

**FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER**

In the Matter of a Under the Family Court Act.

Stephen Grant Russell
O/B/O Evelyn Walsh DOB 01/27/2018

FAMILY OFFENSE PETITION

Petitioner,

Docket #: 154703

- against -

Tara Katelyn Walsh, Stephen Walsh, Maura
Walsh and John Doe #1 through #10.

Respondent (s).

TO THE FAMILY COURT:

Stephen Grant Russell alleges upon information and belief that:

1. The name, gender, and date of birth of each child who is the subject of this proceeding are as follows [specify address or indicate if ordered to be kept confidential pursuant to Family Court Act §154-b (2) or Domestic Relations Law §254]:

Evelyn Walsh

1/27/2018

The above listed child currently reside(s) at 394 Whippoorwill Road, Chappaqua, New York

2. That Stephen Grant Russell is the Petitioner/Father and resides at: 107 Bernard Street, San Francisco, CA 94109.
3. That Tara Katelyn Walsh resides at: 394 Whippoorwill Road, Chappaqua, New York.
4. Upon information and belief, during the last five years, each child who is the subject of this proceeding resided at: In California and Westchester County.

5. Neither Petitioner nor Respondent are on active duty or have recently returned from active military service.
6. An Order was made by this court effectively terminating my parental rights and in turn, giving de facto custody to the child's maternal grandparents.
7. The father of the child who is subject to this proceeding is the Petitioner.
8. I submit this Petition *pro se*, to alert this Court about my pressing concerns regarding the safety of my daughter, Evelyn Walsh ("Evie"), age three, who as the Court is aware, is currently in the care of her mother, Tara Walsh, and her family. The Walsh family resides at 394 Whippoorwill Road, Chappaqua, New York, 10514. The Walsh household is an unstable and unsafe environment with a long history—continuing to this day—of physical and emotional abuse, instability and dysfunction, which poses an immediate danger to Evie's well-being. This abuse is well-documented via members of the Walsh family's own sworn testimony, blog posts, text messages, emails, etc. Thus, these are not unfounded, spurious allegations, but facts reported by Walsh family members themselves.

Overview

1. Evie's mother, Tara Walsh, was caught drugging me in a manner consistent with the history of Medical Child Abuse in Steve and Maura Walsh's (maternal grandparents) home.
2. Steve and Maura Walsh helped facilitate the kidnapping of Evie from San Francisco in direct violation of a court order.
3. Tara Walsh expressed repeated claims of abuse after arriving and moving into Steve and Maura Walsh's home.
4. In the three years that she has been living in Steve and Maura Walsh's home, Evie has shown signs of Neglect, Alienation, Physical Abuse and Medical Child Abuse.
5. Tara Walsh, the Court Appointed Supervisor, and I all reported suspicious bruises on Evie during a visit. When Steve and Maura Walsh were made aware of the suspicious bruises, Tara changed her statement twice, eventually stating there were no bruises and no history of abuse at Steve and Maura Walsh's home.

6. Tara Walsh filed an emergency support motion and was subsequently granted funds to move out of the family estate. We learned from recent depositions and an affidavit that Tara Walsh continues to live at the family compound and has kept her address confidential to obfuscate this fact. She previously texted my mother, Linda Russell, that the abuse, “only gets bad when I try to leave.”
7. No access to Evie is allowed by the Walsh Grandparents. No medical information, or any information at all, about Evie, is provided by the Walsh Grandparents. The Walsh Grandparents contradict Tara Walsh and claim to be Evie’s primary care givers.
8. It was clear at the most recent visit that these issues of Neglect, Alienation, Physical Abuse and Medical Child Abuse are still a pressing concern.
9. Tara Walsh’s older sister, Brienne Walsh-Zipperer, confirmed in her recent deposition that their childhood was abusive and severe enough that the Walsh parents were sued for custody of Tara.
10. Brienne Walsh-Zipperer is estranged from her family and chronicles the family abuse in her blog, “A Brie Grows in Brooklyn.” Recently, one of Tara Walsh’s younger adopted sisters also fled the household and moved to Georgia to live with Brienne.
11. The claims Tara Walsh used to justify the kidnapping have been debunked. A permanent restraining order was granted against her after a long form hearing in San Francisco. Her family did not corroborate her claims in their recent depositions. Tara Walsh withdrew her counter claims in San Francisco after being warned they would be withdrawn with prejudice. And most recently, she wrote a letter to the Chappaqua Police recanting her statements against me - and promised that I could have unlimited access to Evie – if I helped her move out of her family’s home.

Background: A long history of abuse at the Walsh Household

Tara Walsh was largely estranged from her parents during our three-year relationship. As a child she was ‘diagnosed’ with the same hereditary disorder as the rest of her siblings – both biological and adopted – and sued for emancipation with the help of her Aunt (**Exhibit 1**). Tara, however, denied this in a sworn affidavit (**Exhibit 2**) even though it had been documented in multiple places and been a topic of conversation with my Mother, Linda Russell, just a few months prior. (**Exhibit 3**). Brienne Walsh-Zipperer, Tara’s sister, talks about the aftermath:

"Let me tell you — it was fucking awful. I don't think one of my brothers has ever recovered from it, or forgiven me. Our house was dead for ten years after."

- Brienne Walsh recounts the aftermath of the Walsh Family Case (**Exhibit 4**)

Brienne Walsh-Zipperer is estranged from the family and confirmed in her recent deposition that her childhood was, in fact, abusive (**Exhibit 5**). She has chronicled for over a decade the family's abusive behavior and dysfunction in her blog "A Brie Grows in Brooklyn." A few excerpts are listed below:

On Maura Walsh:

- **"I had an abusive childhood, and abusive situations are what I crave."** *"When I was younger, if I told my mom that I was angry at her, she sometimes punched me, she sometimes stopped feeding me [...]"* (**Exhibit 6**)
- *"Mom punished us both for being strong willed. We were hit. When I'm angry how do I diffuse the anger away from Cleo? How do I protect her?"* (**Exhibit 7**)
- *"I grew up with the fear of alcoholism instilled in my heart by my mother, who gave me a shot of whiskey when I was 8- years-old and said to me, 'Isn't that disgusting? You know you're an alcoholic, right?'"* (**Exhibit 8**)
- *Brienne had her first breakdown at school in 8th grade and largely contributes it to, "Modifying my behavior to keep the abusive situation at home under control, which meant trying to make my mother happy. I never talk about my childhood being "abusive," which it was."* (**Exhibit 9**)

On Steve Walsh:

- **"I peed the bed until I was 16, and part of the reason for that was that if I couldn't fall asleep at night, my father used to make me go sit at the kitchen table so that I wouldn't keep on waking him up"** (**Exhibit 10**)
- *"Because sometimes I do lose my temper, I act lesser than, I let my worst self get the best of me, I can also be a fucking asshole... Every day, I struggle to suppress this part of myself, the part of myself I get from my dad."* (**Exhibit 11**)
- **"Last night, I received a huge package from my dad. I was at tennis practice when it arrived. Caleb called me to tell me about it. My parents have not spoken to me in over a year. No letters, no phone calls, no presents for the kids for their birthdays, or holidays. No packages. I started crying. "I don't want to open it," I said, because I knew that it was not a gift, but instead, some sort of emotional bomb. Caleb opened it for me. "It's your wedding dress," he said. I never learned from anyone that I was enough. I got home, and Caleb was waiting at the door for me with the kids."** (**Exhibit 12**)

On the aftermath:

- *"I don't want to be an abusive parent. I don't want to be a screamer, or a hitter. I don't want Cleo to have an eating disorder, or a complex, or be **medicated from the time she can pee in an adult toilet.**" (Exhibit 13)*
- *"**No therapist has ever been able to heal this sadness** I feel over the fucked up things that have happened in my family." (Exhibit 14)*
- *"I think of the images I post on my own Instagram. In the pool with my big, good-looking family. On our big family estate. And I think how **those images lie so hard.**" (Exhibit 15)*

Meanwhile the Walshes have "adopted" two Korean girls, in a kind of do-over. The girls, like dolls, were regularly forced to dress alike despite being three years apart, even as teenagers. This became a hot topic of gossip amongst Chappaqua natives (Exhibit 16)



- Photos published on Brienne Walsh's blog "A Brie Grows in Brooklyn"

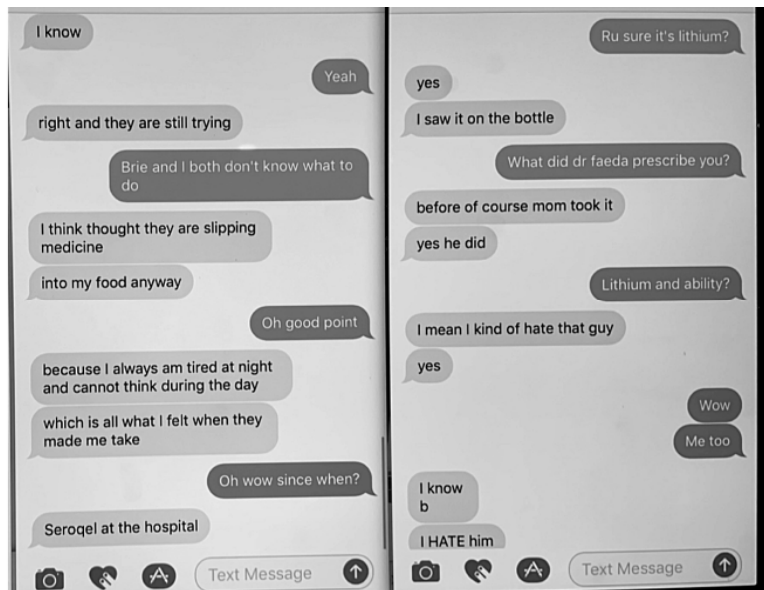
Brienne wrote that "the twins" responded to abuse at their home in much the same way that she and Tara had,

“They are not genetically the same as me, but their reactions to the abuse were identical. One reacts by being super good, and the other reacts by acting out, and they still get punished equally.” (Exhibit 17).

Tara Walsh texted me something similar shortly after returning to her childhood estate, *“Kiara was having a breakdown – I can’t help but **think my Mom gave bpd to 4/6 of us.**” (Exhibit 18).* In addition to emotional trauma and abuse, she alleges physical abuse as well.

*“It’s honestly horrible living here – it’s not healthy living here. I feel so sorry for my sisters. And **they get into physical fights and stuff with my parents.**” (Exhibit 19)*

Most shockingly, at least one of the adopted daughters was diagnosed with the same hereditary disorder as the rest of the Walsh children by the ‘family’ Psychiatrist known for diagnosing everyone with Bipolar Disorder. (Exhibit 20) She stopped taking the heavy medication after experiencing negative side effects but later suspected Maura Walsh was ‘slipping’ the Lithium and Seroquel into her food when the negative reactions returned. She reached out to Tara for advice in May 2017. (Exhibit 21).



Adopted Daughter: *“**I think thought they are slipping medicine... into my food anyway... because I always am tired at night and cannot think during the day... which is all what I felt when they made me take it.**”*

Tara: *“Oh wow since when?”*

Adopted Daughter: ***“Seroquel at the hospital” [...]***

Tara: ***“Ru sure it’s lithium?”***

Adopted Daughter: ***“Yes... I saw it on the bottle...before of course mom took it”***

Despite threats from Steve and Maura Walsh, the eldest adopted daughter, Mariah Walsh, recently fled the family home and moved to Savannah, GA to live with Brienne Walsh, her husband, and their two children. Brienne writes that a father of one of Mariah’s friends reached out to her, *“saying he was worried about my sister and wondering if she could come and live with us. The same family also offered to help pay for [her] college bills.”* **(Exhibit 22)**

Steve and Maura Walsh were not pleased, *“Yesterday [she] told my parents that she was coming to live with me. Their response was that if she does that, she’ll be out on her own. They’ll cut off paying college tuition in the future, as well as her healthcare.”* **(Exhibit 22)**

The Crime: Tara Walsh drugs me in the same manner her mother, Maura Walsh, secretly drugged her and her siblings.

Maura Walsh would advise her children not to have children, “given the history of mental illness in our family.” **(Exhibit 23)** For Tara, it was a bit different. They were concerned that her mental illness would cause her to lose custody and endanger the massive family trust. It is likely for these reasons that Tara became fixated on finding and marrying a wealthy man who she could entrap for his money but would ultimately just go away... She could be free of her parents and finally live her life financially secure.

In March 2017, after undergoing months of tests while feeling ‘not like myself,’ a toxicology test showed over 6x times the reference range for Lithium – the same heavy mood stabilizer that Tara’s sister Kiara suspected Maura Walsh was ‘slipping’ into her food. **(Exhibit 25)**. I had never taken nor been prescribed Lithium and the doctors could not explain the results. It was the first time I suspected being drugged.

Over Tara’s subsequent pregnancy and while we lived together in San Francisco, I would repeatedly feel drugged. Emergency room tests did not show anything and doctors were dumbfounded until Evie’s nanny, Abby Tedla, caught Tara ‘slipping’ pills in my wine in May 2018. Tara has since admitted, in open court under oath, to surreptitiously drugging me with her anti-psychotic medication, Seroquel, **(Exhibit 26)**.

A forensic psychiatrist in San Francisco recommended by Tara’s primary care physician diagnosed her with Borderline Personality Disorder, a diagnosis later confirmed by her

long-term therapist. **(Exhibit 27)** He suspected that Tara would require supervision with Evie for around five years, with intensive treatment, to help with her genetic mental health issues as well as the damage caused by overmedication at a young age and abuse. I was granted Emergency Custody. **(Exhibit 28)**

Tara rationalized drugging me while testifying at the San Francisco Domestic Restraining Order Hearing by saying, “We were living as a family. I made a family decision.” **(Exhibit 29)**

It was also clear that I had been targeted by Tara due to her perception of my ‘wealth.’ For example, she texted her friend just a week before moving to San Francisco, “I’m better off pretending I want to be with him and getting the most while I can – then leaving him for good... I think he will marry me... Then I can just divorce him for money.” **(Exhibit 30)**. While in San Francisco she used Evie as leverage for marriage **(Exhibit 31)**, then a fake pregnancy **(Exhibit 32)**, and stole my hidden and private financial records to see ‘just how much I had.’ **(Exhibit 33)**

Tara’s scheme was an open secret in her family. Brienne blogged that Tara was, “*scheming to get her baby daddy committed.*” **(Exhibit 34)** Yet also casually discussed with their brother that Tara just wanted money “*Yeah she called me last night to say the same thing – [she's] just with Steve to take his money and then she will leave. I get the impression that she is now planning to head back here and is greasing the skid so everyone is happy to see her.*” **(Exhibit 35)**

Steve Walsh Arranges for Kidnapping of Evie

Tara Walsh initially attempted to flee WITHOUT Evie, fearing criminal prosecution but her father talked her into coming back home to San Francisco. **(Exhibit 36)**

Later she attempted to flee again, but with Evie this time and her father talked her into returning home again to San Francisco. **(Exhibit 38)**

At this point a Court Order prohibited Tara from leaving California with Evie. **(Exhibit 39)**. Steve Walsh and I had been in regular contact about treatment and **(Exhibit 40)** he negotiated a ‘two week’ exception from the Court Order so that Evie could accompany Tara on her trip to NY. Tara would get help with her diagnosis and treatment options and Evie wouldn’t leave his sight. **(Exhibit 40-41)**

Unbeknownst to me, Steve Walsh had already hired a full-time nanny in Westchester, NY even though Tara had an apartment in Brooklyn pre-paid for the next six months and I was in San Francisco. **(Exhibit 42)**. He later admitted in a sworn deposition that he never attempted to abide the court order.

When asked why he didn't fly to San Francisco considering the severity of the situation he replied, "It's a six hour flight and that is not something someone just does." (**Exhibit 44**) In reality, he understood that Tara wasn't able to care of Evie on her own and wanted to be Evie's guardian. Meanwhile, I have spent months in Westchester and flown across the country dozens of times for my daughter.

Since arriving in Westchester Tara has complained of abuse, but has been silenced each time.

- *"No they love Evie so much – my Mom doesn't ever want her to leave. But I seriously cannot stand living here... It really hasn't been that bad – it only gets bad when I say I want to leave"* - Tara texts Linda Russell, June 2018 (**Exhibit 46**)
- *"It's honestly horrible living here – it's not healthy"* - Tara texts Steve Russell, June 2018 (**Exhibit 47-48**)
- In July 2018, Tara sent a text to Linda Russell stating, "Steve sent an agreement today I could move back to Brooklyn. I told my family and now they have all joined up to say they will take legal action"
- Tara, the court-appointed supervisor, and I all reported suspicious bruises on Evie. (**Exhibit 49**). When the Walsh's were asked about it, Tara changed her story and stated the bruises were normal, (**Exhibit 50**) she followed-up with an odd letter through her attorney stating that there were no bruises and no history of abuse at the Walsh household. Instead claiming that my following-up on the bruises that she, I, and the supervisor noted as suspicious, was harassment of her. (**Exhibit 50**). Visits were stopped.

Steve and Maura Walsh Are Instrumental in the Alienation of Evie from her Father

Tara continues to show single-mindedness about moving out of her parents' home. For example, on November 12, 2020 Tara and her friend, Jesse Ozeri, proposed to me that Tara, "want[ed] to move out of the Walsh house immediately." Specifically, she dangled my unrestricted access to Evie in exchange for my "help" leaving her parents' compound, which included that I buy Tara a home for her and Evie in Westchester or Greenwich, Connecticut. In return, Tara would allow me to begin visitation with Evie in their new home, that I bought them, as often as I wanted. In other words, Tara tried to extort me to buy her new home if I wanted unlimited access to my daughter. Tara's attempt to leverage me could not have been clearer when she messaged me: "Sooner you get the house for Evie the sooner visits can start." (**Exhibit 60**)

Earlier this year, after I refused to go along with Tara's pressure tactics, Tara filed an emergency support motion and made it clear she needed funds to move out of her

parents' estate ASAP. It was granted. Months later, however, we learned, and it is undisputed, that Tara is still living there. Thus, it was all a ruse.

Steve and Maura Walsh have been active participants in denying my relationship with my daughter, yet to the court they act as if they are not involved. However, that claim is belied by their words and actions. Steve Walsh became the gatekeeper for Evie as soon as she arrived at his compound. He immediately stopped facilitating communication once concerns about the allegations of abuse against his adopted daughters was brought to light. On August 7, 2018, I texted Steve Walsh: "Following up again on getting to see Evie. I've still received no photos, FaceTime, or other interactions as promised." Steve Walsh responded: "You are apparently trying now to involve my youngest daughter which has crossed a huge line with me - I will have a very tough time communicating [with you]." Steve Walsh followed through on this threat as evidenced by his subsequent actions.

For example, on August 20, 2018 I flew from San Francisco to Westchester to visit Evie based on a visitation agreement arranged between the attorneys. Two days later Audrey Courson, Tara's attorney in San Francisco, sent a message that I should email Maura Walsh to schedule my visit. I did not receive a response from Maura, but instead Steve Walsh sent an email to my attorney stating, "Please direct all inquiries to me and this email... I respect your client's right to see his child but [I] also need to assured [sic] of Evie's safety." On August 25, 2018, I returned to San Francisco without having seen my daughter. Again, two days later, Tara stated through her attorney, Audrey Courson, that she "wants to leave her parents out of this moving forward."

Maura Walsh aided her husband's effort to keep me from seeing Evie. On March 28, 2019, she took Evie to the doctor and claimed she was having terrible diarrhea 5x per day, but her doctor found no signs of diarrhea, fever, poor mood, or dehydration. The doctor diagnosed a possible intestinal infection in the absence of any measurable symptoms based solely on the statement of Maura Walsh. Now knowing Maura Walsh's history of medical child abuse this is more concerning.

In March 2019, the Walshes refused to explicitly confirm my visits with Evie placing me in a precarious position that they exploited. I was required by court order to advise the Walshes when I intended to visit Evie, with a visitation supervisor. On March 23 after being notified of my visit, Mr. Walsh followed me in his car from where I was staying at the Crabtree Kittle House and confronted me as soon as I pulled into the Walsh driveway, which was the designated pickup location for Evie. The visitation supervisor described the incident:

Once [Mr. Russell] and [the supervisor] arrived at the driveway gate, [Mr. Russell] texted to inform the family that [they] arrived. However, while [Mr. Russell] was texting, a car pulled into the driveway behind [them] and a gentleman who [Mr. Russell] identified as the maternal grandfather got out

of his car. The maternal grandfather came to [Mr. Russell's] truck's window and angrily asked him to move so he could get in the driveway. [Mr. Russell] calmly asked the maternal grandfather if someone is bringing Evelyn outside. The maternal grandfather stated that they did not get to meet anyone in reference to [the supervisor]. [Mr. Russell] again asked the maternal grandfather if anyone would be bringing Evelyn outside and the maternal grandfather stated that the visit is not happening. [Mr. Russell] stated that the attorneys agreed [to the visit] and the maternal grandfather told [Mr. Russell] to check his email. [Mr. Russell] once again asked if someone could bring Evelyn outside and the maternal grandfather again stated that the visit is not happening. **(Exhibit 56)**

Steve Walsh denied any incident when the police called him that evening. The police report states, "I spoke with Steve Walsh who denies following Russell and states that if he had pulled in behind him it was only by chance. I advised him that if he was following Russell to stop immediately." **(Exhibit 57)**.

On 3/27/2019 Tara retaliated by filing an order of protection against me based on the incident at which she was not even present and yet wrote about it in the first person as if she was present. Her statement contradicts the court-appointed supervisor's account, Steve Russell's statement to police, and even Steve Walsh's statement to police where he denied any incident having occurred.

On 3/31/19, Steve Walsh again followed me and purposefully waited until he thought there were no witnesses present before confronting me. Fortunately, Evie's nanny was present and witnessed the incident. Again, I filed a police report. According to the nanny:

At the drop off of Evie I witnessed Steve Walsh pull up at the top of the driveway after the supervisor headed toward the house with Evie, so the supervisor was not there to see this. Steve Walsh exited his car and had a rude attitude toward Steve and proceeded to say that he was "bringing his kids back home from school" on Sunday March 31st at approximately 5:30. Steve Russell did not respond and simply sat in the car to wait for the supervisor to return. Once the supervisor returned she asked if that was Tara's father behind us and Steve Russell confirmed and we drove off the property. Steve Russell remained calm throughout the entire interaction with Steve Walsh. **(Exhibit 58)**

More recently, Steve Walsh sent an email to my attorney claiming that Evie suffered hives as a result of stress during her visit with my mother, effectively stopping the visits. There was no doctor's note or opinion on the matter. Linda actually gets a similar rash on her cheeks as well after eating strawberries and had contacted Tara to check about applying a topical over-the-counter cream that helps the itching. This was yet another

Walsh family tactic to prevent me and my family from visiting Evie.

Physical and Emotional Abuse

In February 2019, Yoanny Lora, a court-appointed supervisor from Comprehensive Family Services (CFS), noted that Evie would cry when someone from the Walsh household would come to the car to pick Evie up after a visit. Consequently, Ms. Lora asked Tara to keep everyone in the home to reduce her stress upon Evie's return to the Walsh household.

During a supervised visit between me and Evie on March 31, 2019, Evie arrived for the visitation with two sets of odd bruises. The first was a deep pinch mark bruise on her left leg under the band of her diaper. The second was a 3 to 4-inch series of symmetrical strike marks on her shin. These bruises were immediately noticed by me, as well as the court appointed supervisor, Franceska Anilus, and a nanny, Talia Kleinman, both of whom were present at the visit. Ms. Anilus prepared a report of the visit the same day and described the bruises that she saw in a confidential report prepared for the court. Ms. Anilus explained that while she was changing Evie's diaper during a supervised visit on March 31, 2019, she observed that Evie had two black bruises on her body. One was about 3-4 inches in length and about half an inch in width on her left shin and the other was small, circular and about an inch in diameter on her upper left thigh. **(Exhibit 59)**

Similarly, the nanny, Ms. Kleiman, who was present during the visit, witnessed the bruises on Evie's body. According to Ms. Kleiman:

On March 31st I acted as Nanny again and that day I observed a bruise on Evie's left shin as Steve was changing her diaper. The day before I did not see a bruise as he changed her but on March 31st it was very visible. The Supervisor made a note of it and said she had to make a report for it. Steve mentioned he would follow-up and give her a bath the next time to check for any other areas. **(Exhibit 52)**

I reported the bruises to Attorney for the Child ("AFC"), Jennifer Jackman, that same day as well as to my attorneys. **(Exhibit 53)**. Importantly, Ms. Walsh also apparently noted the bruises that day, and independently contacted Ms. Jackman to express concerns about them—which were substantial enough that she, as the primary custodial parent, felt the need to contact the AFC.

Ten days later, on April 9, 2019, after learning that both parents had concerns about Evie's bruises but that the AFC had not followed up, I went to the Chappaqua Police Department and filed a report. (See email exchange between me and Jennifer

Jackman, discussing my police report at **Exhibit 54**). When the police visited the Walsh household that evening, however, Ms. Walsh, in the presence of her parents, stated that the bruises were normal, even though she had complained about them with concern days before to the AFC. The next day, Ms. Walsh's attorney astoundingly wrote a letter to the court contradicting Ms. Walsh's previous statements to the AFC and police, instead stating that there were no bruises at all and that there was no history of abuse at the Walsh household, even though two witnesses in addition to me observed the bruises on Evie. (**Exhibit 55**). It would be one thing for Ms. Walsh's attorney to deny that the bruises were caused by abusive conduct of his client, but to deny their existence outright, when they had been witnessed by multiple individuals, including Ms. Walsh herself, smacks of consciousness of guilt.

All of my visitations had been fully supervised at that point so there was no possibility that the bruises were caused by me. On the other hand, the Walsh family, with its long history of physical abuse, and who are presently Evie's sole, unsupervised custodians, must have necessarily inflicted the bruises.

Additionally, and most recently, Steve and Maura Walsh have at every turn attempted to obstruct my and Grandma Linda's visitation with Evie through repeated denial of visits, making false statements to Evie to deliberately alienate me from my daughter, and making false representations regarding visitation to this Court. Most recently, Steve Walsh manufactured false representations to the Court that Evie had hives in response to stress due to visits with Evie's grandmother Linda. However, Linda— who has prior medical training as a licensed nurse— confirmed that Evie had an adverse reaction to strawberries that the Walshes themselves had packed for her. Notably, when asked for additional details on my daughter's symptoms, the Walshes could not provide any support for their false claims. This is just another example of the pattern of lies and abuse by the Walsh family.

Conclusion

To put it plainly, I fear that my daughter is in imminent danger. Her sole custodians, the Walsh family, have a long, sordid history of abuse and dysfunction. Ms. Walsh suffers from serious mental illness and relies significantly on her family's assistance for childcare. However, her family is not capable of providing a safe, healthy environment for Evie. Ms. Walsh and Evie were mandated to her parents' home for the apparent support network she would have there. But it is now painfully evident that the Walsh residence is too volatile and dangerous to leave Evie in without outside supervision. Evidence of abuse and neglect comes directly from Walsh family members themselves and should therefore be believed.

The Court was plainly lied to in order to obfuscate the Walshes abusive and dysfunctional living arrangement. I recently learned that Tara was still living at her

parents' home despite having asked for and been granted by the support court, a large sum to move out. This is despite the fact that:

- a) Judge Horowitz ordered Tara to keep me informed about Evie, including where she was living. As soon as Judge Horowitz recused herself, Tara went to the court and used the TOP granted on default, and on false accusations, (after the 3/31/19 incident where her father followed me) as grounds to keep her address confidential.
- b) Tara filed an emergency support motion and made it clear to Judge Furman that she needed funds to move out of her parents' home, which was granted.
- c) Tara told Linda Russell that she had moved, even though Tara recently told the court that she is still living with her parents. Steve and Maura Walsh confirmed that in their recent depositions.

The Walsh family has made allegation after allegation against me and none have been proven or even followed-up on. Meanwhile Steve and Maura Walsh have been sued in the past for custody of their children over allegations of abuse, two of their children have fled their home, sworn testimony from Tara's sibling confirmed her childhood was abusive, and they are actively alienating me from my daughter.

WHEREFORE, I respectfully request that the Court:

- d) immediately remove Evie from the Walsh household and place Evie with Linda Russell, Evie's paternal grandmother, who can oversee and facilitate visits with Tara;
- e) order prohibiting Evie's maternal grandparents from all unsupervised contact with Evie until CPS can conduct a review of the abuse allegations, including access to Tara's previous emancipation case.
- f) order the release of Evie's medical records and for a doctor to check on her rash / allergies;
- g) schedule an immediate trial of the issues raised in this case.

Dated: August 26, 2021



Stephen Grant Russell

Exhibit 1

“I don’t know if my sister was filing for emancipation for my -- herself or if she was -- my aunts were going to custody over her. You would have to ask her... Or you could call the court documents.”

- Brienne Walsh (Tara’s sister), SF Civil Deposition, 9/28/20

1 or if my aunts were trying to get custody for her. I
2 don't know.
3 Q. When you say "custody for herself," do you
4 mean to -- as opposed to your parents?
5 A. Yes. She was trying to get emanc- --
6 either -- I don't know the facts of the case.
7 Q. Okay. You used --
8 A. You have to ask her directly. 15:09
9 Q. Sure. You used the term "emancipation." What
10 did you mean by that?
11 A. Again, this is a good example of me writing
12 without kind of being concerned for fact. I don't know,
13 and I really truly don't know if my sister was filing
14 for emancipation for my -- for herself or if she was --
15 if my aunts were going to take over custody of her. You
16 would have to ask her.
17 Q. Okay. Now --
18 A. Or you could call the court documents. 15:10
19 Q. Leaving aside what the specific legal
20 proceeding was, whether it was emancipation or something
21 else, do you know what were the circumstances that gave
22 rise to this?
23 A. Yes.
24 Q. And could you describe them?
25 A. You -- what part of them?

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From the 9/28/20 deposition of Brienne Walsh,
San Francisco Civil Case Russell V. Walsh

Exhibit 2

“I have never attempted or made application to be emancipated.”

-Tara Walsh Westchester Affidavit, 11/14/18

family support. Upon information and belief, no safety concerns were raised regarding my parents, who have been approved to adopt children, two sisters from South Korea, which required a rigorous investigation that included a home study, background check and character references. Respondent’s request for a COI at this juncture is baseless and pure harassment.

- Respondent requests access related to “sealed emancipation proceedings,” which do not exist as I never attempted or made application to be emancipated.

CROSS MOTION FOR ATTORNEY’S FEES AND REQUEST FOR RECONSIDERATION OF THE COURT’S RULING TO RESERVE DECISION ON MY UNDERLYING FEE APPLICATION

8. As set forth above, Respondent’s Order to Show Cause is frivolous, moot and an attempt to prolong litigation and cause me to incur more legal fees, which of course is

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

-----X
TARA WALSH,

Petitioner,

File No. 154703

Docket Nos. V-07641-18; O-06917-18/18A

-against-

AFFIDAVIT OF TARA WALSH

STEPHEN G. RUSSELL,

Respondent.
-----X

STATE OF NEW YORK)
) SS:
COUNTY OF WESTCHESTER)

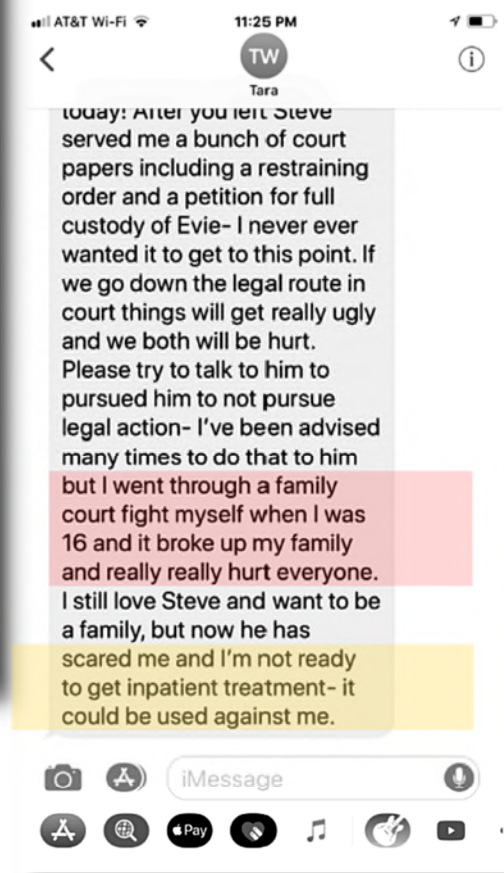
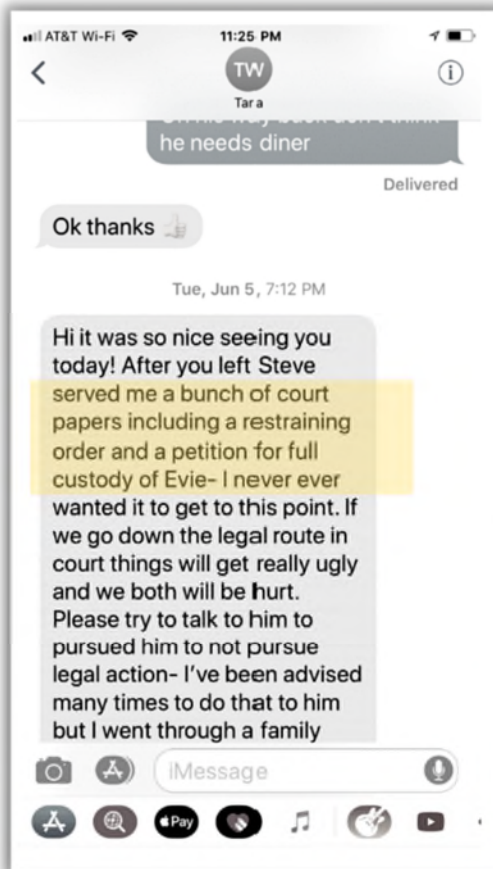
TARA WALSH, being duly sworn deposes and says:

From the 11/14/18 affidavit of Tara Walsh, Westchester Family Court

Exhibit 3

“I went through a family court fight myself when I was 16.”

-Tara Walsh texts Linda Russell, paternal grandmother, 6/5/18



Tara Walsh pleads with Linda Russell, paternal grandmother, to persuade me not to pursue legal action after she was served with a restraining order and petition for full custody of Evie. These documents were filed after she was diagnosed with Borderline Personality Disorder and caught surreptitiously drugging me.

Exhibit 4

"Let me tell you — it was fucking awful. I don't think one of my brothers has ever recovered from it, or forgiven me. Our house was dead for ten years after."

-Brienne Walsh on Tara's emancipation case. Excerpted from the 8/27/2018 blog post titled, "Someone Wants to Sue Me Over this Blog" from "A Brie Grows in Brooklyn"



Some people I have talked to about this say, "So what, you're a good mother, nothing will happen to you." The thing is, back when I was 18 years old, and a sophomore in college, my sister, who had just escaped from a boarding school, and was suing my parents for emancipation, called Child Protective Services on my parents and myself over 35 times. I was 18, and could have technically been given custody over her. Let me tell you — it was fucking awful. I don't think one of my brothers has ever recovered from it, or forgiven me. Our house was dead for ten years after. A happy kid for most of my life, even through my teenage year, I went on to struggle with extreme, oftentimes suicidal, depression for the rest of my twenties.

Excerpted from the 8/27/18 blog post titled, "Someone Wants to Sue Me Over this Blog... And That Person is an Original Uber Investor" from "A Brie Grows in Brooklyn"

Exhibit 5

"Yes, I would."

-Brienne Walsh replies to the question on whether her childhood was abusive in her 9/28/20 deposition.

1 Q. I'll repeat my question. Would you
2 characterize your childhood as abusive? 14:33
3 MS. RATNER: Objection. Asked and answered.
4 MS. AASEN: I don't believe I've gotten an
5 answer to that question.
6 THE WITNESS: The answer would I characterize
7 my childhood as abusive is a really broad question. I
8 would ask you to kind of narrow it down.
9 MS. AASEN: Q. Do you understand the term
10 "abusive"?
11 A. Yes, of course, yeah.
12 Q. I'm asking you to think back on your childhood
13 and to just -- and if you had to describe it, would 14:34
14 abusive be one way that it could be described?
15 MS. RATNER: Objection.
16 You can answer, Brie.
17 THE WITNESS: Yes, I would.
18 MS. AASEN: Q. Okay. Did Tara grow up in the
19 same environment as you?
20 A. No, she grew up in a different house -- no.
21 I'm just kidding. Yeah, she grew up in the same
22 environment.
23 Q. Okay. And -- okay. Would it be fair to say 14:35
24 that Tara grew up in the same environment that you just
25 described as abusive?

Page 101

Veritext Legal Solutions
866 299-5127

From the 9/28/20 deposition of Brienne Walsh,
San Francisco Civil Case Russell V. Walsh

Exhibit 6

“If I told my Mom I was angry at her, she sometimes punched me, she sometimes stopped feeding me...”

“I had an abusive childhood, and abusive situations are what I crave.”

-Excerpted from 8/20/19 blog post by Brienne Walsh titled, “All My Life, I’ve Wanted Unconditional Love” from “A Brie Grows in Brooklyn”

Last night, when I was formulating this post, which isn't even a good post, I wrote that all of my realizations are therapy 101. I had an abusive childhood, and abusive situations are what I crave. I learned that expressing negative emotions leads to violence and hatred. When I was younger, if I told my mom that I was angry at her, she sometimes punched me, she sometimes stopped feeding me, she sometimes stopped paying for basic medical care or college.

My struggle is now that I'm a mother, I need to find a way to have healthy relationships with other people. With Caleb, with my friends, with my community, even the assholes within it. And not healthy in the sense that we're best friends with everyone, but healthy in the sense that we build and nourish the good relationships, and learn how to build strong, fierce and kind boundaries against the bad ones. But how to tell the difference when you're a fucked up person? When you're married to a person who never met his father? When you're so afraid of not being liked that someone not responding to your text right away keeps you up for an entire night,

on the verge of barfing?

I don't have the answer. But I did have a sign from God yesterday. This might seem like a stupid sign, but it meant a lot to me. Cass, lately, has been biting me a lot. He is teething, and it feels good to him. He also thinks my loud screaming is very funny. Especially when he grips my nipple between his teeth, and pulls his head away as hard as his neck will allow.

Cleo, noticing the reaction Cass is getting, tried out biting herself last night. She lay on top of me as I was reading to her before bed, and sunk her teeth into my forehead. But not hard. As soon as she made contact, she pulled away. She wiped her spit from my forehead. She grabbed the sides of my face, and kissed the spot where her teeth had been. “I'm sorry, Mommy,” she said to me. “I love you.”

Exhibit 7

"Mom punished us both for being strong willed. We were hit. When I'm angry how do I diffuse the anger as far away as possible from Cleo? How do I protect her?"

-Excerpted from 1/21/18 blog post by Brienne Walsh titled, "Another Uncomfortably Candid Post About Pregnancy" from "A Brie Grows in Brooklyn"

A Brie Grows in Brooklyn

problems who makes my life worthwhile. If I wanted her, I'm pretty sure my sister would give me the baby she's about to have cut out of her abdomen. Fc

The sadness is irrational, but it is real. And it is personal. What if there is something wrong with me? What if I'm barren? What if my C-section left me with permanent scars that made me infertile? What if I finally have the cervical cancer that's been lurking around my vagina for the last decade?

Because I can't answer those questions myself, this morning, I tried to book a doctor's appointment. My former OB-GYN does not take our new insurance. Neither does any credible doctor in the New York region, it seems. I spent a while on Empire Blue Cross Blue Shield's app this morning, because the website does not work, and almost every doctor in my network was affiliated with Maimonides, a hospital where, no offense, I would not even ask for a bandaid.

It made me so angry! I went into the living room, where Caleb was sitting with Cleo, and wanted to express my rage! But he merely smirked at me, and talked to me the saccharine voice that he uses when he feels like I'm blaming him for something even though all I'm trying to do is get some sympathy. Cleo, in the middle of us, looked up. Something I've been worried about a lot lately is what kind of mother I'll be. The first year of Cleo's life was so easy in that respect. I was deliriously in love with her. Now she's becoming this defiant, cunning little creature whom I actually admire, because she's so strong willed and determined. But she's also hard to deal with. When I tell her "no," she looks at me, and breaks something.

"Why do you think mom did such and such to us?" my sister and I frequently ask each other these days. Because my sister sees how strong Cleo is. Cleo reminds her of herself. My mom punished us both for being strong willed. We were hit. When I'm angry, how do I diffuse the anger as far away from Cleo as possible? How do I protect her?

I'm angry that I'm not pregnant, and I'm scared. I know it will be ok. Thank you for letting me use this blog as a sort of therapy for when I am too much to deal with.

January 21, 2018

4 notes Pregnancy | My life

Exhibit 8

“But I grew up with the fear of alcoholism instilled in my heart by my mother, who gave me a shot of whiskey when I was 8- years-old and said to me, “Isn’t that disgusting? You know you’re an alcoholic, right?” It was her belief that given my genetic make-up, even at that young age, the diagnosis was unavoidable.”

-Excerpted from 2/15/13 blog post by Brienne Walsh titled, “On Money by Martin Amis and Why I Think You’re An Alcoholic” from “A Brie Grows in Brooklyn”



Exhibit 9 :

“Modifying my behavior to keep the abusive situation at home under control, which meant trying to make my mother happy. I never talk about my childhood being "abusive," which it was.”

-Excerpted from 9/11/14 blog post by Brienne Walsh titled, “You Look Like A Drag Queen Crying: On Losing It At My Sister’s Birthday Party” from “A Brie Grows in Brooklyn”

Exhibit 10

"I peed the bed until I was 16, and part of the reason for that was that if I couldn't fall asleep at night, my father used to make me go sit at the kitchen table so that I wouldn't keep on waking him up"

-Excerpted from 7/16/19 blog post by Brienne Walsh titled, "Read Here For Tips On How To Do Potty Training In 3 Hours With No Accidents, Guaranteed, Promise"

The other moms watched with open judgement on their faces from the safety of the pavement. I know I should have brought like one of those fancy portable potties, and made her sit on it, but I don't give a shit. Literally. The nice thing about having a "difficult" kid is that it's inured me to judgment. Yeah, I'm letting my child shit like a Chinese peasant in an airport in Shenzhen, but at least I won't have to take her to a therapist for retaining her poop for weeks at a time. My strong ass kid is a pain in the ass, but she loves her body, and she's not afraid of anything, not even what people might think of her if she's being gross in open sight.

Every parent has their strengths. I have a lot of weaknesses, but one of my strengths is that I don't get that grossed out by bodily functions. Looking back, this strength served me. It probably served me during sexual encounters. It serves me every time one of my kids has diarrhea, which is a lot of times. It also served me when I used to babysit a congenitally disabled girl. She sometimes didn't make it to the toilet. When she got a fever, I had to immediately give her a shot of valium in her butt. I loved her, and I loved taking care of her. Yesterday, when Cleo was finished pooping, I just brought her over to the sprinklers, and washed her with my hands, and when I did that, another mother literally said to her daughter, "Get away from them."

Cleo will probably have accidents until she's 16. I peed in the bed until I was 16, and part of the reason for that was that if I couldn't fall asleep at night, my father used to make me go sit at the kitchen table so that I wouldn't keep on waking him up. The difficult phases of motherhood, I'm finding, don't end, they just get larger, and more gross, and more physical, and if you're not into it, sucks for you, because unless you can find someone to adopt your child, you're in it for life.

At night, when I'm going to bed, I frequently think of all of the ways my children will help me when I'm too old to take care of myself, and for that reason, I wish I could have more children, because two doesn't seem like a home run in terms of being surrounded by love at the end of my life.

#Motherhood #Potty Training

4 notes Jul 16th, 2019



Exhibit 11

"Because sometimes I do lose my temper, I act lesser than, I let my worst self get the best of me, I can also be a fucking asshole... Every day, I struggle to suppress this part of myself, the part of myself I get from my dad."

-Excerpted from 6/4/19 blog post by Brienne Walsh titled, "These Pictures Tell A Lie, I Am A Very Flawed Mother"

When you live in a city, you are just constantly rubbing against people, and it fucking makes you angry. When you are a parent, you are also constantly rubbing up against people, in the playground, at school, at events, at classes, in your building, and it also makes you angry. Most people are assholes. Caleb's general belief is that one should go through life fighting with as few people as possible, and whenever I tell him a story about someone pissing me off, he gets a

look on his face like, "Oh no, you didn't go psycho on them, did you?"

Because sometimes I do lose my temper, I act lesser than, I let my worst self get the best of me, I can also be a fucking asshole.

Especially via text message.

Every day, I struggle to suppress this part of myself, the part of myself I get from my dad, who last weekend, at the Memorial Day parade in Chappaqua, was the sole person screaming at the people who had come in from Michigan to heckle the Clintons as they walked by, and it is fucking exhausting. I want to be liked, I want to be good, I want people to say about me behind my back, "She's a decent person."

But sometimes I want to fucking say to people, "You're a selfish asshole, you are behaving like a spoiled brat, wake the fuck up and in the meantime, leave me and my kids alone." But also, "Forgive me for saying this, will you still be my friend, don't act awkward the next time we run into each other on the playground."

I often think there is something wrong with me, that I'm always getting emotionally entangled with people and then fighting with them. And there probably is something wrong with me. I had a dysfunctional childhood.

But I don't know, isn't it also normal to be angry? And if so, how am I fucking up myself and my kids by constantly pretending like I'm not?

Exhibit 12

"Last night, I received a huge package from my dad... My parents have not spoken to me in over a year... I knew that it was not a gift, but instead, some sort of emotional bomb. Caleb opened it for me. 'It's your wedding dress,' he said... I never learned that I was enough... Caleb was waiting at the door with the kids."

-Excerpted from 6/18/21 blog post by Brienne Walsh titled, "Motherhood Doesn't Get Any Easier, But It Gets Less Dark" from "A Brie Grows in Brooklyn"



Last night, I received a huge package from my dad. I was at tennis practice when it arrived. Caleb called me to tell me about it. My parents have not spoken to me in over a year. No letters, no phone calls, no presents for the kids for their birthdays, or holidays. No packages.

I started crying. "I don't want to open it," I said, because I knew that it was not a gift, but instead, some sort of emotional bomb.

Caleb opened it for me. "It's your wedding dress," he said.

I never learned from anyone that I was enough. I got home, and Caleb was waiting at the door for me with the kids.

#My life #Motherhood

7 notes Jun 18th, 2021



Exhibit 13

"I don't want to be an abusive parent. I don't want to be a screamer, or a hitter. I don't want Cleo to have an eating disorder, or a complex, or be medicated from the time she can pee in an adult toilet."

-Excerpted from 6/17/19 blog post by Brienne Walsh titled, "15-Year-Olds Don't Care About My Issues" from "A Brie Grows in Brooklyn"

Anyway, the reason why I think that there is something wrong with my kid, and my parenting, and my entire being is because my own fucking mother will not reassure me that I'm doing ok, I'm ok in who I am as a person, I'm normal, I'm not an outlier, I'm not dark with shame, I'm not a firebrand, the way I was born does not prevent me from being a successful, kind, and loved person, etc. I don't know what her deal is, but I do know that being a parent is the hardest fucking thing in the entire world, not just because of the sleeplessness, or the physicality, or the boredom, or the pain, but because it forces you to confront yourself, and either change, or become an abusive fucking parent. And you have someone else's life in your hands, and it's no fucking joke, and you can't fuck up because it all means something. Unlike all of the writing jobs I've done in the art world.

And I don't want to be an abusive parent. I don't want to be a screamer, or a hitter. I don't want Cleo to have an eating disorder, or a complex, or be medicated from the time she can pee in an adult toilet. But I honestly do not have the tools at my disposal to figure out how to be a "good" parent. My mother is not there for the lesson. She's playing tennis. I'm an amateur, and I don't have a lot of time or energy to learn, and I'm scared. I don't know who to consult, or what to read, or what the right thing is.

Anyway, I'm happy to be home. I have some really good friends here, and also a television. I don't know how to end this post. Bye.

#Motherhood

4 notes Jun 17th, 2019



Exhibit 14

“No therapist has ever been able to heal this sadness I feel over the fucked up things that have happened in my family.”

-Brienne Walsh on Tara’s emancipation case. Excerpted from the 8/27/2018 blog post titled, “Someone Wants to Sue Me Over this Blog” from “A Brie Grows in Brooklyn”



Yeah, I have a blog where I'm very honest, but do you know what, it's all I have. I don't have money to go see a therapist. Even more so, I don't have money to hire someone to watch Cleo while I go see a therapist. Even more so more so, no therapist has ever been able to heal this sadness I feel over the fucked up things that have happened in my family.

More than anything, I think this blog reaches people who also have fucked up families, and no one to talk about them with. Who struggle with whatever. I don't know why you read this, but it makes me feel good to let you, and other people know, that I am not perfect, that I am struggling, that my life is not a cute Instagram story.

I guess I'll probably be afraid of writing on the blog for the next few weeks, but I'll keep trying.

#My life #Family #Motherhood

20 notes Aug 27th, 2018



Exhibit 15

"I think of the images I post on my own Instagram. In the pool with my big, good-looking family. On our big family estate. And I think how those images lie so hard."

-Brienne Walsh on Tara's emancipation case. Excerpted from the 8/27/2018 blog post titled, "Someone Wants to Sue Me Over this Blog" from "A Brie Grows in Brooklyn"



Then I think of the images I post on my own Instagram. In the pool with my big, good-looking family. On our big family estate. And I think how those images lie so hard. When I got the letter from the lawyer last week, I called my dad, and he screamed at me to calm down. My mother hasn't talked to me in any meaningful way since. I know that there have been battles at the house when I'm not there. I know that

Exhibit 16

-The Walsh family adopted two daughters from Korea. They are three years apart and not biologically related to each other. They were forced to dress alike, even as high school teenagers. All photos are from "A Brie Grows in Brooklyn," however is it a source of gossip in Chappaqua.

- Top Left: Spring 2016
- Top Right: September 2016
- Bottom Photos: Undated



- Photos published on Brienne Walsh's blog "A Brie Grows in Brooklyn"

Exhibit 17

“They are not genetically the same as me, but their reactions to the abuse were identical.”

-Brienne Walsh on Tara’s emancipation case. Excerpted from the 6/29/20 blog post titled, “If You Treat A Living Thing Right, It Will Live For You” from “A Brie Grows in Brooklyn”

Imagine if your mother purposefully killed something that was alive, and belonged to you.

This is one of the many, many subtle abuses I was subjected to as a child, and as an adult. My mother, when faced with the task of caring for me, her child, either turned her back, or purposefully hurt me.

There were subtle abuses, and there were overt abuses. There was a lot of violence. There was a lot of punishment. There was almost no logic to the way that things operated inside our home. I was a good kid who got good grades, didn't drink or do drugs, and still, I was often denied basic human rights such as food, security and love.

As an adult, I began to forget what that was like. You can almost convince yourself that you're just being dramatic.

And then, the pandemic happened.

We moved in with my parents. My little sisters were there. They grew up in the same household, with the same mother. They are not genetically the same as me, but their reactions to the abuse were identical. One reacts by being super good, and the other reacts by acting out, and they still get punished equally. The eldest of the two turned 18 on April 24, in the midst of it all. Before the pandemic hit New York, she had made plans to move out, on her 18th birthday, and in with a friend. The friend's mother had agreed to house and feed her until she went to college.

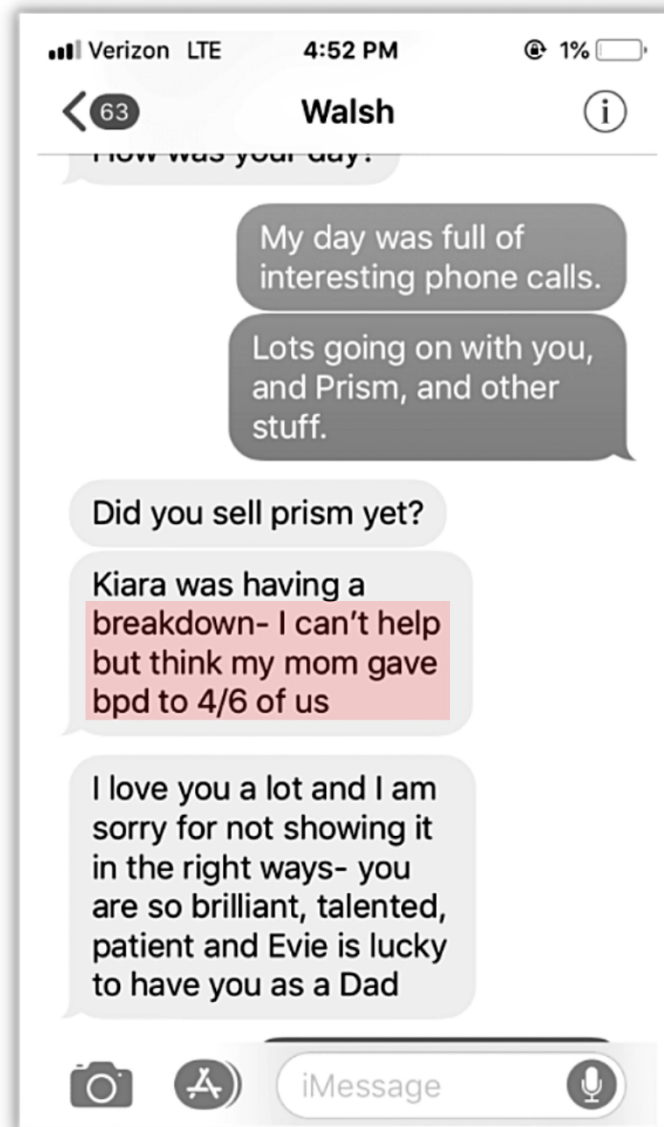
The friend's mother told her two weeks after the lockdown begin that they no longer had room for my little sister.

My parents are rich beyond imagination, but my little sister has no money. They never completed her adoption paperwork, so she has

Exhibit 18

“I can’t help but think my mom gave bpd (Borderline Personality Disorder) to 4/6 of us.”

-Tara Walsh texts Steve Russell, June 2018

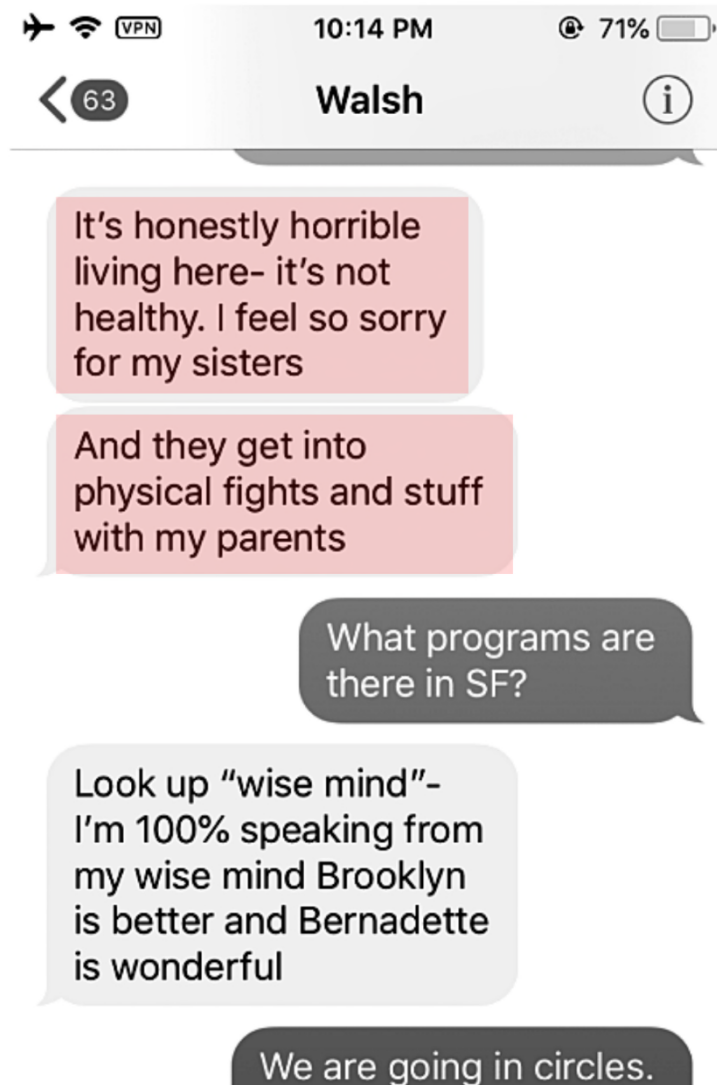


Tara Walsh texts Steve Russell June 2018

Exhibit 19

“It’s honestly horrible living here – it’s not healthy living here. I feel so sorry for my sisters. And they get into physical fights and stuff with my parents.”

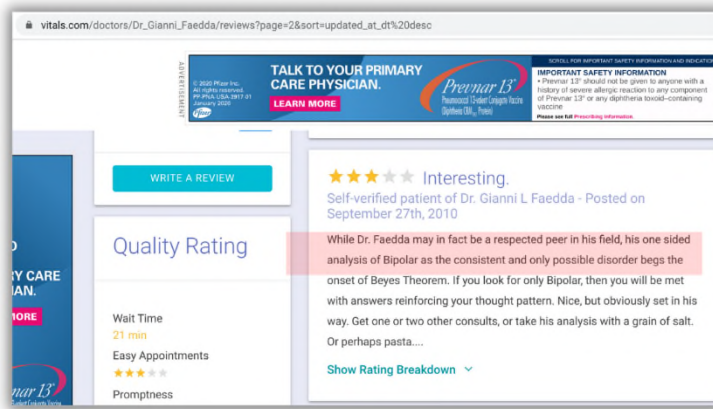
-Tara Walsh texts Steve Russell, June 2018



Tara Walsh texts Steve Russell June 2018

Exhibit 20

“His one-sided analysis of Bipolar as the consistent and only possible disorder begs the onset of Beyes Theorem. If you look for only Bipolar, then you will be met with answers reinforcing your thought pattern.”



Review of Dr. Faeda, Doctor who diagnosed adopted daughter with same hereditary condition as the rest of the Walsh Family.

18 MS. AASEN: Q. Okay. Do you know who
19 Dr. Faeda is -- F-A-E-D-A? 15:15
20 A. Yes, I do.
21 Q. Who's that?
22 A. He's a psychiatrist.
23 Q. Does he treat anyone in your family?
24 A. I don't know.
25 Q. How do you know of him?
Page 129

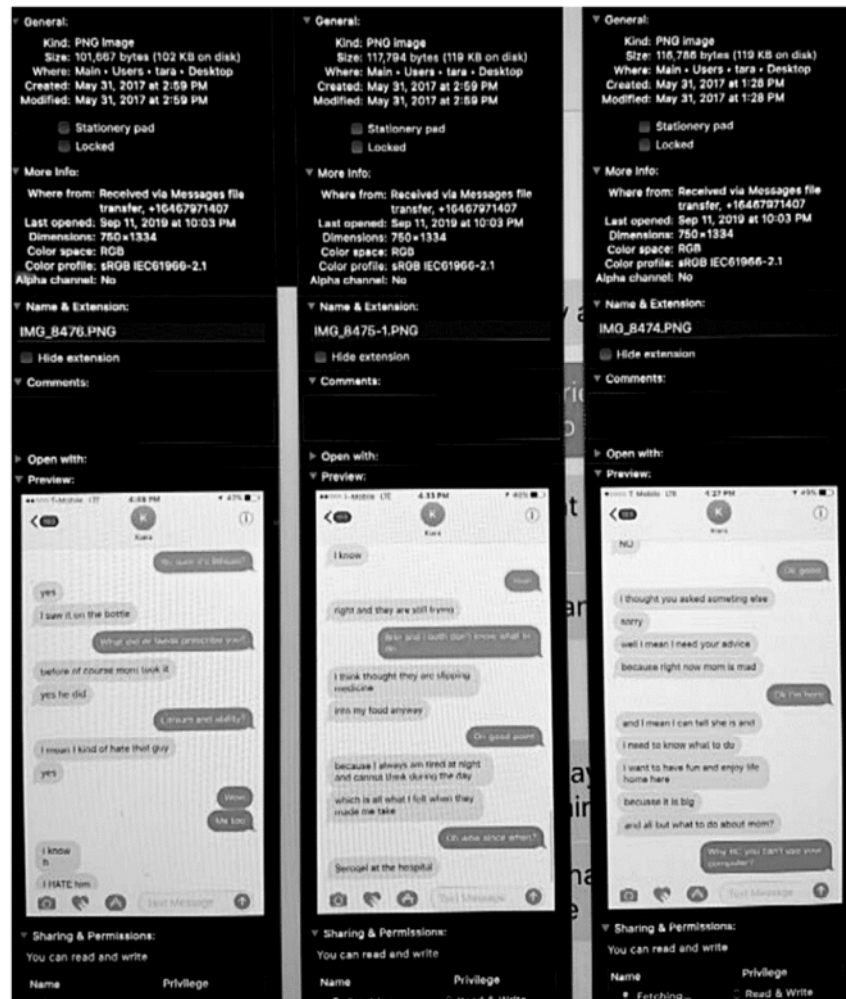
1 A. I know that in the past he has treated people
2 in my family.
3 Q. Who has he treated in your family?
4 A. I believe my uncle Michael and my sister Tara.
5 Q. Okay. Do you know if he's treated anybody
6 else in your family in the past or present? 15:15
7 A. I believe he might have also treated my
8 brother Brendan.

Dr. Faeda has treated at least 4/6 of the Walsh children.

Exhibit 21

“I think thought they are slipping medicine... into my food anyway... because I always am tired at night and cannot think during the day... which is all what I felt when they made me take it.”

-Kiara Walsh, Tara’s sister, asks Tara’s advice after suspecting their mother was ‘slipping’ Lithium and Seroquel into her food. The same medications Steve Russell was surreptitiously drugged with.



Kiara Walsh, younger adopted sister of Tara Walsh, asks Tara for advice after suspecting their mother was 'slipping' Lithium and Seroquel into her food.

Exhibit 22

“Yesterday [she] told my parents that she was coming to live with me. Their response was that if she does that, she’ll be out on her own. They’ll cut off paying college tuition in the future, as well as her healthcare.”

“He was worried about my sister and wondering if she could come and live with us. The same family also offered to help pay for [her] college bills.”

-Excerpted from the 12/17/20 blog post titled, “The Victim Routine Is One I’m Very Familiar With” from “A Brie Grows in Brooklyn”

Last week, my sister Mariah asked me if she could come live with us in Savannah. She has not been happy in college. This past summer, two of her friends committed suicide, and I know that these deaths lay heavy on her mind. “Her life is worth more than a semester of college,” said one of her friend’s fathers, who called me, saying he was worried about my sister, and wondering if she could come live with us. The same family also offered to help pay for Mariah’s college bills.

I am happy to have my sister come live with us. Caleb is also happy with it. We have been setting up a bedroom for her. I know she loves to snuggle, so I made the bed cozy. I put it by a window, where she’ll get plenty of morning sunshine. I’ve been looking for dressers for her, a lamp. I put some art books in the room so she’ll have beautiful things to look at.

It’s a lot, to take responsibility for another person. I’m happy to do it. People, throughout my life, have taken care of me in ways they often don’t realize. They’ve sent me gifts, or notes, when I’m sad. They’ve invited me to stay at their houses. My friend Kim takes care of me all of the time. She offered to drive Mariah all the way from New York to Savannah, even though it will mean she’ll have to quarantine afterwards. Sometimes, people can be so kind it’s almost painful, because you feel like you don’t deserve it. Sometimes, I can’t believe how lucky I am to have a friend like Kim in my life.

Yesterday, Mariah told my parents that she was coming to live with me. Their response was that if she does that, she’ll be on her own. They’ll cut off paying college tuition in the future, as well as her healthcare.

“She’s manipulating you,” my father wrote Mariah about me, as if, instead of doing the right thing, my offer of shelter was some sort of malignant, vicious act.

Exhibit 23

“Are you sure you want to have children given the history of mental illness in our family?”

- Excerpted from the 4/24/19 blog post titled, “Is Your Child a Piece of Work? Come out of the Woodwork” from “A Brie Grows in Brooklyn”

Is Your Child a Piece of Work? Come out of the Woodwork


Before I had kids, I would often have telephone conversations with my mom in which she would say: “Are you sure you want to have children given the history of mental illness in our family?”

My challenge is myself, and my whole fucked up family history, and my own flaws. I need to stop caring what other people think so much so that I don't extinguish what makes my daughter a heroine — or even worse, medicate and prescribe her with disorders where none exist. I struggle every day with what makes a person who they are, and what is good or bad. I think often about whether or not my siblings were victims of our circumstances, or born the way we were. I wonder especially if we were over-medicated. But I also need to up setting boundaries, especially in regards to sugar, which 100% makes Cleo crazy. I have a hard time with the sugar thing because I was not allowed to eat sugar, and any sort of control is triggering, for me, reminding me of the miserable parts of my childhood.

Exhibit 25

"Much higher doses of Li carbonate are often prescribed for specific mood disorders, would be expected to be associated with markedly elevated urine Li if ingestion was recent or chronic."

- Explanation for Steve's Lithium test result which was 6.1x the normal reference range.



DOCTORS DATA

LAB #: U170313-2197-1
 PATIENT: Stephen Russell
 ID: RUSSELL-S-00015
 SEX: Male
 AGE: 43

CLIENT #: 42158
 DOCTOR: Ha Dang, ND
 Marin Naturopathic Medicine
 2144 4th St #6
 San Rafael, CA 94901 U.S.A.

Essential Elements; Urine

		ESSENTIAL AND OTHER ELEMENTS		PERCENTILE				
		RESULT/UNIT	REFERENCE INTERVAL	2.5 th	16 th	50 th	84 th	97.5 th
Sodium (Na)		67 mEq/g	40- 200					
Potassium (K)		59 mEq/g	20- 90					
Phosphorus (P)		400 µg/mg	150- 1000					
Calcium (Ca)		120 µg/mg	20- 250					
Magnesium (Mg)		70 µg/mg	20- 200					
Zinc (Zn)		2.5 µg/mg	0.09- 1.3					
Copper (Cu)		0.24 µg/mg	0.006- 0.06					
Sulfur (S)		950 µg/mg	275- 1000					
Manganese (Mn)		0.003 µg/mg	0.0003- 0.005					
Molybdenum (Mo)		0.03 µg/mg	0.01- 0.13					
Boron (B)		3 µg/mg	0.4- 3.5					
Chromium (Cr)		< dl µg/mg	0.0002- 0.002					
Lithium (Li)		1.1 µg/mg	0.008- 0.18					
Selenium (Se)		0.027 µg/mg	0.03- 0.2					
Strontium (Sr)		0.13 µg/mg	0.035- 0.32					
Vanadium (V)		0.0002 µg/mg	0.0001-0.0015					
Cobalt (Co)		< dl µg/mg	< 0.007					
Iron (Fe)		0.26 µg/mg	< 1					

		URINE CREATININE						
		RESULT	REFERENCE INTERVAL	-2SD	-1SD	MEAN	+1SD	+2SD
Creatinine		105	35- 240					

SPECIMEN DATA	
Comments:	
Date Collected: 03/09/2017	pH Upon Receipt: Acceptable Collection Period: timed: 6 hours
Date Received: 03/13/2017	<dl: less than detection limit Volume:
Date Completed: 03/15/2017	Provoking Agent: NA
Method: IAS, AA, S Spectrophotometry; P ICP-MS; P, Ca, Cr, Co	Lab number: U170313-2197-1 Patient: Stephen Russell
Results are creatinine corrected to account for urine dilution and are representative of a healthy population under normal increase urinary excretion of metals/elements.	Urine Tox. & Ess. Page: 10 Client: 42158

The concentration of lithium (Li) in this urine specimen is unexpectedly high. Li occurs almost universally at low concentrations in water and in plant and animal food products. Li has important functions in the nervous system, and possibly the immune system. Assimilation of Li from food, water and even commonly available organic Li supplements (when taken as directed) would not be expected to be associated with abnormally high levels of Li in urine. In contrast, much higher doses of inorganic Li carbonate, which are often prescribed for specific mood disorders, would be expected to be associated with markedly elevated urine Li if ingestion was recent or chronic.

Occupational/accidental assimilation of excessive amounts of Li could possibly be associated with the manufacture or improper handling of lightweight metal alloys, glass, lubrication greases, and batteries.

Li, when assimilated in excessive quantities, may cause dermatitis, nausea, confusion, coarse hand tremor, slurred speech, edema, or hypotension. Li toxicity may be more pronounced with low sodium intake. Point-in-time Li doses/exposure are rapidly excreted in urine, and blood analysis may not be indicative of exposure after 5 to 7 days.

Exhibit 26

Tara Walsh admits in open court to surreptitiously drugging Steve Russell with her anti-psychotic medication, Seroquel.

I. TARA WALSH'S ADMISSIONS TO DRUGGING STEPHEN RUSSELL

A. Tara Walsh Testified at August 29, 2018 California Hearing for Stephen Russell's Petition for a Domestic Violence Restraining Order (transcript at pp 76, beginning at line 7):

1. By Stacey Pool, attorney for S.Russell, Questioning T.Walsh (transcript at pp 76, beginning at line 7):

Q: On at least two occasions you gave Mr. Russell the drug Seroquel, correct?

A: Yes

Q: Was he aware that you were giving him this drug?

A: No, he was not.

Exhibit 27

"Importantly, due to her childhood history, Tara experiences abandonment anxiety that is triggered when she perceives abandonment."

"Tara began seeing Dr. Gopal for treatment for Bipolar and Borderline Personality Disorder."

- Rita Mercante, Tara's long-term therapist, confirms Tara's Borderline Personality Disorder diagnosis in a letter to the court, attributes it to childhood history.

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

June 24, 2018

To Whom This May Concern:

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

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

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

Best regards,
Rita J. Mercante, LMHC

Exhibit 28

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address): Stacey Poole 202964 LERNER * POOLE, LLP 535 PACIFIC AVENUE, 2ND FLOOR SAN FRANCISCO, CA 94133 TELEPHONE NO.: (415) 391-6000 FAX NO. (Optional): (415) 391-6011 E-MAIL ADDRESS (Optional): Stacey@cafamilylaw.com ATTORNEY FOR (Name): Stephen Russell	or court use only ENDORSED FILED Superior Court of California County of San Francisco JUN 04 2018 CLERK OF THE COURT By: <u>BRIE A. REDDICK</u> Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister MAILING ADDRESS: Same CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME:	CASE NUMBER: FPT-18-377425
PLAINTIFF/PETITIONER: Stephen Russell	
DEFENDANT/RESPONDENT: Tara Walsh	

NOTICE OF NATURE AND AVAILABILITY OF ALTERNATIVE DISPUTE RESOLUTION METHODS IN FAMILY LAW MATTERS

A. Superior Court and Family Law Department Policy Recommending Use of Alternative Dispute Resolution Method in Family Law Matters

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The term "alternative dispute resolution" (sometimes called "ADR") refers generally to methods of resolving disputes without going through formal adversarial court proceedings. Although there are several methods of ADR, the two methods to which this Notice applies are mediation and collaborative law (also called collaborative divorce and collaborative practice).

Exhibit 29

"We were a family. I made a decision as a family."

- Tara Walsh testifies in defense of her drugging Steve Russell with the anti-psychotic, Seroquel at the 10/31/2019 San Francisco Domestic Violence Restraining Order.

19 Q. But you didn't know about his current medical
20 diagnosis. You didn't know about his blood cholesterol, for
21 example?

22 A. I did not.

23 Q. Ms. Walsh, you knew what you were doing to
24 Mr. Russell was wrong, didn't you?

25 A. That's a very complicated question. You know, we
26 were family. I made a decision as a family. I did not mean
27 harm to Mr. Russell. It was not a malicious act.

Exhibit 30

“I’m better off pretending I want to be with him and getting the most while I can – then leaving him for good... I think he will marry me... Then I can just divorce him for money.”

- Tara Walsh texts her on-again, off-again boyfriend, Matan Gavish, less than two weeks before moving to San Francisco with Evie.

Yeah 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.

Okay, have a fun 40 yrs

More like 6 months

That makes no sense

Why?

Bc trusts can be altered?

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

Exhibit 31

“I wouldn’t need to beg you to marry me like a pathetic person. I want to marry you bc of her – I want to give her the best shot at life. Bc loving each other and being together will bring her happiness.”

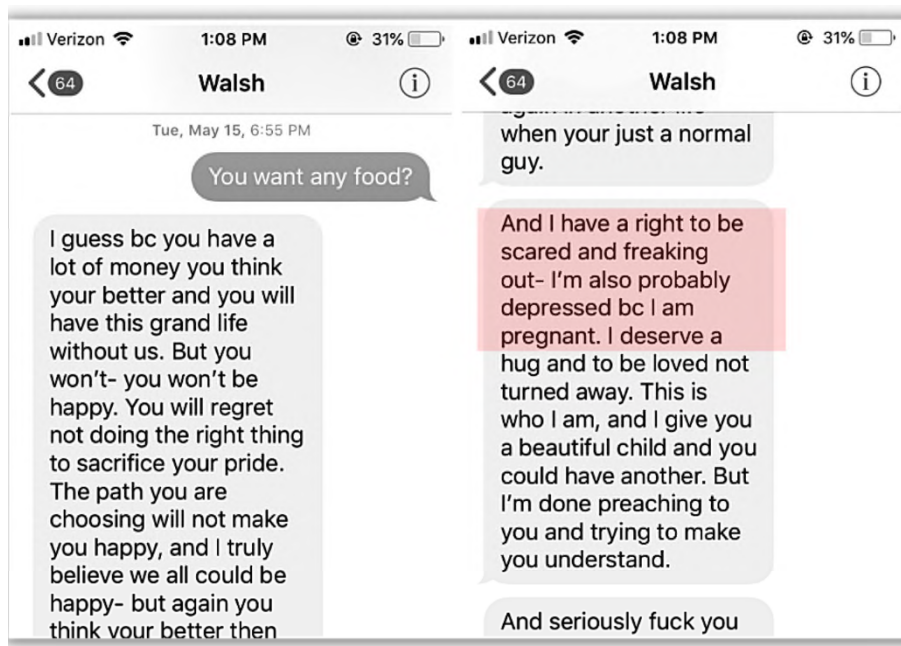
- Tara attempts to guilt Steve Russell into marrying her on May 15, 2018



Exhibit 32

"I'm also probably depressed bc I am pregnant... I give you a beautiful child and you could have another."

- Tara texts Steve Russell on May 15, 2018 two days before texting her friend, Rashmi Narendra, "I think he knows I'm not actually pregnant."



"I think he knows I'm not actually pregnant"

- Tara texts her friend, Rashmi Narendra, on 5/17/2018, WALSH_005693 Line 9106 from SF Civil Discovery

Missed voice call at 5:57 PM

Just tried I'm going back in too worried to leave evie 5:57 PM

I'm 5:57 PM

Okay 5:57 PM ✓

The problem is whenever I'm apart from him for even 1 hour I get super anxious- like I think I would freak out in New York 6:44 PM

What is that about? He also impromptu wanted to have sex- which I did but it was totally just a control thing- very transparent. But I don't not like it- I don't know I need some serious therapy to be able to move on and function 6:45 PM

He even came inside of me- I think he knows I'm not actually pregnant- need to take morning after pill again 6:45 PM



Exhibit 33

- Tara Walsh finds Steve Russell's hidden and private financial statements and emails them to herself, without any security. Here is one of two emails recovered. Documents included stock, personal insurance, bank account statements, broker statements, and tax returns.

From: Vital Branding <tara@vitalbranding.com>
Sent: Thursday, March 22, 2018 1:17 PM
To: tara@vitalbranding.com
Subject: Financial
Attachments: IMG_0431.jpg; Untitled attachment 31620.txt; IMG_0432.jpg; Untitled attachment 31623.txt; IMG_0433.jpg; Untitled attachment 31626.txt; IMG_0434.jpg; Untitled attachment 31629.txt; IMG_0435.jpg; Untitled attachment 31632.txt

Exhibit 34

"I also love people who, on an average day vacillate between... scheming on ways to get their baby daddy committed to a mental institution.

- Brienne Walsh blogs about Tara Walsh in a now deleted post from September 2018.

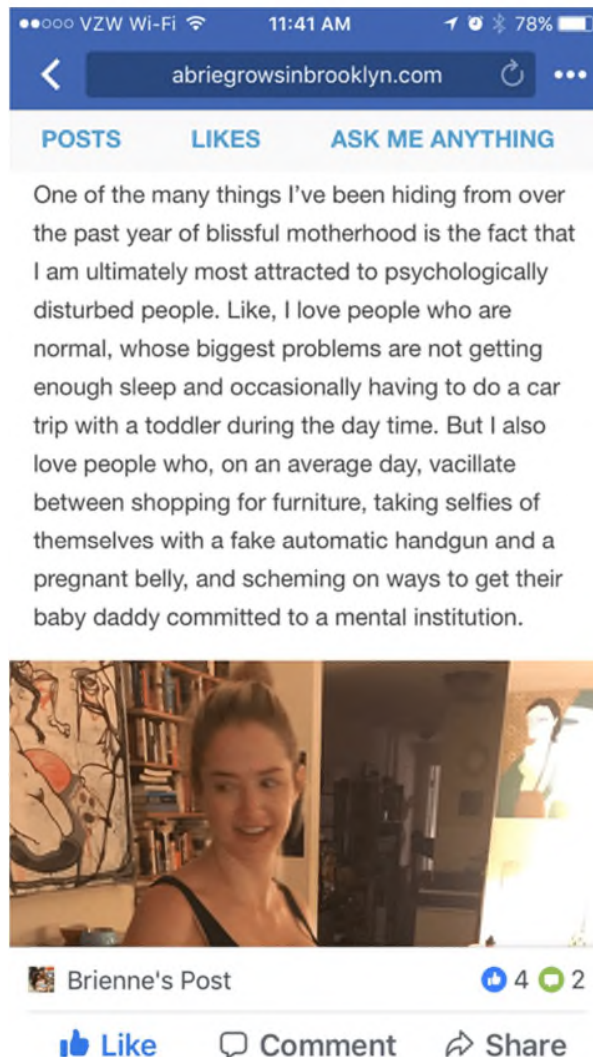


Exhibit 35

"Yeah she called me last night and said the same thing – just with Steve to take his money and then she will leave. I get the impression that she is now planning to head back here and is greasing the skid so everyone is happy to see her."

- Email between Tara's siblings, Brienne and Brendan, shortly before her return to NY in 2018.

1 A. An e-mail between myself and my brother
2 Brendan.
3 Q. Can you read the first paragraph of your
4 brother Brendan's e-mail?
5 A. "Yeah she called me last night and said the
6 same thing -- the just with Steve just to take his money
7 and then she will leave. I get the impression that she 12:52
8 is now planning to head back here and is greasing the
9 skid so everyone is happy to see her."
10 Q. Do you know who he's referring to when he says
11 "she"?
12 A. Yes.
13 Q. Who's that?
14 A. Tara.
15 Q. To your knowledge, did Tara tell Brendan that
16 she was just with Steve to take his money?
17 A. That's what he says in the e-mail, but I do 12:53
18 not have direct knowledge of that being said.
19 Q. Sure. Brendan says "yeah she called me last
20 night and said the same thing." Had she called you and
21 told you that?
22 A. I don't remember.
23 Q. So to your knowledge, you don't remember if
24 Tara had ever told you that she was just with Steve for
25 his money?

Page 47

Exhibit 36

"You almost made me leave my daughter"

- Tara Walsh, texts Steve Russell, that he 'made' her leave Evie after she started to flee San Francisco for fear of criminal repercussions after her crimes against Steve.

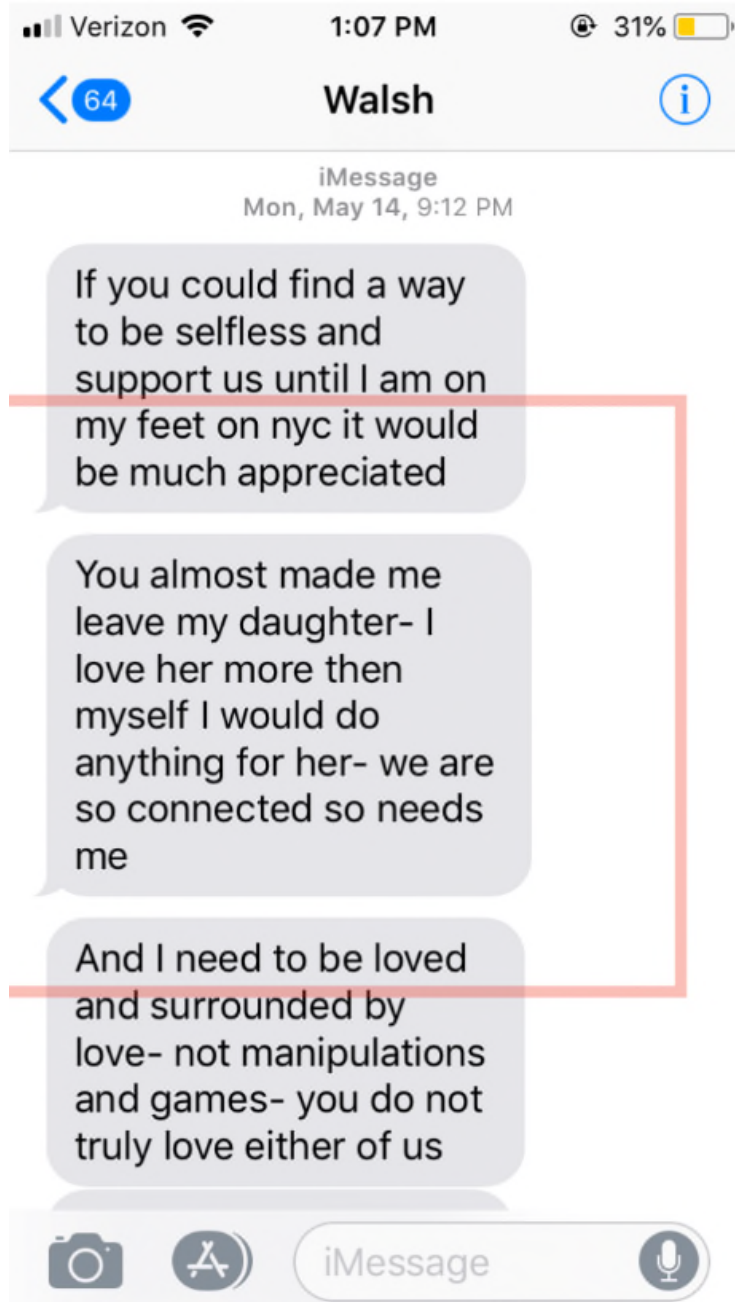


Exhibit 38

"She is cancelling the flight and returning – I will be in touch... She told me she's back at the apartment – is that not the case?"

- Steve Walsh confirms that Tara has safely returned to the apartment with Evie after she disappeared without a word to anyone. Steve Russell and Steve Walsh had been in contact about the best treatment options for Tara.

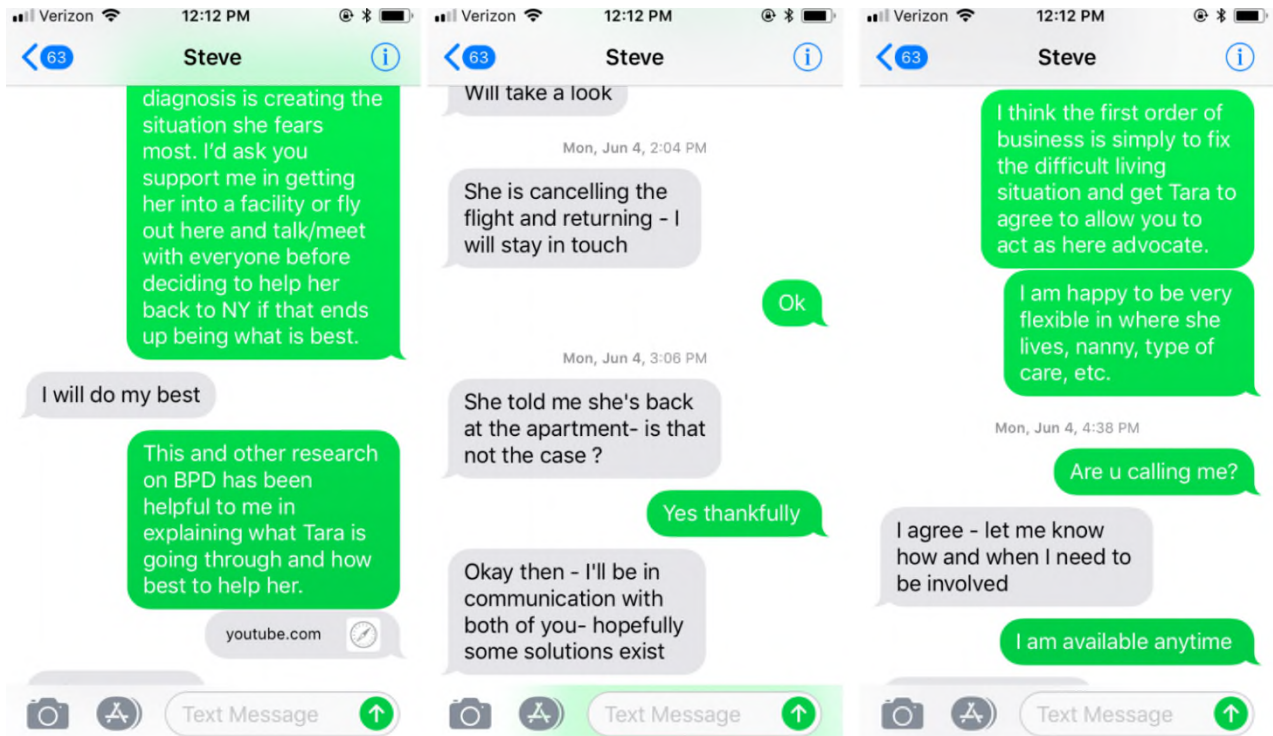


Exhibit 39

San Francisco Court Order Prevented Tara from leaving the state with Evie.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address): Stacey Poole 202964 LERNER * POOLE, LLP 535 PACIFIC AVENUE, 2ND FLOOR SAN FRANCISCO, CA 94133 TELEPHONE NO: (415) 391-6000 FAX NO. (Optional): (415) 391-6011 E-MAIL ADDRESS (Optional): Stacey@cafamilylaw.com ATTORNEY FOR (Name): Stephen Russell	or court use only ENDORSED FILED Superior Court of California County of San Francisco JUN 04 2018 CLERK OF THE COURT BY: BRIE A. REDDICK Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister MAILING ADDRESS: Same CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME:	CASE NUMBER: FPT-18-377425
PLAINTIFF/PETITIONER: Stephen Russell	
DEFENDANT/RESPONDENT: Tara Walsh	

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Exhibit 40

"Excellent. Thank you Steve, we appreciate your assistance and understanding. And thank you for the timely updates."

- Steve Walsh thanks Steve Russell for keeping him informed on Tara's treatment updates.

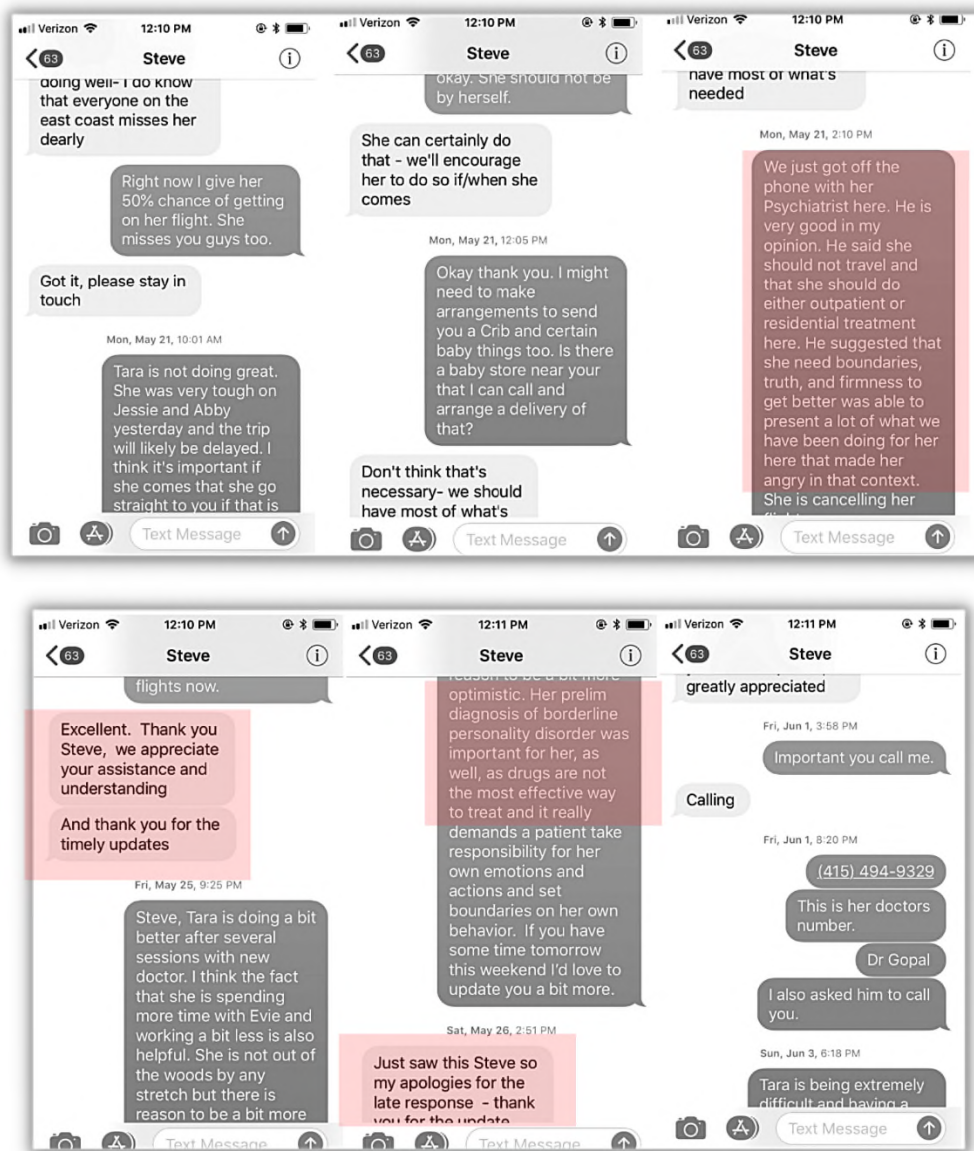


Exhibit 41

"Steve – I'm very happy to hear she'll be coming to visit."

- Steve Walsh understands the court order and confirms he is excited for Evie to come for a visit.

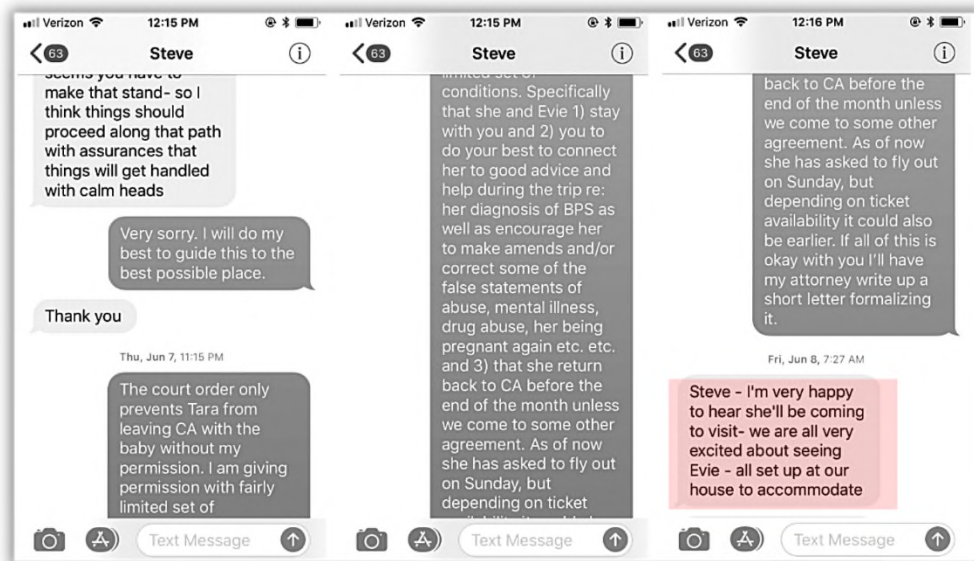
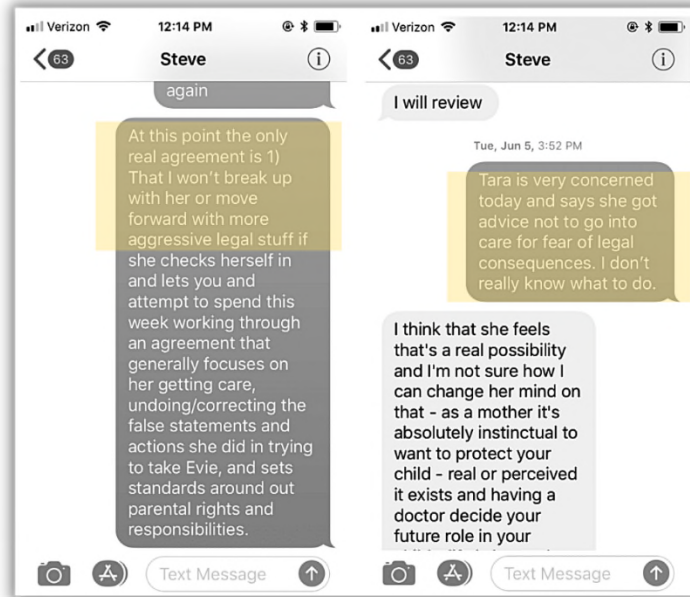


Exhibit 42

Steve Walsh hired a nanny for Evie in Chappaqua, NY knowing that a San Francisco Court Order prevented her from leaving the state.

- SF Civil Discovery WALSH_003434 - 003440

From: stephen Walsh <sw052382@gmail.com>
Sent: Sunday, May 27, 2018 1:57 PM
To: Tara Walsh; Tara
Subject: Anna papers
Attachments: 20180527_165501.jpg; 20180527_165452.jpg; 20180527_165426.jpg; 20180527_165344.jpg; 20180527_165444(0).jpg; 20180527_165406.jpg

SUMMARY

I am a friendly, attentive, responsive, baby sister who is motivated to help children become happy, healthy and well behaved. I am devoted and reliable. I supply loving care while making sure to meet disciplinary and educational goals for each child. I am mature, responsible and a team player who enjoys co-parenting with my employers.

EDUCATION and CERTIFICATIONS High School Diploma - General Studies Escola estadual Andradas, Brazil
...HEALTHCARE PROVIDER (CPR and AED) Program.

WORK EXPERIENCE. My experience about children...I had two children...I took care of them by myself...I have two granddaughters...I took care of them as well because the parents worked or of home and were very busy...my grandson I took care also but just for a few months...because I moved to USA...Living here I worked for a family in Mamaroneck where I took care of a little girl...I was a driver...I washed her clothes...I used to do everything that was necessary about her...her mom used to return from work about 7pm...so I spend all they taking care of the little girl...in Salt Lake City I worked to a family for more than 5 years...They have two girls...they are 5 and 8 years old...Parents are doctors and professors at University of Utah...the others jobs were just for a few days...sometimes hours...or just when parents went out at...

The little babies, these need a lot of love, attention, because they are totally dependent on us...I will always be performing daily activities that meet the emotional and physical needs of the children I care for

Drop offs and pickups from school and other activities
Dinner prep and meals
Up kept children's rooms



While Tara Walsh and Steve Walsh ask Steve Russell to 'hold off on legal action' while she figures out treatment options with her family in New York...

Steve Walsh hired a nanny in Chappaqua NY and emailed Tara her information. WALSH_003434 - 003440

Exhibit 44

"Or fly out here and talk/meet with everyone before deciding to help her back to NY if that ends up being what is best."

- Steve Russell asks Steve Walsh to come visit San Francisco and help figure out the best path forward getting Tara help on June 4, 2018.

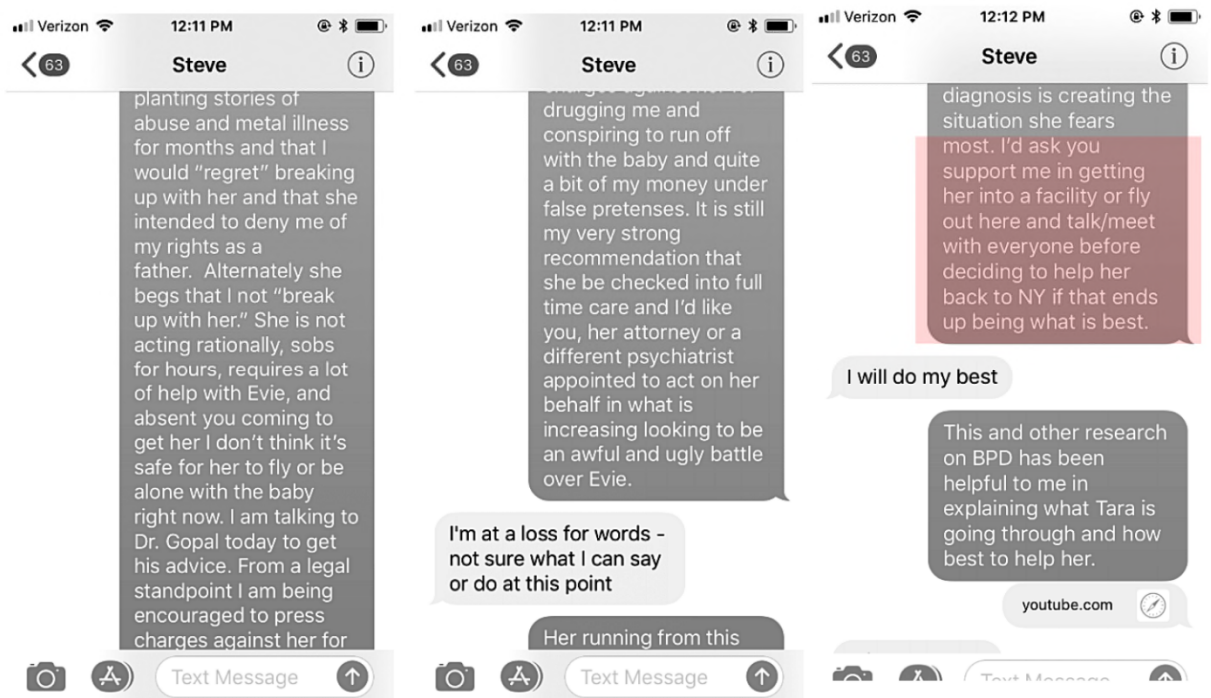


Exhibit 46

“No they love Evie so much – my Mom doesn’t ever want her to leave. But I seriously cannot stand living here... It really hasn’t been that bad – it only gets bad when I say I want to leave”

- Tara texts Linda Russell, paternal grandmother, from her parents’ Chappaqua estate in June 2018

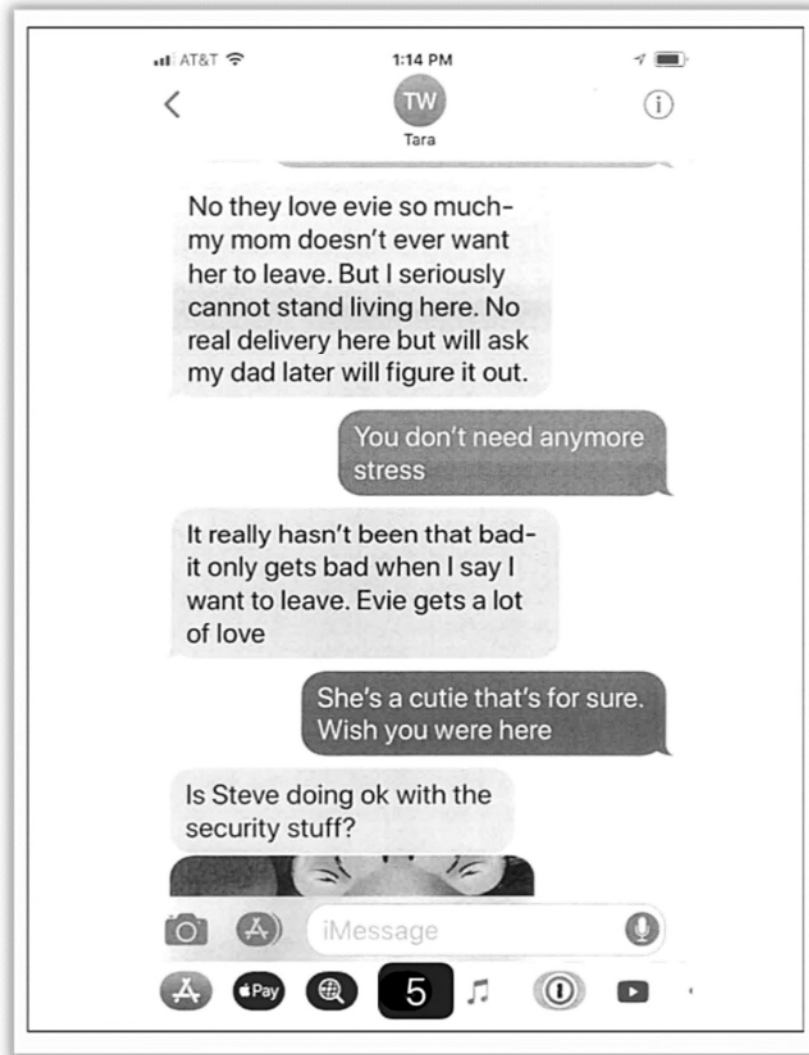


Exhibit 47

"My whole family just wants me to be close, but living with my parents is honestly not good for my mental health. You know the background very well."

- Tara texts Steve Russell from her parents' Chappaqua estate in June 2018

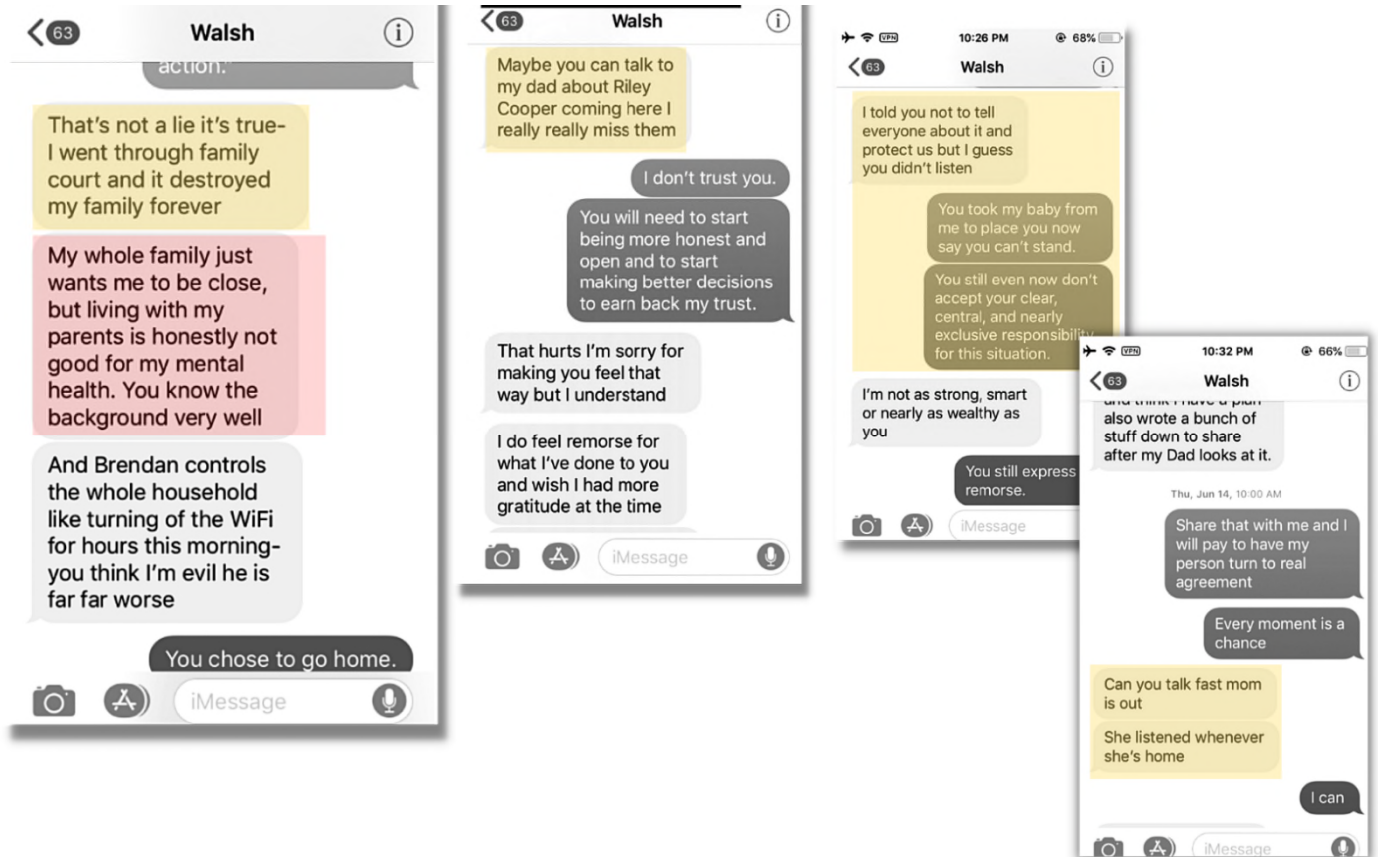
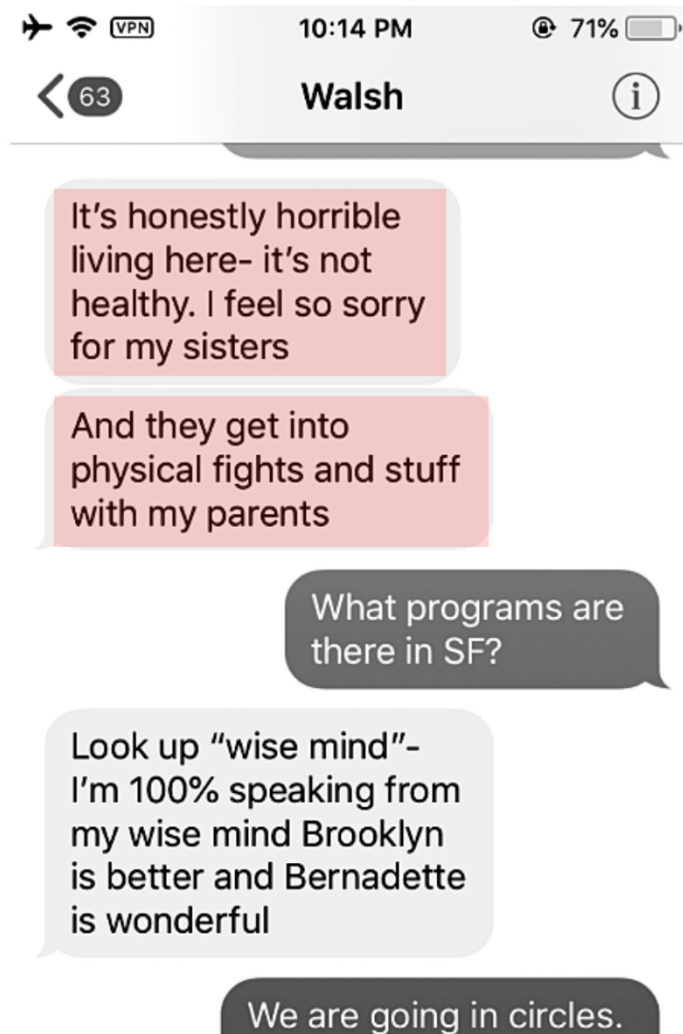


Exhibit 48

“It’s honestly horrible living here – it’s not healthy.”

-Tara Walsh texts Steve Russell, June 2018



Tara Walsh texts Steve Russell June 2018

Exhibit 49

"I advised you that Tara reported to me that Evie returned from a visit with her father on Sunday, March 31 with a big bruise on her shin"

- From 4/6/19 email from Jennifer Jackman to Steve Russell regarding Evie's bruises.

With respect to "bruises", I advised you that Tara reported to me that Evie returned from a visit with her father on Sunday, March 31 with a big bruise on her shin that was not there when she left for the visit. I told Ms. Walsh that it wasn't unusual for a child

Exhibit 50

"[I] will address any concerns that I may have directly with the court... Also, please be advised that I will be filing a motion tomorrow to hold you in contempt for failure to comply with the order directing payment of my fees."

- Jennifer Jackman, AFC, advises Steve Russell that he is late on his bill while after he reported the bruises to the appropriate authorities.

On Wed, Apr 10, 2019 at 4:01 PM, Jennifer Jackman <jmj@mzw-law.com> wrote:

Please remember to copy your attorneys on all email correspondence. I'm discussing this issue with Tara's attorneys and will address any concerns that I may have directly with the court. I understand that you filed a police complaint so this is a criminal matter and quite possibly a CPS matter as well.

Also, please be advised that I will be filing a motion tomorrow to hold you in contempt for failure to comply with the order directing payment of my fees.

Sent from my iPhone

> On Apr 10, 2019, at 3:40 PM, Steve Russell <sgrussell@pm.me> wrote:

>

> Ms. Jackman,

>

> I am available anytime to discuss the details of Evie's bruises etc. and my conversation with Evie's doctor and the nanny. The supervisor documented, as well, though I am unclear as how to best facilitate getting this information to you given restrictions.

>

> I hope you will take the matter seriously and follow up. I have witnessed these cycles first hand with Tara and they tend to only get worse.

>

> Can you let me know who you have spoken to about the incidents in question and how it was explained? Have you confirmed that Evie has been with Tara and her family exclusively or is it true that Tara is taking Evie without supervision to stay with others.

>

> For my end I want to do everything I can to protect my daughter including working with you to settle things down up to and including helping to create a new temporary custody situation that allows for more certainty and less tension.

>

> Let me know if you are open to working with me on something like that.

>

> Steve

Exhibit 51

"[I] will address any concerns that I may have directly with the court... Also, please be advised that I will be filing a motion tomorrow to hold you in contempt for failure to comply with the order directing payment of my fees."

- Jennifer Jackman, AFC, advises Steve Russell that he is late on his bill while after he reported the bruises to the appropriate authorities.

Guttridge & Cambareri, P.C.
Attorneys at Law

222 Bloomingdale Road • Suite 301 • White Plains New York 10605 • (914) 631-6900 • Fax (914) 631-6644

JOHN C. GUTTRIDGE
JO-ANN CAMBARERI*

GLENN P. CUMMINGS
*MEMBER OF NY & CT BARS

ANTHONY LAURIELLO*
Of Counsel

April 10, 2019

Via E-Mail: jason@advocatellp.com

Jason Advocate, Esq.
Advocate, LLP
1540 Broadway, Suite 3710
New York, NY 10036

Via E-Mail: lcaryl@enensteinlaw.com

Larry Carlin, Esq.
Enenstein Pham & Glass
711 Third Avenue, 17th Floor
New York, NY 10017

Re: Walsh v. Russell
File No: 154703
Docket No: O-12635-19

Dear Counsel:

My client advises that the Chappaqua police came to her house yesterday evening. Apparently, Mr. Russell filed a police report yesterday claiming that their daughter was being abused. He reported that she had bruises as if she were "pinched", red marks around her neck and had diarrhoea. He apparently also said something about my client being abused. Both these statements are utterly untrue, and Mr. Russell fully aware of same.

Obviously Mr Russell filed the report in retaliation. Ms. Walsh advised the officer of the history of the matter, and the officer briefly examined the child. Ms. Walsh also explained to the officer that she was fearful of Mr. Russell and had a temporary order of protection against him. This is now the **third** false police report Mr. Russell has made against my client and her family in less than one month.

Exhibit 52

----- Forwarded message -----

From: Talia Kleiman<taliakleiman@gmail.com>

Date: On Wed, Apr 10, 2019 at 3:19 PM

Subject: Fwd: Visits with Evie 3/30 and 3/31

To: <kturnure@pm.me>, <sgrussell@pm.me>

Cc:

During my time acting as nanny on March 30th, I observed a raised, red and clearly irritated rash on Evie's chin, hidden in her baby fat. Otherwise she seemed to be perfectly fine aside from having a ravenous hunger for the food we had for her. Both myself and the supervisor both noticed and discussed the rash and her hunger. On March 31st I acted as Nanny again and that day I observed a bruise on Evie's left shin as Steve was changing her diaper. The day before I did not see a bruise as he changed her but on March 31st it was very visible. The Supervisor made a note of it and said she had to make a report for it. Steve mentioned he would follow-up and give her a bath the next time to check for any other areas. On March 31st she had the same ravenous hunger but the rash was less noticeable than it was the day before.

Exhibit 53

From: Steve Russell<sgrussell@pm.me>

Date: On Sun, Mar 31, 2019 at 3:28 PM

Subject: Fwd: Today's Visit

To: Jason Advocate <jason@advocatellp.com>, Ruth Dayan Eget <rdeget@enensteinlaw.com>, 'Chesnut Katherine' <katherine@advocatellp.com>, Larry M. Carlin <lcarrin@enensteinlaw.com>, Waller, Brian <brian.waller@thompsonhine.com>

Cc:

Once again Evie arrived without a nap and seemed to have not eaten, but the visit went perfectly well in spite of that. She did not cry or fuss one time, but devoured quite a bit of food before really becoming herself.

Tara's primary focus pre-visit was solely to make sure that Kelly was not acting as nanny.

There were a couple of other additional issues of concern, however. Once again. Steve Walsh pulled in behind us, this time as we dropped Evie off and told us to get off his property despite our warnings to him and the warnings of the New Castle Police not to do this. He was clearly following us and when asked what he was doing he said he was picking his daughters up from school. This is not terribly believable on a Sunday.

In any case, so as not to interfere with the police, I'd as Ms. Jackman not to reach out to Mr. Walsh until they have concluded their interview of him and she has spoken to me.

The other issue of concern were the odd bruises on Evie's leg both on her upper thigh and on her shin noted by myself and the supervisor. To me the bruise on the upper leg looked like someone pinched her, while the bruise on her shin looked like something that could have come from a fall, but had an odd pattern consistent with being struck 2-4 times with a stick or rod.

Steve

Exhibit 54

From: Jennifer Jackman jmj@mzw-law.com
Subject: Re: Evie's Bruises etc
Date: April 10, 2019 at 4:01 PM
To: Steve Russell sgrussell@pm.me
Cc: jason@advocatellp.com, katherine@advocatellp.com



Please remember to copy your attorneys on all email correspondence. I'm discussing this issue with Tara's attorneys and will address any concerns that I may have directly with the court. I understand that you filed a police complaint so this is a criminal matter and quite possibly a CPS matter as well.

Also, please be advised that I will be filing a motion tomorrow to hold you in contempt for failure to comply with the order directing payment of my fees.

Sent from my iPhone

On Apr 10, 2019, at 3:40 PM, Steve Russell <sgrussell@pm.me> wrote:

Ms. Jackman,

I am available anytime to discuss the details of Evie's bruises etc. and my conversation with Evie's doctor and the nanny. The supervisor documented, as well, though I am unclear as how to best facilitate getting this information to you given restrictions.

I hope you will take the matter seriously and follow up. I have witnessed these cycles first hand with Tara and they tend to only get worse.

Can you let me know who you have spoken to about the incidents in question and how it was explained? Have you confirmed that Evie has been with Tara and her family exclusively or is it true that Tara is taking Evie without supervision to stay with others.

For my end I want to do everything I can to protect my daughter including working with you to settle things down up to and including helping to create a new temporary custody situation that allows for more certainty and less tension.

Let me know if you are open to working with me on something like that.

Steve

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Exhibit 55

Guttridge & Cambareri, P.C. Attorneys at Law

222 Bloomingdale Road • Suite 301 • White Plains New York 10605 • (914) 631-6900 • Fax (914) 631-6644

JOHN C. GUTTRIDGE
JO-ANN CAMBARERI*

GLENN P. CUMMINGS
*MEMBER OF NY & CT BARS

ANTHONY LAURIELLO*
Of Counsel

April 10, 2019

Via E-Mail: jason@advocatellp.com

Jason Advocate, Esq.
Advocate, LLP
1540 Broadway, Suite 3710
New York, NY 10036

Via E-Mail: icarlin@enensteinlaw.com

Larry Carlin, Esq.
Enenstein Pham & Glass
711 Third Avenue, 17th Floor
New York, NY 10017

Re: Walsh v. Russell
File No: 154703
Docket No: O-12635-19

Dear Counsel:

My client advises that the Chappaqua police came to her house yesterday evening. Apparently, Mr. Russell filed a police report yesterday claiming that their daughter was being abused. He reported that she had bruises as if she were "pinched", red marks around her neck and had diarrhoea. He apparently also said something about my client being abused. Both these statements are utterly untrue, and Mr. Russell fully aware of same.

Obviously Mr Russell filed the report in retaliation. Ms. Walsh advised the officer of the history of the matter, and the officer briefly examined the child. Ms. Walsh also explained to the officer that she was fearful of Mr. Russell and had a temporary order of protection against him. This is now the **third** false police report Mr. Russell has made against my client and her family in less than one month.

Exhibit 56

SUPERVISION SERVICES

244 E.3rd Street, #20564, New York NY 10009

Tel: 917-293-1688 Fax: 212-673-6314 Email: SupervisionServices@yahoo.com

www.supervisionservices.net

Name: Stephen Russell

Date: March 23, 2019

Time: 1:30pm- 5:30pm

Location: Chappaqua, NY

Supervision Monitor (SM) arrived for scheduled visit between Biological Father (BF) Stephen Russell and his daughter Evelyn Walsh (1) at 1:12pm. SM waited for BF outside. BF joined SM promptly at 1:20pm and SM introduced herself. SM and BF then drove to the pick-up/drop-off location of 394 Whipoorwill Road Chappaqua, NY 10514 and arrived at 1:30pm.

Once BF and SM arrived at the driveway gate, BF texted to inform the family that we arrived. However, while BF was texting, a car pulled into the driveway behind us and a gentleman who BF identified as the maternal grandfather got out of his car. The maternal grandfather came to BF truck's window and angrily asked him to move so he could get in the driveway. BF calmly asked the maternal grandfather if someone is bringing Evelyn outside. The maternal grandfather stated that they did not get to meet anyone in reference to SM. BF again asked the maternal grandfather if anyone would be bring Evelyn outside and the maternal grandfather stated that the visit is not happening. BF stated that the attorneys agreed and the maternal grandfather told BF to check his email. BF once again asked if someone could bring Evelyn outside and the maternal grandfather again stated that the visit is not happening.

SM and BF drove back to the visit location where SM was able to observe the accommodations BF setup to visit with Evelyn. SM was also able to meet the nanny, Kelly. BF talked to SM about Evelyn's schedule (napping/feeding) and what he'd planned for the visit. SM departed at 1:45pm.

Supervision Monitor: Franceska Anilus, MSW

Exhibit 57

Excerpt from police report filed by Steve Russell regarding the 3/23/18 incident

Printed: 03/26/2019
At: 07:56:23

New Castle Police Department
200 S. GREELEY AVE
CHAPPAQUA, NY 10514-
(914)238-4422

Page: 1

Entry/CC#: NC-001474-19 Date: 03/23/2019 Time: 16:34 Tour: 3 Desk Officer: 157

Call Type.....: INCIDENT/MAIL Priority...: How Received: OFFICER

Caller.....: RUSSELL, STEPHEN G

Bus. Name...:

Address.....: 15 BANK ST APT# 551

City/St/Zip: WHITE PLAINS, NY -

Call Back #: 415-999-3944

Location of Assignment: 200 S GREELEY AV, CHAPPAQUA

Cross Street.....:

Business Name.....:

Description.....:

Disposition.....: APPROVED/133

Post: Dispatched: y Dispatched Date: 03/23/2019 Call Taker: 152

OFFICERS INVOLVED

Serial #: 177 Rank: PO Name: CHRISTOPHER R ROLISON Type: First Officer at See

ASSOCIATED NUMBERS

Blotter #: NC-001256-19 Call Type: INCIDENT/MAIL SUSPICIOUS

NARRATIVE

I SPOKE WITH STEVE WALSH WHO DENIES FOLLOWING RUSSELL AND STATES THAT IF HE HAD PULLED IN BEHIND HIM IT WAS ONLY BY CHANCE. I ADVISED HIM THAT IF HE WAS FOLLOWING RUSSELL TO STOP IMMEDIATELY.

RUSSELL WAS UPDATED WITH THE RESULTS OF MY CONVERSATION WITH WALSH.

Exhibit 58

----- Forwarded message -----

From: Talia Kleiman <taliakleiman@gmail.com>

Date: On Wed, Apr 10, 2019 at 3:19 PM

Subject: Fwd: Visits with Evie 3/30 and 3/31

To: <kturnure@pm.me>, <sgrussell@pm.me>

Cc:

During my time acting as nanny on March 30th, I observed a raised, red and clearly irritated rash on Evie's chin, hidden in her baby fat. Otherwise she seemed to be perfectly fine aside from having a ravenous hunger for the food we had for her. Both myself and the supervisor both noticed and discussed the rash and her hunger. On March 31st I acted as Nanny again and that day I observed a bruise on Evie's left shin as Steve was changing her diaper. The day before I did not see a bruise as he changed her but on March 31st it was very visible. The Supervisor made a note of it and said she had to make a report for it. Steve mentioned he would follow-up and give her a bath the next time to check for any other areas. On March 31st she had the same ravenous hunger but the rash was less noticeable than it was the day before.

At the drop off of Evie I witnessed Steve Walsh pull up at the top of the driveway after the supervisor headed toward the house with Evie, so the supervisor was not there to see this. Steve Walsh exited his car and had a rude attitude toward Steve and proceeded to say that he was "bringing his kids back home from school" on Sunday March 31st at approximately 5:30. Steve Russell did not respond and simply sat in the car to wait for the supervisor to return. Once the supervisor returned she asked if that was Tara's father behind us and Steve Russell confirmed and we drove off the property. Steve Russell remained calm throughout the entire interaction with Steve Walsh.

Exhibit 59

SUPERVISION SERVICES

244 E.3rd Street, #20564, New York NY 10009

Tel: 917-293-1688 Fax: 212-673-6314 Email: SupervisionServices@yahoo.com

www.supervisionservices.net

Name: Stephen Russell

Date: March 31, 2019

Time: 1:15pm- 5:30pm

Location: Chappaqua, NY

Supervision Monitor (SM) arrived for scheduled visit between Biological Father (BF) Stephen Russell and his daughter Evelyn Walsh (1) at 1:15pm. While SM waited for BF outside, SM noticed that BF, the nanny Talia and BF's girlfriend Kelly were outside adjusting the car seat. SM joined them at 1:20pm then drove with BF and the nanny to the pick-up/drop-off location of 394 Whipoorwill Road Chappaqua, NY 10514. BF remained in the vehicle at the end of the driveway just outside the gates as SM walked up the driveway to escort Evelyn to BF for their visit. SM went to the side door of the home and rang the doorbell. BM's mother opened the door, SM stepped into the home and BM came out of a room putting Evelyn's coat and shoes on. Evelyn continued to be very shy and hesitant with SM so BM offered to walk Evelyn and SM halfway down the driveway. BM held Evelyn while walking down the driveway with SM. At the halfway point BM kissed Evelyn goodbye and started to walk away but when Evelyn cried, BM comforted her again before SM continued down the long driveway to BF's car.

BF got out of his car and greeted Evelyn affectionately before the nanny assisted him with strapping her into her car seat. The nanny played with Evelyn to settle her down while BF drove to the visit location. Once the group arrived at the location, BF's girlfriend Kelly came out of the room as the group was entering and said hello to Evelyn before leaving. BF attempted to play with Evelyn but she walked over to where BF keeps her food and snacks and pointed to what she wanted. BF fed her fruit, 2 baby smoothie pouches, and a few bites of bacon and sausage, noting that BM would not be happy about it. While he ate a piece of bacon, a crumb fell onto his shirt so Evelyn grabbed it and ate it. BF changed Evelyn's diaper and noticed 2 faded black bruises; 1 was linear about 3-4 inches in length and about half an inch in width on her left shin and the other was small circular and about an inch in diameter on her upper left thigh.

Exhibit 60

From: Tara Walsh Settlement Offer

Date: Thursday, November 12, 2020

Tara wants to move out of Walsh house immediately.

Free electronic communication with Evie.

Tara will never record Steve.

Proposal:

- 1) Steve buys home for Evie in Westchester or Greenwich.
- 2) Live in nanny. Cost to Steve.
- 3) Stop all lawsuits.
- 4) Tara will apologize for all her misdeeds.
- 5) Begin visitation in new home with Evie and Steve as much as he wants... Then switch to standard time
- 6) Health insurance for Evie. Life insurance on Steve for Evie.
- 7) Steve to pay for nursery school and all future education expenses.
- 8) Steve to pay for Evie's activities.
- 9) Child support of \$3,000 per month.
- 10) **Sooner you get the house for Evie the sooner the visits can start.**
- 11) End all litigation and come to final order of custody.