

- 1) **NOTE:** Should be in third or first person
  - 2) **NOTE:** Page breaks should be fixed in the exhibits.
  - 3) **NOTE:** Most of the following new text was taken from the previous abuse document (attached).
  - 4) **NOTE:** Add missing exhibits or delete reference to it in the text. Most of the evidence can be found in this Dropbox folder.  
<https://www.dropbox.com/sh/4glplwsoqtz79vg/AADZVbt6YYRJN6hON5cOpk0Fa?dl=0>
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- 5) **Page 7, Exhibit 22:** Delete 'despite'. Should read, "her husband, and their two children."
- 6) **Page 9:** Erase the bullet point about the bruises and include the text Tara sent to Linda in July 2018, "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"
- 7) **Page 9:** Replace from 'My most recent interactions with Tara' to the beginning of the next section with the following points (please make it flow)

Tara continues to show single-mindedness about moving out of her parents' home. On November 12, 2020 she and her friend, Jesse Ozeri, stated that Tara, "want[ed] to move out of the Walsh house immediately." Her proposal traded access to Evie for help leaving her parents' compound.

- "Steve buys home for Evie in Westchester or Greenwich"
- "Begin visitation in new home with Evie and Steve as much as he wants"
- **"Sooner you get the house for Evie the sooner visits can start."**

No settlement was reached and earlier this year 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 we learn she is still living there.

- 8) **First bullet point** of 'Steve and Maura Walsh Are Instrumental in'
  - a) Steve Walsh became the gatekeeper for Evie as soon as she arrived at his compound. He stopped facilitating communication once concerns about the allegations of abuse against his adopted daughters was brought to light.

Text from August 7, 2018:

Steve Russell: Following up again on getting to see Evie. I've still received no photos, FaceTime, or other interactions as promised

Steve Walsh: 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

- 9) First bullet point of 'Steve and Maura Walsh Are Instrumental in'
- a) On August 20, 2018 Steve Russell flew from San Francisco to Westchester to visit Evie based on an agreement between attorneys. Two days later Audrey Courson, Tara's attorney in San Francisco, sent an email that Steve could email Maura Walsh to schedule a visit. Steve Russell did not receive a response from Maura, but instead Steve Walsh sent an email to Steve's attorney, "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, Steve Russell returned to San Francisco without having seen his daughter. Again, two days later Tara stated through her attorney, Audrey Courson, that she "wants to leave her parents out of this moving forward."
- 10) Second bullet point of 'Steve and Maura Walsh Are Instrumental in'
- a) On March 28, 2019, Maura Walsh 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.
- 11) Third bullet point of 'Steve and Maura Walsh Are Instrumental in'
- a) In March 2019, the Walshes were not explicitly confirming nor denying Steve's visits with Evie. Steve was advised by his attorneys to notify them as per the court order, which he did, and then arrive with the supervisor.

On March 23 after being notified of the visit, Mr. Walsh followed Steve Russell from where he was staying at the Crabtree Kittle House and confronted him in the Walsh driveway, which was also the pickup location for Evie. The third-party supervisor described the incident:

Upon arrival at the driveway, Steve Russell was texting to inform the Walshes they arrived. Steve Walsh pulled in behind the car, walked up to Steve Russell, and 'angrily' asked him to move his car. Steve Russell asked if the visit with Evie was happening and Steve Walsh replied **\*\* THEY \*\*** had not been able to meet the supervisor and the visit wasn't happening. Steve Russell 'calmly' asked again and Steve Walsh again denied the visit.

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."

On 3/27/2019 Tara retaliated by filing an order of protection against Steve Russell based on the incident at which she was not present at and yet wrote about in the first person. 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.

12) Fourth bullet point of 'Steve and Maura Walsh Are Instrumental in'

- a) On 3/31/19, Steve Walsh again followed Steve Russell and purposefully waited until he thought there were not witnesses before confronting him. Fortunately, Evie's nanny was present. Again, a police report was filed.

Nanny's statement from 3/31: 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 he was "bringing his kids 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's 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.

13) Last Bullet Point of 'Steve and Maura Walsh Are Instrumental in'

- a) Steve Walsh sent an email to my attorney claiming that Evie suffered hives as a result of stress during the visit with Grandma Linda, 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.

14) Add to the 'Physical and Emotional Abuse' section

- a) 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. She asked Tara to keep everyone in the home to reduce her stress upon return to the Walsh household.

15) Conclusion: Include that the court was lied to in order to obfuscate this abusive and dysfunctional living arrangement. We recently learned 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.

- a) Hon. Horowitz ordered Tara to keep Steve informed about Evie, including where she was living. As soon as Horowitz recused herself Tara went to the court and

used the TOP granted on default (after the 3/31 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 Hon. Furman that she needed funds to move out of her parents home. It was granted.
- c) Despite telling Linda Russell that she had moved, Tara recently told the court that she is still living with her parents. Steve and Maura Walsh confirmed it in their deposition.

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

16) Relief:

- a) Evie immediately placed with Linda Russell, paternal grandmother, who can oversee and facilitate visits with Tara.
- b) No unsupervised contact with maternal grandparents until CPS review conducted, including access to previous emancipation case.
- c) Release of Evie's medical records and for a doctor to check on her rash / allergies
- d) Move for immediate trial.