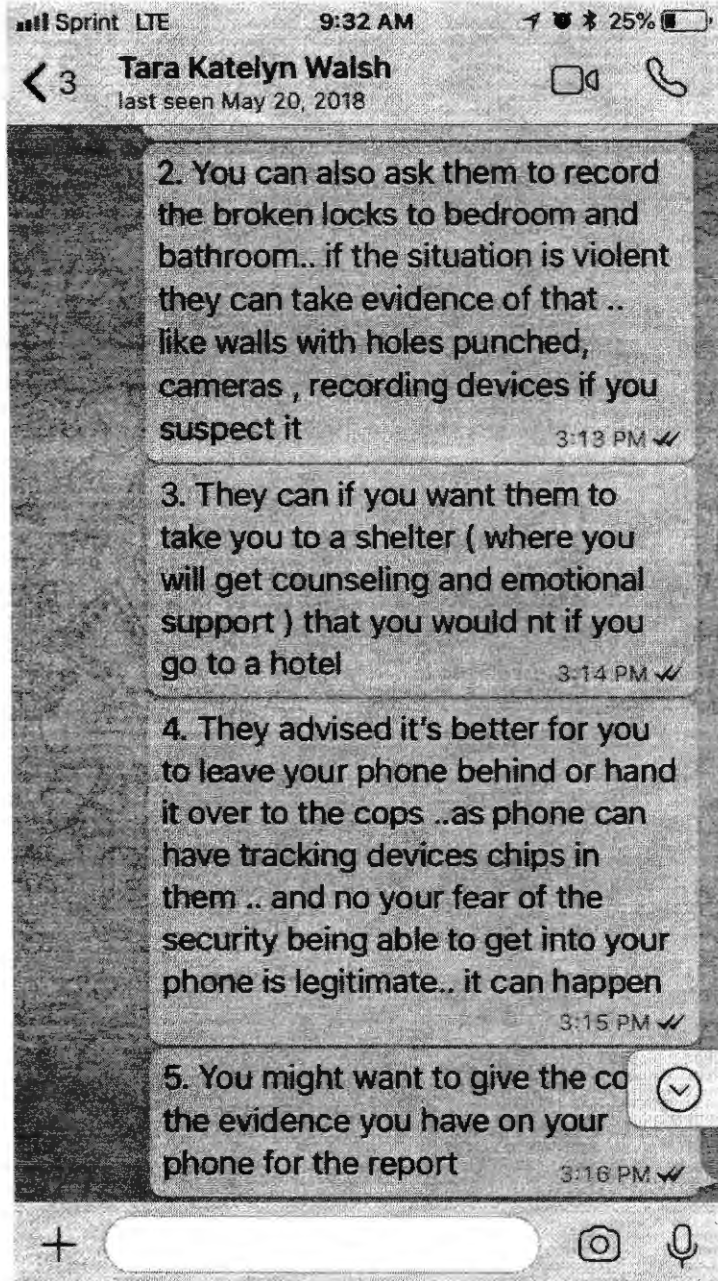
Here Tara also mentions again how Steve could use his money to arm wrestle her in court.

She also mentions he cut the credit card out.

I started advising her on documents she needs to collect before she leaves (as advised by DV helpline)

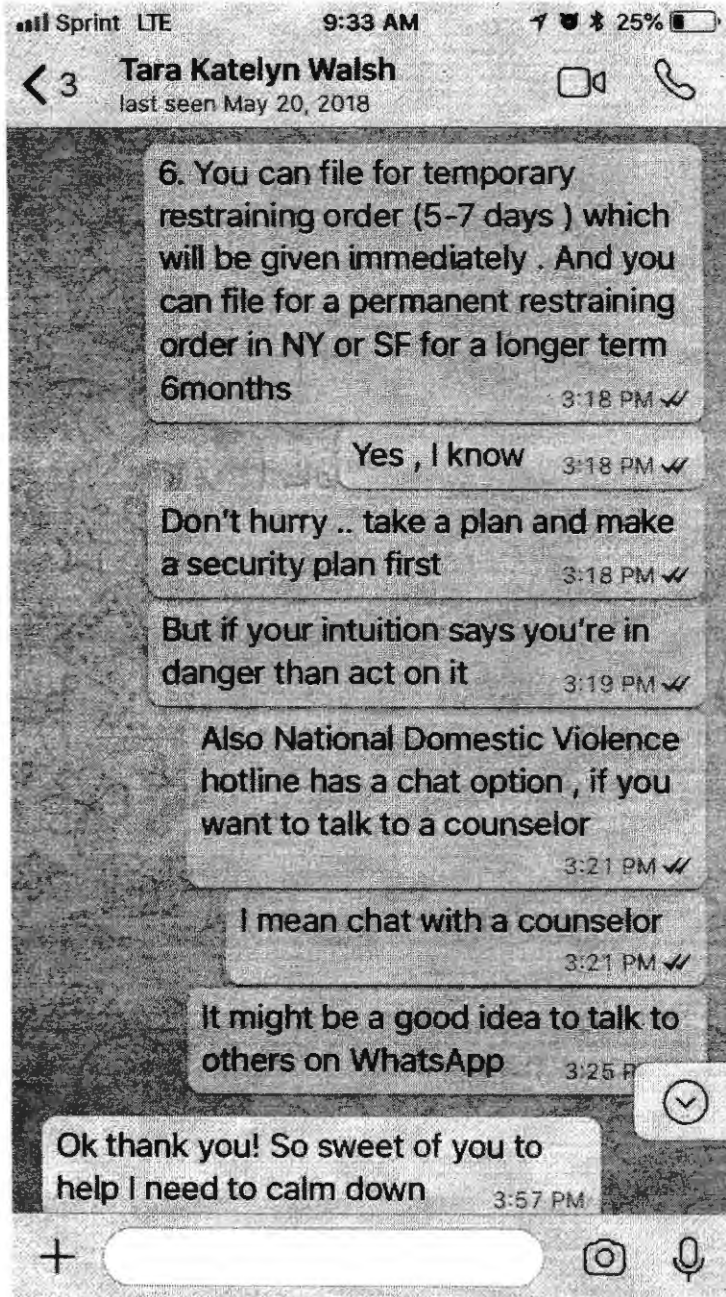


Wed, May 17th, 2018 - SF
Conti.. Me advising Tara on preparing a go to bag.



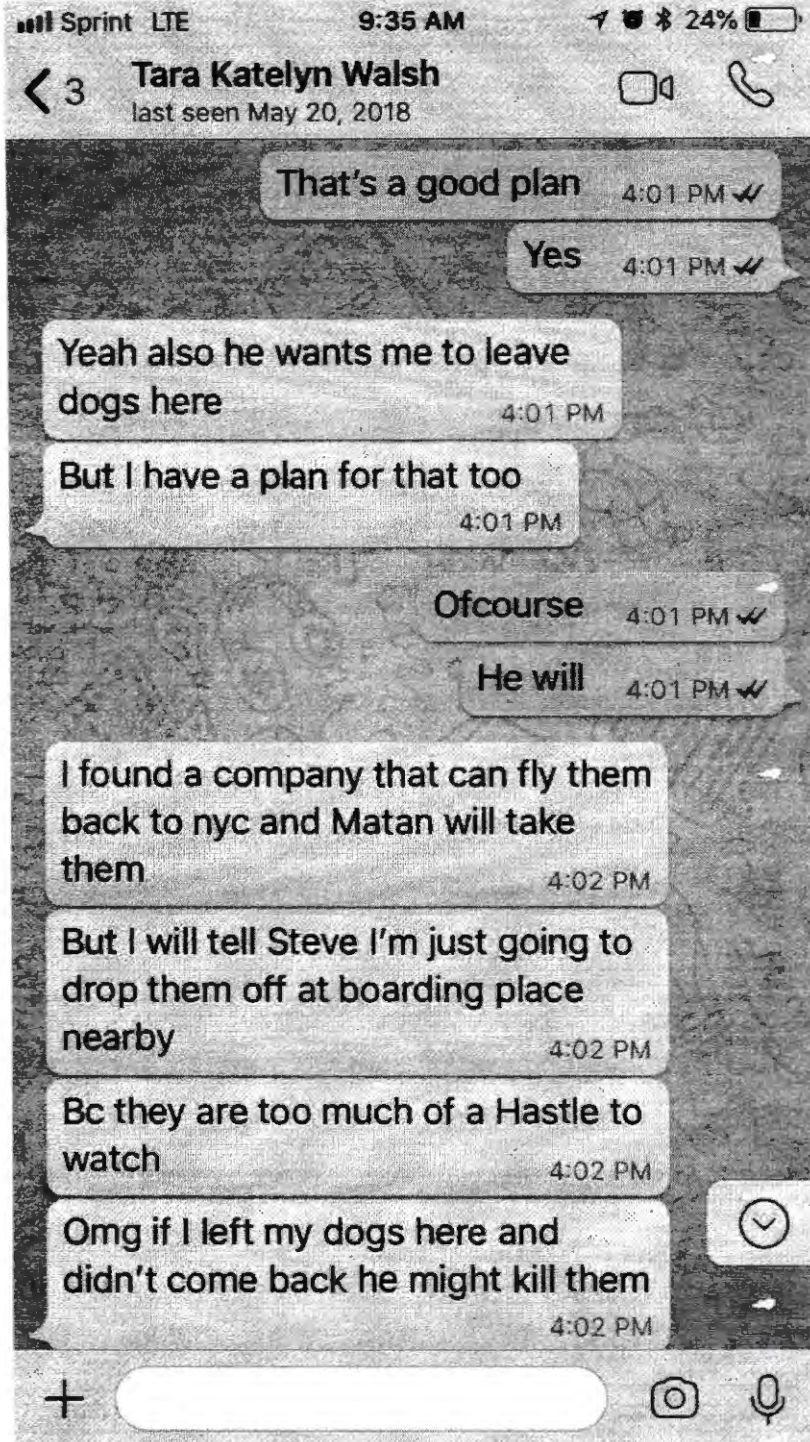
Wed, May 17th, 2018 - SF

Me listing advice from the DV hotline / centre . I also suggested that I can place a welfare call if she needed me to.



Wed, May 17th, 2018 - SF

Conti.. Checklist .. educating her that National Domestic Violence helpline also has a chat function, if she felt she could not talk.



Wed, May 17th, 2018 - SF

Tara afraid that If she left her pets behind Steve might hurt them.



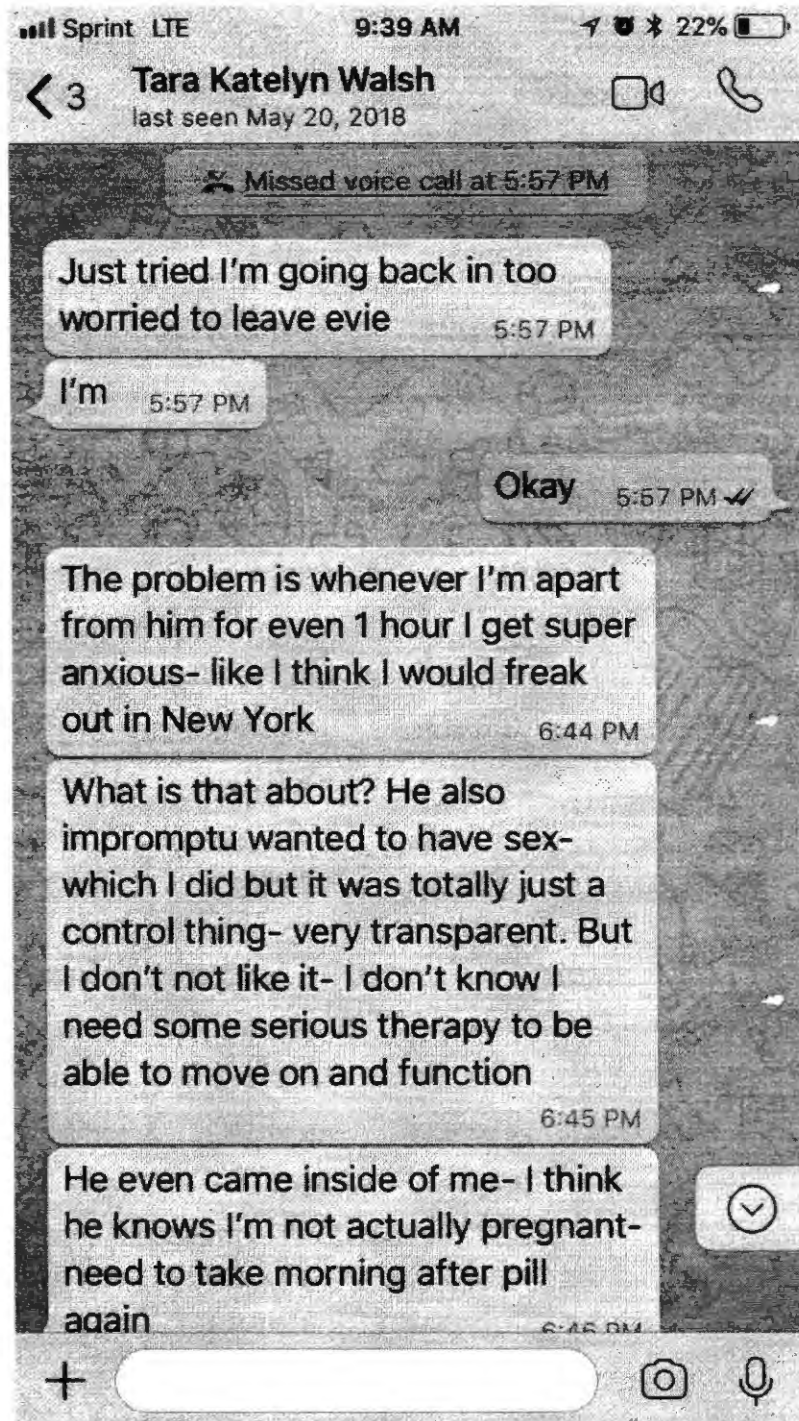
Wed, May 17th, 2018 - SF

Tara afraid that steve might find out if she went to the cops. As the security detail were former cops and might be connected.



Wed, May 17th, 2018 - SF

Picture of bruises from when Steve hurt her.



Wed, May 17th, 2018 - SF

Afraid to leave her daughter with nanny for long duration of time. Also mention
Coerced to have sex and attempt to get her pregnant again , as he had mentioned earlier.