

DV-100

Request for Domestic Violence Restraining Order

You must also complete Form CLETS-001, Confidential CLETS Information, and give it to the clerk when you file this Request.

Clerk stamps date here when form is filed. SUPERIOR COURT 2018 JUL 13 PM 2:45 DEPUTY CLERK LORINA TAUALA

1 Name of Person Asking for Protection: STEPHEN RUSSELL Age: Your lawyer in this case (if you have one): Name: Stacey Poole State Bar No.: 202964 Firm Name: LERNER * POOLE, LLP Address (If you have a lawyer for this case, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, give a different mailing address instead. You do not have to give your telephone, fax, or e-mail.): Address: 535 PACIFIC AVENUE, 2ND FLOOR City: SAN FRANCISCO State: CA Zip: 94133 Telephone: (415) 391-6000 Fax: (415) 391-6011 E-Mail Address: stacey@cafamilylaw.com

Fill in court name and street address: Superior Court of California, County of SAN FRANCISCO 400 McAllister Same San Francisco, CA 94102

2 Name of Person You Want Protection From: TARA WALSH Description of person you want protection from: Sex: [] M [X] F Height: 5'8" Weight: 120 Hair Color: BLONDE Eye Color: GREEN Race: WHITE Age: 33 Date of Birth: 9/10/1984 Address (if known): City: State: Zip:

Court fills in case number when form is filed. Case Number: FPT-18-377425

3 Do you want an order to protect family or household members? [] Yes [X] No If yes, list them: Full Name Sex Age Lives with you? Relationship to you [] Yes [] No [] Yes [] No [] Yes [] No

[] Check here if you need more space. Attach a sheet of paper and write "DV-100, Protected People" for a title.

4 What is your relationship to the person in (2)? (Check all that apply): a. [] We are now married or registered domestic partners. b. [] We used to be married or registered domestic partners. c. [] We live together. d. [X] We used to live together. e. [] We are related by blood, marriage, or adoption (specify relationship): f. [X] We are dating or used to date, or we are or used to be engaged to be married. g. [X] We are the parents together of a child or children under 18: Child's Name: Evelyn Grace Walsh Date of Birth: 1/27/2018

If you do not have one of these relationships, the court may not be able to consider your request. Read Form DV-500-INFO for help.

[] Check here if you need more space. Attach a sheet of paper and write "DV-100, Additional Children" for a title. h. [X] We have signed a Voluntary Declaration of Paternity for our child or children. (Attach a copy if you have one).

This is not a Court Order.

5 Other Restraining Orders and Court Cases

- a. Are there any restraining/protective orders currently in place OR that have expired in the last six months (emergency protective orders, criminal, juvenile, family)? **See EPO issued by SFPD at Exhibit "A"**
 No Yes (date of order): 7/3/18 and (expiration date): 7/10/18 (Attach a copy if you have one).
- b. Have you or any other person named in (3) been involved in another court case with the person in (2)?
 No Yes If yes, check each kind of case and indicate where and when each was filed:

Kind of Case	County or Tribe Where Filed	Year Filed	Case Number (if known)
<input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
<input type="checkbox"/> Civil Harassment	_____	_____	_____
<input checked="" type="checkbox"/> Domestic Violence	Westchester County, NY	2018	_____
<input type="checkbox"/> Criminal	_____	_____	_____
<input type="checkbox"/> Juvenile, Dependency, Guardianship	_____	_____	_____
<input type="checkbox"/> Child Support	_____	_____	_____
<input type="checkbox"/> Parentage, Paternity	_____	_____	_____
<input type="checkbox"/> Other (specify): _____	_____	_____	_____

Check here if you need more space. Attach a sheet of paper and write "DV-100, Other Court Cases" for a title.

Check the orders you want.

6 Personal Conduct Orders

- I ask the court to order the person in (2) not to do the following things to me or anyone listed in (3):
- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, destroy personal property, disturb the peace, keep under surveillance, impersonate (on the Internet, electronically or otherwise), or block movements
 - b. Contact, either directly or indirectly, in any way, including but not limited to, by telephone, mail or e-mail or other electronic means
- The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

7 Stay-Away Order

- a. I ask the court to order the person in (2) to stay at least 100 yards away from (check all that apply):
 Me My school
 My home Each person listed in (3)
 My job or workplace The child(ren)'s school or child care
 My vehicle Other (specify): _____
- b. If the person listed in (2) is ordered to stay away from all the places listed above, will he or she still be able to get to his or her home, school, job, workplace, or vehicle? Yes No (If no, explain): _____

8 Move-Out Order

(If the person in (2) lives with you and you want that person to stay away from your home, you must ask for this move-out order.)

I ask the court to order the person in (2) to move out from and not return to (address):
301 MISSION STREET, 550, SAN FRANCISCO, CA 94105

I have the right to live at the above address because (explain):
I AM ON THE LEASE

This is not a Court Order.

9 Guns or Other Firearms and Ammunition

I believe the person in (2) owns or possesses guns, firearms, or ammunition. Yes No I don't know
If the judge approves the order, the person in (2) will be ordered not to own, possess, purchase or receive a firearm or ammunition. The person will be ordered to sell to, or store with, a licensed gun dealer, or turn in to law enforcement, any guns or firearms that he or she owns or possesses.

10 Record Unlawful Communications

I ask for the right to record communications made to me by the person in (2) that violate the judge's orders.

11 Care of Animals

I ask for the sole possession, care, and control of the animals listed below. I ask the court to order the person in (2) to stay at least _____ yards away from and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of the following animals:

I ask for the animals to be with me because:

12 Child Custody and Visitation

- a. I do not have a child custody or visitation order and I want one.
- b. I have a child custody or visitation order and I want it changed.

If you ask for orders, you must fill out and attach Form DV-105, Request for Child Custody and Visitation Orders. You and the other parent may tell the court that you want to be legal parents of the children (use Form DV-180, Agreement and Judgment of Parentage).

13 Child Support (Check all that apply):

- a. I do not have a child support order and I want one.
- b. I have a child support order and I want it changed.
- c. I now receive or have applied for TANF, Welfare, CalWORKS, or Medi-Cal.

If you ask for child support orders, you must fill out and attach form FL-150, Income and Expense Declaration or Form FL-155, Financial Statement (Simplified).

14 Property Control

I ask the court to give *only* me temporary use, possession, and control of the property listed here:

15 Debt Payment

I ask the court to order the person in (2) to make these payments while the order is in effect:

Check here if you need more space. Attach a sheet of paper and write "DV-100, Debt Payment" for a title.

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

16 Property Restraint

I am married to or have a registered domestic partnership with the person in (2). I ask the judge to order that the person in (2) not borrow against, sell, hide, or get rid of or destroy any possessions or property, except in the usual course of business or for necessities of life. I also ask the judge to order the person in (2) to notify me of any new or big expenses and to explain them to the court.

17 Spousal Support

I am married to or have a registered domestic partnership with the person in (2) and no spousal support order exists. I ask the court to order the person in (2) to pay spousal support. (You must complete, file, and serve Form FL-150, Income and Expense Declaration, before your hearing).

This is not a Court Order.

18 **Rights to Mobile Device and Wireless Phone Account**

a. **Property control of mobile device and wireless phone account**

I ask the court to give only me temporary use, possession, and control of the following mobile devices:
_____ and the wireless phone account for the

following wireless phone numbers because the account currently belongs to the person in ②:
(including area code): _____ my number number of child in my care
(including area code): _____ my number number of child in my care
(including area code): _____ my number number of child in my care

Check here if you need more space. Attach a sheet of paper and write "DV-100, Rights to Mobile Device and Wireless Phone Account" for a title.

b. **Debt Payment**

I ask the court to order the person in ② to make the payments for the wireless phone accounts listed in 18a because:

Name of the wireless service provider is: _____ Amount: \$ _____ Due Date: _____

If you are requesting this order, you must complete, file, and serve Form FL-150, Income and Expense Declaration, before your hearing.

c. **Transfer of Wireless Phone Account**

I ask the court to order the wireless service provider to transfer the billing responsibility and rights to the wireless phone numbers listed in 18a to me because the account currently belongs to the person in ②. *If the judge makes this order, you will be financially responsible for these accounts, including monthly service fees and costs of any mobile devices connected to these phone numbers. You may be responsible for other fees. You must contact the wireless service provider to find out what fees you will be responsible for and whether you are eligible for an account.*

19 **Insurance**

I ask the court to order the person in ② NOT to cash, borrow against, cancel, transfer, dispose of, or change the beneficiaries of any insurance or coverage held for the benefit of me or the person in ②, or our child(ren), for whom support may be ordered, or both.

20 **Lawyer's Fees and Costs**

I ask that the person in ② pay some or all of my lawyer's fees and costs.

You must complete, file, and serve form FL-150, Income and Expense Declaration, before your hearing.

21 **Payments for Costs and Services**

I ask the court to order the person in ② to pay the following:

You can ask for lost earnings or your costs for services caused directly by the person in ② (damaged property, medical care, counseling, temporary housing, etc.). You must bring proof of these expenses to your hearing.

Pay to: _____ For: _____ Amount: \$ _____

Pay to: _____ For: _____ Amount: \$ _____

22 **Batterer Intervention Program**

I ask the court to order the person listed in ② to go to a 52-week batterer intervention program and show proof of completion to the court.

23 **Other Orders**

What other orders are you asking for? _____

Check here if you need more space. Attach a sheet of paper and write "DV-100, Other Orders" for a title.

This is not a Court Order.

24 **Time for Service (Notice)**

The papers must be personally served on the person in ② at least five days before the hearing, unless the court orders a shorter time for service. If you want there to be fewer than five days between service and the hearing, explain why below. For help, read Form DV-200-INFO, "What Is Proof of Personal Service?"

25 **No Fee to Serve (Notify) Restrained Person**

If you want the sheriff or marshal to serve (notify) the restrained person about the orders for free, ask the court clerk what you need to do.

26 **Court Hearing**

The court will schedule a hearing on your request. If the judge does not make the orders effective right away ("temporary restraining orders"), the judge may still make the orders after the hearing. If the judge does not make the orders effective right away, you can ask the court to cancel the hearing. Read form DV-112, *Waiver of Hearing on Denied Request for Temporary Restraining Order*, for more information.

27 **Describe Abuse**

Describe how the person in ② abused you. Abuse means to intentionally or recklessly cause or attempt to cause bodily injury to you; or to place you or another person in reasonable fear of imminent serious bodily injury; or to harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, keep you under surveillance, impersonate (on the Internet, electronically or otherwise), batter, telephone, or contact you; or to disturb your peace; or to destroy your personal property. (For a complete definition, see Fam. Code, §§ 6203, 6320.)

a. Date of most recent abuse: VARIOUS

1. Who was there? MYSELF, TARA WALSH, ABREHET TEDLA (NANNY)

2. Describe how the person in ② abused you or your child(ren):

OVER THE COURSE OF A YEAR AND A HALF, TARA WALSH WAS PUTTING THE DRUG SEROQUEL IN MY DRINKS. SHE ADMITTED TO DOING SO IN HER RESPONSIVE DECLARATION FILED 7/10/18 IN OUR UCCJEA CASE. SEE EXHIBIT B.

Check here if you need more space. Attach a sheet of paper and write "DV-100, Recent Abuse" for a title.

3. Did the person in ② use or threaten to use a gun or any other weapon? No Yes (If yes, describe):

4. Describe any injuries: This caused me to experience side effects including effecting my behavior as well as physiological side effects.

5. Did the police come? No Yes

If yes, did they give you or the person in ② an Emergency Protective Order? Yes No I don't know
Attach a copy if you have one.

The order protects you or the person in ②

This is not a Court Order.

27 Describe Abuse (continued)

Has the person in 2 abused you (or your child(ren)) other times?

b. Date of abuse: September 2017

1. Who was there? MYSELF, TARA WALSH

2. Describe how the person in 2 abused you or your child(ren):
TARA THREW A WINE BOTTLE AT ME.

Check here if you need more space. Attach a sheet of paper and write "DV-100, Recent Abuse" for a title.

3. Did the person in 2 use or threaten to use a gun or any other weapon? No Yes (If yes, describe):
WINE BOTTLE

4. Describe any injuries: NONE

5. Did the police come? No Yes
If yes, did they give you or the person in 2 an Emergency Protective Order?
Yes No I don't know Attach a copy if you have one.

The order protects you or the person in 2
If the person in 2 abused you other times, check here and use Form DV-101, Description of Abuse or describe any previous abuse on an attached sheet of paper and write "DV-100, Previous Abuse" for a title.

28 Other Persons to Be Protected

The persons listed in item 3 need an order for protection because (describe):

29 Number of pages attached to this form, if any:

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: 7/12/18

STEPHEN RUSSELL
Type or print your name

Date: 7/13/18

Stacey Poole
Lawyer's name, if you have one

Steph Russell
Sign your name

Stacey Poole
Lawyer's signature

This is not a Court Order.

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1 **ATTACHMENT TO REQUEST FOR RESTRAINING ORDER**

2
3 **10. FACTS IN SUPPORT**

4
5 **I, Stephen Russell, declare and state:**

6
7 **1. I am the Petitioner in this action. I have personal knowledge of the facts set forth**
8 **below, and if called to testify, I could and would testify competently and truthfully regarding**
9 **the following.**

10 **2. Respondent, Tara Walsh, and I are the parents of Evelyn Walsh (hereinafter "Evie")**
11 **born 1/27/18. I have financially supported Evelyn and Respondent since Evelyn's birth. We**
12 **are currently disputing which state (California or New York) has jurisdiction over Evie.**

13 **3. Respondent (hereinafter "Tara") and I have resided together in San Francisco with**
14 **our daughter since March 18, 2018. Previously, Tara and I had lived together in San**
15 **Francisco (where Evie was conceived) but after an incident whereby she threw a bottle of**
16 **wine at my head, she returned to New York. Tara and Evie moved here from Brooklyn, New**
17 **York so that we could make a go of our relationship. I rented her an apartment in the**
18 **Millennium Tower where I also had a place, we hired a full-time nanny, she had her mail**
19 **delivered to our apartment and Evie began seeing a pediatrician here. Tara brought her two**
20 **dogs with her and moved almost all of her and Evie's belongings to San Francisco. Much of**
21 **her and Evie's belongings remain in San Francisco.**

22 **4. Shortly after we began residing together in San Francisco, Tara began to exhibit**
23 **worrisome signs of mental instability. Tara and I have broken up and reconciled several**
24 **times due to such instability. Tara has had had multiple worrisome episodes where she has**
25 **thrown a full bottle of wine at me, threatened suicide, and has had periods of episodic**
26 **uncontrollable sobbing. Tara has abused alcohol and medication (Adderall), recently faked a**
27 **second pregnancy, and made multiple threats to harm me. Our nanny also witnessed Tara**
28

1 putting drugs into my drinks on multiple occasions (see declaration of Abrehet Asmelash
2 Tedla (hereinafter "Abby") filed herewith.

3 5. I helped Tara find a psychiatrist after one particularly worrisome episode (Dr. Abilash
4 Gopal, M.D). After several joint sessions with Tara and myself, Dr. Gopal recommended a
5 "higher standard of care" for Tara, and also told us that Tara exhibited signs of Borderline
6 Personality Disorder ("BPD") with possible psychopath traits. Tara had earlier self-
7 diagnosed herself with BPD, and her New York therapist had concurred in Tara's self-
8 assessment. Additionally, Tara has received ongoing treatment for Bipolar Disorder since
9 the age of fourteen. I told Tara that for us to remain in a relationship she would have to seek
10 residential treatment. Tara's response was to fire the psychiatrist and make arrangements to
11 leave San Francisco with Evie.

12 6. TARA filed a Responsive Declaration on July 10, 2018 with regard to our UCCJEA
13 action. In it, she attaches a text message from her to my mental health professional stating
14 "sometimes when he is out of his mind on drugs and won't sleep I have put Seroquel in his
15 wine-bc I don't know what to do." See Exhibit "B". Seroquel is an antipsychotic
16 medication that Tara takes for bipolar disorder.

17 7. Our nanny, Abrehet Tedla, witnessed TARA putting medication in my drinks on
18 numerous occasions. Her declaration is attached hereto as Exhibit "C". She did not
19 originally report it to me because she did not understand what was happening.

20 8. I believe that TARA had been putting Seroquel in my drinks for the past one and a
21 half years. I contacted the police who issued me an Emergency Protective Order.

22 9. Given that TARA and I have an infant child together and she was drugging me while
23 we were in a committed relationship, I am concerned about how she could attempt to harm
24 me now that we are not together. Clearly this is a very serious offense that could have had
25 long term effects for me had I experienced serious side effects or other issues from this
26 medication, especially when it was mixed with alcohol.

27 SIGNATURE ON JUDICIAL COUNCIL FORM

EMERGENCY PROTECTIVE ORDER (See reverse for important notices.)

1. PROTECTED PERSONS (insert names of all persons protected by this Order):
Stephen Grant Russell

2. RESTRAINED PERSON (name): Tara Knoll Walsh

Sex: M F Ht.: 5'08 Wt.: 120 Hair color: Blk Eye color: Grn Race: W Age: 33 Date of birth: 09/10/1984

3. TO THE RESTRAINED PERSON:

a. YOU MUST NOT harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, destroy any personal property of, disturb the peace of, keep under surveillance, or block the movements of each person named in item 1.

b. YOU MUST NOT contact, either directly or indirectly, by any means, including but not limited to by telephone, mail, e-mail or other electronic means, any person named in item 1.

c. YOU MUST stay away at least: 150 yards from each person named in item 1.
 stay away at least: 150 yards from move out immediately from
(address): 301 Mission Street #55D San Francisco CA 94105

d. YOU MUST NOT own, possess, purchase, receive, or attempt to purchase or receive any firearm or ammunition. If you have any firearms, you must turn them in to a law enforcement agency or sell them to, or store them with, a licensed gun dealer.

e. YOU MUST NOT take any action, directly or through others, to obtain the addresses or locations of any person named in item 1.

4. (Name): _____ is given temporary care and control of the following minor children of the parties (names and ages): _____

5. THIS ORDER WILL EXPIRE AT THE CLOSE OF THE COURT BUSINESS DAY ON: July 10th, 2018

6. TO THE PROTECTED PERSON: If you need protection for a longer period of time, you must request restraining orders from the court in the county where you live:
(Name and address of court): 400 McAllister Street Room #103 San Francisco CA 94103
If you go to court to request restraining orders, take your copy of this form with you. If a juvenile petition is pending, file in that court.

7. Reasonable grounds for the issuance of this Order exist, and an emergency protective order is necessary to prevent the occurrence or recurrence of domestic violence, child abuse, child abduction, elder or dependent adult abuse, or stalking.

8. Judicial officer (name): Commissioner Tapply granted this Order on (date): 07/03/2018 at (time): 2:05 Hrs

APPLICATION

9. The events that caused the protected person to fear immediate and present danger of domestic violence, child abuse, child abduction, elder or dependent adult abuse (except solely financial abuse), or stalking are (give facts and dates; specify weapons):
Over the course of a year and a half, Russell was being poisoned by Walsh via Seroquel in his drinks. Walsh left the state and is currently residing in New York. Russell stated he has not had any recent contact from Walsh and is not sure of her exact location.

10. Firearms were: observed reported searched for seized

11. The person to be protected lives with the person to be restrained and requests an order that the restrained person move out immediately from the address in item 3c.

12. The person to be protected has minor children in common with the person to be restrained, and a temporary custody order is requested because of the facts alleged in item 9. A custody order does does not exist.

By: Ofc. Dove (PRINT NAME OF LAW ENFORCEMENT OFFICER) [Signature] 4326 (SIGNATURE OF LAW ENFORCEMENT OFFICER)

Agency: San Francisco Police Department Telephone No.: 415-575-6000 Badge No.: 4326

PROOF OF SERVICE

13. Person served (name): _____

14. I personally delivered copies of this Order to the person served as follows: Date: _____ Time: _____
Address: _____

15. At the time of service, I was at least 18 years of age and not a party to this cause. I am a California law enforcement officer.

16. My name, address, and telephone number are (this does not have to be server's home telephone number or address): _____

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
Date: _____

(TYPE OR PRINT NAME OF SERVER)

[Signature] EXHIBIT A
(SIGNATURE OF SERVER)



Tue, May 22, 12:20 AM

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

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



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

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STEPHEN RUSSELL

ENDORSED
FILED
Superior Court of California
County of San Francisco
JUL 09 2018
CLERK OF THE COURT
KELLY DAVIES
By: _____ Deputy Clerk

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

11 In re the Matter of
12 Petitioner: STEPHEN RUSSELL
13 and
14 Respondent: TARA WALSH

CASE NO.: FTP-18-377425
DECLARATION OF ABREHET TEDLA
Date: July 10, 2018
Time: 1:30 p.m.
Dept: 404
Judge: Richard C. Darwin

17 I, Abrehet "Abby" Tedla, declare and state:

- 18 1. My name is Abby Tedla and from March 6 of this year to very recently, I was Evelyn
19 (Evie) Grace Walsh's nanny and primary caregiver. I lived with Mr. Stephen Russell
20 and Ms. Tara Walsh at their home at 301 Mission street.
21 2. First, I'd like to say that I love Evie and she was very well taken care of in San
22 Francisco. In addition to myself, Evie's father, and sometimes staff also helped with
23 Evie. Their home was very nice and well taken care of in one of the nicest buildings
24 in San Francisco, and Mr. Russell had retained one of the top pediatricians in the city
25 for Evie, and Ms. Walsh as well from a concierge medical group called Private
26 Medical.
27 3. Tara moved to California from New York in March of this year. I was initially hired
28 for a one-month contract to spend nights with the baby, but that was later expanded to

1 include much of the day too. Tara's medication prevented her from being able to take
2 care of the baby at night, especially before Evie was able to generally sleep through
3 the whole night. My understanding from both Mr. Russell and Ms. Walsh was that
4 they intended to live in San Francisco going forward. Ms. Walsh purchased clothes,
5 furniture, baby goods, changed her address, received mail, and began seeing doctors
6 here. I was asked to continue on and I am currently on the payroll or the next 2 ½
7 months.

8 4. I have never seen Mr. Russell be abusive to Ms. Walsh in any way and I do not
9 believe this to be his nature. I have seen Ms. Walsh regularly verbally abuse Mr.
10 Russell, however, but Mr. Russell was always patient and kind to her. I have
11 witnessed Ms. Walsh yell and call Mr. Russell names such as "old, fat, asshole". Due
12 to the ongoing verbal assaults to Mr. Russell, I once asked him "how do you do it?" I
13 have never seen someone deal so well with another person being so verbally abusive.
14 In fact, I contacted Mr. Crutcher at times and advised him to remove Mr. Russell
15 from the situation as I felt so bad for him.

16 5. Ms. Walsh told me she took prescription sleeping pills at night prior to going to
17 bedtime and was unable to care for Evie during the night.

18 6. On one occasion, on 5/15/2018, I took Evie for a walk with Ms. Walsh's permission.
19 After returning from our daily walk with Evie, Ms. Walsh was yelling and extremely
20 irate. She accused me of trying to take her baby away. Feeling hurt, confused and
21 afraid by her false accusations of trying to kidnap Evie, I left the apartment and
22 started towards the elevator. Moments later, I heard through the closed door Evie
23 screaming. Concerned for Evie's safety I rushed back to see if she was Ok. Tara said
24 Evie had rolled off the bed accidentally. Evie had a bump and red bruise on her head
25 and I was asked to help get the baby to the hospital. After seeing the doctor, it was
26 determined she was fine, thankfully.

27 7. Ms. Walsh had been putting drugs in his drinks without his knowledge and she had
28 asked me to lie and tell social services that he was a bad dad/person. Once Ms. Walsh

1 realized I was not going to lie for her or condone her mistreatment and drugging of
2 Mr. Russell, she began to treat me with disdain and ultimately fired me. One time after
3 I had told Mr. Russell about her drugging him, she yelled, "I hate that fucking
4 nanny!" On one occasion she told me she was "bipolar". I regret not informing Mr.
5 Russell right away about her putting the pills in his wine, but I did not understand
6 exactly what was happening.

7 8. I commonly worked as her nanny 18-22 hours a day, seven days a week; apparently
8 working via her computer or enjoying her free time doing other things. I have heard
9 Mr. Russell offer to pay her to do projects for him after she complained that she did
10 not have any money.

11 9. I saw her drug him on at least two occasions; however she told me and Dan Ochoa
12 that she "did it all the time." This caused me to fear for Mr. Russell's safety and I saw
13 the effects on those two occasions after he drank the tainted wine. It appeared to
14 cause him to lose consciousness shortly after. Once, when Tara's friend was visiting,
15 I threw away any open containers of food in case maybe Tara had added it to other
16 food or drink in the house. I also told Bryan to tell Steve not to drink anything. That
17 night I threw away the leftover food. That was the only time I threw away food. I
18 wasn't otherwise concerned for my safety.

19 10. Mr. Russell gave me 3-month severance and asked that I consider helping in case of
20 an emergency. Ms. Walsh had just then agreed to see a new Psychiatrist after another
21 incident where she believed she saw Mr. Russell was running around with a gun,
22 which didn't happen. When she realized that was a delusion, she called her mother
23 and doctor who said Ms. Walsh needed an immediate medical intervention and
24 delusions like this had happened in the past.

25 11. Mr. Russell seemed genuinely committed to helping Tara and was hopeful that with
26 treatment she might get better.

27 12. I love Evie and only want what is best for her. She had a very good home in San
28 Francisco and many people who cared for her. Tara was difficult, but I believe this is

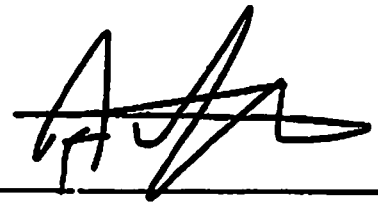
1 part of her mental illness, and in reality Mr. Russell does want her to get better. Mr.
2 Russell is a good person who provided for everything Ms. Walsh and baby needed
3 and had many close family and staff nearby. Even though Ms. Walsh fired me twice, I
4 came back because of Evie who is the happiest baby I have ever seen in my entire
5 life.

6 13. My last act for Ms. Walsh and Mr. Russell was to help Ms. Walsh and the baby visit
7 Ms. Walsh's parents. I was not present when this happened, but I heard that in the
8 previous two weeks, Ms. Walsh had tried to secretly leave the state first by herself
9 and then with the baby. On the second occasion, Mr. Russell took emergency action
10 and received a court order to keep Evie in the state until a mediation hearing. But, Mr.
11 Russell also thought a 2-3 week break might be helpful to Ms. Walsh. So, he agreed
12 to let her visit her parents in NY if she would agree to stay at her parents' house and
13 return home in 2-3 weeks. Tara agreed. I flew with Ms. Walsh and the baby and saw
14 her father pick them up at the airport. I then stayed the night in a hotel and flew back
15 the next day.

16 14. Since that time, my only conversations with Tara have been pleasantries. I did not
17 expect her to stay in NY or make the accusations she has.

18 15. I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20
21 Dated: 7/6/2018



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Abby Tedla