

**Russell v. Maman, et al.; Russell v. Walsh
Timeline and Supporting Evidence**

Date	Event	Supporting Evidence	Evidence/ Investigation Needed	Notes
F RUSSELL IS A SUCCESSFUL TECH ENTREPRENEUR WITH BUSINESS TIES TO THE CIA AND FOREIGN GOVERNMENTS				
	Stephen Russell is a successful inventor and tech entrepreneur with over a dozen patents, specializing in biometrics and facial recognition technology. Russell is the founder of Prism Sky Labs, Inc., a video intelligence company and 3VR Security, Inc., which develops video intelligence technology. 3VR Security received investment from In-Q-Tel, the CIA backed venture capital firm who invests taxpayer money in startups developing technology useful to the CIA	Client interview In-Q-Tel website: https://www.iqt.org/		
May 2015	Tara Walsh meets Steve through their mutual friend Chris Ochoa on a boat trip in New York City in Mid-May 2015. Walsh met Ochoa through Walsh's ex-boyfriend Steve Kemler (who Walsh claims is also wealthy and successful)	Walsh's "My Narrative Record" at p. 1		Tara's pattern of dating wealthy/successful men may serve as supportive evidence she targets men for financial gain Maybe Kemler's profile: https://www.linkedin.com/in/steven-kemler-b5619b/
June 2015-2016	In or around June 2015, the U.S. Office of Personnel Management announced it had been the target of a data breach (the "OPM hack" and Russell receives notice from the government that records pertaining to him and his companies linking him to the CIA/In-Q-Tel were part of the breach	https://www.washingtonpost.com/news/federal-eye/wp/2015/07/09/hack-of-security-clearance-system-affected-21-5-million-people-federal-authorities-say/ https://en.wikipedia.org/wiki/Office_of_Personnel_Management_data_breach		From client meeting on 1/15/20 (paraphrased): "Sometime around 2014-2015, a woman who identified herself as CIA came to my office and said that my info had been leaked in the Snowden Leaks. She simply said something like, 'I'm required to tell you that the leak affected you.' She showed me the specific language from the leak that pertained to me. It didn't identify me by name, but it

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		https://www.washingtonpost.com/world/national-security/us-intelligence-head-cia-did-not-pull-officers-from-beijing-after-opm-hack/2015/11/02/8631aa4e-81a5-11e5-a7ca-6ab6ec20f839_story.html		<p>was clearly my information. I think the information leaked about me had to do with consulting I did on a Request for Proposal for surveillance deployment in the Changi airport in Singapore. The information leaked did not include much detail.</p> <p>“Then, in late 2016, I reached out to the FBI (specifically, to Kevin Phelan in the Palo Alto office) to ask about both the leak and the OPM data breach to see if either one could be related to the weird things I was experiencing (e.g., unusual people approaching me and saying strange things, like making negative comments about black people). I wanted to know if there was anything to worry about.</p> <p>“Now, I’m in talks with Stewart Baker at Steptoe Johnson (who I was told was the best for this kind of thing). I’ve asked him if the leak and breach could have anything to do with anything that’s happened to me but he still hasn’t given me answer. All he has said is that the US government is not investigating me.”</p>
RUSSELL AND TARA WALSH BEING A TUMULTUOUS “ON-AGAIN, OFF-AGAIN” RELATIONSHIP				

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January 2016-April 2016	Tara begins flying between San Francisco and New York to spend time with Steve. In March/April, Walsh represents to Steve that she is pregnant.	Walsh's "My Narrative Record" at p. 2		Steve now believes Walsh was lying about this pregnancy. Client told us during 1/15/20 meeting that Abby Tedla (the nanny) once told him that Tara bought a fake pregnancy test. Client said he compared the kit to a real kit and noticed the differences, confirming that the one Tara used was fake. Client says Tara would repeatedly (around 4-6 times) say "I think I'm pregnant," and "I think I had a miscarriage." Client believes this was manipulation. Client says that in May 2018, Tara showed him a pregnancy test that showed positive, but then Tara admitted to him that she was just "fucking with him." So when Tara said she was pregnant in May 2018, Russell asked her to prove it, and they went for an ultrasound, and upon confirmation from the doctor, client of course believed the pregnancy. Evie was born from that pregnancy.
May 2016	Walsh claims she suffered from a miscarriage at around 10 weeks of pregnancy. Steve and Walsh break up and Walsh moves back to New York in May 2016 but continues to fly to San Francisco to see Steve. Walsh claims to have additional miscarriages during this time (2-3 total)	Walsh's "My Narrative Record" at p. 4		
A BREAK-IN AT RUSSELL'S HOME AFTER BUSINESS DEALINGS ABROAD TRIGGERS CONCERNS ABOUT SECURITY				

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Aug.-Sept. 2016	<p>Russell travels to Kiev, Ukraine with Ring.com CEO Jamie Siminoff to set up research and development offices for Ring Labs.</p> <p>Russell travels with Jamie Siminoff [see Notes column] to Nantucket. When Russell returns, it appears his home has been broken into. The power is off at the main breaker and the hinges looked like they had been removed, holes in the drywall, wifi access point was disconnected, breaker was off.</p> <p>Per Micheletti's notes: When SR came home, the power wasn't working. The "Main" switch was turned off. He observed small holes drilled in odd places throughout the house. Gap in the molding. Floor boards.</p> <ul style="list-style-type: none"> • Started to have sleep disturbances. Couldn't sleep. Felt overwhelming feeling and slight panicking. Potentially due to a chemical spray in the home. • Found a stringy, slimy fungus everywhere in his home. Believes its Dictyostelium (slime mold) • There seemed to be a low frequency hum throughout the house and sensation of being too close to a router. Seemed to have a "data component" not a sign wave. • Would see lasers throughout the house. Potential a type of Infrared. • His mom would see red lights.[see Notes 	<p>Client interview</p> <p>SRID000320 [Bryan Crutcher Report]</p> <p>Client interview; GA000245-246 [RM's notes from team meetings]</p> <p>GA000235 [RM's notes from team meetings]</p>	<p>No police report; no documentation per client</p>	<p>Ring Labs is now known as Ring Ukraine, and is an innovative research and product development team committed to creating state-of-the art smart home security systems sold by Ring.</p> <p><i>From client meeting on 1/15/20 (paraphrased), re Siminoff:</i> "I don't think Jamie Siminoff was trying to sabotage me. But he had me pitching complicated privacy-centric stuff to let him build Ring and not get into trouble (which he ultimately got into). . . . Near the end of 2016, Jamie became slanderous ("Prism is shit," "Steve is shit," etc.). His reasoning was that he thought I wasn't delivering."</p> <p><i>From client meeting on 1/15/20 (paraphrased), re being followed:</i> "Around March [YEAR?], I saw a photo of what looked like George wearing a Disney hat and a Disney jacket. Around the same time, there were laser pointers being shot around, and the WiFi SSID showed up with weird messages. I started feeling drugged. It was like living in a haunted house. I didn't feel so much that people were surveilling me; it was more like they were just being provocative. It was silly nonsense shit,</p>

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	<p>column]</p> <ul style="list-style-type: none"> Started noticing people were following him [see Notes column] <p>Crutcher told us during interview that while Russell was in Ukraine, there was a “minor glitch” [see Notes column] and the only ones who knew about it were a handful of people. Russell received money from In-Q-Tel, a VC firm that funds tech companies but is basically a front for the CIA (this is well documented, Crutcher says), so government was aware of the glitch. But somehow (Crutcher does not know how) Akkelquist eventually found out about the glitch and he later used that knowledge to get the client’s attention and trust.</p>			<p>but it was still annoying and ultimately a bit concerning. I was very sick around this time too, which amplified my feelings and made these experience feel off the charts. [<i>Darren: we need to track down any related photos and reference them as exhibits and have them in evidence. Like photos of George, photos of laser pointers in trees.</i>]</p> <p>“In terms of people following me, there was a guy who was in front of my house once [WHEN?], on foot, who clearly followed me into a burger joint.</p> <p>“My mom told me later that there was a guy taking photos of our floral bed. This was the same person that Tara and I saw when we went to Sanctuary in Arizona; he sat at the table next tous. We have one photo of him [DID YOUR MOM TAKE A PHOTO WHEN HE WAS STANDING BY THE FLORAL BED? Note: Steve says we should already have this in our files.]</p> <p>“Then there was “Baldy 1,” who was a bald guy who was standing awkwardly outside our house. I have a photo of him. Later, I went to lunch with a friend (who was a colonel in the army, went to Stanford and Harvard, and wrote a policy paper on how Russia would invade Ukraine). During that lunch, a bald guy was there. I took a photo of him too. I</p>

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				<p>sent the two photos to Carnegie Mellon (who does tough facial recognition stuff), who said it was in fact the same guy. They gave me their findings in writing (in an email) [WE NEED A COPY.]. When I showed these photos to Steve Gudelj, who was a top surveillance person for the SF police, he said it was the same person too. Gudelj said Baldy looked like a retired FBI guy. Gudelj went to the FBI shortly thereafter and showed them the photos. He said that his conversation with the FBI was awkward. His takeaway was that there was some awareness in the FBI of who this person was. And this fits in with George [Akkelquist], who had pseudo association with the FBI. [WHAT EXACTLY DID AKKELQUIST SAY ABOUT BALDY? HOW DOES THIS "FIT IN" WITH AKKELQUIST?] I got treatment for my Lyme disease, and the madness that was the end of 2017 came to an abrupt conclusion.</p> <p><i>From client meeting on 1/15/20 (paraphrased) re "minor glitch":</i> " When Bryan Crutcher said in an interview with your office that there was a 'minor glitch' in Ukraine, I think this is what he was talking about: 3VR was designed for particular application—live</p>

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				<p>video. If you apply it for <i>recorded</i> footage (like governments do), it's a terrible app. It just won't work well. So at one point, George [Akkelquist] told me that his sources tell him that Galfort (Russian company) was made at me, and that they wanted me to solve a technical problem [the one explained above], and when he described the technical problem he did so in a nuanced way that I wouldn't expect anyone to understand unless they were familiar with 3VR. (Galfort probably took our technology.) George said things about my product, and about Galfort, that no one should have known. It was weird for me that George would even know about how 3VR works, and that it wouldn't work for a certain type of application. George seemed to do Jedi mind tricks. But looking back, it's possible that I was the source of some of the details that I now attribute to George (i.e., maybe he didn't know quite as much detail as I thought he did; maybe I filled in some details for him)."</p>
December 2016 - July 2017	Walsh states that during this time, "Steve began to act very strangely: extremely paranoid, and seemingly delusional and psychotic. In my opinion from the research I did ...I would best compare it to a (likely) drug induced psychosis.	Walsh's "My Narrative Record" at p. 4		May serve as supportive evidence that the break-in prompted Steve's paranoia. However, Walsh says around this time, she believes he started abusing Adderrall

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	Walsh reports that in December, Russell stopped going to work, rarely left the house, “came to believe fibers of metal were coming out of his skin,” and “started to believe he was being targeted by what he called “agents.” Walsh stated that “Steve started to believe certain people were following him who worked for the CIA			
July 2017	Walsh returns to San Francisco to be with Steve	Walsh’s “My Narrative Record” at p. 7		
Oct. 2016-2017	Russell becomes concerned about security due to his dealings in Ukraine and is concerned that he might be being followed.	Client interview		
RUSSELL ENGAGES WITH SECURITY PERSONNEL WHO SUGGEST HE MAY BE BEING FOLLOWED				
August-September 2017	<p>Russell hires a private investigator, Steve Gudelj, who confirms he is being followed, but says it’s likely the US government and nothing foreign, dangerous, or nefarious. This makes Russell feel better. [see Notes column].</p> <p>Sept. 20, 2017 From Russell to Gudelj: “Hey Steve. My attorney will be reaching out. Things to confirm are (1) the two dudes you checked out 2) the low frequency sound we sent to your bug research buddies. 3) the fact you though [sic.] you might have been tailed. 4) your insight that most of this was theatrics not actual surveillance 5) the fact that you spotted an “unregistered” LP on a Blue Civic a</p>	<p>Client interview</p> <p>SRID000591 [text from SR to SG]</p>		<p>Gudelj is “Steve G” on Russell’s iPhone – (425) 999-1534</p> <p><i>From client meeting on 1/15/20 (paraphrased):</i> Gudelj said to me something to the effect of,</p> <p style="padding-left: 40px;">You’re chasing these guys and making it worse by thinking people are nefarious, or by confronting people and staying up all night watching out for something. This is all self-harm. What’s happening is outside of your control. It’s not normal to think you’re being surveilled.</p>

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	couple of days ago. 6) That I reported seeing bald dude again on my flight to Newark.” Steve Gudelj responds: “K”			“Gudelj even told the defendants [WHO, SPECIFICALLY?] not to take my case, because there was no threat to me. In this case it was lightweight provocative stuff, at best. It stopped right around the time Gudelj was telling me these things. [DID THE PROVOCATION ITSELF STOP, OR YOUR EXCESSIVE WORRYING ABOUT IT?].
September 20, 2017	Russell via text message introduces private investigator Steve Gudelj to Faisal Rashid, Russell’s Fenwick and West attorney.	Text messages between Russell and Faisal Rashid, dated Sept. 20, 2017 from Russell’s phone	Where is this? Unable to locate.	
RUSSELL IS INTRODUCED TO DEFENDANTS THROUGH THE SILICON VALLEY TECH COMMUNITY				
Oct. 18-19, 2017	<p>Russell is introduced via email by Adeo Ressi to Ryan Micheletti, who owns and operates Shield Corps Security in California.</p> <p>October 18, 2017 email from Adeo Ressi to Micheletti “My good friend, Steve Russell, has had a series of covert actions being taken against him, including being watched and even dosed.”</p> <p>Micheletti writes to Russell, “I’m working with several contacts to line this job up. There are two tiers here: 1) Former FBI, Counter Intelligence Professionals; 2) Former Special Operations Israeli Mossad”</p>	SRID000881-882 [emails between Adeo Ressi, RM, and SR]		<p>According to Bryan Crutcher, Ressi was Russell’s friend and also Micheletti’s employer. Ressi knew Russell’s concerns and knew Micheletti had a security business so connected the two. [SRID000815 (“Notes from Bryan Crutcher Interview (8/22/18)”)]</p> <p>Client tells us that Ressi is Elon Musk’s best friend, and that client met Musk through Ressi. Client says Ressi runs “Founder’s Institute,” which helps people start their own businesses, but mainly serves as a great please to make connections. Client himself met many people through it. Client says Micheletti is COO of Founder’s Institute, and that Micheletti’s security business is actually</p>

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				secondary to his role with Founder's Institute.
Oct. ?,??, 2017	Russell meets Micheletti and describes his situation as a series of covert actions being taken against him, including possible surveillance and drugging.	SRID000008 [Micheletti's 6/5/18 letter to Russell]		
Oct. 19-25 2017	<p>Because Micheletti's company (Shield Corps Security) did not specialize in investigative services, Micheletti reaches out to Akkelquist. (Unknown how they knew each other, but Micheletti referred to Akkelquist as "a friend and experienced security consultant who originally introduced me to Tom LaFrenier")</p> <p>Tom LaFreniere owned Dynasec International, a security company that specialized in private investigations. Unclear if he still owns the business, as he told us during our interview that he intended to hand operations over to someone else and retire within a couple of months.</p>	<p>SRID000008 [Micheletti's 6/5/18 letter to Russell]</p> <p>SRID000821 ["LaFreniere Memo to Client"]</p>		<p>Akkelquist knew LaFreniere because FBI special agent Randy Cook told LaFreniere to connect with Akkelquist when LaFreniere was appointed to run the FBI Joint Terrorism Task Force in the Bay Area shortly after 9/11. LaFreniere only recalls that Akkelquist was personable. Akkelquist and LaFreniere met again approx. 5 years ago when they were both called to assist with an armed tribal dispute on a Native American reservation near Red Bluff. Maman was there too. LaFreniere has no idea how or why Akkelquist and Maman got involved. [SRID000821-822 ("LaFreniere Memo to Client").]</p> <p>Akkelquist's profile on DFW's website notes that he worked for the Foreign Legion. Crutcher reports that Akkelquist has a deceased person's SSN, which Crutcher says might be because Akkelquist purportedly worked for the Foreign Legion, a military service branch of the French Army that is open to foreign recruits; when you're done</p>

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				<p>working for the Foreign Legion, Crutcher says, they give you a new identity. [SRID000814 (“Notes from Bryan Crutcher interview (8-22-18)”)]</p> <p>NOTE: GA000143-144 is a 9/11/87 court order from Oregon granting Akkelquist’s application for a name change, from George Edmund Abbiabdallah to George Edmund Akkelquist. Unclear if this supports or refutes Foreign Legion theory behind identity change.</p> <p>According to Special Ops Magazine, Legionnaires were, in the past, forced to enlist under a pseudonym (“declared identity”). This disposition exists in order to allow people who want to start their lives over to enlist, and the French Foreign Legion held the belief that it was more fair to make all new recruits use declared identities. . . . As of 20 September 2010, new recruits may enlist under their real identities or under declared identities. Recruits who do enlist with declared identities may, after one year’s service,</p>

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				<p>regularise their situations under their true identities. https://special-ops.org/4954/french-foreign-legion-enlistment-and-training/</p> <p>This is not entirely consistent with Crutcher's statement; it appears the Legion previously forced its members to <i>enlist</i> under a pseudonym, not change their identity <i>after</i> service. Unclear if Akkelquist changed his name (via court order) simply to enlist in the Foreign Legion.</p> <p>According to HowStuffWorks.com, "many men (the legion doesn't accept women) who join have questionable backgrounds that they're trying to leave behind. The declared identity rule levels the playing field for all Legionnaires, whether they have a checkered past or not." https://science.howstuffworks.com/french-foreign-legion.htm</p> <p>Crutcher also noted the aforementioned armed tribal dispute and said Crutcher's colleague told him it was all a big fraud, and that Akkelquist was working for the "wrong side," orchestrating takeover of the legit side, and that Akkelquist had someone enter the casino and plant virus</p>

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				<p>on the computer. Crutcher believes the federal agent involved in this fraud was indicted. [SRID000814 (“Notes from Bryan Crutcher interview (8-22-18)”]. Per NK’s research, this incident appears to refer to a dispute that became a lawsuit bearing case no. 2:15-cv-00538-MCE-DMC (Eastern District of California): Paskenta Band of Nomlaki Indians et al. v. Ines Crosby et al. This was a RICO suit in which plaintiffs alleged that defendants, over a period of 17 years, took control of their tribal government and through fraud, coercion, extortion, intimidation, bribery, and deception, stole and diverted tens of millions of dollars in tribal money for their personal benefit. [SRID000612-173 (Nomlaki Indians Complaint).] NK believes this is the relevant dispute for three reasons: (1) the Complaint sets forth that “the RICO Defendants launched an armed assault on the Tribe’s Rolling Hills Casino (the “Casino”), in coordination with a destructive cyber-attack on the Casino and Tribe’s computer systems.” Rolling Hills Casino is just 22 miles from Red Bluff, and LaFreniere said the</p>

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				<p>incident with Akkelquist occurred “near Red Bluff.”; (2) On April 27, 2018, Maman texted Akkelquist, “remember when we were in Nomlaki, our deputy chief (under Erik) his name was Brian...” [CT00205 (NM text to GA).] Although the Complaint does not identify a Brian, it does concern the Nomlaki people, and it does identify an Erik Lohse: “The RICO Ringleaders caused Tribe-Owned Business ‘E’ to pay Erik Lohse—son of RICO Ringleaders Leslie and Larry Lohse—who lives in Arizona, has no expertise that Tribe-Owned Business ‘E’ requires, and performs no work for Tribe-Owned Business ‘E’, \$60,000 a year in compensation purportedly for his services as a Board Member of Tribe-Owned Business ‘M.’”; and (3) Crutcher said a federal agent involved in the fraud was indicted, and the Complaint focuses on RICO Ringleader John Crosby,” a “former accountant and FBI special agent.” John Crosby was in fact indicted. [SRID000785-809 (John Crosby Indictment).]</p>
Oct. 19, 2017	Akkelquist texts Tom LaFreniere’s contact info to Micheletti (which suggests Akkelquist did not believe he himself was qualified to assist	GA000001-GA000002 [texts between GA and RM]	Is there a license issue related to this	

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	Russell). Akkelquist tells Micheletti that LaFreniere will be calling him regarding “your client/friend.”		referral? Unclear from texts. Discovery is needed.	
Oct. 25-26, 2017	<p>Ryan texts Russell that he followed up with one of his contacts who gave him the number of a “recommended FBI friend” and connects him with LaFreniere.</p> <p>LaFreniere recalls that he received a call from Akkelquist or Micheletti in 2017 noting that Russell needed help. LaFreniere did not specify the month or time of year, but it was likely October 2017, based on GA’s and RM’s texts on October 19 (see previous entry).</p>	<p>SRID000446 (RM texts with SR)</p> <p>SRID000822 (“LaFreniere Memo to Client”)</p>		Ryan Micheletti is named “R” on Russell’s phone (650) 743-6358
Oct./Nov. 2017	<p>Russell connects with LaFreniere. Russell tells him he thought he might be being followed and drugged due to his dealings in Eastern Europe. Russell asks him to provide security for him.</p>	SRID000822-823 (“LaFreniere Memo to Client”)		
Nov. 2017	<p>LaFreniere performs an initial investigation to assess the existence and nature of any threats against Steve and in around November 2017, LaFreniere determines and tells Russell that there was no danger to him. However, given Russell’s concerns, LaFreniere agrees to assign several security professionals to cover Russell in a 24/7 “<i>counter-surveillance</i>” capacity. Bryan Crutcher is one of these security personnel.</p>	SRID000823 (“LaFreniere Memo to Client”)	Obtain invoices via discovery	<p>LaFreniere believes that Steve’s facial recognition technology is something that would in fact interest the intelligence community.</p> <p>Unlike LaFreniere, Crutcher does believe there were strange occurrences around Russell (but unclear if this was during Crutcher’s time with LaFreniere in SF, or when Crutcher worked for Russell in NY). But did not witness threats or</p>

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				danger Maman and Akkelquist said were present.
Nov. 8, 2017	An engagement letter between Russell and DynaSec International is executed.	SRID000823 (“LaFreniere Memo to Client”)	Obtain Engagement letter	La Freniere says he has in his possession the agreement. LaFreniere charged Russell about \$100 per hour for his guys’ time, and a little over \$100 per hour for his own time, and only one person was assigned to Russell at a time (usually). LaFreniere was shocked when he eventually learned how much Akkelquist and Maman charged Russell and believed they took advantage of him by stoking his fears.
Nov. 2017- Mar. 2018	Tom LaFreniere and Dynasec International provide Russell with 24- hour counter-surveillance services. Russell would send LaFreniere photos of individuals and license plates and ask LaFreniere to investigate to determine whether he was being followed. LaFreniere never discovers anything alarming or unusual and reports this back to Steve. [LaFreniere told us that he has invoices from November 28, 2017 to March 2, 2018 for services to Russell.]	SRID000823 (“LaFreniere Memo to Client”)	Obtain invoices and supporting documents	NOTE: might be better to seek such documents from LaFreniere informally, given that (1) we are on friendly terms; (2) he appears to support our position; and (3) he let us review the invoices during our interview (although he was hesitant to allow copying), which invoices appeared to show monthly charges of approx. \$12,000 to \$30,000.
December 2, 2017	Tara Walsh alleges that while Russell was having dinner with her sister Brienne in Brooklyn, NY, Steve got up abruptly, told them he was leaving and slammed the door in Tara’s face as he walked out. After returning to Tara’s apartment Russell broke up with her, “repeated his cycle of yelling at her,” and “raised his arm as if to strike her then violently	Walsh’s Response to Russell’s Special Interrogatories No. 1		

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	threw the TV remote across the room where it made a huge large dent in a wall.” Walsh further alleges that the next morning she “woke up and realized her prescription bottle of Adderall was missing” and Russell admitted to taking it.			
January 2018	Russell expresses to LaFreniere concerns about a light socket or electrical outlet—LaFreniere referred to it as a light socket, but Micheletti and the Survey Report on the item referred to it as an outlet, so we will refer to it as an outlet herein. LaFreniere tells Bryan Crutcher (who was working for him at the time) to carefully handle the outlet for chain of custody purposes. LaFreniere recalls that Russell handed the outlet to Crutcher who handed it to Reginald K. Ogata, who LaFreniere knew was a former FBI technical expert. Ogata analyzed the outlet and determined it was “a normal outlet with no secreted surveillance devices.” As detailed further below, Ogata ultimately prepared a report stating the same, dated 2/4/18.	<p>SRID000823 (“LaFreniere Memo to Client”)</p> <p>SRID000815 (“Notes from Bryan Crutcher Interview (8-22-18)”)</p> <p>SRTL008 [Micheletti’s 6/5/18 letter to Russell]</p> <p>SRID000215 -227 [Technical Vulnerability Survey Report re SR’s residence, prepared by Ogata, dated 1/26/18]</p> <p>SRID000229-241 [GFI Outlet Report, prepared by Ogata, dated 2/4/18]</p>	<p>Who has the outlet now?</p> <p>Who was the report shared with?</p>	<p>Although reference is made at various times through this timeline to a “suspicious” outlet or socket, all such references in fact refer to a single item: a GFI outlet.</p>
DEFENDANTS DISCUSS RUSSELL’S FINANCIAL STATUS AND MANUFACTURE SECURITY ISSUES TO CONVINC RUSSELL TO RETAIN THEM FOR EXORBITANT FEES				
Jan 13-14, 2018	Russell asked Micheletti if he knew anyone who could (1) identify what the apparent surveillance device in the electrical outlet was; and (2) preform a bug sweep (aka “Technical Counter Surveillance Measures”) at his apartment. Micheletti contacted O’Hana Security Consultants to perform the bug sweep. As detailed further below, O’Hana (through Larry Long and Reginald Ogata) produced a	SRID000008 [Micheletti’s 6/5/18 letter to Russell]		Micheletti was the first person to suggest the outlet might be a surveillance device.

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	<p>report dated 1/26/28 which reported “no evidence of electronic or technical compromise was detected.”</p> <p>Russell texts Micheletti videos and photos of the apparent surveillance device in the outlet. Micheletti responds, “It looks like a microphone. I’m having someone review it right now.”</p>	<p>SRID000215 -227 [Technical Vulnerability Survey Report re SR’s residence, prepared by Ogata, dated 1/26/18]</p> <p>SRID000443 [RM texts with SR]</p>		
Jan 14, 2018	<p>Micheletti texts Akkelquist “...Remember that VIP I told you about where you connected me to Tom Lafanier? Well it turns out he was one of the first investors in Uber and has made a good amount of money. He just sent me the video above of what looks to be a microphone in an electrical socket. He’s asking for someone to come to his house to do a full bug sweep. Check out the video above and let’s chat today when you have time”</p>	GA000002-GA000003 [RM texts with GA]		Micheletti and/or Akkelquist targeted Russell because of his “VIP” status with a lot of money
Jan 17, 2018	<p>Micheletti texts Akkelquist: “Hey George, he’s open to engage with you/us for payment. The problem is he flies out tonight to head to New York. I could meet you at the shop on Thurs or Fri and we could have a call with him ... what do you think?”</p>	GA000003-GA000004 [RM texts with GA]		
Jan 18, 2018	<p>Micheletti texts Akkelquist: “Spoke to Tom. He’s happy to have us involved FYI.”</p>	GA000004 [RM texts with GA]		
Jan 21, 2018	<p>Micheletti and Akkelquist exchange texts:</p> <p>RM: “Hey George, I’m still coordinating but we are close. Waiting for his final approval to move forward.”</p> <p>....</p>	GA000005-GA000006 [RM texts with GA]		

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	<p>RM: “Okay. He said he wants to activate you. I told him \$1,000 per hour was the standard rate but that we’d give him a discount. I think \$750 is fair.</p> <p>GA: “We start with \$750.00 is fair to evaluate SOW. We go from there because I want you to have at least \$250.00. That is makes me confutable [sic.]. Let me know please. Thx.”</p> <p>RM: “Agreed. Call me back anytime. The next step is to setup a call with Steve after you and I speak. We’ll do the interview, prepare an SOW then finalize the deal.”</p>			
Jan. 23, 2018	<p>Walsh alleges that Steve “became panicked” and “thought gas was coming through the vents. Steve was totally manic.” Steve told Walsh “we needed to leave immediately and go stay 50 miles away with my parents in Chappaqua, NY. My parents greatly disliked Steve and knew he was psychotic, so would never allow him at [their] house.” Walsh further alleges that when “she calmly told Steve they could not go to [her] parent’s house, Steve grew very aggressive. He yelled and biolently tof me that I had to listen to him... Steve then threatened to smach my cellphone in my face. He raised his hand as if in the motion to strike.”</p>	Tara’s Responses to SROGS		
Jan. 24, 2018	<p>Micheletti introduces Russell to George Akkelquist, a purported expert in Countering Violent Extremists (“CVE”) on a phone call. On the phone call they discuss:</p> <ul style="list-style-type: none"> Russell’s business dealings in Ukraine, the Snowden leak including 	<p>GA000006-GA000007 [GA and RM text to confirm time to speak with SR]</p> <p>GA000245-246 [Micheletti’s notes from team meeting]</p>		<p>In his June 5, 2018 letter to Russell, Micheletti writes, “I also introduced you to George Akkelquist, a friend and experienced security consultant who originally introduced me to Tom LaFrenier and Dynasec International.</p>

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	<p>Russell's involvement with the CIA, Moscow Subway Project, Korean National Police</p> <ul style="list-style-type: none"> • Russell's house being broken into after a September 2016 visit to Ukraine where there were holes in the drywall, wifi access point was disconnected, breaker was off, hinges on the door was broken • Several individuals caught on camera walking in front of Russell's house in different outfits and a device on their nose that projected IR shadows and light on their face that blurred their face • Russell's current full time protection detail • Chris Ochoa and suspicion he is part of the FSB (Russian Federal Security Service) • Akkelquist advised the leadership at LinkedIn, Facebook, Chairman and CEO of MGM Corp. Founder of Google. • They charge \$1,000 per hour \$500 per day for travel expenses • "G Priorities" : request security detail to be changed, 2 new people to do "Advanced Work" • Tell Russell to pay in cash to be "off the radar" 	<p>GA000118-153 [Akkelquist's photos, letters, and other documents supposedly supporting his representations re his background and qualifications]</p>	<p>George's extensive experience gave me confidence that he could help the situation. Later, you retained George directly as an advisor to help navigate the complex security situation." [SRID000008 (Micheletti's 6/5/18 letter to Russell)]</p> <p>Akkelquist immediately takes control from this first meeting with Russell, making a "request" that the security detail "be changed."</p>
<p>Jan. 25, 2018</p>	<p>Akkelquist and Ryan have a phone call at 8pm. According to Micheletti's notes: "SR told his existing security detail that George was the 2nd highest</p>	<p>GA000244 [Micheletti's notes from team meeting]</p>	<p>Russell says LaFreniere told him that it was a waste of Russell's money to continue paying LaFreniere for services that were unnecessary because there was</p>

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	<p>person in the FBI. This was incorrect information and a breach of a verbal agreement we had on our call on 1/24 to keep our conversations confidential</p> <ul style="list-style-type: none"> • George spoke with Tom Lafanier who indicated he is considering dropping SR as a client. • Many of the reported incidents by SR happen from when he is alone (detail is not present) • George established an information channel in Eastern Europe.” 			<p>no threat. This is likely why, per RM’s notes, “LaFreniere told Akkelquist he is considering dropping Russell as a client.” This is consistent with what Russell told us during meetings, which is that LaFreniere told Defendants not to take Russell on as a client.</p>
Jan/Feb ?? 2018	<p>Akkelquist is sent a video of the suspected device and states the plug appears to be a surveillance device of Russian origin. This assertion confirmed Russell’s concerns about his dealings in Ukraine, so--based on Akkelquist’s assertion--Russell retains Akkelquist as a security adviser to help navigate the complex security situation.</p> <p>LaFreniere recalls that Akkelquist gave Russell his opinion on the outlet, but LaFreniere does not know whether Akkelquist actually analyzed the physical outlet or simply saw a photo or video of it. Russell told LaFreniere that Akkelquist concluded that it was a Russian device of some sort. LaFreniere asked Russell for Akkelquist’s report on the analysis, and LaFreniere was troubled when Russell said that Akkelquist never gave Russell a written report.</p>	<p>Russell interview</p> <p>SRID000816 (“Notes from Bryan Crutcher Interview (8-22-18)”) </p> <p>SRID000823 (“LaFreniere Memo to Client”)</p>	<p>Discovery is needed into Akkelquist’s assessment of the outlet.</p>	<p>NOTE: it does not appear that Akkelquist said <i>in writing</i> that the device was on of surveillance and/or one of Russian origin. We know this only from the client’s own account, and from our meetings with Crutcher and LaFreniere.</p> <p>LaFreniere told us during our interview that he did not know Akkelquist to be any sort of expert on Eastern Europe at all.</p>
Jan. 26, 2018	<p>Larry Long and Reginald Ogata perform a Technical Vulnerability Survey of Russell’s</p>	<p>SRID000215-227 [Technical Vulnerability Survey Report re</p>		

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	<p>1917 Stockton St., San Francisco Residence. According to the report, "no evidence of electronic or technical compromise was detected."</p> <p>Micheletti's notes regarding the TCSM Sweep:</p> <ul style="list-style-type: none"> • ...Audio devices in electrical outlets tend to be an FBI tactic as it requires a sophisticated setup... • ...An Eastern European threat would most likely be cyber, not physical... • ...Follow up with Brian [Crutcher] to get the old outlet with the retracting device 	<p>SR's residence, prepared by Ogata and Long, dated 1/26/18]</p> <p>GA000244 [Micheletti's notes from team meeting]</p>		
Jan 27, 2018	<p>According to Micheletti's notes, text message exchange between Micheletti and Russell: SR reported that homeless person tried breaking into his neighbors house in SF the week of 1/23/17</p> <ul style="list-style-type: none"> • SR's security detail reported seeing "Baldy" (a character that has been appearing frequently) outside the doctors office where his significant other was giving birth • SR's baby was born on 1/27/17 • SR reported "Chris Ochoa" threatened him. SR believes Chris swabbed his hand with a chemical while at a bar. The security detail was not present. SR confronted him about it and the following text message exchange ensued: [screenshot of texts between Chris Ochoa and Russell re chemical swabbing incident] 	<p>GA000243 [Micheletti's notes from team meeting; this particular entry in his notes is entitled "Text Message exchange with Steve"</p>	<p>Which of Steve's security reported this?</p>	<p>These texts may have been via Telegram app and thus automatically deleted from phones by now.</p>

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	<ul style="list-style-type: none"> • SR texted Ryan and described how the voice conversation went: <ul style="list-style-type: none"> o Chris: "I assume you think I am a part of this.... You are wrong.... As a friend, I am telling you not to do this... We can go to the mat on this, that's fine ...". Then SR hung up on him • SR sent Ryan a couple apartments in NY he is considering moving to. Ryan gave him a recommendation but wanted to 			
DURING THIS TIME TARA WALSH IS SURREPTITIOUSLY DRUGGING RUSSELL WITH HER PRESCRIPTION MEDICATIONS HEIGHTENING RUSSELL'S SECURITY FEARS				
Jan 27-30 2018	Tara admits to drugging Russell allegedly to help him calm down while they were in the hospital for the birth of their daughter	Sergeant Caraway interview		Sgt. Caraway has since back-peddled on this, but told Brian Waller that Tara admitted to this
Jan 27, 2018	Evie, Tara and Steve's child is born in New York.	Client interview		
Jan 29, 2018	<p>Akkelquist connects Micheletti to Nir Maman, and Micheletti and Maman start texting.</p> <p>Maman tells Akkelquist that he has spoken with Micheletti, and he asks Akkelquist if he can "take a call." Akkelquist says yes.</p>	<p>GA000006-GA000008 [RM texts with GA]</p> <p>CT000071 [NM texts with GA]</p>		Crutcher believes Akkelquist may have some connections to the intelligence community, but says Maman is a "poser" who over the top representations on his resume. Says he has "a bunch of names" of people who have had legal issues with Maman. (<i>See</i> "Notes from Bryan Crutcher Interview (8-22-18)")
Jan 30, 2018	Timen emails Maman biographies for Bob Praus and Wayne Monico stating "both gentlemen are solid and professionals and worked with me on various projects are active in the business."	NM000005 [AT email to NM]		
Jan 30, 2019	Micheletti texts Akkelquist: "Nir sent me an overview of your convo and the phases you	GA000008-GA000009 [RM texts with GA]		

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	two discussed. I'm still trying to lock Steve down..." Akkelquist responds: "Glad you are good with this phased approach ... Will modify together as we get more clarity. I'm standing buy [sic] to book flights."			
Jan 31, 2018	Maman texts Akkelquist that he "would rather get paid directly by Steve/his accountant please. How do we arrange that? I need info to invoice him."	CT00072 [NM texts with GA]		
Jan 31, 2018	Maman text to Akkelquist: "... I'll stick to the original structure with Ryan, will sign a contract with Ryan and have him pay me. I need a contract In case I get asked about the money transferring in"	CT00073 [NM texts with GA]		Micheletti is subcontracting Maman.
Jan 31, 2018	According to Micheletti's notes, Defendants had a call with Russell. Here are Micheletti's notes: <ul style="list-style-type: none"> • He went to his girl friend's residence a day early to scope it out and found devices in the mirror and in a toilet paper dispenser. • Reports that he is feeling sick due to a chemical spray. Suggested it might be a type of insecticide chemical phosphate. • Create separate account with prepaid credit cards • Arrange for George to talk to Steve today so he can call George Directly. Goal is to have a straight line to George. • Current detail shuts down on the 2nd. • SR wants us to reach out to Terra's father • Use What's App to communicate internally 	GA000242 [Micheletti's notes from Defendants' call with Russell]	Can we tie the "chemical spray" feeling to Tara's drugging? What are the side effects?	Insecticide Symptoms: "Organophosphates and carbamates cause eye tearing, blurred vision, salivation, sweating, coughing, vomiting, and frequent bowel movements and urination. Blood pressure can decrease. Heart rate can decrease and become erratic and seizures can occur. Breathing may become difficult, and muscles twitch and become weak. Rarely, shortness of breath or muscle weakness is fatal. Symptoms last hours to days after exposure to carbamates, but weakness can last for weeks after exposure to organophosphates.

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			<p>Pyrethrins can cause sneezing, eye tearing, coughing, and occasional difficulty breathing. Severe symptoms rarely develop.” https://www.merckmanuals.com/home/injuries-and-poisoning/poisoning/insecticide-poisoning</p> <p>Client described to us his experience of being drugged with Seroquel as follows (paraphrased from 1/15/20 meeting): “Seroquel is like a roofie when taken in the doses I was getting. You experience that you’re going to lose consciousness, even though you won’t actually lose consciousness. And alcohol will amplify that feeling, as will having the drug dissolved in a drink. So when I was drugged, I was afraid of going unconscious (and mainly afraid of what could happen to me if I went unconscious), so I took a bunch of Adderall to stay awake (to counteract the Seroquel). I didn’t have a prescription for Seroquel. The Seroquel episodes would spike fear, so I took medication for it, which I couldn’t stop taking because I could have had hallucinations and other issues if I did. This can damage the nervous system.”</p> <p>Thus, there is some overlap between the symptoms of (at least one form of)</p>
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				insecticide exposure and Seroquel drugging; namely, potential difficulty breathing.
Jan. 31, 2018	<p>Akkelquist, Micheletti, and Maman have a conference call with Russell.</p> <p>George Akkelquist introduces Russell to Nir Maman, owner of CT 707 Inc., and convinces Russell to retain him as an additional security consultant. Based on their assertions that Russell was in great danger, Russell retains both Akkelquist and Maman for investigative services and security, and they plan to start in early February.</p>	<p>GA000009 [RM texts GA that RM and NM will have call with Russell, and GA accepts RM's invitation to be on the call]</p> <p>SRID000009 [Micheletti's 6/5/18 letter to Russell]</p> <p>Client Interview</p>		<p>Crutcher says Russell was paying Maman and Akkelquist 60k per week, and from that 60k Micheletti was getting 20k per week as a finder's fee (i.e., RM was getting 1/3 of the money). This appears consistent with Micheletti's confirmation on 3/7/18, in response to Maman's question, that for March they would charge Russell approximately 9k per day, just as they did in February (weekly would be approximately 63k). Crutcher says Micheletti took copious notes all the time when with Russell, Maman, and Akkelquist. [SRID000815 ("Notes from Bryan Crutcher Interview (8-22-18)")]</p>
Jan 31, 2018	Akkelquist texts Micheletti: "We can help Steve, will talk in detail in person next week. Thx."	GA000012		
Feb 1, 2018	<p>Micheletti has a phone call with Russell and then a separate call with Akkelquist</p> <p>According to his notes:</p> <ul style="list-style-type: none"> Russell feels like he can't trust his existing detail and said, "I am afraid of my own detail. These guys are working against me and are making a case against me ... they are making it impossible for me to stay in New York. I'm frustrated that I can't see my newborn daughter, I can't see my wife, I feel helpless." "Our duty is to assess and repair his image" 	GA000241		<p>LaFreniere says that when Russell informed him that he had fired Ackerman and his team and had hired "George's guys" (in reference to Akkelquist), LaFreniere thought, "George doesn't have "guys"..." [SRID000823 ("LaFreniere Memo to Client")]</p> <p>NOTE: Although client fired Ackerman, it does not appear client fired LaFreniere; rather, client has told us that LaFreniere simply told him it did not</p>

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	<ul style="list-style-type: none"> • “Budget x 3 months and have that wired in and retained as a retained to spend from that money” • 10 George hours plus 500 trip, plus retainer of 35,000 • “Based on the recommendation by George, SR fired his existing detail. Nir lined up another agent to watch SR to bridge the gap between today and the actual start date for tomorrow (2/2) • \$195,000 USD Nir • \$245,000-Ryan 			make sense for client to continue paying him for services, because there was no threat.
Feb. 1, 2018	Nir Maman’s company, CT 707 Inc., begins performing security and investigative services for Russell through Ryan Micheletti’s Shield Corps Security. The arrangement was for Shield Corps to bill Russell directly because of their license to do business in California. Shield Corps would then pay CT 707, Inc. for the contracted protection services.	SRID000009 [Micheletti’s letter to Russell] SRID000016-31 [invoices] SRID000034-188 [emails re invoices]		
Feb. 1, 2018	Reginald Ogata picks up the GFI outlet from Bryan Crutcher which was removed from Russell’s 1917 Stockton St., San Francisco, CA residence.	SRID000229-241 [GFI Outlet Report]		
Feb. 2, 2018	Nir flies to New York to meet Russell. At 0515-0547, Akkelquist speaks to Russell and he reports that Russell appears happy, confident in his detail and feels secure.	GA000241		
Feb 2, 2018	Timen texts Maman: “All is under control, just got back home for the night. The two guys will be with him during the night. I will resume action tomorrow morning...” Maman responds: “...looking forward to catching up more on next trip and spending time strategizing projects with you!...”	NM00010-11		“two guys” not four NOTE: Crutcher notes that Timen and Shlomo were part of Maman’s team and were supposed to be providing close protection, but even though Russell leased an apartment (unclear in which

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	Timen: Absolutely, we must get together strategically. We have an amazing potential doing it. I'll keep you posted and looking forward to your next trip...."			city) in the same building as him for them to stay in, they hardly ever stayed in that apartment; instead they stayed at a hotel several minutes award, which Crutcher found unacceptable. [SRID000812 ("Notes from Bryan Crutcher Interview (8-22-18)"]
Feb. 2, 2018	Micheletti sends Davalos an email, writing "George said you two spoke about the retainer, so I wanted to send you the information below." Micheletti provides an itemized breakdown showing 126k for a 14-day retainer, 270k for 30 days if security services (or 9k daily), and "4 Guards Total."	SRID000040 [RM email to Davalos re invoice]	Must seek discovery from Shlomo as to whether, and from what point, he knew there were only 2 guards (himself and Timen), not 4.	Crutcher says that Timen said that 4 people were on their security team. However, when Crutcher was driving with client he observed no one was following or protecting – so Nir/George's team (i.e., Timen and Shlomo) were not honest about what they were doing. Crutcher says he only ever saw two guards: Timen and Shlomo. Crutcher believes Maman told Timen to tell Russell that other guards were around even if Russell didn't see them. Crutcher asked Timen one day, "are you sure there are people following Steve?" Crutcher believes it was at that moment that Timen knew Crutcher was on to him. Crutcher says that once Timen and Shlomo confronted Maman regarding how much Maman was getting paid in comparison to them, Timen and Shlomo turned on Maman and began telling Russell the truth (i.e., there were only 2 body guards). Crutcher believe Timen told Russell, "they told me to lie to you." [SRID000812-813 (Notes

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				from Bryan Crutcher Interview 8/22/18)]
Feb. 4, 2018	Reginald “Reggie” Ogata performs a Technical Vulnerability Survey of the GFI Outlet, using a Research Engineering International OSCOR Green Omni-Spectral Correlator and an analysis of the video taken of the outlet. The TVS report concludes that the GFI outlet “is a normal outlet with no secreted surveillance devices.”	SRID000229-241 [GFI Outlet Report]		The report states, “[t]he following examination was conducted by [Ogata] at the request of Ryan Micheletti, Shield Corps Security.”
Feb 4, 2018	Maman asks Timen how everything is going and Timen responds: “...Am sitting down with Steve all relaxed and friendly. He’s happy as a clam.”	NM00012		
Feb 5, 2018	Akkelquist emails Bull and LaFond of DFW to “You two can laugh all you want. . . .Sisters I need both of your help in making the above invoice professional. I have never invoiced anyone before... Please make me look good and professional.” Akkelquist includes in his email a draft email to Davalos of Morgan Stanley writing, “DFW Metroplex has been conducting an all threat assessment, close personal security and pending issues consulting to Mr. Steve Russell ... billing \$1k per hour from Jan 2 nd through Feb 4 th .”	DFW000031-DFW000032; DFW000045 <i>NOTE: DFW45 is the same as DFW 31-32]</i>		NOTE: Akkelquist alleges in his settlement conference statement that he was only ever retained to repair SR’s image, and that Maman was responsible for security. DFW says in its statement that it played no substantive role in the case. This email from Akkelquist refutes both of those allegations.
Feb. 6, 2018	Akkelquist emails Bull and LaFond of DFW, sharing “sample” of CT707’s invoice and retainer for them to consider following in preparing an invoice for Akkelquist to send to Russell.	DFW000033		
Feb. 6, 2018	Micheletti has a phone call with Reggie Ogata, the TSCM agent, and Ogata explains why the	GA000240	**We need to ask Steve	

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	GFI could not be an effective counter-surveillance device		exactly when or if he was ever told the results of the TSCM sweep	
Feb. 6, 2018	Timen texts Maman: “Achi, just managed to bring them all: Steve, his Gf, baby, and two dogs to our preferred spot on Jersey. Had a few challenges but nothing that we couldn’t handle. They are all happy	NM00013	What challenges is Timen referring to?	
Feb 6, 2018	Akkelquist texts Micheletti: “Talked with Steve at length this morning, all good and positive. He is making great progress. Talked with Albert (detail team leader) he confirmed my above assessment of Steve. Talked with Nir, same as Steve and Albert. Talked with Davalos at MS [Morgan Stanley]. Have a good definition of Steve’s financial status. All above are agenda items to our call this pm ...”	GA000015-GA000016		
Feb 7 2018	Maman texts Timen: “...FYI: George mentioned to me that we will apparently be adding one additional CP agent to the team. Everything to be confirmed in tomorrow’s meetings”	NM00017		
Feb. 8, 2018	Meeting with Russell, Akkelquist, Micheletti According to Micheletti’s notes, Akkelquist tells Russell something along the lines of: “You are not crazy ... this is a classical psychological operation to affect their mind to convince them they are crazy. Anxiety, everything around you is giving you the creeps.” Maman “checked with Russia and SR is on a watch list for one of two reasons: His company is competing with a company that is	GA000235-236, GA000240 [notes from team meetings]		It is unclear if and when this was conveyed to Russell, but Akkelquist and Maman developed several theories which led Defendants to believe the harassment Russell was facing could be international in nature and potentially from multiple sources/actors: (1) they theorized that Russell’s security issues were related to his past professional relationships with international organizations, and his past business

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	<p>owned or managed by the Kremlin/Russian government; SR's business dealings with Kiev developers got noticed.”</p> <p>Akkelquist also asks Russell who he is dealing with financially, requests that Russell tell Stephen Davalos, Russell's financial advisor at Morgan Stanley, that he can trust Akkelquist. Defendants discuss Russell's “crypto investments” with him</p>			<p>dealings with government agencies within the U.S. Specifically, they told Russell that he was likely being targeted due to the sensitive nature of his work on the Moscow Subway Project. (2) They theorized that 3VR's receipt of money from InQtel was a potential cause. (3) They theorized that the threats were tied to the June 2013 leak of classified documents by Edward Snowden, which included information on Russell's involvement with InQtel and the Moscow Subway Project; (4) they theorized that the Office of Personal Management's letter to Russell re his FBI file being hacked by the Chinese could be related to the harassment. [SRID000009-10 – Micheletti's letter to Russell]</p>
Feb. 2018	<p>According to Micheletti (in his letter to Russell), Akkelquist and Maman advanced the theory that the source of the security issues were connected to Russell's previous business relationships with international organizations and U.S. government agencies. This is consistent with Micheletti's notes from a team meeting on 2/8/18, in which he writes that “Nir checked with Russia and SR is on a watch list for one of two reasons: - His company is competing with a company that is owned or managed by the Kremlin/Russian governments; - SR's business dealings with Kiev developers got noticed.”</p>	<p>SRID000009-10, 13 [Micheletti's letters to Russell]</p> <p>GA000235</p>	<p>Must seek discovery from Shlomo re who these “various individuals” are. (Presumably its Maman, Akkelquist, Micheletti, and/or Timen, since that makes up</p>	<p>NOTE: Akkelquist alleges in his settlement conference statement that he was only ever retained to repair SR's image, and that Maman was responsible for security. Akkelquist's text messages to Russell (SRID000439-41) about purported threats refutes that statement.</p>

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	<p>Micheletti also writes in his letter to Russell that Akkelquist and Maman told Russell that the surveillance he believed he was experiencing was connected to the sensitive nature of the computer vision and facial recognition technology being implemented across several international projects during his time at 3VR, InQtel (a CIA backed venture fund), and the Moscow Subway Project. [see Notes column.]</p> <p>Crutcher writes that “both [Maman and Akkelquist] claimed to independently verify that there were active threats against Stephen (V) Russell. They provided the victim with specific and apparent credible details related to a business deal of (V) Russell's company in Russia and also the Ukraine. (V) Russell was also provided photos, recordings, and other pertinent information relating to his perceived threat. On multiple occasions, the suspects relayed convincing "intelligence" information which served to dramatically increase the victims concern for his safety. The suspect began to isolate him from anyone who had helped him in the past and was instructed not trust anyone except them including representatives of the US Government. They explained to him that some of his former security team, as well, were most likely part of the opposing entity that attempted to harm him. The suspects then escalated the perceived threat by providing compelling information they had allegedly discovered using their</p>	<p>SRID000010 [Micheletti’s letter to Russell]</p> <p>SRID000321 [Bryan Crutcher Report]</p>	<p>the entire “team.”)</p>	<p>Russell told us during our 1/15/20 meeting that he found great successful implementing his facial recognition technology (through his company, 3VR) in the Singapore Airport and the South Korean Subway. However, at one point [WHEN?], someone told him that his technology had been deployed in the Moscow Subway. Russell was unaware of that, and so this freaked him out, and he soon thereafter stopped 3VR business and started Prism.</p>
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	<p>connections with the Russian intelligence community. One example was telling the (V) Russell that a specific, known, Russian mob boss also known as the CEO of Galfort, a Russian security company, had put a contract out on the victim's life and/or a request to steal/acquire the victim's intellectual property (IP). They alleged that was due to the victim pulling out of a 3VR biometric pilot project in the Moscow subway system. (S) Akkelquist told the victim the CIA had initiated a counter intelligence investigation into the victim and his association with the Russian government and the investigation was still active. (S) Akkelquist further stated the CIA was responsible for the recent mass cancelling of all of Prism's retail analytics contracts in Russia. Akkelquist also told (V) Russell that Prism's President, Joseph Saad, was attempting to takeover Prism and (V) Russell's babies, grandfather, Steve Walsh (father of Tara Walsh) and their family were scheming to take his child that he shares with Tara Walsh (estranged girlfriend, mother of child Evie in common).”</p> <p>The highly specific and detailed nature of the information Maman and Akkelquist provided, including confidential details relating to Russell’s prior business dealings, made their claims seem highly credible to Russell. Shlomo says the security team explained that there was an active investigation against Russell because</p>	<p>Russell Interview</p> <p>SRID000243 [Shlomo’s letter to Russell: “My understanding and</p>		
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	of the business he had conducted in Russia/Ukraine. This is consistent with Maman’s comment during a team meeting (referenced above) that Russell was on a watch list due to his business dealings in Kiev.	information I received from various individuals who were on the team was that you had some security concerns and active threat against you as results of a business deal your company had in Russia and the Ukraine”]		
Feb. 7, 2018	DFW’s invoice to SR for “retainer fee February 7 – March 7, 2018” [\$15,000]	DFW000065		
Feb. 7, 2018	DFW’s invoice to SR for <ul style="list-style-type: none"> - “All Threat Assessment, Close Personal Security and Pending Issues Consulting for Mr. Steve Russel [and] Close Consulting and Personal Security Services Directly for Mr. Russel” [\$6,000] - “Detailed Assessment of Mr. Russel’s previous consulting firm and interview of former person in charge of previous firm” [\$2,000] - “Assembling, Deployment of new details currently in charge of close protection of Mr. Russel by Our Employee Directly.” [\$3,000] - “Travel Day Plus Expenses” for Feb 4 (HI-CA), Feb 7 (CA-NY), Feb 10 (NY-CA), and Feb 14 (CA-HI) [each \$500] 	DFW000066		NOTE: Akkelquist alleges in his settlement conference statement that he was only ever retained to repair SR’s image, and that Maman was responsible for security. DFW says in its statement that it played no substantive role in the case. This invoice from DFW refutes both of those allegations.
Feb. 9, 2018	Russell meets with Akkelquist and Micheletti. According to Micheletti’s notes, they discuss: <ul style="list-style-type: none"> • Russell’s suspicions of Chris Ochoa as an Israeli, U.S. or Russian agent. “George says it’s not Israel or Russia. Russians are 	GA000231-233		

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	<p>more sophisticated that the Israelis. You won't see them or they will be very direct with the person and introduce themselves.”</p> <ul style="list-style-type: none"> • “Task for George: Look into it which file was taken and what information” [regarding the CIA OPM hack involving Russell’s files] • “George believes Reece Mooney is Steve Sluteman. CIA technology developer. Job is to keep an eye on anyone who the CIA invests in. He is supposed to make himself known to the subject so the subject knows they are being followed.” • “Task: When SR gets back to CA, connect his current detail to Ryan. Do a debrief and interview them. We will take over SR's House from them. Keep them as friends. Get all info about how they started working with Tom and develop report.” • “Task: SR connect Ryan to Dan Ochoa and Brian” [Dan Ochoa and Bryan Crutcher worked on security detail together] • Drug symptoms of LSD, Opiate, Panic fear, anxiety, and gas [no reference made in Micheletti’s notes to Tara’s drugging and/or Seroquel] 		<p>Must determine in discovery whether GA in fact looked into which of client’s files were compromised . Client told us he believes any background info utilized by government to provide Russell his security clearance was likely compromised .</p>	
Feb 10, 2018	Maman texts Timen: “...quick question: does your company have a security license in NY? And are all the guys working licensed?”	NM00015		
Feb 10, 2018	Micheletti creates a “list of tasks” for Albert, Russell, Micheletti, Maman, and AKkelquist	GA000229		Suggests Micheletti may have believed in Defendants’ representations about active security threats

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Feb. 11, 2018	Akkelquist emails Bull and LaFond introducing Micheletti: “please send him the required legal form to set up as part time partner in the ongoing protective mission called “Hand of God... Ryan please coordinate with Mary Jane to facilitate legal requirements to make your relationship with DFW seamless legally to insure “Hand of God” is a successful mission”	DFW000028		Supports action against Micheletti as co-conspirator / partner of Defendants
Feb. 12 2018	Micheletti (through Shield) begins sending Russell invoices for \$63,000 per week for security services (plus additional costs for things like hotels and meals), which Defendants said was needed in order to engage numerous investigators to conduct the investigations of the security threats they had identified and to provide security to protect against these threats.	SRID000016-31 Russell interview		
Feb. 12, 2018	Russell enters into agreement to retain George Akkelquist via his company DFW Metroplex Training Academy in Fort Worth, TX, for April 2018-December 2018, per an agreement with Russell on February 10, 2018. This consists of \$1,000 per hour for 100 hours equaling \$100,000.	DFW000067		
Feb 12, 2018	Timen emails Maman information for the wire transfer payment	NM00004		
Feb 13, 2018	Timen texts Maman: “Just to recap ... George wants me to be around him all the time (George said he will talk to you on this as well) ...”	NM00024		Supports narrative of defendants wanting to control Russell
February 13, 2018	\$12,000 wire transfer from DFW to Valerie Quijano (Akkelquist’s “wife”)	DFW000073		

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Feb 14, 2018	Maman texts Timen: “what do you have as far as insurance coverage and how much coverage for your services? Formalities Timen responds: “...we have a bond for 500k and liability for 2m” Maman: “...Ryan is just trying to work an insurance clause into the contract with Steve. Is yours general liability or professional liability?”	NM00026		
Feb 15, 2018	Micheletti confirms Chris Ochoa’s name and addresses for a background check	GA000228		
Early Feb. 2018 – April 2018	<p>George Akkelquist and Nir Maman repeatedly tell Russell that he is at risk from threats, and that he needs to continue to pay them for additional services or his life will be in danger. They further suggest that others around Russell are potentially working against his interests to create grave concern for Russell and to isolate him so that he will only trust them. See the following quotes:</p> <p>From Micheletti’s notes from phone calls with SR and GA on 2/1/18, “Based on the recommendation by George, SR fired his existing detail. Nir lined up another agent to watch SR to bridge the gap between today and the actual start date for tomorrow (2/2)” Bryan Crutcher too writes that Maman d Akkelquist “explained to [Russel] that some of his former security team, as well, were most likely part of the opposing entity that attempted to harm him.”</p>	<p>Russell interview</p> <p>SRID000009-10 [Micheletti’s letter to Russell]</p> <p>GA000241</p> <p>SRID000321 [Bryan Crutcher Report]</p>		

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				about it from Russell. [SRID000817 (“Notes from Bryan Crutcher Interview (8-22-18)”)]
February 18, 2018	Micheletti emails Akkelquist, Nir and his brother Zach Tom Lafreniere’s Report of Investigation into Prism Skylab Industrial Espionage sent by Russell	GA000177 [RM’s email] GA000178-223 [LaFreniere’s report]		LaFreniere’s report identifies Yuri Milner (GA000210), but unclear why Milner was identified in the report. Russell told us during 1/15/20 meeting that around 2016, a purported CIA official (Russell did not believe he was actually a CIA official) approached Russell and asked him if he knew how to contact Yuri Milner, a Russian billionaire. This concerned Russell greatly because Milner was very powerful, and because he did not know who this purported CIA official was.
February 20, 2018	Russell is suspicious of Chris Ochoa and texts Akkelquist re Chris Ochoa reaching out to Joe Saad, the President at Russell’s company Prism.	GA000020	Investigation into details of client’s suspicion of Chris Ochoa/ Jo Saad	LaFreniere believes that Russell’s concerns became more severe when he interacted more frequently with Chris Ochoa in New York. LaFreniere believes Ochoa was a drug dealer who was popular in affluent circles. He said that Don Ackerman invested Ochoa and created a report. At one point, Russell got mad at LaFreniere and Ackerman; he accused LaFreniere of telling Ackerman that Russell was using cocaine. LaFreniere told Russell (and maintains to this day) that he said no such thing to Ackerman. He also told Russell that he believed Ackerman was doing his best to help Russell. [SRID000823 (“LaFreniere Memo to Client”).]

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February 20, 2018	Maman informs Timen they are bringing in Ronen Shlomo	NM00032-36		
February 20, 2018	<p>Tara Walsh texts Matan Gavish: “Well he is going to buy a \$2.3 million dollar apartment in sf and put it in a trust under Evie’s name I can also control So his mom said to just come there for a few weeks than can always sell it and say [Fuck you]</p> <p>Gavish: Trusts can be altered</p> <p>Walsh: In what way? [...] Well he’s pushing me into a corner – my dad said having the baby was my idea and my problem. So I have to do whatever to survive if I sue him for child support I will get like \$2k a month Which is not enough to live off of I’m better pretending I want to be with him and getting the most while I can- then leaving him for good</p> <p>Gavish: Okay, have a fun 40 years</p> <p>Walsh: More like 6 months ... I think he will also marry me if I submit to him then I can just divorce him I really mostly hate him at this point- not sure I can manage to hold myself back. But would be the sweetest revenge if I could</p>	WALSH_004106 – WALSH_004107		
February 21, 2018	<p>Walsh to Gavish: I think I can stay here and figure out a way to make it work. I think there’s a risk of me exploding at some point if I go to sf and causing physical harm to steve- which means the baby could be taken from me. Not risk almost a guarantee</p>	WALSH_004107		
February 21, 2018	Maman send Ronen Shlomo a Non-Disclosure Agreement	NM00142		
February 22, 2018	Maman texts Akkelquist, “My dream in life is to be huge...only so that I can take care of all the people G-d put in my life and make sure	CT00095		

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	they always have a home and no troubles to worry about...”			
February 27, 2018	<p>Russell, Micheletti and Akkelquist meet and Russell’s home in San Francisco.</p> <p>According to Micheletti’s notes:</p> <ul style="list-style-type: none"> • “SR is most worried about cyber attacks, wifi, cameras ... Action: George to talk to Nir and engage “the team” to bring in and secure SR’s networks.” • “Action: Contact Russia about Chris Ochoa” • “George: • CIA trying to preserve US policy towards Russia. Viewed as “this is IP we want but can’t have and [Russell] is giving it to our enemy (Ukraine) • Good news is that there is no minus in SR’s name and there is no physical threat. • George’s source has dinner with Putin 2x per month. • Russia actively tracked SR until Dec 2015. • US shut down SR’s Apple project, not Russia • The Russians are not here for you, any threat or surveillance is likely the US • Is Ochoa linked to anyone at Prism? Is he part of the conspiracy? To take SR’s attention off of Prism? • ... Passively collecting intel by throwing SR a bone and see how he bites it” 	GA000226-228		<p>Why, then, does Maman later say that Russell is walking into the lion’s den? Why does Akkelquist later say that defendants “continue to receive alarming reports”? Why do defendants drag Russell out of town (e.g., Hawaii) purportedly for his safety?</p> <p>Why are they “passively” collecting intel? Why are they “throwing SR a bone”? Suggests they are not taking his</p>

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				concerns seriously and/or don't sincerely believe there's any threat.
February 28, 2018	Timen emails his February 2018 Expense Sheet	NM00007		
February 28, 2018	\$12,000 wire transfer request from DFW to Valerie Quijano	DFW000074		
March 1, 2018	Maman texts Timen: "Submitted your expense report ... we're sorting out March payments now. Update looks like we just signed on for the next 3 months duplicating Feb ... and possible going a full 6 months! ..." Timen: "Achi! Great news, looking forward to catching up!..."	NM00040		Evidences their goal of having Russell continue using their services
March 2, 2018	Akkelquist emails Mary-Jane Bull (of DFW) W9 form for Nader/Nadir Abualzolof. Akkelquist says he is "a person who owns the business." The W9 itself [DFW000063], signed March 3, 2018, lists Nader's name as "Nader Abwalzolof," who operates the business "Fast Finance Auto Sales" in Campbell, California	DFW000017-24 [emails] DFW000063 [W9]		NOTE: in an email (DFW000024), Akkelquist appears to be addressing Nadir, but the "To" field shows Houssam El Ayle's email address.
March 2, 2018	This is the date of LaFreniere's final invoice to Russell.	SRID000823 ("LaFreniere Memo to Client")		
March 4, 2018	Akkelquist texts Micheletti re Hawaii trips and suggests that Russell, Tara, and Timen will all be in Hawaii. Tara alleges that Russell physically assaulted her and she produced photographs of bruising allegedly from this time	GA000028 Tara's discovery responses, XXX		
March 7, 2018	Walsh alleges that Steve admitted he slept with other people while Walsh was pregnant and when he saw her texting her friends he "aggressively told me to stop messaging people and threatened to smash my cellphone...within	Tara's responses to SROGS		

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	seconds he swooped down grabbed my cellphone from my hands, threw it on the ground and stomped it into pieces.”			
March 8, 2018	Russell states that he got out of the shower and found Walsh breaking his devices including ipads, his phone, and laptops. Walsh alleges that Russell “chased [her] upstairs in the house to the kitchen/living room area, as he said he was going to break her laptop.” Walsh alleges that “ Steve violently smashed me around his mother’s kitchen, pushing me up and down off the floor and against the kitchen counter aggressively attempt to grab [her] laptop from [her] arms to break it.”	Tara’s My Narrative Record; Tara’s Journal of Mental health Episodes Tara’s responses to SROGS; client interview; Walsh produced photographs of her bruises		
March 7-9, 2018	Russell takes a toxicology test at the Redwood Toxicology Laboratory. The results are negative except for Zolpidem (prescription sleep medication).	“FW Toxicology Tests”	Does client voluntarily take sleep meds?	
March 9, 2018	Shlomo emails Maman re Chris Ochoa investigation: “We received the report you sent. It seems missing lots of information and may be inaccurate! For example, the LinkedIn profile attached indicates he is connected to a business named Bask Labs, however there is no mention in the report about the business or his affiliation to it .From preliminary check we did, we believed that there is another person by the same name in CA and that the 2 records got mixed on all databases. We will need to sort them out to make sure the data provided are only reflecting your Subject. We unfortunately will have to re do the report from scratch!! (but much more detailed and deep...) In addition we	NM00158-NM160		

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	<p>will expand the research regarding his Social Media and his circle of friends. Im sure he has more than just LinkedIn. I suggest that we conduct a debt analysis on him (credit etc..) as well as do an asset/financial investigation to determine how much money he and his businesses may have. If necessary we can follow up on his financial investigation and create a complete profile of his spending habits and expenses (for example who and what he is paying for). That will include ATM spending, credit cards and checks. We should look into who he is talking with (calls)? We should or could inquire to see what medications/drugs he is being prescribed. We should check if he was ever licensed as a broker/dealer. He claims to have worked in the financial world.... Not sure about that at all, however we should be able to obtain information about that. Lastly we may want to do a bit of surveillance on him and see what he is up to, who he is meeting with etc... Please take a look at this list and let me know what items would help the client. We can price this once we know the scope.”</p>		
<p>March 10, 2018</p>	<p>Akkelquist texts Maman, “it is now important for you to be in Hawaii for Vallation meeting and Steve because things are now moving fast in good directions. I will call you today and will fill you in on details. Vallation can pay for your flight.”</p>	<p>CT00102</p>	<p>Crutcher noted in his report that Akkelquist is/was “Chief Security Information Officer” for a company called “Vallation Security Inc.” [SRID000332 (Bryan Crutcher Report).] During our first meeting with Crutcher in August 2018, Crutcher explained that Akkelquist once told Russell that if he agreed to work with the Israelis and provide his IP to Vallation, Israel would provide Russell with</p>

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				<p>protection from the Russians. Russell tells us that in Hawaii in March 2018, Akkelquist tried to convince Russell to assign certain IP rights relating to Prism to Vallation. [SRID000817 (“Notes from Bryan Crutcher Interview 8/22/18).] We understand from Russell that Akkelquist gave him a copy of Vallation’s 2017 Investor Proposal deck/slideshow. [SRID000852 (Vallation slideshow).] That deck identifies Ryan Dodd as CEO, Akkelquist as President / CSIO, Maman as VP, Security Operations, Critical Infrastructure/Urban Counter Terrorism, Colonel Tray Ardesse as Advisor, Ryan Micheletti as Advisor, and Fmr. Chief Michael Fisher as Advisor. The info on Vallation’s website has changed over the past few months; there are no longer any individuals named on the website. However, several months ago we saved screenshots from the website, which show that Akkelquist was listed as President and Chairman, Melody LaFond was listed as Executive VP, CFO, COO, and Contract Administrator, Nir Maman was listed as Executive VP, and Raymond Bull (of DFW) was listed as CTO. [SRID000845-845 (Vallation webpage).] At that time, the website described the company as follows: “We at Vallation are a dedicated team of experts with combined tactical experience of over 50 years in the field</p>
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				<p>of law enforcement, investigations, terrorism, and violent crime solutions. Our mission is to employ this experience and team in support of all first responders at every spectrum of the consuming relevant agencies of our product. Our product First Responders Intelligence System (F.R.I.S.) delivers that solution.” [SRID000850 (Vallation web page).]]</p> <p>A lawsuit was filed in 2019 in Illinois by Ryan Dodd, Vallation, Inc. a California corporation, Edward Diaz, and Michael Clancy against Akkelquist, LaFond, and Vallation, Inc., a Wyoming corporation. This is likely why the website no longer names Akkelquist or LaFond (or anyone else).</p>
March 10, 2018	Maman texts Shlomo screenshots of LinkedIn profiles of Camille Sable, Dario Mauti, Francine Khayata	NM00173-NM00175		
March 11, 2018	Shlomo and Maman discuss investigation into Camille Sable, Dario Mauti	NM00175-NM00178		
March 2018	Akkelquist and Maman tell Russell that he needs to travel to Hawaii because his life is in danger. Akkelquist insists that Russell stay at Akkelquist’s home in Hawaii.	<p>Russell interview</p> <p>SRID000013 (Micheletti’s 6/5/18 letter to SR)</p>		
March 20, 2018	Walsh alleges that Steve demanded her Adderall “due to Steve’s addiction to amphetamines.” Walsh alleges she “kept her prescription locked in a security bow with a key. I wore the key around my neck.” Walsh	Walsh responses to SROGS		

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	alleges that after refusing to give him the prescription medication, Steve broke up with her and said “stop it or I will smash your cellphone in your face” and against “raised his arm as if in a motion to strike.”			
Mar 10-21, 2018	Russell, Tara Walsh, Albert Timen, Ryan Micheletti fly to Hawaii to meet Akkelquist.	GA000028-29 SRID000013, 25-29 SRID000322-323		
March 10-21, 2018	<p>Akkelquist repeatedly tells Russell to wait for Maman and his specialized team of individuals to arrive in Hawaii to tell him the details about the foreign threats against him that they had allegedly discovered. Meanwhile, Akkelquist’s wife sells Russell naturopath and MLM products.</p> <p>During this time, Akkelquist tries to convince Russell to assign certain intellectual property rights to Akkelquist’s company Vallation, stating that doing so was necessary to protect Russell’s security. According to Crutcher (who was not present and only heard this from Russell), Akkelquist told Russell that if he agreed to work with the Israelis and provide his IP to Vallation, Israel would provide protection to Russell from the Russians.</p> <p>Akkelquist tells Russell about his experience with the CIA in Nicaragua, FBI Awards, special mission in Guantanamo Bay, U.S Army Ranger, Army Sergeant (giving Russell two army pins allegedly from his service), and his current work with the Hawaii airport dealint with issues.</p>	<p>Russell interview</p> <p>GA000118-GA000153 (Akkelquist produced records supposedly confirming his representations regarding his professional experience)</p> <p>SRID000322-323</p> <p>SRID000817 (“Notes from Bryan Crutcher Interview (8-22-18)”)</p>	<p>Russell has the two pins Akkelquist gave him and we have pictures of them [research needed, or expert].</p> <p>It was during this time that GA tried to steal SR’s intellectual property.</p>	

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	According to Crutcher (who was not present and only heard this from Russell), Akkelquist had not seen his wife in 10 years at the time, and in Hawaii Russell received text messages that his life was in danger.			
March 12, 2018	\$11,000 wire transfer request from DFW to Valerie Quijano	DFW000075		
March 14, 2018	BSecure Invoice for \$8,007.60	NM00161		
March 15, 2018	Shlomo sends Maman a proposal “for the client [they] discussed]	NM00143		
March 15, 2018	Shlomo texts Maman: “Need this on letterhead. Out client is aggressively being followed and stalked by an individual driving a vehicle with the following license plate: (you put the plate and state here) ...”	NM00181	Why is Shlomo telling Maman they need it on letterhead?	
Mar. 16, 2018	Nir Maman arrives in Hawaii with no investigation professionals and does not tell Russell any details about the purported foreign threats.	Russell interview GA000058 (text between Timen and Akkelquist re Maman’s flight)		
March 16, 2018	Micheletti emails Akkelquist, Maman and his brother Zach re “Op: Hand of God.” “Team, It’s been approximately 1.5 months since we started Operation Hand of God and we are seeing good results. With you help, I will put together an official report which we can give Steve. The report date will cover Feb 1-March 15...” The email Includes list of competed, pending, and future tasks for Micheletti, Timen, Shlomo, Akelquist, and Maman	GA000223		
March 18, 2018	Maman emails Shlomo, the letter requesting investigation on the license plate	NM00144		

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March 10-21, 2018	Around the time in Hawaii both Maman and Akelquist represented to Russell that a woman named Celeste who worked for the U.S. Air Force had been following and surveilling him. They showed Russell alleged photographs, detailed information, and background checks on the woman and warn Russell that continued and elevated security was necessary.	Russell interview	Russell provided us pictures that they sent purportedly of Celeste
March 10-21, 2018	They tell Russell that Vladimir Starov of <u>Galfort.ru</u> has targeted Russell because of work he did with the Moscow Subway 10 years prior, and because he was doing business in Ukraine. They also tell Russell that the FBI/CIA have an ongoing counter intelligence investigation regarding him.	Russell interview	<p>Crutcher too says that Maman and Akkelquist told Russell that Russell had angered CEO of Galfort, who Russell did business with in Ukraine. Says Galfort was a security company using Russell's technology in Ukraine. [SRID000815 ("Notes from Bryan Crutcher Interview (8/22/18)".)]</p> <p>Google research indicates that "Vladimir Starov" is (or was) President of Galford OOO, whose website is Galfort.ru.</p> <p>Russell described the situation to us during our 1/15/20 meeting with him: "When Bryan Crutcher said in an interview with your office that there was a 'minor glitch' in Ukraine, I think this is what he was talking about: 3VR was designed for particular application—live video. If you apply it for <i>recorded</i> footage (like governments do), it's a terrible app. It just won't work well. So at one point, George [Akkelquist] told me that his sources tell him that Galfort (Russian company) was mad at me, and that they wanted me to solve a technical</p>

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				problem [the one explained above], and when he described the technical problem he did so in a nuanced way that I wouldn't expect anyone to understand unless they were familiar with 3VR. (Galfort probably took our technology.) George said things about my product, and about Galfort, that no one should have known. It was weird for me that George would even know about how 3VR works, and that it wouldn't work for a certain type of application."
March 16-21	Maman texts Russell representing that the \$3 million intelligence service was "discussed and finalized" the terms of that service in Hawaii in the third week of March ... we further reinforced that verbal agreement the following week in San Francisco ... In that meeting you are the one who proposed being able to pay \$1million up front and securing the other \$2 million against your Uber Stock/shares. I would never have conjured up anything like that and I explained to you that I have never entered into any such agreements based on a security guarantee like that, so you explained to me in detail what that would look like and I ended up agreeing to your terms."	SRID000374 [NM and SR text messages]		
March 20, 2018	Timen texts Maman: "just an FYI. Bryan Crutcher had sent this to Steve today regarding the license plates he requested us to check. Call me when you have a moment. (screenshot of notes of 2008 Dodge)	NM00043		
March 20, 2018	Maman send Shlomo a revised letter re investigation into the license plates stating "Our client is currently being aggressively	NM00149-150		

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	followed and stalked by an individual driving a vehicle with the following license plate Please obtain information regarding the registered owner of the vehicle so we can either report him to authorities or subpoena for a deposition.			
March 20, 2018	Shlomo texts Maman that the car being investigated is a 2008 Dodge owned by an Aurora Celeste: "I did some digging and found some interesting info. This female is 32 years old from San Francisco ...has military background in Airforce...On databases her Social security number is blocked. We only see this with people who take active action to remove the information from databases so she may have either government work or is just obsessed with privacy... We can develop more info if necessary ...this is a soldier's residence Maman: in UT?	NM00184-186		
March 23, 2018	Shlomo sends Maman his expenses for a total of \$43,875	NM00187		
March 20, 2018	\$16,440 (or \$6,440?) wire transfer request from DFW to Valeria Quijano	DFW000075		Many other requests for wires to Quijano from February to June 2018. <i>See generally</i> DFW000072-122.
March 21, 2018	Shlomo's company BSecure sends Maman an invoice for "security services rendered in San Francisco from 2.25.18" and stating they "received your partial payment of USD 10,000.00"	NM00151		
Mar. 2018	When they return from Hawaii, Maman and Akkelquist tell Russell that his life is again in danger and that Russell should move to Redwood City.	SRID000013 (Micheletti's 6/5/18 letter to Russell) Russell interview		Crutcher called this a "false emergency" and said Maman and Akkelquist would create false emergencies and ask for more money.

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		SRID000817 (“Notes from Bryan Crutcher Interview (8-22-18)”)		
March 22, 2018	Tara’s brother Brendan Walsh texts Russell: If you touched my sister ...u fucking bitch... get over here to ny and come face to face... Russell replies: Brendan, what are you taking about?			
March 22, 2018	Tara texts her father and brother Steve and Brendan Walsh; “Brendan and Dad. Steve is not abusive to me. He has never been abusive to me. Please stop texting him Brendan.”	Steve’s text messages (Tara sent a screenshot to Steve)		
March 22, 2018	Akkelquist texts Maman that they have confirmed a meeting with Russell on March 27 th . He says “Ryan will run the logistics.”	CT00121		
Mar. – Apr. 2018	Maman proposes varying numbers that Russell must spend on additional security services, including \$10 million on cyber security, \$3 million, then \$1 million, and lastly stating \$2 million. Ultimately, Nir Maman sends an invoice to Russell for \$1 million with fine print on the invoice for an additional \$2 million	Russell interview SRID000202 (CT707 invoice)		
March 23, 2018	Shlomo texts Maman his expenses until April 10 for a total of \$48,375	NM00187		
March 26, 2018	Akkelquist texts Micheletti “...most things were discussed today. Nir will brief you on progress tomorrow morning. All good.”	GA000031		
March 27, 2018	Micheletti meets with Nir	GA000031-32		
March 27, 2018	Maman texts Akkelquist, “I think I made a huge piece of progress on this case!”	CT00126		
March 28, 2018	Maman texts Akkelquist, “Reconfirm with Steve payment structure of 1m and 2m in the shares and ask him how we begin to set up the	CT00131		

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	2m share contract plz as I didn't discuss it with him.			
March 28, 2018	Akkelquist texts Maman, "Son, had an awesome debrief with Steve more info for you. Having a detailed debrief again tomorrow about the house etc.. he is all in with the program. Key is to secure the funds quickly for all the obvious reasons."	CT00132		
March 28, 2018	Akkelquist texts Micheletti: "Brother, couldn't have enough time with Nir this morning. He will discuss Op plan [sic.] with us as he gets home."	GA000032.		
Mar. 28, 2018	Russell receives a Wire Transfer Request via Morgan Stanley for \$168,000 to George Akkelquist via DFW Metroplex Training Academy, 8205 Camp Bowie West, No. 104, Ft. Worth, TX 76116, Pinnacle Bank, Routing Bank number 111903517	SRID000208 (MorganStanley wire transfer request form)		
Mar. 28, 2018	Akkelquist emails Davalos of Morgan Stanley: "please be advised that Mr. Maman will be sending you his banking info as he is retained by Mr. Steve Russell for agreed upon services starting date Marcy 20 th 2018 to March 20 th 2019.	DFW000009-10		
Mar. 29, 2018	Maman texts Akkelquist, "Simone began analyzing S's incident (phone call with CO) in relation to the backdrop of our identified theory... which agrees is factual. We need to arrange another debrief with S, you, Simone, and me... where she can begin to put the pieces together on the hypnosis initiative and to begin working with him.	CT00134-135		NOTE: Simone is Maman's wife (see CT00287). She is a "certified nutritionist & registered hypnotherapist" per www.simonemaman.com
Mar. 29, 2018	CT 707 Inc. sends Russell a Retainer Invoice for \$1 million (\$500,000 for "Specialized Intelligence and Investigation Services" and	SRID000202 (CT707 invoice)		

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	\$500,000 for “Network Security analysis and re-configuring).” The Retainer Invoice lists installment 1 as \$1 million and installment 2 as \$2 million secured against Russell’s Uber shares and paid out within 2 years of the date of the invoice			
March 30-31, 2018	According to Maman, Maman speaks with Russell on the phone and Russell tells him that he would be heading into the office that day to fill out the payment release authorization for the \$1 million dollars with Davalos of Morgan Stanley	SRID000374 (NM text to SR)		
March 2018	CT707 produced notes that February expenses were \$12,436, March expenses were \$13,886 and hours worked were 30 at a rate of \$600 per hour (\$18,000) for a total of \$44,322	CT00065		
April 1, 2018	BSecure invoice #01663 for \$28,500	NM00164		
April 2, 2018	Akkelquist texts Micheletti “Brother see you tomorrow at 0730. Please bring a check with you for 3k made to Nader Aboualzolof. Memo = service in Mexico. Will explain. See tomorrow.		Investigation and Discovery on who Nader Aboualzolof is and what services he is being paid for.	
April 3, 2018	\$6,500 wire transfer request from DFW to Valeria Quijano	DFW000079		
Apr. 4, 2018	\$1 million is paid to CT 707 Israeli Krav Systems, Inc.at for the purported security services, wired to a Canadian address. The \$1 million is paid by Russell’s accountants	SRID000263(William Capps’ letter to SR) CT00185-186 SRID000374, 379 (NM texts SR) SRID000213 [payment confirmation?]		

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April 5, 2018	Timen texts Maman: “Just was on the phone with Tara to calm her down ... all is good now, just landed into the mess ☺	NM00054		
April 6, 2018	Timen texts Maman: “I’ve got questions from Steve that I need to deliver answers and don’t know what to answer him yet. Maman: Yes achi I spoken with Art ... waiting for a written report, but for now tell him everything is clear and safe. Timen: Ok I’ll transfer the message, he’s also wants to know what tests were done at the house.	NM00056		<p>“Art’s” phone number (identified in NM00055) is 650-868-0500. Google search of phone number leads to “Arthur Lesser”:</p> <p>LESSER, ARTHUR MERIT SECURITY PO Box 7236 Redwood City, CA 94063 Phone: 650-366-0100 Mobile: 650-868-0500 Fax: 650-366-7530 Web:http://www.meritsecurity.com Email: alessar@meritsecurity.com Specialty: COR, SEC, SUR, TSCM License: 23721</p> <p>LinkedIn: https://www.linkedin.com/in/artlesser/</p>
April 7, 2018	Maman texts Akkelquist regarding Russell, “He explained to me that he does not believe that what he is going through is what we assessed on my last trip there (control over his mind)....”	CT00155		
April 7, 2018	Maman asks Shlomo to give him the IP address of where he his while he is connected to the internet at the house [possibly Steve’s? house?]	NM00158		Is this at Steve’s house so Maman can access/hack devices?
April 8, 2018	Maman texts Shlomo \$80,000 wire payment sent to him today	NM00159		
April 8, 2018	Russell texts Nir that he is cancelling “cyber stuff” and that Davalos will arrange for the \$1 million to be wired back.	CT00157 [Maman/Akkelquist txt] SRMSG000041 [Russell/Maman txt]		

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<p>April 8, 2018</p>	<p>Maman texts Timen: Achi call me away from Steve ASAP plz ... Did you discuss anything with him at any point in time relating to the cyber operation we have been planning? Call me when you can Still driving? ... Maman: Achi make 100% sure that Steve is never left alone. If you guys leave the car, one stays with the car. Timen: "Achi, with lots of effort and care I managed to control the situation. I want to be clear that I don't have enough resources to work this magic and maintain our way forward if I'm not compensated accordingly as I made this sacrifice for the team, but this is way above and beyond any standard operation. Maman: I know achi. This entire thing has moved in very unexpected direction. I will call shortly</p>	<p>NM00059-NM00061</p>		<p>Crutcher says Timen eventually confronted Maman because (Crutcher believes) Timen was not getting paid nearly as much as Maman. Timen was only getting approx.. \$500 per day. Crutcher says Timen and Shlomo then turned on Maman and started telling Russell the truth: that there were less security guards than he thought. Crutcher says Timen and Shlomo then tried to get Russell to pay them 150k per month to investigate and retrieve intelligence on Maman and try to get Russell's \$1 million back. Timen and Shlomo told Russell not to share much info with Crutcher, who they said was part of an FBI scheme and should not be trusted. CRTCH000004 [Notes from Bryan Crutcher Interview]</p>
<p>April 8, 2028</p>	<p>Maman texts Micheletti, "Steve's instability is nerve wrecking!"</p>	<p>NM000316</p>		
<p>April 8, 2018</p>	<p>Maman text to Eldar: Hi Eldar. Call me plz Eldar: In elevator with them. Albert can't talk, with client Maman: Step away from them and call me Eldar: Tried Maman: Eldar make 100% sure that Steve is never left alone. If you guys leave the car, one stays with the car.</p>	<p>NM000123</p>		
<p>April 8, 2018</p>	<p>Text messages between Akkelquist and Micheletti. Micheletti: Hey brother ... haven't heard from steve yet. Everything ok?</p>	<p>GA000037</p>		

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	Akkelquist: No brother very bad couple days of terrible self inflicted episodes. Stand by we might be on the tail end of this one. Will keep you posted.			
April 9, 2018	Maman texts Timen to "call me before you're with Steve plz"	NM00062		
April 9, 2018	Maman texts Timen : Sorry missed you achi in mtng [sic] with lawyer. You with Steve yet? How is he? Timen: He called and cancelled. All is good he is still in the apt	NM00063		
April 9, 2018	Maman texts Timen: Did you see Steve yet? I know George had a lengthy discussion with you. You're doing an amazing job, you won't regret it achi. Timen: "... He's really very angry about the fact he doset [sic] have any answers from you or George. He's making it clear that he's conditioning all future work on bottom line answers and documentation given to him by you and George.... I'm holding the fort, but I would make an effort to send him some documented info on where we stand this far to calm his mind.... I have to get back will continue to update	NM00063-NM00064		
April 9, 2018	Maman texts Russell, "you have my word you're in no better hands than with my Dad and me."	SRMSG000001		
April 10, 2018	Akkelquist confirms to Maman in text that Maman owns 8 million shares in Vallation, and that Maman is Executive VP of Cyber and Training.	CT00163-164		Confirmation that Maman owns part of Akkelquist's company, Vallation, and is its Vice President.
April 10, 2018	Akkelquist emails Micheletti and Maman re "Update"	GA000172		

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	Agreed, I briefed Nir on all the latest ... I'm still in constant texting with Steve as we speak... He is coming around and retracting some his earlier statements as he is coming down from a terrible drug induced last 3 days..."			
April 10, 2018	Micheletti emails Akkelquist and Maman: "I spoke with Steve tonight and it sounds like he's getting frustrated with our performance. I know there is a lot of information still to be unfolded as I haven't been in the loop recently. He's requesting we provide a security report that he can use to justify the expenses with his bankers and use it to help repair his reputation. He was very calm and collected when I spoke with him and is grateful for the work we've done, but in his words " things have gotten sloppy. I know there is a lot more to the situation, I just wanted to put this on your radar so we can take control of this situation before it gets out of hand. I think the three of us should sync up on a call before meeting with Steve.	GA000172		Crutcher believes Maman and Akkelquist were dishonest about the level of supervision they were giving Russell. Crutcher says Maman told Timen to tell Russell other guards were around even if Russell didn't see them. Crutcher believed their invoices were way too high for their services. Crutcher says he told Timen via text (perhaps Signal) something to the effect of Russell getting scammed by Maman and Akkelquist. Crutcher says it doesn't take a brain surgeon to recognize that Maman and Akkelquist were manipulating Russell. Crutcher says he once told Micheletti in Russell's kitchen that he had to stop "playing both sides" and start seeing that the situation was "messed up," but Micheletti said he was loyal to Akkelquist. (See "Notes from Bryan Crutcher Interview (8-22-18)")
April 9-10, 2018	Emails between Maman and Shlomo re Bank of Valletta Business Account Statements and investigation into Jonathan Isaac Cohen and an account in the Cayman Islands	NM00145-148		
April 10, 2018	Maman texts Micheletti, "prepping agreement for continuation of service for a year...hopefully I get him to sign it!"	NM000323		

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April 11, 2018	Akkelquist sends to Maman what he says is a text that Akkelquist sent to Russell on April 11 “after a bad Adarol [sic] alcohol binge.” The text is very long, but he tells Russell to stay within the priorities they set, including “- assisting you to regain your posture as a reliable business man who is not CRAZY . . . – assisting you with health issues using good people ie Valerie to keep you from getting into ER records (I need your help and commitment for this goal)”	CT00255		Evidence that Defendants’ looped in Akkelquist’s wife by design to profit off Russell too. NOTE: Valerie Quijano-Akkelquist’s business is called InVogue Health Consultants LLC (DFW000062)
April 11, 2018	Oanu Rosu from Ronen Shlomo’s company BSecure emails Maman and Shlomo that they ran the plates [of the car Russell requested investigation of] and “determined it is registred to Aurora C. David. There are 2 individuals by this name in CA. One is in San Bernadino and is a 74 year old lady and one in San Francisco, Born November 25, 1985. We did research and determined that she is a military person who lived in various military bases.... Her Facebook account shows her date of birth as we have as well as her military affiliation. ... [photos of Aurora David and her social media pages]	NM00133-NM00141		These photos and info on Aurora David were sent to Russell
RUSSELL EXPRESSES THAT HE WANTS TO WIND DOWN DEFENDANT’S SERVICES BUT MAMAN CONVINCES STEVE TO SIGN A \$1MILLION DOLLAR CONTRACT FOR ADDITIONAL SECURITY SERVICES				
April 12, 2018	Micheletti texts Maman and [another person]: Hey guys, Steve has asked me to come up to San Francisco to 301 Mission. He says he wants to wind things down . I’m on my way and will be there in approximately one hour.	NM000125		
April 12, 2018	Maman meets with Russell with Timen present at Steve’ residence at 301 Mission street, Millenium Tower	NM00066		

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April 12, 2018	Maman texts Akkelquist, “things not going good with Steve. Might be time to pull the plug.”	CT00167		
Apr. 12, 2018	Nir Maman provides and Russell executes an Agreement of Service with Nir Maman’s company CT 707 Israeli Krav Systems, Inc. to pay \$200k a month plus expenses for security and physical protection	SRTL204		
April 13 2018	Akkelquist texts Maman that he discussed the following with Russell: “stay on track with Cyber, no need to revisit Russia, FBI IS best dealt with by resuming business and I’m helping him do that with Fris (which will enhance FBI ops/investigations. Promoting him in confidences ie Halifax San Diego Orange co etc... - talking with Jamie when we have Cyber results. – that is my job and I’m doing it. I need his help and commitment to succeed parallel with Cyber/Humin efforts. – I believe that he is not Crazy and I don’t take anything lightly that he tells me. – I believe there is the threat against him isolated now with the hypnosis and baldy. Celest, Louisa, Ochoa etc...”	CT00170-171	Further client input on what Akkelquist is talking about is needed.	Client explained to us during 1/15/20 meeting that “Fris” refers to an app or service of Vallation’s. (Per Vallation’s website, FRIS is First Responder Intelligence System, which “supports domestic and international law enforcement by identifying gangs, radical organizations and international/domestic terrorist groups.” https://www.vallationsystems.com/services). Client remembers something about Akkelquist saying that the client had fallen out of favor with the FBI, and that the client’s involvement with FRIS would help rebuild his reputation with the FBI.
April 13, 2018	Maman texts Akkelquist, “looks like everything is back on [sic] track. Will call in approx. hour and half” and then “Just signed the agreement with Steve for another year.” Akkelquist responds, “Great [thumbs up emoji] happy for you/us.”	CT00172-173		
April 14, 2018	Maman texts Timen: Ok I need to sit with both of you, make your way to my hotel please (Ronen and Timen)	NM00071		
April 14, 2018	Timen texts Maman: Steve is having an episode right now	NM00073-74		

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	Maman: Fuck ... What about? Timen: I'm making my way to him to find out what's going on... Maman: Ok keep me posted achi			
RUSSELL CONTINUES TO ASK FOR A REPORT DETAILING DEFENDANT'S FINDINGS				
April 15, 2018	Micheletti texts Maman and Defendants: "... Steve is meeting with Prism's legal counsel on Friday and is asking for the lightweight report by then. I'm putting something together now, but perhaps we should setup a call with the three of us sooner rather than later."	NM00125		
April 15, 2018	Timen to Maman: "Hi Achi, all is good. Managed to settle him calmly last night and now he's probably still asleep. Timen: Let me know if you have a bodycam in mind or if I should be looking or something that fits the task. Maman: "he wants for the team to move into his old unit he just moved out of, which is fine ... it will help cut down on expenses. Please tell him you guys will be relocating to the unit ... you guys have everything you need there... Timen: Achi I'll not be moving there. It's a mess of a place and has no privacy... I'll move the other two in there once they arrive	NM00074-75		There might have been 2 other potential security personnel coming in
April 15, 2018	Maman and Shlomo texts re investigation into accounts in the Cayman islands, Jonathan Isaac Cohen,	NM00207-209		
RUSSELL GROWS INCREASINGLY FRUSTRATED WITH DEFENDANTS' SECURITY SERVICES AND INABILITY TO PROVIDE A REPORT OF THEIR FINDINGS AND SUGGESTS THAT HE WILL GO WITHOUT SECURITY AS IT MAY NOT BE NEEDED				
April 15, 2018	[Likely Micheletti texts with Russell] Micheletti: Nir is in charge of and is coordinating the security detail. There are a lot of moving parts and the scope of work is being changed per your request	NM00126-128		

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	<p>Russell: Not really. No effort is underway to identify and clear odd folk around last night. My details is 1. Albert is still at Hyatt. And I am kinda locked in my apt. Nir and Ronen both left without comment or question.</p> <p>Micheletti: The new detail is being set up. I know Nir is on a plane right now and can't be reached. I'll reach out to Albert now.</p> <p>Russell: When will team arrive? I think I am just going to go without security and see how it goes ... I have to get back to my life. I want to be clear with you. If another incident happens and no one is around and no perps are at least identified/cleared it's the last day of the protection detail.</p> <p>Micheletti: "I understand and would feel the same way. It sucks that this has caused such a big interference in your life. Since day one, I've tried to help by introducing you to different people and networks that could potentially solve the problem. George and Nir so far have been the most helpful. Ultimately, I want you to be able to go back to a normal life and not have to worry about security. Whatever happens, I will do my best to continue to help and I hope that this next phase will give you the peace of mind and answers you are looking for. I hear you loud and clear about future incidents and will make sure this gets relayed ..."</p> <p>Russell responds: "Ok. Let's just get report done and my \$\$\$\$\$\$ back. I'll give Nir this month to get local team back on track."</p>	<p>NM00077</p>		
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	<p>Micheletti texts Russell's response to George Akkelquist and Nir and states :”he is under the impression he will be getting his money back from the Unit</p> <p>Maman shares screenshot of Micheletti's texts with Albert Timen</p>			
April 15, 2018	<p>Maman texts Timen: Achi... all efforts need to be made to keep him happy and show we are eliminating all gaps</p> <p>Timen: “Achi I'm around him all day once he's out of his apartment. I'll make sure to put the effort on him ... He had another episode last night and we arrived immediately and no one was there ... what else is expected?</p>	NM00077-NM00078		
April 16, 2018	BSecure Invoice # 01646 for \$51,863.91	NM00162		
April 17, 2018	<p>Micheletti text to Akkelquist and Maman: Hey guys, should we setup our team call? Last time Steve messaged me on Sunday, he wanted a report by Friday and to try and get his money back. I want to make sure we have properly dealt with his expectations and if we need a report, then I'll have to start cranking it out.”</p> <p>Maman responds with a screenshot from Russell stating: “I don't need any deliverables from you. You can simply refund the \$1M payment for “Cyber” and whatever portion of the \$200k is for this month is left ...”</p>	NM00129		
April 16, 2018	Shlomo's company BSecure emails Maman an invoice for services rendered in San Francisco	NM00152, NM00156		

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	from 3/22/18 to 4/15/18 and an invoice for the research on A. David			
April 16, 2018	BSecure Invoice #01664 for \$41,780	NM00165		
April 17, 2018	BSecure Invoice # 01665 for \$5,500	NM00166		
April 17, 2018	\$18,000 wire transfer request from DFW to Valerie Quijano	DFW000078		
April 18, 2018	Maman texts Timen: Achi call me ASAP ... how's everything How's Steve? ... All is well, we are "checking" for him few things right now.	NM00079		"checking" shows they are just trying to appease Russell rather than definitively telling him there are no active threats
April 19, 2018	Akkelquist books a flight to see Steve on April 22-28, 2018	GA00038 (text messages to Akkelquist)		
April 19, 2018	Shlomo's company BSecure send Maman an invoice for the "research projects: Ochoa, Franklin and Cayman. Invoices #1663 & #1665	NM00153		
April 19, 2018	Shlomo texts detail of expenses for sum of \$80,706: "When you transfer the money, transfer \$75,756 separately for security and \$4,950 for investigation. Shlmo: I'll call soon. It was a hard morning with the client.	NM00209		
MAMAN ATTEMPTS TO MANUFACTURE SECURITY ISSUES TO REPORT TO RUSSELL				
April 18-20, 2018	Maman texts Shlomo following up on investigation on the "Cayman accounts"	NM00210-212		
April 19, 2018	Maman texts an unknown person "Find out for me please if this guy works for any organization in your home country: [screenshot of Christopher Ochoa linkedin page] ... Good guys or gad guy Unknown Person: Ok ... What kind of business? ...any criminal connections?	NM000114-NM000116 (WhatsApp messages)	**Need to find out why these texts were redacted (might be	***Person's name and some texts are redacted in Maman's document production **Zeev told us that they were investigating the wrong Chris Ochoa in New York

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	<p>****[[[THE NEXT TEXT WAS REDACTED IN THE DOCUMENT PRODUCTION]]****</p> <p>Maman: Glad to hear you guys are ok. I have information that he is an agent for Russia...not sure if gov or criminal. His business information is fake, but he has several million dollars and on LinkedIn this is his business operations [LinkedIn Screenshots]</p> <p>Unknown Person: Fraud ...Ok I'll get information for you [...]</p> <p>Maman: October 21, 1974 is Ochoa's date of birth...I need to know if he has any connections to Russia at all plz</p> <p>Unknown Person: Ok</p>		<p>good for us if they refuse to produce and we get an adverse inference?)</p>	<p>According to Micheletti's notes (GA000232), Russell said around 2/9/18 that he believed Ochoa was either an Israeli, US, or Russian agent, and Akkelquist said not Israeli or Russian.</p>
April 20, 2018	<p>Unknown person to Maman: I sent all information to my link Need few days to check [[[[REDACTED PORTION OF TEXT]]]]</p>	NM00117		
April 20, 2018	<p>Albert Timen texts Maman that Russell "took apart a lamp's decorating head on his own and gave it to us to inspect since there are "hidden things devices" inside. He asked us to cut it through and discover what's inside." Maman responds: "When ever anything occurs, you need to let me know right away. I can't be in a position where he calls me to discuss an occurrence and I sound like I don't know what happened. Those are things that make him question us because it shows him there's not real organization or effort on our part." Timen: "Achi, Ronen told you about the episode yesterday. All that he added when we picked him up later on was that he took out of his pocket that thing and gave it to us to cut it for him. Not sure what I suppose to tell you.</p>	NM0001, NM00080-NM00090		<p>Crutcher also believed Maman and Akkelquist were dishonest about the level of supervision they were giving Russell. Crutcher says Maman told Timen to tell Russell other guards were around even if Russell didn't see them. Crutcher believed their invoices were way too high for their services. Crutcher says he told Timen via text (perhaps Signal) something to the effect of Russell getting scammed by Maman and Akkelquist. Crutcher says it doesn't take a brain surgeon to recognize that Maman and Akkelquist were manipulating Russell.</p>

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	<p>The fact he calls you means that he plays with all of us. He needs a psychiatrist.</p> <p>No achi no one told me about it... the first I heard of it was from Steve. Point is anything that makes an "issue" communicate to me what is going on so I can be prepared for a following up conversation with him. It doesn't matter what Steve "needs" achi ... he's our client and we're here to help him through what ever he's going through. See you in a few days</p> <p>Maman: Record Steve please as soon as you're with him voice recording</p> <p>Timen sends Maman photos of light switches with casing removed, hinges removed, knives, tools and parts of Russell's apartment, Steve kneeling on the floor looking under a drawer with another man doing the same, photos of the top of a lamp</p> <p>Timen: He's now at the apartment as he didn't want to leave. We went down to find out who are his neighbors on top and bottom which I doubt we can do without making an official investigation. There is a privacy breach if we try it otherwise. He keeps taking things apart randomly and when we try to take his mind away he's thinking we are becoming hostile...</p> <p>Ok there are many more pictures documented but there is no reason to send all. I advise that we maintain a plan forward that is covering all bases for us involved.</p>			<p>Re green highlights: does Maman think he and his team are qualified / entitled to charge Steve millions of dollars for purported investigative services even if really what Steve "needs" is a psychiatrist? Does he think he's entitled to bill a client millions of dollars for the work a psychiatrist should be doing?</p>
April 20, 2018	Maman texts Shlomo " Record Steve please as soon as you're with him voice recording "	NM00212		

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	Shlomo: The situation is not good ...he is calling the police.... He's distorting reality with what he is saying to you.			
April 20, 2018	Shlomo texts Maman: Cayman account was closed jan 2017 closed for inactivity with no money in it... typically it takes 6 mo to a year for that to happen. I asked for cost to verify what was the account prior to that. Still checking if he has other accounts there.	NM00212-213		
April 20, 2018	Russell tells Maman he found suspicious items in home, and Maman tells him to ziplock them.	SRMSG 6-7		
April 21, 2018	<p>Maman texts Akkelquist and Micheletti messages from Russell from that morning: "Albert; pack him up, I want him out of the city (far away) for the weekend ... make it feel like a vacation getaway</p> <p>Only you and Ronen go, the other two stay behind to "conduct surveillance" on his unit, neighbors, etc.</p> <p>Ryan: please help Albert find/coordinate a place to take him too. Hopefully he can just relax and sleep until Dad and I get there Monday morning. We need to get him to work ASAP ... he's bored out of his mind and losing himself with all he has to occupy himself.</p> <p>Maman then sends screenshots from Russell where Russell states: No progress after your talk. The set of new faces and helicopter were not vetted. No visual sweep was don't [sic] of my house . The guys refuse to do even basic</p>	NM00130-132		Maman puts "conduct surveillance" in quotes implying they are just pretending to do so

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	house work like removing and replacing suspect fixtures... My metric of success is simple, they need to stop these events and/or at least identify and follow the threat. I am just not seeing any action from them other than....”			
April 21, 2018	<p>Maman texts Russell: Steve, please stop all of this! You’re not helping your own situation!! There is nothing in any fixtures I can assure you of this! We are trying to put together a report for you to clear you but your actions now are going to cause others to contradict our report! The opposition is winning right now. This is what they have caused... for you to be so paranoid and suspicious of everything that you start tearing down your own life. YOU NEED TO STOP THIS BEHAVIOR RIGHT NOW....</p> <p>Steve, Albert and Ronen will not give you anything in writing and they will not communicate anything to Dan or Brian. Only my Dad and me will provide you with written reports, and we will discuss those reports with you when we arrive on Monday.</p>	SRMSG000011 SRMSG000014		
April 21, 2018	Russell texts Maman: I am sorry Nir. I am officially terminating our engagement. This does not work for me. Please return all unused funds.	SRMSG000017		
April 21, 2018	Maman texts Akkelquist, “Steve has gone off the deep end.. I’m not getting through to him he seems to respond better to you... please call him today and order him to authorize the invoice I submitted to Davalos today. “ and then “I’m going to send Davalos an invoice for 6 months of service in advance which is \$1.2	CT00183-184		

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	million...tell Steve he needs to authorize it so that we can work without worries to get him his report.”			
Apr. ?? 2018	Shortly following the wire transfer, Russell learns that George Akkelquist lied about his FBI and CIA background, that Nir Maman had made similarly exaggerated claims, and both had lied about the size and nature of their security services.	Russell interview	Where/How did Russell learn Defendants lied about their backgrounds?	NOTE: Akkelquist produced certain docs supposedly confirming his background/experience
Apr. 21, 2018	Maman represents to Russell that, “[t]here are no unused funds” and that all the money Russell paid was put toward requested services. Maman further threatens, “[l]astly, I’m telling you this right now Steve, you are driving yourself to the ground, you’re making all the wrong moves right now, you are walking yourself into the lion’s den.” Maman also states that Russell will “need a final report from us to document the last three months plus everything we factually found for you,” but refuses to release any report or accounting without full payment.	NM00228-230		
Apr. 21, 2018	Maman texts Micheletti, “If Steve contacts you tell him you can’t speak with him until Dad and I arrive. He terminated our agreement, I gave him an ultimatum to negotiate a proper resolution of all outstanding invoices for a favorable report”	NM000342		
April 22, 2018	Maman texts Akkelquist, “Sending Michael bono \$50k retainer to rep us on this, he is working on it full time as of now...”	CT00188		
April 22, 2018	Maman tells Timen and Shlomo to send him payment information, amounts and expense	NM00091-NM00097		

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	<p>owed and says “plz both of you send it to me in text message not email, need it all ASAP today Timen: Is there any news regarding situation with Steve? Maman: He has calmed down, I will be discussing the situation with him tomorrow but chances are that I’m wrapping up this detail as of tomorrow ... he’s too unstable ... Maman: Achi in the meantime you and our other guy can make arrangements to fly home ASAP... We’re done with Steve Timen: Shit!! I’ve pre-paid my hotel till the end of the month Maman: Cancel it achi... things are not going good with Steve ... Timen: Are you and your dad [Akkelquist] coming here to meet with him? Maman: Yes... him and his attorney. There is no more agreement no matter what, he’s asking for money back Timen: Fuck!!! Maman: Yup Timen: I’ll send the expenses and salary and will include it all as it was already charged Achi. He’ll have to finish up to date all that was accounted Maman: Don’t know what I can do about anything beyond tomorrow achi ... I’ll have to get through meeting with him over the next two days and see how things get resolved ... Get yourself home, and cease all cmms with Steve pls</p>			
April 23, 2018	Unknown person text: Hello Ahi. Your request received an answer. They found out and asked	NM000118	**Need to find out why	Persons’ name is redacted

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	<p>who they could for this person. This persona had criminal links on the Balkans in the sphere of fraud, in rather narrow circles. In Russia, this name was recorded in the southern region. The Chechen Republic and the South of the Russian Federation. In communications with intelligence agencies there is no information, but the possibility of cooperation is not ruled out.</p>		<p>these texts were redacted (might be good for us if they refuse to produce and we get an adverse inference?)</p>	<p>***Zeev mentioned that they were investigating the wrong Chris Ochoa</p>
<p>April 23, 2018</p>	<p>Timen sends Maman Expenses from April 10 to April 23 = \$19,175 and 12 hours worked for a rate of \$700 per hour = \$8,400 for a total balance of \$27,575</p>	<p>NM00098</p>		
<p>April 23, 2018</p>	<p>Maman texts Russell, "Steve...you agreed to everything that has been provided to date. Everything provided to date, has been based on your requests. We have gone above and beyond for you Steve, you've been surrounded by people all around you that do not believe you, think your crazy and want you committed. We are the only ones who stuck by your side for the past three months. You are clueless about the things you believe you have figured out."</p>	<p>NM00240</p>		
<p>April 23, 2018</p>	<p>Maman texts Russell: "My Dad and I came into town to meet with you and attorney. As per your request... We most certainly will not be forwarding any information to you via any modality given the contention on our agreements that currently exists... we have no problem with showing/sharing with you some of the info in person... Given that you are contesting our business agreements, I will</p>	<p>NM00234-235</p>		

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	suggest that we meet as we agreed to first “resolve” the legal “issues.”			
April 23, 2018	CT707 produced notes that between April 10-23 there were 12 hours for a rate of \$700 for a total of \$8,400 and expenses of \$19,175	CT00065		
April 23, 2018	\$22,000 wire transfer request from DFW to Valeria Quijano	DFW000077		
April 23-24 2018	Maman and Russell text regarding returning the money and involving attorneys. Russell: Nir I really need a copy of the contracts and the draft report Ryan has been writing before I make any decisions ... Since there is no contract for the \$1m and you verbally agreed to return it, please go ahead and do that. Beyond that I am terminating the 200,000 contract of April 12 for breach and non-performance. I won't be meeting or speaking with you until you remedy	NM00242-NM00243		
April 24, 2018	Maman texts “Steve It was 3 million dollars not 1, 1 was the first installment payment. Any yes there was an agreement that will be confirmed by several sources.... You're not making a wise decision with any of this Steve.” Maman represents “Any money you have paid has been for services you requested and that has been delivered to date.”	NM00242-246		
April 25, 2018	Micheletti asks Akkelquist via text if he sent Russell a photo of Akkelquist (photo included in text message), to which Akkelquist responds, “No, he sent it to you?”	GA000041-42		
April 26, 2018	Akkelquist texts Micheletti: “...Thx for considering trying to help me with Steve..”	GA000042-43		

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	Micheletti responds, "You and I are on the same page and I'll give Steve a call tomorrow. We will get through this with peace and integrity."			
April 26, 2018	Maman texts Timen "Steve is telling us that you are still working for him" Timen: What?? Didn't you send us home? Maman: Lol... not according to him! And he's not paying of our outstanding bills Timen: Did we get the payment Achi? Maman: I will be paying you guys out of my pocket	NM00101		Maman is not telling them about \$1 million dollar wire transfer and claims he is paying them out of pocket
April 27, 2018	Russell texts Maman: Hey Nir, This isn't going to be a good time. Too many things I am dealing with. ...Is there a good time tomorrow. Or alternately I can send someone to bring you an NDA in foster city and facilitate a more frank convo that way.	NM00247		
April 27, 2018	Maman texts Akkelquist, "remember when we were in Nomlaki, our deputy chief (under Erik) his name was Brian...do you remember his last name and do you have any contact info for him by any chance?" Akkelquist responds, "Brian Bates" and sends link to his contact info.	CT00205		
MAMAN BEGINS GATHERING EVIDENCE TO USE AGAINST RUSSELL				
April 27, 2018	Maman texts Timen: "please put together and send me every single pic you have of Steve behaving irrationally and tearing apart his place. I will call you tomorrow to explain the situation.	NM00103		
Late Apr. 2018	Bryan Crutcher is hired fulltime via his company, Crutcher & Associates, to	Client interview		

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	provide 24/7 investigative, security, and concierge services to Russell. Crutcher takes over for Maman and Akkelquist, and begins to investigate their prior activities.	Notes from Bryan Crutcher Interview (8/22/18)		
April 30, 2018	<p>Maman texts Timen: Ok, since Steve is not paying me for April, I have to get an overdraft of my business account to cover paying you guys ... please Send me all the other pics/vids you have on Steve ... it's important Our attorney needs those right away in order to finalize a report that will protect us</p> <p>Timen: Not a problem Achi, I'll gather all I have and send it to your email. It's sad it ended this way and we definitely need to be fully protected.</p> <p>Maman: Achi he's a nut beyond. It really is too bad ... we tried everything to honestly help him.</p> <p>[...]</p> <p>Timen: I know Achi I was there from day one and been through all his phases and moments. It's beyond our help.</p> <p>Maman: "I will get us to an early happy retirement achi!"</p> <p>Timen: "You have my full support Achi. We shell redeem our losses from this last one.</p>	NM00103-106		<p>May be used as support of Defendants' narrative that Steve was the problem</p> <p>Next message talks about another projects and how it "should pay us real good"</p>
April 30, 2018	<p>Maman texts Timen: I'm just praying their baby stays safe (from him and Tara!)</p> <p>Timen responds: It's a problem as both parents are not a square case.</p>	NM00105		Maman suggesting both are a danger to Evie
April 30, 2018	BSecure Invoice # 01666 for \$31,474.47 (billed to CT707)	NM00167		

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May 2018	Checks from DFW to Nadar Abwazoloff on: May 7, 2018 - \$3,000 May 10, 2018 - \$3,000 May 13, 2018, \$3,000 May 19, 2018 - \$3,000 May 16, 2018 - \$3,000	DFW000089-DFW000090		
May 1, 2018	<p>Akkelquist asks Micheletti to help him draft a text to Steve regarding “getting back the \$1m wired to Nir on April 4.” Akkelquist’s first draft reads as follows (in pertinent part):</p> <p>“I am concerned about you, specially that I know that solid information confirming the threat to you keeps on coming and Nir gave me enough last week in person for me to beg you to find a way to see this information with Nir and Ryan, the sooner you can. Based on the above, I know you are not crazy. The investments you made are now paying off paving the road to solutions and a factual report that I for one can put my name and signature on. Steve, I can't send you any of this information, but please get it from Nir with Ryan present. The above is my advise. Blessings. G”</p> <p>Micheletti revises the draft as follows (in which final form Akkelquist sends message to Russel):</p>	GA000043-GA000046		Akkelquist’s warnings about threats, and “solid information” supporting those threats, flies in the face of Akkelquist’s assertion in his settlement conference brief that he was only ever retained to repair Russell’s reputation.

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	<p>“We continue to receive alarming reports through the intelligence network about the characters we’ve been investigating. I believe this will lead to a favorable report as it confirms the existence of threats that you have been facing. This info needs to be shared in person and cannot be shared in a text.”</p>			
<p>May 1, 2018</p>	<p>Russell replies to Akkelquist: “Thank you George. I know you are not an enemy and appreciate the ongoing help. ... I’ll drop Ryan and Nir a line. Ideally I’d like Ryan to come and present a report on past activity and any recent findings to me in person in SF. Ideally I’d like that to be in writing and include whatever supporting documentation is required. A high level summary from you or Nir over a secure channel today would also be appreciated if any threats or intel are timely.</p> <p>Akkelquist replies: Steve, thank you for the kind words and care. Steve, I wish it were as simple to use any medium but in person to disseminate such sensitive info. I’m encouraged that you will drop a line to Ryan & Nir and take it from there. I will help if you wish me to ask them to come to meet with you and present you with the evidentiary factual info. As far as I know it was timely last Friday per my last urgent text to you and when Nir left I couldn’t be updated other than info still coming.</p>	<p>GA000103-104</p>		

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May 1, 2018	Shlomo's company BSecure sends Maman an invoice for services rendered in San Francisco from 4/16/18-4/22/18	NM00154		
May 2, 2018	Timen emails Maman "As you requested I have attached the pictures I had on my phone regarding Steve." Attached are pictures of Steve on a ladder taking something from the ceiling and pictures of a lamp head	NM00008		Maman gathering damaging "evidence" to be used against Steve
May 2, 2018	Timen texts Maman: Achi, I send you all the pics I had of what you requested to your email address. Let me know if you got it or not.	NM00107		
May 3, 2018	Maman texts Shlomo re their "call today: Ochoa : 1. Report from previous investigator: you stated that you believed the report to contained false investigative information and that the investigator may have mixed up Ochoa with someone else. – please provide a report indicating what parts of the past investigative report is false. Project Switzerland: my father in: -David Dadoun -His company name: Sterling securities -USB hire d him/his company to do all their currency trading -He set up hid –sic] office there and hired staff to run the operation... " Shlomo: Great	NM00218-220		
MAMAN HIRES AN ATTORNEY TO PUT PRESSURE ON STEVE FOR FURTHER PAYMENT				
May 7, 2018	Maman texts Timen: Achi, some important questions my attorney needs answered to please: 1. Does your company hold a security license for NJ and NY to provide	NM00108-109		

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	<p>physical security? 2. Text me the first and last names of all the guys who were on the detail for Steve in NJ in Feb plz.</p> <p>Timen: "... As for the Security license we are fully licensed in NJ, and some of the guys who subcontracted in NY are registered guards there as well with license to carry.</p>			
May 7, 2018	Maman texts Shlomo that w \$52,481.15 wire payment was sent to him this morning	NM00221		
May 14, 2018	Akkelquist emails Mary Jane Bull of DFW "please forward my Son Nir your banking information ...Nir is going to wire me some money."	DFW000005-06		
May 17, 2018	Maman texts Ronen for 1) an accounting detailing the \$80,000 Maman paid him (what was spent so far and what is left), all the information; 2) all information gathered on Ochoa, and 3) What is the timeline to get things moving regarding Switzerland/USB	NM00222		
MEANWHILE, TARA'S MENTAL HEALTH ISSUES BEGIN TO ESCALATE AND RUSSELL'S STAFF WITNESS TARA SURREPTITIOUSLY PUTTING PRESCRIPTION DRUGS IN HIS DRINKS				
April 29, 2018	Tara texts Russell quoting article: Couple's therapy can be an effective way to develop strategies for coping with [bipolar disorder together ...Indeed caring for someone who has a mental illness can be more draining than caring for someone with cancer..."	Texts from Steve's phone		*Tara conceding she has a mental illnesses despite her responses to Form Interrogatories saying she didn't suffer from any mental injuries prior
May 2018	Abby observes Tara putting pills in Russell's drinks. Bryan Crutcher observes a white chunk floating in Russell's wine glass and later learned Tara put her prescription medications in his drink.	<p>2018-07-09 FILED Declaration of Bryan F. Crutcher</p> <p>2018-07-09 FILED Declaration of Abrehet Tedla</p>	Crutcher declaration: "Other staff members such as	

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	Abrehet Tedla approaches Crutcher about it and she tells him that her and Dan Ochoa see her do it all the time	8.29.2018 Transcript of Proceedings - SF Family Law Matter	Darwin Lee, Dan Marks also expressed similar concerns to me” – possible friendly witnesses	
May 15, 2018	<p>Tara had an episode where she yelled at Abby and accused her of trying to take her baby away and kidnap her although Abby was taking Evie on a walk with Tara’s permission. Later that day, as Tara was yelling, Evie fell off the bed and had a bump and bruise on her head. They took Evie to the hospital.</p> <p>Steve told Bryan to move Evie’s crib from apt 55D to 10G because they were going to paint the apartment. After finding out, Tara “became irate and irrational” and “lashed out at [him] via text message ...” ¶2-3. Crutcher Decl. (Also witnessed Evie’s injury from fall)</p>	<p>2018-07-09 FILED Declaration of Abrehet Tedla</p> <p>2018-07-09 FILED Declaration of Bryan F. Crutcher</p>		
May 19, 2018	<p>Text message from Tara to Russell: “You physically assaulted me March 4 and I was smart enough to save pictures of all my bruises.” Russell replies, “Whatever” Tara: “you do not want me to call the police and to be arrested.” ... “Can you please pick up your phone... I am very close to calling the police.</p>	Texts from Steve’s phone		Tara threatening Russell

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	<p>Text from Tara to Russell: “The reason I have been so shaken up is bc I have PTSD ... From living with you and what you have done – most recently when you secretly injured me while I was recovering from child birth... I should have left then but I’m a victim of domestic abuse I can go on its all documented, I have a lot of allies ... People do not like men like you – men that hurt women to feel powerful ... on top of that you are totally psychotic, a drug addict, and an alcoholic. ... Tell me you are not coming back here or I will call the police.” Russell replies: “I’m fine with you calling the police... You need help.”</p>			
May 20, 2018	<p>Text from Tara to Russell: “Instead, when they become reactive, take the time to listen without pointing out the flaws in their argument. Try not to take it personally. If the person does point out something you could improve or have done wrong, acknowledge their point, apologize, and suggest a way you can improve on the matter in the future. If the individual feels like they’re being heard, the crisis is less likely to escalate. However, if the conflict arises to the level where an individual is throwing a full-on tantrum or threatening you, it’s best to walk away and resume the conversation when they are calmer.”</p>			<p>*Tara conceding she has a mental illnesses despite her responses to Form Interrogatories saying she didn’t suffer from any mental injuries prior</p>
May 21, 2018	<p>Tara texts Russell re “LPPHC Partial Hospitalization Program and Intensive Outpatient Program.” Russell replies, “Great. Did you talk to your primary care physician about this?”</p>	<p>Texts from Steve’s phone</p>		<p>*Tara conceding she has a mental illnesses despite her responses to Form Interrogatories saying she didn’t suffer from any mental injuries prior</p>

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May 21, 2018	Russell to Abby text: “Abby very sorry about tonight. Evie needs you and Tara has agreed not to interact with you outside of apologizing for her actions... Please come back and take care of Evie. Even if we can’t make it work long term I will make sure you are taken care of.”	Texts from Steve’s phone		
May 21, 2018	Russell text to Dr. Gopal: “Dr. Gopal this is Steve Russell. Thank you for the time today. While Tara was at your apt the Nanny shared with me that Tara had put her Serouquel in my wine on a number of occasions and a couple of other things she felt I needed to know. I am not particularly angry about it, but when I brought it up to Tara she did not handle it well, fired the nanny, and may reach out to you. I don’t see it as an emergency and Evie will be fine without the nanny for a night, but if you need to reach out for any reason this is my contact info.	Texts from Steve’s phone		
May 22, 2018	Walsh texts Dr. Abilash Gopal re the drugging: “...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 ...So Steve is saying I’m having another episode- but I am totally calm, not emotional....”	Exhibit I to Walsh Declaration filed in SF proceeding on July 10, 2018		*Tara conceding she has a mental illnesses despite her responses to Form Interrogatories saying she didn’t suffer from any mental injuries prior
May 23, 2018	Nir. I am again asking to return the money wired to you. We have no contract and I have no work product.	NM00248		
May 23, 2018	Russell texts Akkelquist: “Nir has still not returned the \$1m nor provided me with any	GA000104		

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	work product. Similarly, Ryan has not provided any report or other work product. I'd like your help in encouraging both to do so."			
May 28, 2018	Russell texts Maman: I've reached out Ryan with offer to settle this and part as friends. I think it's in everyone's interests that you seriously consider it and do so pretty quickly	NM00248		
May 31, 2018	Akkelquist texts Russell: Steve, Brother. This is Surah 103 "Al Aser" Minor correction on the "teaching of the truth" correct translation in context is 'reminded each other to stand fast for Truth, Patience and constancy in righteousness.' That was the guideline on witch [sic.] we decided to go about your affairs in New York last Feb ... It is still my guidance in dealing with you ... Steve I have never changed with you, and have been very patient even when you hurt me after I've trusted you. Sending my partial picture of Ryan witch [sic.] I never gave you permission to disseminate... You may think it's a joke. My safety and family's are not a joke. Neither is yours or your family that I still hold all events from Feb to 10 May in the outmost [sic] confidence. You hired me to be your advisor for security and help you prepare your new branding into the business world fee of the events of 2016 and most of 2017. I did my best to deliver on my promise to not fail you. Your last text ordered me to retrieve "your money from Nir" and if I can't then we are parting	GA000107-110		

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	<p>ways” you knew in advance that you are giving me a task outside the scope of my work; I’m not a law firm and not an asset recovery company. You just wanted a reason to fire me witch [sic.] you did. Please consider the above with the context of Surah 103 and reflect on your actions with me and mine with you. I hold your events, failures and successes in confidence and I never badmouthed you nor defamed you ... Steve you can think of me thinks like I’ve heard from people “scammer, con artist, and lastly Tom Lafanier wanting to make sure “you are not being taken advantage of” Steve you are not a baby, helpless. You are a smart man and you know exactly what you’re doing. I still consider you as a friend and will never hurt your reputation....</p>			
June 2, 2018	<p>Akkelquist texts Maman what he says is a text that Russell sent to Akkelquist: “I terminated the security agreement bc Nir was in breach and actively countermanding my orders. The annual nature of the agreement was not clear.”</p>	CT00244-245		
June2-4, 2018	<p>Maman begins asking Akkelquist for written evidence of Russell’s Adderall, drug, and alcohol abuse, and written evidence re Tara’s unhappiness with Russell.</p>	CT00241-275		
June 3, 2018	<p>Maman texts Shlomo: “... You mentioned that the report Steve received on Ochoa from the other investigator (the report I sent you), was wrong, that it was on a different Chris Ochoa. You Also told me</p>	NM00225		

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	that Chris uses his brother's identity. 1. Please indicate for me how you know the other investigator got the wrong Ochoa. And 2. Please indicate for me everything you have that shows Chris uses fake identities. Thank you.			
June 4, 2018	Russell texts Akkelquist asking if it is Akkelquist's "intent to keep or return the retainer provided for you 2018?" Akkelquist goes radio silent	GA000111		
Jun. 4, 2018	Nir Maman retains attorney William Capps, who sends threatening communications to Russell, including a letter demanding \$2.4 million, referencing false allegations of "substance abuse," "a history of using powdered cocaine from a dealer source whose name has been identified," "having sex with prostitutes," and false allegations of abuse by the mother of Russell's daughter.	SRTL263-266		
June 4, 2018	Tara flees to airport with Evie without notice, Crutcher follows her, and Tara returns to apartment voluntarily.	2018-07-09 FILED Declaration of Bryan F. Crutcher, ¶¶12-13 and Ex. A (police report).		Crutcher's team was prepared to take Tara to airport per her request, but without notice Tara fled with Evie in an Uber. Crutcher told Russell, who told Crutcher to follow them to make sure they got on plane safely. Crutcher jumped in the same Uber. In car, Tara called her parents, who seemed to advise her to go back to apartment. Tara also called her doctor and told him she knows he believes she has severe borderline personality disorder and that every problem in her relationship with Russell is her fault. They flagged down police officer to make record of situation. Tara

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				said she was not victim of a crime, and said she wanted to return to apartment.
June 5, 2018	Maman texts Shlomo re report on wrong Chris Ochoa and Ochoa's fake identity stating "...I need answers to the above questions [regarding Ochoa] urgently"	NM000224-225		
June 2018	Ryan and Ronen in various writings all deny and/or distance themselves from Nir Maman and George Akkelquist.	SRTL011 [Micheletti] SRTL013 [Micheletti] SRTL243 [Shlomo]		In the 6/5/18 letter to Russell in response to receipt of the Capps letter, Micheletti writes that he's "shocked and angered by the letter and would like to distance myself and my firm from its claims in the strongest possible terms." Micheletti writes that he was the primary note keeper on all interactions between security team and Russell. Micheletti writes that Akkelquist and Maman both independently claimed to verify and communicated an active threat against Russell with specific and credible details, and says on multiple occasions Russell was instructed to leave his home (e.g., to Hawaii and to Redwood City) because of specific concerns. Micheletti writes that it's "extremely unprofessional and to my knowledge flatly untrue" that "drug use or mental illness was relevant or even witnessed." Micheletti also writes that the claim in Capps' letter that security team found Russell to be a threat to Tara is false and contrary to Micheletti's observations. Micheletti writes that Akkelquist and Maman communicated that Tara was engaged in active attempt to discredit Russell and take his child from him. (SRTL013).

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June 6, 2018	\$32,000 wire transfer request from DFW to Valeria Quijano	DFW000084; DFW000118		
June 14, 2018	Maman texts Shlomo asking him to find out who this telephone number belongs to (916)-975-4737	NM00226		
June 12, 2018	Akkelquist emails Mary-Jane Bull (of DFW), sends her Houssam El Ayle's W9, refers to him as "Sam," and says "he will be doing work with me."	DFW000003 (email) DFW000064 (W9)		
June 27, 2018	\$11,000 wire transfer request from DFW to Valeria Quijano	DFW000082, DFW000112		
July 9, 2018	Declaration of Abrehet Tedla is filed in Russell's SF family law action.	2018-07-09 FILED Declaration of Abrehet Tedla		Key excerpts: Evie was very well taken care of in SF. Russell retained one of the top pediatricians in the city. Never saw Russell abusive to Tara in any way and does not believe that to be his nature. Russell was always patient and kind to Tara. Tara would yell and call Russell names. Had never seen someone deal so well with such abuse. Asked Crutcher to remove him from situation at times. Tara on May 15 was irate, accused Abby of trying to take Evie away. Tara told her Evie rolled off the bed accidentally and hit her head. Abby saw the bump and bruise. Tara put drugs in Russell's drinks and asked Abby to lie and tell social services that Russell was a bad dad and bad person. When she refused, Tara mistreated her and fired him. Saw Tara drug Russell on two occasions, and Tara told her and Dan Ochoa she did it "all the time." Russell seems genuinely committed to helping Tara. Russell is a good person who provided everything

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				Tara and Evie needed. Russell agreed to let Tara and Evie visit Tara's parents in New York if Tara would agree to stay with her parents and return in 2-3 weeks. Tara agreed. Abby flew with Tara to New York and flew back the next day. Abby did not expect Tara to stay in New York.
July 9, 2018	Declaration of Bryan F. Crutcher is filed in Russell's SF family law action.	2018-07-09 FILED Declaration of Bryan F. Crutcher	Interview Darwin Lee and/or Dan Marks, who supposedly believed Tara was a threat to Russell?	<u>Key excerpts:</u> observed Tara as "irate and irrational," "highly agitated and verbally abusive." Tara cursed, cried, and yelled in belief that Crutcher and Russell and Abby were planning to kidnap Evie. Observed bump on Evie's head after she fell off bed under Tara's watch. Rode with Tara in Uber when she suddenly fled with Evie on June 4; overheard her tell her doctor on the phone that she knows he thinks every problem in her relationship with Russell is her fault.(Police report re car ride attached to Declaration.) In May, he observed white substance in Russell's wine; later learned Tara put her medication in his drink, and advised her not to do that again. Russell never presented threat to anyone, and never even disrespected Tara. Russell shows amazing empathy, patience, and support for Tara under "verbally and mentally abusive" conditions. Feared for Russell's safety very often. Abby told him she feared Tara was drugging him, and that Tara told her and Dan Ochoa she does it all the time. Tara frequently harassed,

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				antagonized, cursed at, yelled at, and belittled Russell (sometimes hours on end, sometimes in front of Evie) as if attempting to cause a violent reaction from him. Darwin Lee and Dan Marks (also on his staff) expressed similar concerns to Crutcher. Abby would ask Crutcher to remove Russell from situation for his safety. Tara would often say “I am mentally ill.” Russell did not have a gun.
July 18, 2018	Nir Maman’s attorney, William Capps sends a settlement letter to Russell stating that CT 707, Inc. would release all claims upon payment of \$1,494,000.	SRTL267-268		
July 24, 2018	Declaration of Ronen Shlomo is filed in Russell’s SF family law action.	SRTL270-271		<u>Key excerpts:</u> Russell was always warm and loving with Evie. Russell ensures all of Tara’s needs were looked after. Russell ensured Evie was comfortable at home, secured primary healthcare physician for her, and hired full-time nanny. Russell did his best to make Tara comfortable in CA (“jump[ed] through hoops”). Ronen never observed violence or aggression from Russell towards Tara or even in general, and cannot imagine Russell behaving that way. Tara never complained about moving to CA, and never indicated she was concerned for her or Evie’s safety in CA.
July 28, 2018	Text Message exchanges between Nir Maman and Tara Walsh: Maman: “He’s not answering me yet. In his statement does he only state that he never saw Steve hit you, or does he state	WALSH_005693 [an excel spreadsheet produced by Walsh with 1,164 entries on a single spreadsheet marked “Chats,” which includes Tara’s “Chats” (“G” Chat		Evidence re coordination between Tara and Nir. In Tara’s “My Narrative Background” and “Journal of Steve Mental Health

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	<p>anything else?” Walsh: “Yes that and that I sad sf was my home, Steve never verbally abused me, he could never imagine Steve being violent or abusive and a bunch of other lies. Zero about how insane Steve is.”</p> <p>Walsh: “Albert actually reached out I am hopefully talking to him soon. Honestly Ronan wasn’t even around a lot. What was his contract with Steve?”</p> <p>Maman: “Let me know what Albert tells you. Ronen was under contract to me, not to Steve [...]</p> <p>Walsh: Ronen? Ok let me know what he says. It’s hard to believe they just made this up. Is he not a witness for your case!</p> <p>Maman:?</p> <p>Maman: No... they all worked for me, they have no involvement on our business dealings with Steve</p> <p>Walsh: I have one amazing testminoy from an NYPD guy in ny- tells the truth about how nuts Steve is. I also have a 18 minute 911 call my brother made reporting Steve as abusive. SO I’m not totally losing- everyone on his side is paid off- I think that will come out in court</p> <p>Walsh: I also have a ton of videos where Steve is out of his mind and images of the destruction he did. As well as a journal of all his major mental health breakdowns from mid-2016-June 2018</p> <p>Maman: Wow</p>	<p>via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]</p>	<p>Episodes” she admits that she knows Maman and Akkelquist were conning Steve</p> <p>Steve thinks Tara didn’t produce all text messages with Nir which seems likely as the first text message in the produced exchange begins in the middle of the conversation about Ronen’s declaration</p>
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	<p>Walsh: Yeah might be useful for your too – he’s been to the ER at least 3x’s in the past year for being poisoned. [...]</p>			
July 29, 2018	<p>Maman: Ronen has not gotten back to me yet. Why do you think Albert might still be working for Steve? Walsh: Just wondering- don’t say anything to him but he agreed to meet with me Maman: Albert hasn’t been getting back to me, I don’t know what’s up with him. Both of them are not being very straight with me</p>	<p>WALSH_005693 [an excel spreadsheet produced by Walsh with 1,164 entries on a single spreadsheet marked “Chats,” which includes Tara’s “Chats” (“G” Chat via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]</p>		
July 29, 2018	<p>Walsh and Albert Timen text about meeting and Timen encourages settling the court case through mediation</p>	<p>WALSH_005693 [an excel spreadsheet produced by Walsh with 1,164 entries on a single spreadsheet marked “Chats,” which includes Tara’s “Chats” (“G” Chat via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]</p>		
July 30, 2018	<p>Maman: Hi did you meet with Albert? Ronen is being evasive with me ... he stated to me that he had no clue that Steve had him on his witness list and that he wasn’t sure how his signature ended up on that statement! I believe that Steve paid Ronen for his statement and Ronen is afraid that I will find out. Ronen may be I [sic.] breach of the NDA he signed with me when I employed him by providing Steve with any information, my attorney is</p>	<p>WALSH_005693 [an excel spreadsheet produced by Walsh with 1,164 entries on a single spreadsheet marked “Chats,” which includes Tara’s “Chats” (“G” Chat via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]</p>		<p>In contrast to Walsh’s words, Crutcher says he never saw Russell use physical force towards Tara, and never even saw him use body language or words indicating that he was going to be violent. However, he did see Tara use such body language and words that Crutcher believes were meant to incite violence from Russell. He says Tara constantly verbally abused Russell, sometimes for hours. Sometimes it was</p>

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	<p>assessing that. My attorney also suggested that you attorney should ask for a continuance in order to introduce new witnesses</p> <p>Walsh: Well I will tell you if I see him in court tomorrow. For sure! Albert is trying to get me and Steve to come to some agreement so is covertly working for Steve. I'll ask about the continuance – why you have any ideas of other witnesses?</p> <p>Maman: Albert has pictures of your bruises from Steve on his cell phone, are you aware of that?</p> <p>Walsh: No that's fucked up ... I think they took them out of my iCloud... How do you know that?</p> <p>Maman: Did you take pics of your injuries caused by Steve at all? Ask George about the pics [...]</p> <p>Walsh: Would George talk to me about that? .. Anything I could get confirming Steve hurt me would be great [...]</p>	<p>Screenshot of Text message exchange is attached as Exhibit J to Tara Walsh's Declaration in family law proceeding</p>		<p>so bad that the nanny, or Crutcher's colleagues, would have Crutcher take Russell away from the situation (e.g., to grab a beer). Crutcher believes Tara's intent was to push Russell to the point where he assaulted her. Crutcher says Russell displayed more restraint than Crutcher knew was "humanely possible." He says he absolutely would have known if ever Russell hit Tara, and he never saw any bruises or injuries on Tara. He says he never saw Russell use illegal, prescribed drugs either. (See "Notes from Bryan Crutcher Interview (8-22-18)")</p>
July 31, 2018	<p>Walsh: So if you have any ideas of any evidence or anything by them would be huge help</p> <p>Maman: You mean the court didn't make any decision? We will help you out ... this postponement of trial date will hopefully give us time to sort things out to do so</p>	<p>WALSH_005693 [an excel spreadsheet produced by Walsh with 1,164 entries on a single spreadsheet marked "Chats," which includes Tara's "Chats" ("G" Chat via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]</p>		
August 8, 2018	<p>Maman text to Tara: Hi...interesting ...I'm not a tech/cyber expert so I have no</p>	<p>WALSH_005693 [an excel spreadsheet produced by Walsh with 1,164 entries on a single</p>		<p>**Maman claims he is not a tech/cyber expert but still got Russell to sign a \$3M cyber security agreement</p>

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	clue, you should reach out to Shay [Maman's friend who handles security]	spreadsheet marked "Chats," which includes Tara's "Chats" ("G" Chat via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]		
August 14, 2018	Walsh: Hey any update on helping out Next hearing is in sf on August 29	WALSH_005693 [an excel spreadsheet produced by Walsh with 1,164 entries on a single spreadsheet marked "Chats," which includes Tara's "Chats" ("G" Chat via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]		
August 2018	Albert Timen relays to Steve that he had coffee with Tara, where Tara told him that she had been talking with Nir and he would help her keep Evie if Tara helped Nir get another \$3m dollars from Steve	Client interview	Need details from Albert Timen and declaration, if possible.	May support claim against Tara in establishing an agreement was made in furtherance of the con
Aug. 7, 2018	A manila envelope is slipped under Russell's psychiatrist's door, Dr. Gopal, who is testifying in the child custody proceeding. The envelope contains a falsified cover letter purporting to be from Ronen Shlomo's company, BSecure Security Services, with a forged signature of Ronen Shlomo, a member of Russell's security team. Ronen Shlomo filed a declaration in Russell's family law matter with his signature, on July 24, 2018, suggesting a source from which the signature was forged. The contents of the	"Documents in manila envelope" SRTL271 [Shlomo's signature page on declaration]		

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	manila envelope include confidential matters that Akkelquist and Maman had access to.			
Aug. 9-13, 2018	Nir Maman makes multiple calls to Ronen Shlomo, pleading for him to return his calls, and asking him to write that he (Ronen) has no idea what Russell is talking about in his letter, that the letter is fake, and that he (Ronen) was not involved in any manner like Russell suggests.	AUDIO-2018-08-09-21-11-17 AUDIO-2018-08-10-11-23-00 AUDIO-2018-08-13-14-48-06		What "letter" is Maman referring to?
August 29, 2018	DVRO hearing in Russell's SF family law action	"8.29.2018 Transcript of Proceedings - SF Family Law Matter"		Nanny, Abrehet "Abby" Tedla, testifies as follows: She witnessed Tara calling Russell names "lots of times," and witnessed Tara yelling at Russell "a lot of times." She wanted Russell to take a break during fights that went on more than 4-5 hours; she would ask Crutcher to remove him from situation. [This is consistent with Crutcher's declaration.] She never witnessed Russell yell at Tara, hit her, or assault her. Tara once said "I hate that fucking nanny." Never witnessed Tara limping. Said Tara's mood "goes up and down." Tara told her she's been diagnosed as bipolar. Said she saw Tara putting some pills in Russell's drink one time, asked her what she was doing, and Tara said trying to calm him down. Said Russell was "out of it," "acting weird," "walking back and forth," prior to being given the drugs. Tara told Abby and Dan Ochoa she did this "all the time." Abby told Russell she witnessed this. Russell was calm when he learned this. Abby never sees Russell

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				get mad or “react to anything.” Said Tara fired her twice, once after she told Russel about the drugging.
October 4, 2018	<p>Walsh text to Maman: Hi Nehr- there has been a development in the legal battle that may be of use to you. Let me know if you have time</p> <p>Maman: Hey Tara... hope you're doing well. I can call you in about 10 minutes ...</p>	WALSH_005693 an excel spreadsheet produced by Walsh with 1,164 entries on a single spreadsheet marked “Chats,” which includes Tara’s “Chats” (“G” Chat via Google, perhaps?) with persons like Maman, Timen, and her personal friends. Actual messages do not appear to have been produced.]		
Oct. 24, 2018	Micheletti texts Akkelquist: “Hey George ... Some issues with Steve have arisen and I need your [sic.] to help to put together a report	GA000047		
November 19, 2018	Maman texts Tara, Can you plz send me your lawyer’s name and tel number (for your civil suit). My attorney wants to speak with them about a mutual strategy.”	NM00365		
November 23, 2018	<p>Maman texts Tara Walsh: “...can you please remind me the date of the incident where Steve attacked you and broke your phone and laptop? And please send me anything you have from that incident (photos etc) to nidf@rogers.com I’m gathering all the details for our report. Thank you...”</p> <p>[...]</p> <p>Tara responds: Also the date he hurt me when Albert came is March 8th. This is one pic of my bruises – but so many other useful things” [photo of Tara’s bruises]</p>	NM00369-00373		

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	<p>Maman: Ok great...I remember Albert replaced our cell phone because Steve broke it ...is that correct?</p> <p>Tara: Yup they got me a new cellphone and new computer- Steve also broke my computer. I still have the cellphone and computer they gave me- which I obviously do not use anymore.</p>			
Feb. 11, 2019	Tara texts Maman, "I was served with the subpoena to testify against you for Steve today. . . . if I am forced to do it, I will just say I do not recall to everything other then Steve is an abusive, drug addict loser with lots and lots of money"	NM00377-378		
Feb. 12, 2019	Maman texts Tara, "Our attorneys are speaking"	NM00378		
Apri. 30, 2019	Maman texts Tara, "Our attorneys have been in touch...I know they were discussing exchanging information on both sides."	NM00380		
July 2019	<p>Stephen Russell and Kelly Turnure were on vacation in Napa, California, staying at the Carneros Resort and Spa, the Renaissance Hotel in Reno and then at an apartment in Downtown Reno that Bryan Crutcher and Steve's security staff set up the year prior. Both Russell and Turnure became ill and Turnure believes she suffered a miscarriage.</p> <p>Russell stated the wine tasted odd but the source of illness would be "pure conjecture." Russell reports that his ankles started to swell up, his blood pressure skyrocketed, he felt heart palpitations,</p>	"Client interview Memo re Reno Toxic Exposure"		

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	<p>inflammation, and the bug bites were not healing and started hurting and oozing. Ms. Turnure remembers telling Russell to go to the emergency room because his ankles were severely swollen.</p> <p>Ms. Turnure reports similar but lesser reactions and that she suffered a miscarriage. Ms. Turnure reports that she began to get cold sores and rashes on her face which she had not gotten before. She also reported that she got a urinary tract infection that took three rounds of antibiotics to clear up. Ms. Turnure also reported that she had a bag migraine and believes this was around the time she suffered the miscarriage. She also believed she had shingles but was informed by doctors that she did not.</p> <p>Russell scheduled appointments at Antara Medicine in San Francisco before returning home because he felt so ill. He was seen by Dr. Lee and was given blood tests and medication to keep inflammation down.</p>			
July 14, 2019	Ms. Turnure called the doctors regarding the spider bite she had gotten because her arm was swollen and numb.	“Client interview Memo re Reno Toxic Exposure”		
July 31, 2019	Russell submits to to GPL Mycotox testing at Great Plains Laboratory, Inc. The tests came back with unusually high levels of Mycophenolic Acid (“MPA”), a byproduct of the Penicillium fungus.	“Client interview Memo re Reno Toxic Exposure”		
August 2019	Ms. Turnure believes she had her miscarriage around August 1, 2019, because this is when she felt very ill. From	“Client interview Memo re Reno Toxic Exposure”		

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	August 1, 2019 through August 10, 2019, she had to return to her doctors at Plushcare because her urinary tract infection was not clearing up after several rounds of antibiotics.			
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