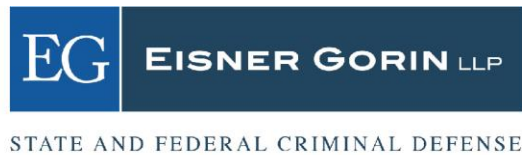


Alan Eisner, Esq.*
Dmitry Gorin, Esq.*
Robert Hill, Esq.



14401 Sylvan Street
Suite 112
Van Nuys, CA 91401
T 818.781.1570
F 818.781.5033

1875 Century Park E
Suite 700
Los Angeles, CA 90067
T 310.328.3776

www.EGattorneys.com

*Certified Specialist, Criminal Law
State Bar of California, Board of Legal Specialization

September 28, 2018

Rani Singh, Head Deputy District Attorney
City and County of San Francisco District Attorney's Office
850 Bryant, 3rd Floor
San Francisco, CA 94103
Via Email: rani.singh@sfgov.org

Re: VICTIM: Stephen Russell (SFPD Rpt. No. 18-0494149)
Demand for Prosecution

Dear Counsel:

My firm represents Mr. Stephen Russell relating to a prolonged pattern of poisoning by Mr. Russell's ex-girlfriend, Ms. Tara Walsh. Mr. Russell is a victim of a crime and respectfully urges your office to prosecute Ms. Walsh under applicable law as outlined below. Pursuant to California Constitution Article I, § 28, Mr. Russell has the right to reasonable notice and to reasonably confer with your office regarding the potential charges and any potential disposition. Accordingly, Mr. Russell respectfully requests direct contact with your office regarding this case. In evaluating this matter, please consider the following.

I. Introduction

This case involves surreptitious drugging of Mr. Stephen Russell by his ex-girlfriend and mother of his young daughter, Ms. Tara Walsh. The evidence is clear that Ms. Walsh's engaged in a prolonged pattern of unlawfully drugging her then-boyfriend, Mr. Russell. Ms. Walsh has admitted in sworn declarations filed in civil court that she administered Seroquel, an antipsychotic medication, to Mr. Russell by slipping it in his drinks on multiple occasions. (Exhibit A - Declaration of Tara Walsh.) Ms. Walsh is not a licensed physician and administered the substance without Mr. Russell's knowledge, much less his consent.

Urinalysis conducted by Dr. Ha Dang from a sample collected from Mr. Russell on March 9, 2017 provides further troubling findings including an unusually elevated

Re: VICTIM: Stephen Russell (SFPD Rpt. No. 18-0494149)
Request for Prosecution – Page 2

Lithium level. As detailed in the enclosed lab report, Lithium poisoning can result in serious mental and physical symptoms including dermatitis, nausea, confusion, coarse hand tremor, slurred speech, edema, and hypotension. (Exhibit B - Lap Report.) Mr. Russell is informed that Ms. Walsh is prescribed Lithium for her multiple serious mental illnesses, including bipolar and borderline personality disorder.

The surreptitious drugging of an intimate partner is a serious criminal offense which warrants the filing of formal felony charges. Failure to file any charges would set a dangerous precedent that spiking of a partner's drink with a dangerous substance is acceptable conduct so long as great bodily injury or death luckily does not occur. Ms. Walsh's reckless and intentional conduct must not be tolerated.

II. Legal Standards

Penal Code § 347(a)(1) provides, in relevant part, that “[e]very person who willfully mingles any poison or harmful substance with any food, drink, medicine, or pharmaceutical product...where the person knows or should have known that the same would be taken by any human being to his or her injury, is guilty of a felony...” While poisoning can certainly result in death, whether intended or not, the Penal Code punishes poisonings that result in much less serious injury as well. “By making it a felony to administer poison with the intent to cause *any injury*, the Legislature has evidenced its concern for the dangers involved in such conduct...” (*People v. Mattison* (1971) 4 Cal.3d 177, 186, emphasis added; *see also People v. Taylor* (1970) 11 Cal.App.3d 57, 58 [mere furnishing of heroin to decedent in violation of Health and Safety Code was a felony inherently dangerous to human life for purpose of felony murder rule].)

Penal code § 245(a)(1) provides that “[a]ny person who commits an assault upon the person of another with a deadly weapon or instrument other than a firearm...,” is guilty of assault with a deadly weapon. Some objects, “while not deadly per se, may be used, under certain circumstances, in a manner likely to produce death or great bodily injury. In determining whether an object not inherently deadly or dangerous is used as such, the trier of fact may consider the nature of the object, the manner in which it is used, and all other facts relevant to the issue. [Citations.]” (*People v. Koback* (2018) 25 Cal.App.5th 323, 329–330, citing *People v. Aguilar* (1997) 16 Cal.4th 1023, 1028-1029.) Based on this definition, courts have upheld convictions based on conduct involving a wide variety of implements and methods. (*See e.g. In re D.T.* (2015) 188 Cal.Rptr. 273 [bottle or pencil could be deadly weapons]; *In re David V.* (2010) 104 Cal.Rptr.3d 471 [roll of coins, batteries, or bicycle footrests could be deadly weapons]; *People v. Autry*

Re: VICTIM: Stephen Russell (SFPD Rpt. No. 18-0494149)
Request for Prosecution – Page 3

(1991) 283 Cal.Rptr. 417 [search of defendant's person was justified by officer feeling two hypodermic needles, which could be classified as deadly weapons].)

The act of surreptitiously administering prescription drugs, whether Seroquel or Lithium, to a victim without his knowledge qualifies as a poisoning within the meaning of Penal Code § 347, an assault within the meaning of Penal Code § 245(a)(1), or both. Any mind-altering prescription medication administered to an individual for whom it has not been prescribed can cause great bodily injury or death. Even if the immediate physical effects of the drug are not life-threatening, the prescribed individual knows, or should know, that the effect on the victim's mental state could result in harm to the victim, or others. For that reason, the conduct at issue here is incredibly serious, as reflected by the legislature's designation of poisoning as a felony punishable by multiple years in state prison.

III. Factual Basis

The declaration of Bryan F. Crutcher is enclosed for your review. (Exhibit C - Declaration of Bryan Crutcher.) Mr. Crutcher is a retired Vallejo Police Department officer who was hired by Mr. Russell to provide security for Ms. Walsh and his daughter. Given his frequent presence in the home with Mr. Russell and Ms. Walsh, Mr. Crutcher is well-situated to testify to the dynamic between the couple. Mr. Crutcher notes several instances he has personally observed in which Ms. Walsh has been irrational and aggressive. In one incident, Ms. Walsh called Mr. Crutcher a "fucking asshole" for moving the baby's crib to allow for a painting crew to complete their work. On several occasions, Mr. Crutcher personally overheard Ms. Walsh describe herself as mentally ill. On one occasion, Mr. Crutcher observed a white pill floating in Mr. Russell's wine glass, corroborating Mr. Russell's suspicion that Ms. Walsh was medicating him without his knowledge.

After Mr. Russell became aware that Ms. Walsh was spiking his drinks, he sought a domestic violence restraining order. In her Memorandum in Opposition (DV-120), enclosed for your review, Ms. Walsh admits in a sworn declaration that she has administered Seroquel to Mr. Russell on multiple occasions without his knowledge by placing the substance in his wine. Ms. Walsh attempts to justify her conduct by claiming that Mr. Russell would periodically go through manic episodes and that the Seroquel drugging was an attempt to help him sleep. She further claims that Mr. Russell voluntarily took similar doses of her Seroquel to help him get to sleep in the past.

Re: VICTIM: Stephen Russell (SFPD Rpt. No. 18-0494149)
Request for Prosecution – Page 4

Ms. Walsh's credibility is further undermined by her conduct during the course of the relationship, which has come to light through the parties' civil litigation. Please review Exhibit D, which provides a sample of the text messages sent between Ms. Walsh and her ex-boyfriend while she was supposedly engaged in a committed relationship with Mr. Russell. It is clear that Ms. Walsh was attempting to manipulate Mr. Russell into a marriage based on what can only be described as the most cynical financial motivation.

Ms. Walsh's abusive behavior is further documented in the sworn declaration of Abrehet Tedla, attached as Exhibit E. Ms. Tedla served as the parties' nanny and observed not only the surreptitious poisoning of Mr. Russell by Ms. Walsh, but also many instances of verbally and mentally abusive conduct by Ms. Walsh toward Mr. Russell. Conversely, Mr. Russell is described as a dedicated father who was kind to Ms. Walsh despite that absolute lack of reciprocation. This abusive disposition is consistent with Ms. Walsh's financial motivation to remain in the relationship with Mr. Russell as well as her efforts to poison him by spiking his drinks.

IV. Conclusion

Ms. Walsh's attempted justification for drugging her then-boyfriend lacks credibility. First, if Mr. Russell truly took doses of Seroquel in the past on a voluntary basis, one would assume that Ms. Walsh would not be required to secretly drug him by placing pills in his wine. Second, Ms. Walsh's history of mental illness, and motivation to gain an advantage in the ongoing family law proceedings in San Francisco and New York, undermine her credibility. In short, Ms. Walsh has admitted to drugging her former partner on more than one occasion without his knowledge or consent. That conduct evidences a willingness to engage in dangerous and unlawful behavior and therefore warrants a significant criminal sanction.

If Mr. Russell had been killed by an overdose or other unexpected reaction between the Seroquel, Lithium, or potentially other substances slipped into his drinks by Ms. Walsh, there would be no question that she would be liable for murder. The fact that Ms. Walsh was lucky enough only to inflict temporary symptoms on Mr. Russell when she drugged him multiple times does not justify a lack of criminal prosecution. The fact that Ms. Walsh wishes Mr. Russell to go to sleep does not justify drugging him any more than it would have justified hitting him over the head with a blunt object or choking him unconscious.

This matter is as straightforward as it is serious. There are no issues of proof to speak of given that the assailant has already admitted to the relevant conduct in sworn

Re: VICTIM: Stephen Russell (SFPD Rpt. No. 18-0494149)
Request for Prosecution – Page 5

court filings. Nor, again, can there be a serious argument that the drugging was an acceptable method of managing Mr. Russell's sleep habits. Knowingly introducing powerful mind-altering substances into another's body without their consent is a poisoning, and an assault. The interests of justice require that such actions be punished through a formal criminal court filing.

I look forward to speaking with you further about this important matter in the near future.

Very truly yours,

EISNER GORIN LLP

DMITRY GORIN

Exhibits as referenced.

1 Audrey T. Courson (Bar No. 291039)
2 Law Offices of Audrey T. Courson
3 100 Pine Street, Suite 1250
4 San Francisco, CA 94111
5 audrey@coursonlaw.com
6 Telephone: 415.745.3681

7 Attorney for Respondent Tara Walsh

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

10
11 In re Matter of:

12 STEPHEN RUSSELL,

13 Petitioner,

14 v.

15 TARA WALSH,

16 Respondent.

Case No. FPT-18-377425

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

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

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

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

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

28
RESPONDENT'S DECLARATION IN SUPPORT OF RESPONSE TO EX PARTE REQUEST

EXHIBIT A - 1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

19 **PETITIONER HAS PHYSICALLY ABUSED ME**

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

26 ///

27 ///

28

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

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

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

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

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

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

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

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

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

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

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

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

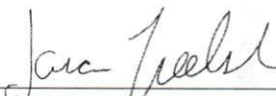
1 leaving him. I have always been scared of leaving him. (See text messages to friend attached
2 hereto as **Exhibit J.**)

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

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

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

9
10 Dated: July 10, 2018

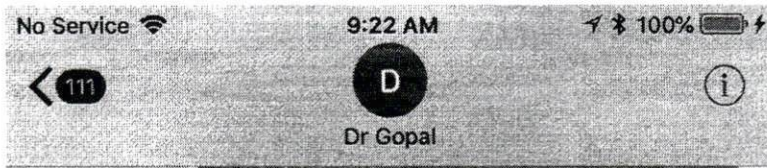


Respondent Tara Walsh

BY FAX

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

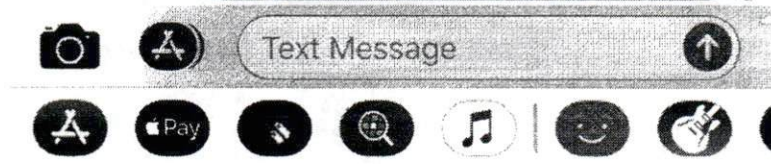
EXHIBIT I



Tue, May 22, 12:20 AM

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

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



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



LAB #: U170313-2197-1
 PATIENT: Stephen Russell
 ID: RUSSELL-S-00815
 SEX: Male
 AGE: 43

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

Toxic Metals; Urine

TOXIC METALS					
		RESULT µg/g creat	REFERENCE INTERVAL	WITHIN REFERENCE	OUTSIDE REFERENCE
Aluminum	(Al)	3.4	< 25		
Antimony	(Sb)	0.4	< 0.2		
Arsenic	(As)	10	< 75		
Barium	(Ba)	2.2	< 7		
Beryllium	(Be)	< dl	< 1		
Bismuth	(Bi)	66	< 2		
Cadmium	(Cd)	0.2	< 0.8		
Cesium	(Cs)	6.9	< 9		
Gadolinium	(Gd)	< dl	< 0.5		
Lead	(Pb)	3.3	< 2		
Mercury	(Hg)	3.4	< 3		
Nickel	(Ni)	2.4	< 8		
Palladium	(Pd)	< dl	< 0.1		
Platinum	(Pt)	< dl	< 0.1		
Tellurium	(Te)	< dl	< 0.5		
Thallium	(Tl)	0.3	< 0.5		
Thorium	(Th)	< dl	< 0.03		
Tin	(Sn)	4.1	< 4		
Tungsten	(W)	0.06	< 0.4		
Uranium	(U)	< dl	< 0.03		

URINE CREATININE							
	RESULT mg/dL	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: DMPS 250MG	Provocation: POST PROVOCATIVE	
Method: ICP-MS	Creatinine by Jaffe Method		
Results are creatinine corrected to account for urine dilution variations. Reference intervals and corresponding graphs are representative of a healthy population under non-provoked conditions. Chelation (provocation) agents can increase urinary excretion of metals/elements.			
V13			



LAB #: U170313-2197-1
 PATIENT: Stephen Russell
 ID: RUSSELL-S-00815
 SEX: Male
 AGE: 43

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

Essential Elements; Urine

ESSENTIAL AND OTHER ELEMENTS							
	RESULT/UNIT per creatinine	REFERENCE INTERVAL	PERCENTILE				
			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					
			68 th		95 th		
Cobalt (Co)	< dl µg/mg	< 0.007					
Iron (Fe)	0.26 µg/mg	< 1					

URINE CREATININE							
	RESULT mg/dL	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: DMPS 250MG	Provocation: POST PROVOCATIVE	
Method: ISE; Na, K Spectrophotometry; P ICP-MS; B, Ca, Cr, Co, Cu, Fe, Mg, Mn, Mo, Se, Sr, S, V, Zn Creatinine by Jaffe method			
Results are creatinine corrected to account for urine dilution variations. Reference intervals and corresponding graphs are representative of a healthy population under non-provoked conditions. Chelation (provocation) agents can increase urinary excretion of metals/elements.			
			V13

INTRODUCTION

This analysis of urinary elements was performed by ICP-Mass Spectroscopy following acid digestion of the specimen. Urine element analysis is intended primarily for: diagnostic assessment of toxic element status, monitoring detoxification therapy, and identifying or quantifying renal wasting conditions. It is difficult and problematic to use urinary elements analysis to assess nutritional status or adequacy for essential elements. Blood, cell, and other elemental assimilation and retention parameters are better indicators of nutritional status.

1) 24 Hour Collections

"Essential and other" elements are reported as mg/24 h; mg element/urine volume (L) is equivalent to ppm. "Potentially Toxic Elements" are reported as µg/24 h; µg element/urine volume (L) is equivalent to ppb.

2) Timed Samples (< 24 hour collections)

All "Potentially Toxic Elements" are reported as µg/g creatinine; all other elements are reported as µg/mg creatinine. Normalization per creatinine reduces the potentially great margin of error which can be introduced by variation in the sample volume. It should be noted, however, that creatinine excretion can vary significantly within an individual over the course of a day.

If one intends to utilize urinary elements analysis to assess nutritional status or renal wasting of essential elements, it is recommended that unprovoked urine samples be collected for a complete 24 hour period. For provocation (challenge) tests for potentially toxic elements, shorter timed collections can be utilized, based upon the pharmacokinetics of the specific chelating agent. When using EDTA, DMPS or DMSA, urine collections up to 12 hours are sufficient to recover greater than 90% of the mobilized metals. Specifically, we recommend collection times of: 9 - 12 hours post intravenous EDTA, 6 hours post intravenous or oral DMPS and, 6 hours post oral bolus administration of DMSA. What ever collection time is selected by the physician, it is important to maintain consistency for subsequent testing for a given patient.

If an essential element is sufficiently abnormal per urine measurement, a descriptive text is included with the report. Because renal excretion is a minor route of excretion for some elements, (Cu, Fe, Mn Zn), urinary excretion may not influence or reflect body stores. Also, renal excretion for many elements reflects homeostasis and the loss of quantities that may be at higher dietary levels than is needed temporarily. For these reasons, descriptive texts are provided for specific elements when deviations are clinically significant. For potentially toxic elements, a descriptive text is provided whenever levels are measured to be higher than expected. If no descriptive texts follow this introduction, then all essential element levels are within acceptable range and all potentially toxic elements are within expected limits.

Reference intervals and corresponding graphs shown in this report are representative of a healthy population under non-provoked conditions. Descriptive texts appear in this report on the basis of measured results and correspond to non-challenge, non-provoked conditions.

Chelation (provocation) agents can increase urinary excretion of metals/elements. Provoked

reference intervals have not been established therefore non-provoked reference intervals shown are not recommended for comparison purposes with provoked test results. Provoked results can be compared with non-provoked results (not reference intervals) to assess body burden of metals and to distinguish between transient exposure and net retention of metals. Provoked results can also be compared to previous provoked results to monitor therapies implemented by the treating physician. Additionally, Ca-EDTA provoked results can be used to calculate the EDTA/Lead Excretion Ratio (LER) in patients with elevated blood levels.

CAUTION: Even the most sensitive instruments have some detection limit below which a measurement cannot be made reliably. Any value below the method detection limit is simply reported as "< dl." If an individual excretes an abnormally high volume of urine, urinary components are likely to be extremely dilute. It is possible for an individual to excrete a relatively large amount of an element per day that is so diluted by the large urine volume that the value measured is near the dl. This cannot automatically be assumed to be within the reference range.

ANTIMONY HIGH

This individual's urine antimony (Sb) is higher than expected, but potential associated symptoms and toxic effects may not be present. This is because antimony has two valences: Sb+3 and Sb+5. Sb+3 is inherently the more toxic but is mostly excreted in feces. Sb+5, less toxic, binds less well to body tissues and is excreted mostly in urine. The current analysis does not differentiate the two forms of Sb.

Antimony can be assimilated by inhalation of Sb salt or oxide dust, ingested with (contaminated) foods or fluids, or absorbed transdermally. Inhalation may occur in industrial areas that involve smelting or alloying is done (usually with copper, silver, lead, tin). Sb is present in tobacco at about 0.01% by weight; about 20% of this is typically inhaled by cigarette smoking (Carson et al., Toxicology and Biological Monitoring of Metals in Humans, Lewis Pub. p. 21, 1987). Antimony compounds are used for fireproofing textiles and plastics, and this element may be found in battery electrodes, ceramics and pigments. Antimony can be absorbed with the handling of gun powder or the frequent use of firearms. Recent studies indicate high levels of antimony in sheepskin bedding produced in New Zealand. Antimony contamination of soft plastic-bottled water is time and temperature dependent.

Symptoms of mild Sb exposure/retention may be insidious and multiple including: fatigue, muscle weakness, myopathy, and metallic taste. Chlorides and oxides of both valences of Sb can be mutagenic and may affect leukocyte function. Sb can bond to sulfhydryl (-SH) sites on enzymes and may interfere with cellular metabolism. Acute symptoms that may be associated with excessive Sb exposure/retention include: respiratory tissue irritation and pneumoconiosis with (chronic) inhalation of Sb dusts, RBC hemolysis with inhalation of stibine (SbH₃) vapor, and gastrointestinal distress if orally ingested. Skin exposure can produce "antimony spots" or rashes which resemble chicken pox. Certain molds can produce the highly neurotoxic stibine gas from Sb; stibine inhibits acetylcholinesterase activity.

A hair element analysis may be used to further assess Sb exposure. Antimony may

be elevated in urine following administration of DMPS or DMSA if exposures to Sb have resulted in net retention; such levels may or may not be associated with overt adverse health effects.

BIBLIOGRAPHY FOR ANTIMONY

1. Carson B.L. et al. Toxicology and Biological Monitoring of Metals in Humans, Lewis Publishers, Chelsea MI, pp 21-26, 1987.
2. Tsalev D.L. and Z.K. Zaprianov. Atomic Absorption Spectrometry in Occupational and Environmental Health Practice. CRC Press, Boca Raton FL, pp 85-87, 1983.
3. Scriver C.A. et al The Metabolic Basis of Inherited Disease, 6th ed. McGraw-Hill, New York NY, pp 2349-50 on PFK deficiency. 1989.
4. Westerhof P. et al. Antimony leaching from polyethelene trepthalate (PET) plastic used for bottled drinking water. Water Res(2008)42:51-56.
5. Andra, SS et al. Co-leaching of brominated comounds and antimony from bottled

BISMUTH HIGH

This individual's urine bismuth (Bi) markedly exceeds the expected level. Urine is the major excretion mode for Bi, and this high level reflects a high level of exposure to the element. However, toxicity of Bi is slight and manifestations occur only when gram quantities are assimilated.

Bismuth is a byproduct of lead and copper ore refining. Bismuth has therapeutic uses with antimicrobial, anti-secretory and anti-inflammatory actions. Bismuth subsalicylate ("Pepto-Bismol") hydrolyzes in the stomach to salicylic acid and insoluble Bi; it can be effective in halting traveler's diarrhea. Historically, Bi was used to treat syphilis. Bismuth is used commercially in low-melting-point alloys and solders and is commonly in automatic sprinkler heads for building fire protection. Bismuth often is a component of: pigments, paints, glazes for ceramics, glass, and some semiconductor materials. Some cosmetics including lipstick may contain Bi oxides as a pigment (pearlescent white). Dry cell battery electrodes (cathode) may contain bismuth.

Early signs of excessive Bi exposure include: constipation or bowel irregularity, foul breath, skin pigmentation changes, and gum pigmentation (blue-black) with stomatitis. With excessive exposure and net retention, pathological changes may occur: erythema and skin sores, irritation of mucous membranes, nephritis, nephrosis with proteinuria and degeneration of proximal tubules, hepatitis with jaundice with fatty changes in the liver, and "bismuth encephalophy" with mental confusion, clumsiness, myoclonic jerks, tremors, and dysarthria. These acute symptoms are expected only with repeated ingestion of high doses (gram amounts) of soluble bismuth compounds.

Laboratory tests that help to assess Bi exposure are whole blood and hair element analyses. Some increase in urine Bi may follow administration of dithiol metal binding agents (DMPS, DMSA) as Bi has a very high propensity to bind to sulfhydryl groups.

BIBLIOGRAPHY FOR BISMUTH

1. Harrison's Principles of Internal Medicine, 13th ed, McGraw Hill, New York, NY pp. 282, 534, 1994.
2. Tsalev D.L. and Z.K. Zaprianov Atomic Absorption Spectrometry in Occupational and

Environmental Health Practice CRC Press, Boca Raton FL, pp 101-103, 1983.

3. Carson B.L. et al. Toxicology and Biological Monitoring of Metals in Humans Lewis Publishers, Chelsea MI pp 44-7, 1987.

LEAD HIGH

This individual's urine lead (Pb) is higher than expected which means that Pb exposure is higher than that of the general population. A percentage of assimilated Pb is excreted in urine. Therefore the urine Pb level reflects recent or ongoing exposure to Pb and the degree of excretion or endogenous detoxification processes.

Sources of Pb include: old lead-based paints, batteries, industrial smelting and alloying, some types of solders, Ayurvedic herbs, some toys and products from China and Mexico, glazes on (foreign) ceramics, leaded (anti-knock compound) fuels, bullets and fishing sinkers, artist paints with Pb pigments, and leaded joints in municipal water systems. Most Pb contamination occurs via oral ingestion of contaminated food or water or by children mouthing or eating Pb-containing substances. The degree of absorption of oral Pb depends upon stomach contents (empty stomach increases uptake) and upon the essential element intake and Pb status. Deficiency of zinc, calcium or iron increases Pb uptake. Transdermal exposure is significant for Pb-acetate (hair blackening products). Inhalation has decreased significantly with almost universal use of non-leaded automobile fuel.

Lead accumulates extensively in bone and can inhibit formation of heme and hemoglobin in erythroid precursor cells. Bone Pb is released to soft tissues with bone remodeling that can be accelerated with growth, menopausal hormonal changes, osteoporosis, or skeletal injury. Low levels of Pb may cause impaired vitamin D metabolism, decreased nerve conduction, and developmental problems for children including: decreased IQ, hearing impairment, delayed growth, behavior disorders, and decreased glomerular function. Transplacental transfer of Pb to the fetus can occur at very low Pb concentrations in the body. At relatively low levels, Pb can participate in synergistic toxicity with other toxic elements (e.g. cadmium, mercury).

Excessive Pb exposure can be assessed by comparing urine Pb levels before and after provocation with Ca-EDTA (iv) or oral DMSA. Urine Pb is higher post-provocation to some extent in almost everyone. Whole blood analysis reflects only recent ongoing exposure and does not correlate well with total body retention of Pb. However, elevated blood Pb is the standard of care for diagnosis of Pb poisoning (toxicity).

BIBLIOGRAPHY FOR LEAD

1. ATSDR Toxicological Profile for Lead (2007 update) www.atsdr.cdc.gov/toxprofile
2. Centers for Disease Control and Prevention. Third National Report on Human Exposure to Environmental Chemicals. Atlanta, GA: CDC; 2005.
http://www.cdc.gov/exposure_report/report.htm [Accessed 02/01/2009]
3. Lead Tech '92, "Proceedings and Papers from the Lead Tech '92: Solutions for a Nation at Risk" Conference, Sept 30-Oct 2, 1992. Bethesda, MD, IAQ Publications, 4520 East-West Highway, Ste 610, Bethesda, MD, 20814.
4. "Preventing Lead Poisoning in Young Children", US Centers for Disease Control, Atlanta, GA, Oct. 1991 Statement, US Dept. of Health and Human Services.
5. Carson B.L. et al. Toxicology and Biological Monitoring of Metals in Humans, Lewis Publishers, Inc.,

Chelsea, MI, p. 128-135, 1986.

6. Tsalev D.L. et al. Atomic Absorption Spectrometry in Occupational and Environmental Health Practice Vol 1, CRC Press, Boca Raton, FL 1983.

7. Piomelli S. et al. "Management of Childhood Lead Poisoning", J. Pediatr 105 (1990) p. 523-32.

8. Shubert J. et al. "Combined Effects in Toxicology - a Rapid Systematic Testing Procedure: Cadmium, Mercury and Lead" - J. Toxicology and Environmental Health, 4:763-776, 1978.

9. Mayo Clinic. Mayo Medical Laboratories. <http://www.mayomedicallaboratories.com/test-catalog/clinical+and+Interpretive/60246> [Accessed 10/25/2011]

10. Saper RB et al. "Lead, mercury and arsenic in U.S. and Indian manufactured ayurvedic medicines sold via the internet." JAMA (2008) 300(8): 915-23.

MERCURY HIGH

This individual's urine mercury (Hg) is higher than expected but may not be sufficiently high to be associated with overt pathophysiological effects. Symptomatology depends on many factors: the chemical form of Hg, its accumulation in specific tissues, presence of other toxicants, presence of disease that depletes glutathione or inactivates lymphocytes or is immunosuppressive, and the concentration of protective nutrients, (e.g. zinc, selenium).

Early signs of excessive Hg exposure include: decreased senses of touch, hearing, vision and taste, metallic taste in mouth, fatigue or lack of physical endurance, and increased salivation. Symptoms may progress with moderate or chronic exposure to include: anorexia, numbness and paresthesias, headaches, hypertension, irritability and excitability, and immune suppression/dysregulation. Advanced disease processes from excessive Hg assimilation include: tremors and incoordination, anemia, psychoses, manic behaviors, possibly autoimmune disorders and renal dysfunction or failure. Note that in Hg exposure of long duration, renal excretion of Hg (and normal metabolites) may become impaired, and the urine level of Hg might be only mildly elevated or not elevated at all due to renal failure.

Mercury is used in: dental amalgams (50% by weight), explosive detonators; some vaccines, pure liquid form in thermometers, barometers, and laboratory equipment; batteries and electrodes, some medications and Ayurvedic herbs, fungicides and pesticides, and in the paper industry. The fungicide/pesticide use of mercury has declined due to environmental concerns, but Hg residues persist in the environment. Emissions from coal-fired power plants and hospital/municipal incinerators are significant sources of mercury pollution.

Methylmercury, the most common, organic form of Hg, occurs by methylation of inorganic Hg in aquatic biota or sediments (both freshwater and ocean sediments). Methylmercury accumulates in aquatic animals and fish and is concentrated up the food chain reaching highest concentrations in large fish and predatory birds. Except for fish, the human intake of dietary mercury is negligible unless the food is contaminated with one of the previously listed forms/sources. Daily ingestion of fish can result in the assimilation of 1 to 10 micrograms of mercury/day.

Depending upon the extent of cumulative Hg exposure, elevated levels of urine Hg may occur after administration of DMPS, DMSA or D-penicillamine. Blood and especially red blood cell elemental analyses are useful for assessing recent or ongoing exposure to organic (methyl) Hg.

BIBLIOGRAPHY FOR MERCURY

1. Centers for Disease Control and Prevention. Third National Report on Human Exposure

to Environmental Chemicals. Atlanta, GA: CDC; 2005.

<http://www.cdc.gov/exposurereport/report.htm> [Accessed 2/01/2009]

2. Suzuki T. et al eds, *Advances in Mercury Toxicology*, Plenum Press, New York, 1991.
3. World Health Organization: "Methylmercury" *Environ. Health Criteria* 101 (1990); "Inorganic Mercury" *Environ. Health Criteria* 118 (1991) WHO, Geneva, Switzerland.
4. Tsalev D.L. and Z.K. Zaprianov, *Atomic Absorption Spectrometry in Occupational and Environmental Health Practice*, CRC Press, Boca Raton FL, pp 158-69, 1983.
5. Birke G. et al "Studies on Humans Exposed to Methyl Mercury Through Fish Consumption", *Arch Environ Health* 25, 1972 pp 77-91.
6. Pelletier L. "Autoreactive T Cells in Mercury-Induced Autoimmunity", *J. Immunology*, 140 no.3 (1988) pp 750-54.
7. Werbach M.R. *Nutritional Influences on Illness*, 2nd ed, Third Line Press, Tarzana CA, pp 249, 647, 679, 1993.
8. Saper RB et al. "Lead, mercury and arsenic in U.S. and Indian manufactured ayurvedic medicines sold via the internet." *JAMA*(2008)300(8):915-23.

TIN HIGH

Tin is elevated in this individual's urine, and urine accounts for at least 80% of excreted tin that is ingested and absorbed from the gastrointestinal tract. Ingested tin is not significantly absorbed if it is an inorganic form. Oxide coatings readily form on metallic tin, and salts can quickly oxidize making them insoluble. Organic tin, however, is bioavailable and more readily absorbed. Some organic tin compounds such as short-chain alkyltins can be absorbed transdermally and can cause degeneration of myelin.

Food and drink usually provide small daily intakes of (nontoxic) tin, with amounts depending upon type of food, packaging, quality of drinking water and water piping materials. Total daily intake is expected to vary from about 0.1 to 15 milligrams. Tin is present in many metal alloys and solders; bronze, brass and pewter contain the element. Dyes, pigments and bleaching agents often contain tin. Anticorrosion plating of steel and electrical components may also use tin. "Tin cans" are tin-plated steel with a thin outer oxide layer allowing the surface to be shiny but inert. Modern food-containing cans usually have polymer coatings that prevent food-metal contact. In the past some toothpastes contained stannous fluoride, a soluble fluoride source for strengthening tooth enamel. Currently most brands of fluoridated toothpastes contain sodium fluoride. Organic tins, the usually toxic forms, are: biocides (triphenyltin and alkyltins) used against rodents, fungi, insects and mites; curing agents for rubbers and silicones (dialkyltin); and methyltin formed bacteriologically (similar to methylmercury).

Mildly elevated levels of tin in urine may reflect sporadic dietary intake and excretion; there may be no associated symptoms. A two- or three-fold increase in urine tin levels is not uncommon following administration of EDTA or with sulfhydryl agents (DMSA, D-penicillamine, DMPS). Early signs of chronic organic tin excess can be: reduced sense of smell, headaches, fatigue and muscle aches, ataxia and vertigo. Hyperglycemia and glucosuria are reported. Also, for organic tin exposure, there can be irritation of contacted tissues (eyes, skin, bronchial tubes, or GI tract). Later, immune dysfunction may occur with reduced lymphocytes and leukocytes; mild anemia may occur. A hair element analysis can be used to corroborate tin excess. Tin is commonly elevated in urine from autistic patients following administration of DMSA or DMPS.

BIBLIOGRAPHY FOR TIN

-
1. Winship K.A. "Toxicity of Tin and Its Compounds", Adverse Drug Reactions and Acute Poisoning Reviews, 7 no.1, pp 19-38, 1988.
 2. Gray B.H. et al. "Inhibition of Tributyltin Mediated Hemolysis by Mercapto Compounds" J. Applied Toxicology 6 no.5 pp 363-70, 1986. Discussed BAL, DMSA, DMPS relative effectiveness in inhibiting a toxic effect of tin.
 3. Ganguly B.B. et al "Cytotoxicity of Tin in Human Peripheral Lymphocytes in Vitro" Mutation Research, 282 no.2, pp 61-67, 1992.
 4. Tsalev D.L. and Z.K. Zaprianov, Atomic Absorption Spectrometry in Occupational and Environmental Health Practice, vol. 2, CRC Press, Boca Raton, FL, pp 199-204, 1983.
 5. Carson B.L. et al. Toxicology and Biological Monitoring of Metals in Humans, Lewis Publ., Chelsea MI, pp 260-63, 1987.

ZINC HIGH

High urinary zinc may or may not correspond to global zinc excess or to zinc loss from body tissues, because the major route for zinc excretion is via the bile, intestinal transport and feces. Typically, from two to ten percent of total zinc excretion occurs via urine; a similar amount occurs in sweat; the remainder (about 80 to 95%) occurs via biliary secretion to the intestine and is excreted in feces. Urine levels may fluctuate without reflecting or influencing body stores.

Very high urinary zinc levels are expected to result from EDTA detoxification therapy; 3 to 20 mg/L is commonly measured in the 12 hours following intravenous administration of EDTA. Lesser elevations of urine zinc also are expected to result from sulfhydryl agent detoxification therapy (DMPS, DMSA, D-penicillamine). One to five mg/L is commonly found in the 24 hours following administration of these agents. Zinc repletion may be beneficial or required during such therapies.

Breakdown of tissue releases zinc into extracellular fluids and increases urinary zinc levels. This may be observed following or in conjunction with: accidental injury, surgery, catabolism of diseased/disordered tissue, starvation (ketosis) and diabetes. Zinc wasting may occur in alcoholic cirrhosis.

Zinc overload or toxicity can occur from ingestion of zinc contaminated food or drink; galvanized pipes or pails can be sources. Occupational or environmental exposure to zinc fumes may produce an acute contamination or poisoning. Elevated urinary zinc beyond two standard deviations high (without provocation) warrants investigation of possible sources of zinc excess, or of tissue catabolism or injury.

Excessive amounts of zinc in body tissues may displace copper and/or iron from tissue binding sites and may provoke anemia. Symptoms consistent with chronic zinc toxicity include: lethargy, difficulty writing and with fine motor skills, light-headedness, and renal failure. Immediate symptoms (within 12 hours) of acute zinc excess via ingestion include: nausea, vomiting, diarrhea, exhaustion, headache, dizziness, and myalgia. Other laboratory findings consistent with zinc toxicity would be: elevated leukocyte count, elevated serum amylase and lipase, elevated whole blood zinc concentration, elevated hair zinc level (if the zinc excess is chronic).

BIBLIOGRAPHY FOR ZINC

1. Lantzsch H.J. and H. Schenkel "Effect of Specific Nutrient Toxicities in Animals in Animals and Man: Zinc in Handbook Series in Nutrition and Food, Sect.E, vol 1, CRC Press, Boca Raton FL, pp 291-307, 1978.

-
2. King J.C. and C.I. Keen "Zinc" Chapt. 10 in Modern Nutrition in Health and Disease 8th ed. Shils, Olson and Shike eds, Lea & Febiger, Philadelphia PA, pp 214-230, 1994
 3. Tsalev D.L. and Z.K. Zaprianov Atomic Absorption Spectrometry in Occupational and Environmental Health Practice vol 1, CRC Press, Boca Raton FL, pp 209-14, 1983.
 4. Aggett P.J. "An Overview of the Physiology and Metabolic Role of Zinc" in Zinc in Human Medicine, Inst. Child Health, London, TIL Publications, Toronto, Ont. pp 9-38, 1984.
 5. Fell G.S. "Diagnosis of Zinc Deficiency" in Zinc in Human Medicine ibid. pp 39-50.
 6. Petering, H.G. "Some Observations on the Interaction of Zinc, Copper and iron Metabolism in Lead and Cadmium Toxicity." Environ. Health Perspect., pp. 141-145, 1978.
 7. Lauwerys, R. et al. "The Influence of Orally-Administered Vitamin C or Zinc on the Absorption of and Biological Response to Lead." J. Occup. Health, 25: pp. 668-678, 1983.

COPPER HIGH

Significantly elevated copper in urine can be secondary to provocative challenge with sulfhydryl (-SH) bearing agents such as D-penicillamine ("Cuprimine"), DMSA, or DMPS. Large, multi-gram doses of vitamin C (ascorbic acid), administered orally or intravenously, may slightly or moderately increase excretion of copper.

Increased urinary copper can be an artifact of nutritional supplementation with copper or come from drinking water that is high in copper content. Acidic water carried in copper pipes can dissolve some copper which increases the copper intake if used for drinking or cooking. Molybdenum supplementation at high levels or if inappropriate may cause increased copper excretion; molybdenum and copper are mutually antagonistic in terms of body retention.

Bacterial or other infections may cause hypercupremia with attendant or delayed hypercuprinuria. This is transient and follows the inflammatory stage of the disease. Published studies such as Vivoli, Sci Total Environ, 66 p. 55-64, 1987 have correlated increased urinary copper with increased blood pressures in hypertensives. Biliary obstruction or insufficiency can decrease normal excretion of copper via the bile while increasing blood and urinary levels. Proteinuria also may feature increased copper levels.

Hyperaminoacidurias that include histidinuria can result in urinary copper wasting because histidine is a powerful chelator of copper. Hyperaminoacidurias that include histidine can be of many origins including: genetic factors, chemical or elemental toxicities, infectious agents, hyperthyroidism, sugar intolerances, nephrotic syndromes, etc.

In Wilson's disease, urinary copper is generally increased (above 100 micrograms/24 hours) without provocation or chelation. Use of D-penicillamine or DMPS as a provocative diagnostic procedure can yield a 5 - 10X increase in urinary copper levels in normal individuals. In contrast, Wilson's disease patients may then excrete 50-100 times the normal levels or 1000 to 2000 mcg/24 hr. (Walshe, J. Rheumatology (supp/7) 8 p.3-8, 1981).

Urine analysis (unprovoked) is not an adequate procedure to assess copper stores or copper metabolism. Blood levels, erythrocyte copper content, erythrocyte superoxide dismutase activity, and serum ceruloplasmin are other more indicative measurements for copper status.

BIBLIOGRAPHY FOR COPPER

1. Braunwald et al., eds. Harrison's Principles of Internal Medicine, 11th ed., McGraw Hill,

Chapter 311, 1987.

2. Johnson M.A. and B.E. Kays, "Copper: Its Role in Human Nutrition", Nutrition Today, Jan/Feb 1990, pp 6-14.
 3. Harper et al. Review of Physiological Chemistry, Lange Medical Publications, 17th ed., pp. 588-89, 1979.
 4. J. M. Walshe "The Discovery of the Therapeutic use of D-Penicillamine" J. Rheumatology (Supplement 7) 8, pp. 3-8, 1981.
 5. Werbach M.R. Nutritional Influences on Illness 2nd ed., Third Line Press, Tarzana, CA, 1993.
- Multiple source references on copper physiology and pathology.

CHROMIUM LOW

The chromium level in this urine sample is low. Chromium (Cr) is essential for proper metabolism of glucose in humans. It potentiates the action of insulin via glucose tolerance factor (GTF) which is Cr+3 bound in a dinicotinic acid-glutathione complex. Other functions of Cr include aiding in lipid metabolism and assisting with HDL/LDL cholesterol balance.

Significance of Low Chromium: Clinical findings consistent with Cr deficiency are those of GTF insufficiency including diabetes, hyperglycemia, and possibly transient hyper/hypoglycemia. Excessive LDL cholesterol also may be consistent with Cr deficiency. Some investigators have linked Cr deficiency to ischemic heart disease and atherosclerosis.

Other Useful Analyses: Urine Toxic Metals and Essential Elements provocative testing with EDTA can be used to assess Cr stores.

BIBLIOGRAPHY FOR CHROMIUM LOW

1. Anderson R.A. Essentiality of Chromium in Humans" Sci Total Environ. 86, 1989, pp 75-81.
2. Anderson R.A. et al, Am. J. Clin. Nutr. 41, 1985 pp 571-77
3. Mertz W., "Chromium Occurrence and Function in Biological Systems". Physiological Review 49(2), 1969, pp 163-239.
4. Mertz, W. Clinical, Biochemical and Nutritional Aspects of Trace Elements, Alan R. Liss, Inc., New York, NY, 1982, pp 315-23.
5. Rennert O.M. and W-Y Chan Metabolism of Trace Metals in Man vol II, CRC Press, Boca Raton FL, pp 122-24.
6. Tsalev D.L. and Z.K. Zaprianov, Atomic Absorption Spectrometry in Occupational and Environmental Health Practice, CRC Press, Boca Raton, FL, 1983, pp 113-17.
7. Wallach S.J. Am. Coll. Nutr 4, 1985, pp 107-120

LITHIUM HIGH

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.

SELENIUM LOW

Urine accounts for about one-half of the total body excretion of dietary selenium when normal amounts are ingested. Seafood, organ meats, cereal grains, and seleniferous vegetables (garlic, onions) are good dietary sources. Selenium is also excreted in sweat, and lesser amounts are present in fecal matter. Because diets are highly variable in selenium content, urine is not a reliable indicator of selenium adequacy or function.

Low urinary selenium may be a consequence of: junk food diet or highly-processed food diet, gastrointestinal dysfunctions, renal insufficiency (in which case other elements will be subnormal in urine but possibly elevated in blood), and long-term parenteral nutrition or special diets that are low in selenium.

Selenium is a necessary element for proper activity of two enzymes in human metabolism: glutathione peroxidase (GPx) and iodothyronine deiodinase (ITD). Selenium deficiency may cause weakness or rate limitation for one or both of these enzymes. GPx oxidizes glutathione while reducing oxidized lipids. Weak GPx activity may allow excessive inflammation to occur. ITD deiodinates thyroxine prohormone and catalyzes T4 → T3. Selenium deficiency may be a cause of insufficient T3 and thyroid dysfunction (Berry J.M. Nature 349, 1991 pp.438-40).

Symptoms consistent with selenium deficiency include: myalgia, increased inflammatory responses, hypothyroidism with low T3. Cardiomyopathy and Keshan disease can occur in cases of severe, chronic Se deficiency. Subnormal selenium may accentuate the effects of cadmium, mercury or arsenic overload. Confirmatory tests for selenium status include packed red blood cell elements, and hair elemental analysis (provided that antidandruff shampoos have not been used).

BIBLIOGRAPHY FOR SELENIUM

1. Berry M.J. et al. "Type I Iodothyronine Deiodinase is a Selenocysteine-Containing Enzyme"

Nature 349 (1991) pp 438-40.

2. Oldfield J.E. "Some Implications of Selenium for Human Health" Nutrition Today (Jul/Aug 1991) pp 6-11.

3. Levander O.A. and R.F.Burk "Selenium" Chapt. 12 in Modern Nutrition in Health and Disease 8th ed. Shils, Olson and Shike eds. Lea & Febiger, Phila. PA, pp 242-51, 1994.

4. Martin J.L. "Nutrient Toxicities in Animals and Man: Selenium" in Handbook Series in Nutrition and Food Sect. E, Vol I, CRC Press Boca Raton FL, pp 309-18, 1978.

5. Tsalev D.L. and Z.K. Zaprianov Atomic Absorption Spectrometry in Occupational and Environmental Health Practice CRC Press, Boca Raton FL, pp 182-87, 1983.

Lab number: **U170313-2197-1**
Patient: **Stephen Russell**

Urine Tox. & Ess.

Page: 12
Client: **42158**

LERNER • POOLE, LLP
ATTORNEYS AT LAW
535 PACIFIC AVENUE, 2ND FLOOR
SAN FRANCISCO, CALIFORNIA 94133-4635
(415) 391-6000
FACSIMILE: (415) 391-6011

1 Stacey Poole, Esq., (SBN 202964)
2 LERNER • POOLE, LLP
3 535 Pacific Avenue, Second Floor
4 San Francisco, CA 94133
5 Telephone: 415-391-6000
6 Fax: 415-391-6011
7 stacey@cafamilylaw.com

8 Attorneys for Petitioner
9 STEPHEN RUSSELL

ENDORSED
FILED
Superior Court of California
County of San Francisco

JUL 09 2018

CLERK OF THE COURT
KELLY DAVIES
By: _____
Deputy Clerk

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN FRANCISCO

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

CASE NO.: FTP-18-377425

DECLARATION OF BRYAN F.
CRUTCHER

Date: July 10, 2018
Time: 1:30 p.m.
Dept: 404
Judge: Richard C. Darwin

16
17 I, Bryan Crutcher, declare and state:

- 18 1. I am a retired police officer with 15 years' experience with the Community Service
19 Bureau, SWAT, Motors/Traffic Street Crimes Unit, and Force Options instructor. I
20 am currently a Credentialed Special Investigator (under contract) with the United
21 States Federal Government. I am the owner-founder of Crutcher & Associates
22 Resource Group, Inc. conducting pre-employment polygraphs for approximately
23 seven local law enforcement agencies and am a California Licensed Private
24 Investigator.
25 2. On May 15, 2018, at approximately 0900 hours, while working for the client, Stephen
26 Russell as his Executive Coordinator, he advised me via text messaging that I move
27 his baby's crib from apartment 55D to apartment unit 10G where he was on the lease
28 for both. He was requesting this move of the baby's crib and other items as we had

BC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

been planning for several weeks on doing a large amount of painting of the entire 55D apartment; and 10G was a suitable place for the family to reside while such repairs and painting were completed. It was estimated to take three full days for the painting to be completed.

3. At approximately 0945, Tara Walsh, the client's girlfriend and mother of his four-month-old (at the time) baby discovered that we had moved the baby's crib to 10G and the baby's associated personal effects such as bottles, wipes etc. Tara became irate and irrational. She lashed out at me via text messaging stating at 0945 hrs.: "I am not leaving this apartment until we are packed up and moved out. He's had us moving like crazy. I am totally exhausted, and I just can't move somewhere else. I have a baby, it is not fair."
4. At 1258 hrs. she text messaged me stating "I can't believe you moved the baby's crib without consulting me. That's my property for my daughter. I can call the police and get them involved or you can bring it back up. I am not leaving here, I need to pack, and I am under a tremendous amount of stress with all I need to do. I am not moving down there."
5. I was later directed by Stephen Russell to bring the baby crib and belongings back up to 55D and to cancel the painting which was scheduled to start the next day in the morning on May 16th. I did both, brought the crib back up to 55D and cancelled the painting crew.
6. While bringing the crib back up to 55D Tara was standing in the hall near the entry of 55D. She was crying and yelling at me and in general she said I was a "Fucking Asshole" for taking the crib, and that she believed Steve and I were planning on kidnapping the baby.
7. Due to Tara's highly agitated and verbally abusive state, I felt it best to remove myself from the scene and so I left and began to take the elevator to the 10G apartment.

PL

- 1 8. Before the elevator came, I was called back to 55D where I had been told the baby
2 fell off the bed onto the ground while in sole care of Tara (see Pat Williams' report).
3 Upon my arrival back to 55D, I observed the baby to have redness over her right eye
4 on her forehead which was consistent with what I know from experience and training
5 to be from a blunt impact.
- 6 9. The baby was taken to a nearby clinic for a medical exam and observation. CARG
7 staff member Darwin Lee went with Tara, the baby and Abby the nanny to obtain the
8 medical exam.
- 9 10. On May 27, 2018, Tara asked me to have one of our concierge staff travel with her to
10 New York while she went and visited her family. She later asked for Darwin Lee to
11 go. She also asked if we would walk her dogs every day and feed them in her
12 absence which she said was for approximately 1.5 weeks (see attached text
13 messages). At one point, Tara had our staff assistant, Jinnie Tam, assist her in
14 attempting to find a boarding facility for her dogs while she was in NY. Tara
15 ultimately decided to take the dogs with her instead. She decided not to go at this
16 time and rescheduled her flight for 06/04/18. She appeared very comfortable with
17 using our concierge services and our staff for running errands, making appointments,
18 and at time even watching Evie while she was out of the apartment.
- 19 11. On June 1, 2018 Tara again asked me to set up transportation for her and Evie. She
20 wanted to use the family car to get to the airport as she was leaving to visit in NY on
21 06/04/18. She further asked if an associate of mine, a retired NYPD officer "Howie"
22 who resided in NY, to pick them up and take her and Evie to her parents' home where
23 she would be staying. I made these arrangements with Howie to pick her up and
24 advised our staff to facilitate getting her and Evie to the airport on time, using the
25 family car.
- 26 12. On June 4, 2018, Staff was all set to take Tara to the airport as she had requested,
27 when without notice, she decided to leave the apartment unannounced with Evie. She
28 called an Uber and was preparing to board it with Evie in a very unsafe red/bus zone

BL

1 in front of the apartment at 301 Mission Street. Concerned for the safety of Evie, I
2 contacted Mr. Russell and was advised to follow her to the airport and make sure Evie
3 got safely on the plane. I listened as Tara called both her mother and father on her
4 cell phone while riding in the Uber. It appeared both advised her to go back to the
5 apartment. During the Uber ride, Tara also called her doctor and told him that she
6 knows he believes she has severe borderline personality disorder and every problem
7 in her relationship with Steve is her fault.

8 13. I had entered Tara's Uber because the location of the family car made it impractical
9 to promptly follow the Uber. The family car was in the Millennium Towers valet
10 parking structure two floors underground, heavy traffic conditions at the time on and
11 around Mission Street, and the red zone they had stopped in had busses loading and
12 unloading passengers. I felt entering the Uber was my only alternative, so I entered
13 the Uber car and explained to the Uber driver I was simply along for the ride and was
14 instructed by the father of the baby to ensure the baby's safe arrival and boarding of
15 the plane to NY. Tara objected to me being there, but I explained several times I was
16 not trying to impede or prevent her from leaving but instead simply ensure safe travel
17 and boarding of Evie onto the plane. I even asked Tara and Bishop, the Uber driver,
18 if they wanted me to call the police for them, both declined my offer. Ultimately, we
19 were successful in flagging down a Police officer on Market Street in SF, driving a
20 marked police unit and we requested a report be taken for documentation purposes.
21 See SFPD Report number 180-415-167 attached hereto as Exhibit "A". Tara admitted
22 she was not a victim of any crime and wanted to return to her apartment at 301
23 Mission Street in San Francisco.

24 14. Tara had staff member Jinnie Tam assist her in attempting to locate a boarding house
25 for the dogs. In other text messages she invited us to enjoy cake with her, Steve and
26 Evie for Evie's fourth month celebration. Tara felt comfortable enough with me that
27 on 05/25/18, she asked me to conduct a background check on a subject in NY. It
28

1 appeared she embraced us and our presence until it was revealed to Steve by Abby
2 about her tainting his beverages.

3 15. In early May 2018, on one occasion I observed a small white chunk of something
4 floating in a wine glass that Mr. Russell had just consumed. Not knowing what it was
5 at the time, I later learned Tara had put some of her own prescription medications in
6 his drink. I advised her not to do that again and it was not acceptable under any
7 circumstances. She seemed to understand.

8 16. I have observed Tara work from her laptop and she told me she could work
9 essentially from anywhere at any time. She explained to me that she was able to
10 outsource much of the work performed for her clients and she even helped me with a
11 feature on my company's web page to drive more business. I paid her for her
12 assistance and I was aware that Mr. Russell also was using her services for at least
13 one project where he paid her. I became aware of this because I heard them
14 discussing her buying IP addresses and other related products and services for him.

15 17. To my knowledge Mr. Russell does not have in his possession, control, or access to
16 any dangerous weapons including guns, knives other than eating utensils, tasers, or
17 any other dangerous weapons. Mr. Russell has never in my presence presented a
18 threat to anyone including Tara, Evie, staff, friends and or family. I have never
19 observed him to threaten, harass, assault, stalk or even disrespect Tara or anyone
20 under any circumstances. Mr. Russell has demonstrated an amazing amount of
21 empathy, thoughtfulness, patience, support to Tara under conditions that I can only
22 describe as her being verbally and mentally abusive. We feared for his safety on
23 many occasions and almost daily after she was exposed for tainting his beverages.
24 The nanny, Abby, approached me and said she feared Tara had been putting
25 medication in his food and other drinks. I asked her what made her believe this? Abby
26 said Tara told her and Dan Ochoa that she "does it all the time."

27 18. I have never heard of/or witnessed Mr. Russell behave in a manner that could even
28 remotely be construed as "disorderly, harassing, assaultive", or behave in a manner

LERNER • POOLE, LLP
ATTORNEYS AT LAW
535 PACIFIC AVENUE, 2ND FLOOR
SAN FRANCISCO, CALIFORNIA 94133-4635
(415) 391-6000
FACSIMILE: (415) 391-6011

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

which met the threshold of reckless endangerment. In fact, I would say Tara frequently harassed, antagonized, cursed at, plus belittled Mr. Russell while yelling at him in a manner I sometimes questioned to be intentionally attempting to cause a violent reaction from him. Other Staff members such as Darwin Lee, Dan Marks also expressed similar concerns to me. This forced us to post a staff member inside the apartment for Mr. Russell's safety. It was not uncommon for Tara to badger and harass Mr. Russell for hours on end. She would accuse him of cheating on her, assaulting her, trying to leave her and Evie and frequently, called him a "monster, asshole" and other abusive obscenities and mean-spirited names. It was not uncommon to see her yelling these things at him while holding or in the immediate presence of their baby Evie. Mr. Russell, without fail, would attempt to calmly talk to her and in his amazing fashion would patiently talk to her and attempt to explain to her that he loved her and Evie. He wanted to be with her, but she needed to make an effort to follow her doctor's directives and suggestions if there was hope for them to be an intact family. This was a repeated cycle almost every night where one moment Tara appeared okay, but the next moment she would start in on him with her verbal assaults which would last for hours. At times my staff and Abby, the nanny, who does not work for me, have told me I need to get him out of the apartment because Tara was so verbally abusive they feared for his safety or that she might provoke him to a violent reaction. Tara would commonly say "I am mentally ill." On the way to the airport in the Uber on 06/04/18, she told the Uber driver that she was mentally ill. The Uber driver advised her not to tell people that because it could be used against her in a custody battle. Tara has stated that Mr. Russell had threatened to take Evie away from her, however, I have never heard him say that. Tara accused me and the nanny Abby of attempting to take or kidnap Evie. Tara also accused Mr. Russell of having a gun when he did not. She also told Mr. Russell that she was pregnant which she was not. All of these false accusations are examples of Tara being delusional at times.

BC

LERNER • POOLE, LLP
ATTORNEYS AT LAW
535 PACIFIC AVENUE, 2ND FLOOR
SAN FRANCISCO, CALIFORNIA 94133-4635
(415) 391-6000
FACSIMILE: (415) 391-6011

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

19. Tara took full advantage of my staff's concierge and personal services offered. See Exhibit B attached hereto which is a recent chain of text messages between me and Tara whereby she asks for numerous favors, including errands, watching her dogs, and invites me and my family over for a celebration.

20. Tara had changed her mailing address to reflect her new residency at 301 Mission Street, San Francisco, CA, and received mail and packages there almost daily.

21. The Service of Summons was proper as it was performed by Dan Marks on 06/05/18, at 3:20 PM.

22. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 6TH day of July, 2018 in SAN FRANCISCO, California.


BRYAN F. CRUTCHER

San Francisco Police Department

INCIDENT REPORT

180415167

Report Type: Initial

180415167

INCIDENT	Incident Number	Occurrence From Date / Time	Occurrence To Date / Time	Reported Date / Time	CAD Number			
	180-415-167	06/04/2018 14:02	06/04/2018 14:09	06/04/2018 14:09	181552070			
	Type of Incident SUSPICIOUS OCCURRENCE 64070							
	Location of Occurrence: 730 MARKET ST		At Intersection with/Premise Type STREET, (NOT SIDEWALK)		District TENDERLOIN			
	Confidential Report? <input type="checkbox"/>	Arrest Made? <input type="checkbox"/>	Suspect Known? <input type="checkbox"/>	Suspect Unknown? <input type="checkbox"/>	Non-Suspect Incident? <input checked="" type="checkbox"/>	Domestic Violence? <input type="checkbox"/>	(Type of Weapon Used)	Use of Force? <input type="checkbox"/>
Location Sent / On View: 730 MARKET ST		At Intersection with			Reporting District CENTRAL			
Crime and Clearance Status 0	Reported to Bureau	Name	Star	Date/ Time	Elder Victim <input type="checkbox"/>	Gang Related? <input type="checkbox"/>	Juvenile Subject? <input type="checkbox"/>	Prejudice Based? <input type="checkbox"/>
Have you reviewed the attached list of procedures required by Department General Order (DGO) 7.04?								

OFFICER	I declare under penalty of perjury, this report of <u>3</u> pages is true and correct, based on my personal knowledge, or is based on information and belief following an investigation of the events and parties involved.							
	PROP 115 CERTIFIED		5 Year/Post					
	Reporting Officer	Star	Station	Watch	Date			
	KRESLEY, WALLACE H	1826	Central Station	1100-2100	06/04/18 20:26			
	Reviewing Officer	Star	Station	Watch	Date			
CHAN, LAWRENCE T	1484	Central Station	1500-0100	06/04/18 20:44				
OIC	Star	Station	Watch	Date				
CHAN, LAWRENCE T	1484	Central Station	1500-0100	06/04/18 20:45				
Related Case	Related Case	Re-assigned to	Assigned to	Assigned by				
-	-	Copies to 3J300 3*300	3J300 Add'l Copies	LC 1484				

REPORTEE	Code	Name (Last, First Middle)	Alias	Email								
	R 1	BISHOP, DEJA DANAE										
	Day Phone	Type	Home Address	City	State	Zip Code						
	(619) 305-4019	Cell	3152 BONA ST	OAKLAND	CA	94601-						
	Night Phone	Type	Work Address	City	State	Zip Code						
	DOB / Age	DOB	or age between and	Race	Sex	Height	Weight	Hair Color	Eye Color	ID Type	Jurisd.	ID No.
	04/14/93 25	Unk. <input type="checkbox"/>		B	F	57	145	BLK	BRO	DL CA	E1669301	
Confidential Person <input type="checkbox"/>	Violent Crime Notification <input type="checkbox"/>	293 PC Notification <input type="checkbox"/>	Star	Follow-up Form	Statement	Relationship to Subject						
				YES <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/>	STRANGER/NONE						
School (if Juvenile)	Injury/Treatment	Other Information/If Interpreter Needed Specify Language UBER DRIVER										
Interpreter Needed <input type="checkbox"/>	Language	Language Description (if Other)	Language Line Service/Interpreter ID#	Bilingual Ofc Star#								

REPORTEE	Code	Name (Last, First Middle)	Alias	Email								
	R 2	WALSH, TARA										
	Day Phone	Type	Home Address	City	State	Zip Code						
	(914) 915-7689	Cell	301 MISSION ST	SAN FRANCISCO	CA	94105-						
	Night Phone	Type	Work Address	City	State	Zip Code						
	DOB / Age	DOB	or age between and	Race	Sex	Height	Weight	Hair Color	Eye Color	ID Type	Jurisd.	ID No.
	09/10/84 33	Unk. <input type="checkbox"/>		W	F	57			GRE	DL NY	734392422	
Confidential Person <input type="checkbox"/>	Violent Crime Notification <input type="checkbox"/>	293 PC Notification <input type="checkbox"/>	Star	Follow-up Form	Statement	Relationship to Subject						
				YES <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/>	STRANGER/NONE						
School (if Juvenile)	Injury/Treatment	Other Information/If Interpreter Needed Specify Language UBER DRIVER										
Interpreter Needed <input type="checkbox"/>	Language	Language Description (if Other)	Language Line Service/Interpreter ID#	Bilingual Ofc Star#								

EXHIBIT A
Page 1 of 3
EXHIBIT C 8

San Francisco Police Department 2

INCIDENT REPORT

180415167

Report Type: Initial

REPORT # 3	Code R 3		Name (Last, First Middle) CRUTCHER, BRYAN FRANKLIN				Alias			Email				
	Day Phone (707) 687-4224		Type Cell		Home Address 507 MORNINGSTAR WAY				City VACAVILLE		State CA	Zip Code 95687-		
	Night Phone		Type		Work Address				City		State	Zip Code		
	DOB 09/30/67	Age 50	DOB Unk. <input type="checkbox"/>	or age between and		Race W	Sex M	Height 5'9	Weight 200	Hair Color BRO	Eye Color HZL	ID Type DL CA	Jurisd. C3788042	ID No.
	Confidential Person <input type="checkbox"/>	Violent Crime Notification <input type="checkbox"/>		293 PC Notification <input type="checkbox"/>		Star		Follow-up Form YES <input checked="" type="checkbox"/>	Statement YES <input checked="" type="checkbox"/>		Relationship to Subject STRANGER/NONE			
	School (if Juvenile)			Injury/Treatment				Other Information/If Interpreter Needed Specify Language HIRED SECURITY FOR (R2-WALSH) PER STEPHEN RUSSELL						
	Interpreter Needed <input type="checkbox"/>	Language		Language Description (if Other)			Language Line Service/Interpreter ID#		Bilingual Ofc Star#					

PROPERTY 1	Code/No BWC 1	Item Description KRESLEY #1828				Brand AXON		Model		
	Serial No.		Gun Make	Caliber	Color		Narcotics Lab No.		Quantity 1	Value \$0.00 Total
	Seized by (Star)			From Where						
	Additional Description/Identifying Numbers UPLOADED TO EVIDENCE.COM AT CO.A									

EXHIBIT A
Page 2 of 9 EXHIBIT C - 9

San Francisco Police Department
INCIDENT REPORT

180415167

Report Type: Initial

NARRATIVE

On Monday, June 4, 2018 at approximately 1409 hours, I was flagged down in front of 730 Market Street by an Uber driver, later identified as (RP-1) Deja Bishop regarding a person riding in her vehicle without her permission.

I activated my (BWC) Body Worn Camera and Bishop gave me the following summarized statement: Bishop told me that she picked up (RP-2) Tara Walsh as her Uber fare, however before she could drive away a male, later identified as (RP-3) Bryan Crutcher got into the front passenger seat of her vehicle and refused to leave. Walsh stated that she knew who Crutcher was but she did not want him in the vehicle. Crutcher told Bishop that he was hired as a bodyguard by Walsh's boyfriend to provide security to Walsh's daughter, Evelyn Walsh (01/27/2018) who was also in the vehicle. Bishop told me she was worried for Tara and Evelyn Walsh's safety and wanted to file a report.

I asked Crutcher to exit the vehicle, he complied and gave me the following summarized statement: Crutcher stated that he is a retired Vallejo Police Officer hired as a security guard by Steven Russell, the boyfriend of Tara Walsh. Crutcher explained that Russell hired him to provide security to the baby, Evelyn Walsh as Russell does not trust Tara Walsh's ability to properly care for their daughter. According to Crutcher, on today's date, arrangements had been made to take Tara Walsh to airport by Crutcher and other security personnel. At the last moment, Walsh changed her mind and wanted to take Uber to the airport instead. Crutcher was instructed to ensure Evelyn and Tara Walsh's safe arrival to the airport, therefore he got into the Uber vehicle as well.

Central Officers Horan #428 (3A46), Mohamed #4254 and O'Keeffe #426 (3A13C) also responded to assist.

I met with Tara Walsh who told me the following: Walsh told me that her and her boyfriend, Steven Russell are in the process of breaking up. Walsh explained that Russell is very affluent and has hired security to watch over her and her baby because he doesn't fully trust her. Walsh explained that there is no custody agreement in effect for 5 month old Evelyn Walsh. Walsh corroborated that she was going to the airport to return to her home state of New York, however she is tired of having security follow her around and wanted to take Uber to the airport. Walsh stated that she is not the victim of a crime and that her and her baby were in good health. Walsh refused shelter and any other services. Walsh said that she had changed her mind and now wanted Uber to take her and her daughter to Russell's residence located at 301 Mission St. She told me that she wanted to go alone and not be accompanied by Crutcher.

I observed Emily Walsh who appeared in good health and was being bottle fed by Tara Walsh. I performed a computer records check of Bishop, Walsh and Crutcher which provided negative results. I informed Crutcher that he could not ride in the Uber vehicle with Tara and Evelyn Walsh. Crutcher complied and told me that he would be picked up by other security personnel working for Steven Russell.

I provided a Walsh, Bishop and Crutcher with a SFPD Follow Up form with a case number.

EXHIBIT A
Page 3 of 3
EXHIBIT C-10

iMessage with 19147157689
6/16/18, 4:50 PM

Hello, He's doing well.

Yeah he responded sorry just get worried

Anytime Tara.

iMessage with 19147157689
5/31/18, 2:11 PM

Can you get laundry detergent?



5/31/18, 3:18 PM

We got Gain moonlight breeze but they didn't have lavender



We are on our way back.

6/1/18, 10:47 AM

Bryan- I am going to go back to ny on Monday- is it possible for someone to come with me on the same flight and also for that Howie guy to pick me up from the airport? I will be gone 1.5 weeks. Also are you ok to cover the dogs? They just need to be fed 2x per day and walked once a day ideally.

 IMG_2133 

Here is the flight

 IMG_2134 

And here is the return flight

Yes, consider it Done as long as Steve Approves which I assume he does. No worries Tara, you are in good hands. And we will care for Cooper and Riley like they were our own.

Ok thank you Bryan! Yes I know Riley and Cooper are in good hands

Steve will be fine with it will tell him to text you to approve

Just spoke with Howie. He will pick you guys up and take you wherever you want. I need the address

EXHIBIT B

Page EXHIBIT C6-11

where you two will be staying

394 whippoorwill road, chappaqua ny 10514

On the flight there, if possible get a seat for whom ever is coming near us in the mint section- it's the front section of the plane- right now I have two seats next to each other in the 5th row

iMessage with 19147157689
5/27/18, 1:24 PM

Just want to talk to Steve about first

Sounds good.

So I'll call you in a few but Steve wants to keep using Abby until we find someone permanent

Just headed out for walk and then can call

Copy that.

When Jennie gets back she has been in contact with several Nanny services. We will see what she comes up with.

5/27/18, 5:00 PM

Tara, Could I take you up on your generous offer to buy a taller chair for the table where Darwin and the guys sit?

Yeah sure can work on today

Awesome thanks

I got awesome chair emailed it to you- even has massage feature

You are Sweet. Thank you. I'll check it out. Thanks so much.

That chair looks bad ass! Nice find. Thanks a million.

Do you want to come up at 6:30 for cake with the baby? You can bring Amy

Or your daughter

Sure, sounds great. See you then.

Ok great!

Can we bring anything?

Do you have paper plates? That would be great!

Oh yeah!

Click to Load Preview

airbnb.com



iMessage with 19147157689
5/26/18, 4:11 PM

Hi Bryan do you happen to have a cake pan down there?

Oh I think we might Aimee is looking

No, we need one though, especially since tomorrow is Evie's Fourth month 🎂

We will go get one. 🙌

And bring it up

What size pan would you like?

Haha yes that's why! I wanted to bake her a cake

Where could we even get one?

Such a good Mom..

There's a target nearby I'll send Aimee.

Ok sounds good!

BTW I found probably the best nanny. But she's not cheap.

Can you keep a secret, not from Steve of courses.

meaning anyone else

Yea you mean not tell Abby?

Would love to learn more- we pay Abby \$30 an hour now

Just you and STEVE

Ok yeah that's fine

Can know. She's more expensive but worth it.

IMG_2054

Can you do a background check on this women? She is meeting with my mom tomorrow to watch Evie at night for 11 days in New York

Yes, I'll get it right over to you guys.

Thanks!

You are quite welcome.

5/26/18, 6:53 PM

What is your email address?

Tara@vtlbranding.com

Cool. I'll be sending you a preliminary background on her. It's a check not an actual Back Ground investigation. A check simply checks know databases where a background investigation is actually a combo of a check and then investigators actually go and interview people and verify all the information listed in the BG check.

Do it look clean? Will check email

Password is "NANNY"

5/26/18, 10:33 PM

Click to Load Preview

this is where you will be going. Let me or Aimee know whatever you need to make the trip amazing and of course Evie comfortable.

I have two more Nanny's for you to interview.

iMessage with 19147157689
5/16/18, 5:24 PM

Is there anyway you can pick up my medication at Walgreens for me? I can't leave evie she's sleeping and they close at 6:30- the medication is under my name Tara Walsh.

Of course 🙌

iMessage with 19147157689
4/27/18, 12:37 PM

Is the chef women coming at 1 still? Also what's her name again?

Yes, Briana will be here at 1pm

K thanks

Your welcome, see you soon

4/27/18, 2:32 PM

Steve wanted to know if you or someone could pick up my medical kit for me from doc- the address is 3580 California St. Suite 101, SF, CA 94118

Are you able to go get it?

I can't go bc with evie

Yes, I'll get it. Can you give me there phone number please. I'm going to send you a document asking for some emergency contacts and stuff.

Ok sounds good need my email?

Tara@vtlbranding.com

They close at 5:30 at doc

 Lisette Private Medical 

EXHIBIT B
Page 5 of 6

That's the contact at doc

Thanks

Thanks!

You are welcome. Just on a Side note, Do we have a any child seats yet?

Yes for evie yes two

Why?

We will be needing one at some point so that we can have a car set up and the guys properly trained how to install it in the event we need to exit the building smoothly and safely.

4/27/18, 5:48 PM

North India resturant 123 2nd St
San Francisco, CA 94105
United States

Please get paneer tikka Masala mild, chicken tikka masala medium, 3 naan, rice

Also palak paneer

Got it

Thank you!

Tara Texts with Friends and Family 1/21 - 3/5 2018

After spending 3-4 days at the hospital with Tara Walsh, Stephen Russell returned home to find evidence of a possible break-in at their NY Apartment. He confirmed tampering detectors had been triggered and consulted with security person who had previously identified suspect devices in Mr. Russell's SF home before breaking down and boxing a number of unremarkable household items. Mr. Russell did not know at the time that Ms. Walsh had given her ex/current-boyfriend Matan Gavish access to the house while she and Russell were at the hospital delivering their child. Mr. Russell also attempted to fix the apartment's broken vent before passing out in exhaustion. In doing so he created a mess that concerned the local security team who contacted Tara Walsh suggesting that it was unsafe for her to return there. No effort was made to tidy up the house or wake Mr. Russell. The next day while Russell slept in, Chris Van Buren entered the apartment and contacted Tara Walsh describing the condition of the house as "Not bad" in contrast to Erik Hendriks' assessment. Erik Hendriks then sent photos of the apartment to Tara Walsh who responded the apartment was not in as bad of condition as she had been led to believe. Tara Walsh and the family concluded that the house was indeed safe to return to and did so. Mr. Russell was asked to move to a hotel and missed the first few days with his child. A few days later Tara allowed Mr. Russell to return home, apologized and blamed Erik Hendriks, Don Ackerman and her sister for overdramatizing events. These text messages chronicle Tara Walsh's communications with friends and family before during and after the incident, as well as, her decision to move to San Francisco.

1/21/18

Brienne Walsh (Sister) to Tara Walsh:

I'm super depressed I'm not pregnant I'm probably barren [...] I just talked to Jennifer rose

Tara Walsh to Brienne Walsh:

Ugh oh what did u say?

Brienne Walsh to Tara Walsh:

Told her Steve was there and you feel ashamed Steve needs to leave TARA He could make you lose custody

Tara Walsh to Brienne Walsh:

He's not doing anything crazy though- seriously aside from the security He's not taking adderall- It's just hard to tell him to go bc he's trying to do the right thing by being here. But I understand your and her concern. Once he starts acting crazy I will tell him he has to leave

1/22/18

11:45 AM

Tara Walsh to +1 (917) 565-6255 Mathew Ferguson

I think I might have to kick Steve out though He has 24 hour security outside the apartment and my neighbors are asking questions

Mathew Ferguson to Tara Walsh:

Wow, strange? Is it his paranoia or jealousy of you having other men?

Tara Walsh to Mathew Ferguson

Paranoia

Mathew Ferguson to Tara Walsh:

Wow

Tara Walsh to Mathew Ferguson:

Neighbors are fine I told him security was for his job. Lol

1/23/18

3:43 PM

Tara Walsh to Linda Russell (Russell's Mother):

Do you think he will follow through in giving financial support? He said he can't support me if I loose my work and also definitely to pay for baby nurse. I really don't want to have to end up going to court to get money I told my sister that being nasty/confrontational with him is the worst idea. I'm just worried my business Well he has promised it over and over but nothing in writing- I tried and tried to get it from him on paper but gave up

6:03 PM

Tara Walsh to Linda Russell:

He finally got up won't talk to me only said that he is leaving soon. Seriously the nerve I did nothing. How dare he treat me like this seriously Linda- it's horrible I have the new dog walkers coming now so can't get upset He ended up being nice and came to hotel with him- following ur plan for peace. Baby measuring 9lbs 10ounces!

1/24/18

1:24 PM

Tara Walsh to Linda Russell:

I think he has schizoaffective disorder- like right now he is acting maniac he woke up at 7am. He also feels super strong and is spending like crazy The hotel room is like \$750/night and he got two of them! I looked it up was just curious

7:02 PM

Brienne Walsh to Tara Walsh:

No TARA you need to leave it's not safe I'm serious If you don't leave I'm going to call the psychiatrist and the police [...] No TARA. I'm talking to mom and dad. You need to go home NOW You can easily take an Uber By yourself Just take your stuff and leave Go to the hotel lobby

Tara Walsh to Brienne Walsh:

No I will just get uber. Please stop threatening to tell my psychiatrist stuff though they will honestly take her away from me. I won't let him ever hurt her I'm just trying to make peace with him before she comes- I'm just doing my best. I'm sorry for involving you- this will just end up like what happened between myself and Mom and Dad- it will be horrible and I am stable and taking care of myself Please don't say anything to psychiatrist and make a bigger deal with doctors- she called them again after last conversation. I tried to leave it's just too much I'm exhausted. Steve said the security people can help me leave tomorrow I know your mad ect- I'm not destabilized or hysterical I am calm and fine.

7:52 PM

Tara Walsh to Linda Russell:

I'm going to go knock on door and talk to him- tell him calmly I need to go back to apartment and that I love him He probably won't answer though He did and he's back in the room but my sister said she will call my psychiatrist or the police if I don't leave So I basically have no choice- they will end up trying to take the baby away from me if I stay around him. I

1/25/2018

5:55 PM

Tara Walsh to Steve Russell:

I just tried to call you back Are you out with a girl or something I don't get it? I think I might be going into labor- my sister is coming over bc I'm scared I'm confused what you are doing and now is not the time seriously I don't know how you can play games or be out with a girl right now. It's so sad you gave me hope

Steve Russell to Tara Walsh:

I am with security at rooftop restaurant Please jump in a car and come or I can send Erik for u

Tara Walsh to Steve Russell:

I see a girl sitting with you in the picture.

Steve Russell to Tara Walsh:

Its table next to me if anything

(Sent picture of security guy Erik Hendriks)

8:28 PM

Tara Walsh to Steve Russell:

I wish no one else was involved and we could escape to a beautiful island and live happily ever after in peace and give our daughter a beautiful life I don't ever want to be apart from you I'm just afraid of when you leave me- I love you so much it hurts at times Can u call me? Or come back?



1/26/2018

11:03 AM

Steve Russell to Tara Walsh:

I have to go to a quick meeting but it's midtown I will meet u at doctor. What is address?

Tara Walsh to Steve Russell:

Ok appointment at 1pm 51 West 51st Street

1:00 PM

Tara Walsh to Steve Russell:

Are you there yet? 5 min away Suite 320 third floor I'm here

Steve Russell to Tara Walsh:

Here

1:32 PM

Tara Walsh to Matan Gavish:

Ru back? I need to go to the hospital So may need you to get dogs today Ru there?

Matan Gavish to Tara Walsh:

Okay. Do I need to arrive at a certain time to run into Steve?

Tara Walsh to Matan Gavish:

No he's with me going to the hospital won't be there at all

Matan Gavish to Tara Walsh:

K

Tara Walsh to Matan Gavish:

But you have time- I could end up coming back if my blood pressure goes down- so I would wait 2-3 hours before you go anyway Like minimum

6:29 PM

Tara Walsh to Matan Gavish:

I would give anything to have Riley on my chest right now

6:34 PM

Steve Russell to Tara Walsh:

I am eating a ton so I can last the night
Be back in 5-10

Tara Walsh to Steve Russell:

Ok! Got to drink some water my sister is here I'm ok just see you soon!

Steve Russell to Tara Walsh:

I'll let you and your sister be for a bit. I am in waiting room. 7pm only 4 more hours to go!!!

Tara Walsh to Steve Russell:

It's ok she wants to say hi she's not contentious at all brought ur backpack I just got to go for a walk around the hall

Steve Russell to Tara Walsh:

Oh nice! Okay I'll see you in a second

9:02 PM

Tara Wash to Matan Gavish:

How are RC??? Send me pic!! Earth to Matan

10:39 PM

Tara Walsh to Linda Russell:

So I'm about to get the c section! Sure Steve told you. Little girl is almost here!!

Linda Russell to Tara Walsh:

Been waiting am glad you are waiting. Love you.

Tara Walsh to Linda Russell:

Aw love you too- Steve has been very good to me

1/27/2018

Matan Gavish to Tara Walsh:

With Caleb going there now. It's done?

1:17AM

Tara Walsh to Steve Russell:

2:22 AM

Tara Wash to Matan Gavish:



5:39 AM

Tara Walsh to Brienne Walsh:

I still haven't slept waiting for seroquel if I don't pick up in Am I'm sure I won't sleep long anyway- tell Mom and Dad though I'm like to excited to even sleep I'm trying though

2:53 PM

Tara Walsh to Steve Russell:

When ru coming back? Family still here

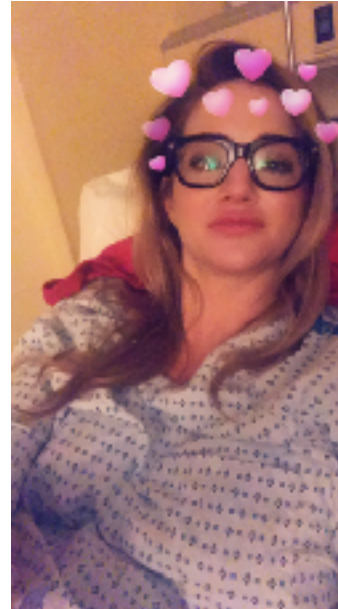
Steve Russell to Tara Walsh:

Coming now I got you something. But boy I need to shower I'll shower there. Do they have a razor?

9:27 PM

Tara Walsh to Brienne Walsh:

Ok great! If you can please bring me the adderall- I'm not abusing it I can barely keep my eyes open



1/28/2018

10:32 AM

Tara Walsh to Steve Russell:

Just got a present! She's out!

Steve Russell to Tara Walsh:

Oh nice. First tanning bed. You guys ok? We are having lunch and wine! Nice change of pace but will be back in 30.

Tara Walsh to Steve Russell:

Ok take your time! Yeah we are good she's sleeping

Steve Russell to Tara Walsh:

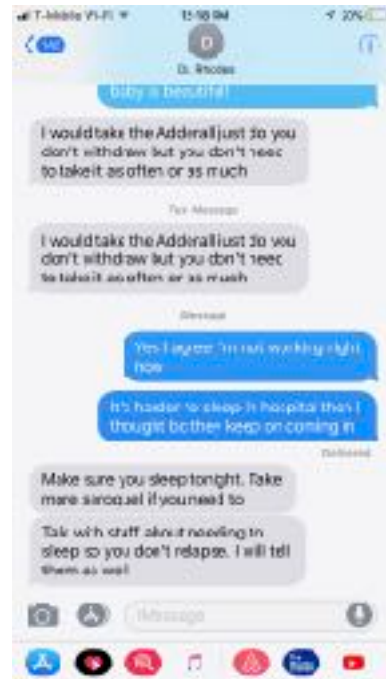
New Marvel movie is out

Tara Walsh to Steve Russell:

Oh sweet wait for me to see it- we can go and leave her with night nurse Andrea texted me back so we are good 👍

Steve Russell to Tara Walsh:

Oh great



4:48 PM

Tara Walsh to Steve Russell:

Ru coming back? My other aunt is coming would be good for you to meet her- she's the lesbian lawyer former nypd officer on

Steve Russell to Tara Walsh:

Yes coming now

Tara Walsh to Steve Russell:

Ok no rush she's not here yet

9:28 PM

Tara Walsh to Steve Russell:

I'm still feeling super emotional maybe should tell doc Where ru?

Steve Russell to Tara Walsh:

Coming

1/29/2018

5:35 PM

Tara Walsh to Linda Russell:

So we get to go home tomorrow! I wish you could come here to see her but know you have the plans to go away- maybe after. He's being really good expect he filled his adderall today here! I told him to plead he careful with it- cross your fingers he doesn't abuse it and go crazy.

8:39 PM

Tara Walsh to Lind Russell:

Ok I hope so! Worried about him though- he thinks there is someone shining stuff into hospital room. It's obviously the adderall now [Pic of Steve at Window]

8:42 PM

Tara Walsh to Lind Russell:

But let's hope he holds it together for one more day here But my blood pressure is super high- like 168/94- yesterday and today it went up so they might make me stay here longer now 😞 we were set to leave tomorrow at 11am

1/30/2018

7:31 AM

Joe Prendergast to Steve Russell:

Good morning Steven. I am in lobby, let me know if you need anything.

Steve Russell to Joe Prendergast:
Cool meet me in the lobby

11:00 AM

[Joe Prendergast drives Steve Russell to Brooklyn Apartment. Notes very strange behavior. Irrational. Delusional. Takes several pictures. Leaves]

1:25PM

Tara Walsh to Steve Russell:

Poor thing has two holes in her heart and artery issue- but they said highly doubtful she will need surgery and should close on her own. They need me to bring her back in two weeks though- team of cardiologists came in was kind of scary

2:31PM

Steve Russell to Tara Walsh:

What? Best child cardiologist is at Stanford

Tara Walsh to Steve Russell:

I really need you to go stay at a hotel - I just know you still haven't slept and it's not good for the baby and I to be around. I love you to death- you just need to get better and sleep.

2:42 PM

Tara Walsh to Linda Russell:

Very bad with Steve - very bad. Security will not allow me to go back to my apartment

Linda Russell to Tara Walsh:

Did they say what he's doing?

Tara Walsh to Linda Russell:

Totally destroyed the place- broken glass everywhere- total mess.

Linda Russell to Tara Walsh:

What have they done with him.

Tara Walsh to Linda Russell:

Nothing - they called me in confidence. They can't really say or do anything.

Linda Russell to Tara Walsh:

Cant they take him to the hospital and say what happened

Tara Walsh to Linda Russell:

I don't think they will bc he's paying them. They said said they are going in now (3:49 PM) to try and reason with him.

Linda Russell to Tara Walsh:

Take a deep breath. Relax not your fault. You can't do anything. Maybe he cut himself.

Tara Walsh to Linda Russell:

Why do you say that? They called again said the place looks like it was burglarized It must be really really bad for them to intervene- they were very stern with me I could not return there with an infant

Tara Walsh to Steve Walsh:

Dad can you please call me important Steve is out of control back at my apartment security guys called me that it's not a good situation for me to go back to- not sure if you have any ideas

3:20 PM

Joe Prendergast to Steve Russell:

I'm in front of your building up a couple of parking spots in the truck with Eric will be right up talking to Don Everything OK

[Erik and Joe tell Steve that he and Tara should not come back to the apartment and they should take the baby to a hotel. Erik takes more pictures. No help cleaning is given. They leave.]

6:04 PM

Tara Walsh to Aunt Peggy:

I'm ok- Long story but Steve not doing well mentally and destroyed my apartment today looking for spy devices. I told them at the hospital I need to stay another night while he hopefully cleans it up. But sadly I can't have him stay with us anymore.

6:52 PM

Erik (Security) to Tara Walsh:





You get?

Tara Walsh to Erik (Security):

Yes it's actually less bad than I thought but still not good.

9:05 PM

Tara Walsh to Steve Russell:

Stopped taking adderall today- I think I'm seriously done for good. You need to too. She is such a blessing- we need to be our best for her. When I look into her eyes I just never want to let her down. She truly is an angel. I love u and am not trying to ruin our family- I'm just trying to make it better.

1/31/2018

7:12 AM

Chris Van Buren to Tara Walsh:

Hi Tara this is Chris (Security) I will be with Steve today so I wanted to talk to you this morning about the situation with Steve and your apartment.

Tara Walsh to Chris Van Buren:

Hi Chris- Thanks for checking in. The plan was to leave the hospital today around 10:30/11am with my parents and head to Brooklyn. I was going to go in and talk to Steve about going to a hotel with my Dad before we bring the baby in (she will be with my sister down the street). Not sure what the current state of the apartment is- will have to clean it up.

Chris Van Buren to Tara Walsh:

Ok great! I have not spoken with Steve yet this morning. Eric told me he was up throughout the night so I didn't want to wake him if he was sleeping. Please text or call me when you are leaving the hospital or if you need something!! Thanks!

Tara Walsh to Chris Van Buren:

Ok sounds good thank you!!

7:37 AM

Tara Walsh to Steve Russell:

Just waking up Is the apartment cleaned up?

Steve Russell to Tara Walsh:

Who told you it wasn't? Could use a mop though. What is your cleaning lady's number?

Tara Walsh to Steve Russell:

I texted her she can't come until Saturday- I have a swifter in the closet we could use. Also a broom in there (where washer and dryer are). Did you get to sleep?

Steve Russell to Tara Walsh:

Yes of course.

Tara Walsh to Steve Russell:

We will most likely be leaving here at 10:30/11 She is so friggin cute I can't handle it. Getting her dressed now parents still not here.

Steve Russell to Tara Walsh:

I am really worried about place

Tara Walsh to Steve Russell:

Ok I think it will be fine- we are packed up about to leave. I'm goin to come there first solo to help clean. Are you in the apartment? I really would prefer to not have to bring her to my sisters, but I have no idea what state the apartment or you are in Dealing with my parents is not fun for me. I want to just be in my home with my child- you are creating a very situation Im also recovering from major surgery and my blood pressure is still high which is dangerous- I need calm and serenity

7:49 AM

Steve Russell to Joe Prendergast:

You here?

9:05 AM

Tara Walsh to Aunt Kathleen Ruiz:

Sorry crazy busy day yesterday coming home from hospital. Also having some upsetting issues with Evie's father. But family helping to get resolved. She is such a little angel though I don't want to put her down! Aww thank you! No I'm good I had the night nurse last night and Brie is huge help. Yes he's seen her- he was really sweet and good with her for the first 5 days. Then he just had a mental breakdown- it's a long story but he is basically schizophrenic/bipolar. His whole family is banding together for an intervention with a security team he hired. It's super sad bc he's going to miss all these moments with her.

9:30 PM

Joe Prendergast (Local Security) to Tara Walsh:

I just heard back from California if you're up please give me a call thank you.

11:43 AM

Tara Walsh to Chris Van Buren (Security/Driver):

Do you know if Steve is still in the apartment. Is the place a mess?

Chris Van Buren to Tara Walsh:

Not that bad.

Tara Walsh to Chris Van Buren:

Ok thanks- I will be there shortly

12:44 PM

Steve Russell to Tara Walsh:

I love you honey and will be wherever you want me to be but want to share what happened

Tara Walsh to Steve Russell:

Can you please wire me money for the baby nurse? I can't afford her and I need her she starts tonight

Steve Russell to Tara Walsh:

I will take care if you any way I can. What's your Dad's number?

Tara Walsh to Steve Russell:

I'm in total shock I spent the last two hours cleaning, my wound is killing me and my back. The poor baby- she needs at least one parent. You are very very sick and need to go check yourself into the hospital.

Steve Russell to Tara Walsh:

You are making things worse and you are not informed

Tara Walsh to Steve Russell:

If you truly love me and your daughter, then go get psychiatric help and get off drugs. I cannot see you or allow you to see her until you do- no questions not up for debate. But you have left me drowning so if you can give us money so we can have help that would be much appreciated. I am totally heartbroken

Steve Russell to Tara Walsh:

If you were my partner you'd talk to my security person before acting like you understand the situation

Tara Walsh to Steve Russell:

I am your partner and love you like crazy. You just need help, it's heartbreaking. I need you desperately right now too- my pain meds have worn off and I have no one to get them for me until later. This is horrible

Steve Russell to Tara Walsh:

I love you. And the help I needed was for you to ask me to explain before deciding you had all the facts.

Tara Walsh to Linda Russell:

What should I say to him? Should I let him explain the facts?

Tara Walsh to Steve Russell:

You were doing so well before you took the adderall- it was wonderful. I'm happy to talk to your security and have them explain.

4:34 PM

Steve Russell to Tara Walsh:

I know what happened. You don't. Stop making things worse.

Tara Walsh to Steve Russell:

I am heartbroken over this situation. I can't afford the baby nurse so I'm not sure what to do. I can't continue to do nothing and enable you- the baby will be taken away from me. So

can you just not give me, who is totally broken down, a little peace in giving me money for the nurse? You have put me threw too much- I need to be there for our daughter I beg you please so I don't need to stress about having help with her.

Steve Russell to Tara Walsh:

I'll give you the moon What would you like me to buy for you and her? Send me a list.

Tara Walsh to Steve Russell:

Just send me \$30k- can I email your banker? I have everything

Steve Russell to Tara Walsh:

No

Tara Walsh to Steve Russell:

The night nurse is \$9.5k per month

Steve Russell to Tara Walsh:

Ok

8:31 PM

Steve Russell to Tara Walsh:

Had dinner next door. Going to get a drink in city then staying at Brooklyn Hotel.

Tara Walsh to Steve Russell:

Andrea is here she is very kind. I'm heartbroken we all can't be together. She said she looks exactly like you

Steve Russell to Tara Walsh:

We are not together bc of what you did. Apologize and try your best to fix it. You had a hard few days and I forgive you but you made things unnecessary hard for us.



2/1/18

8:16 AM

Joe Prendergast to Tara Walsh:

If you are up please give me a call ty
[Chris Van Buren and Don Ackerman Contact]

8:26 AM

Tara Walsh to Brienne Walsh:

Wow so they really are not messing around to get him help I just talked to the security guy- they confronted him last night it wasn't real and he fired them- but they are still working

8:53 AM

Tara Walsh to Joe Prendergast:

Thank you

8:57 AM

Tara Walsh to Rashmi Narendra:

This is the box he took with him of materials to test He broke mirrors, doors, sink, dishwasher, holes in wall (covered in spackle), took handles off doors and cabinets Disassembled sockets- my dad helped me clean up with cleaning person- just need to get handyman

Rashmi Narendra to Tara Walsh:

Omg, the security was right ..

Tara Walsh to Rashmi Narendra:

Yeah- it's ok now though much better They are staging a major intervention he fired them. But they are still watching him.

Rashmi Narendra to Tara Walsh:

That's sweet of them.

Tara Walsh to Rashmi Narendra:

My dad was just blown away- steve was trying to explain to him this place has poison and spyware all over it. My dad just was shaking his head But then made him handshake he would stay away from me until my dad met with his security team *Which is never going to happen*

Rashmi Narendra to Tara Walsh:

They know, it is dangerous for him and others around him for him to be so sick .. He can think strangers are spy's and do something .. and get into trouble .. I pray that he gets the help he needs

Tara Walsh to Rashmi Narendra:

Yeah me too I've been praying for him- it kills me at times bc she looks exactly like him. But I feel wayyy better today after good sleep.

9:24 AM

Tara Walsh to Stephanie Gundogdu:

I'm ok now- major drama with Steve yesterday. But rested and am just crazy about the baby. I don't want to put her down! He just took adderall and didn't sleep and got super crazy. Brie is being a huge bitch though I think I need to stay away from her Well today we went to pediatrician, Cleo went through all my bags dumping out in room- a small piece of adderall must have fallen out and she put in her mouth. Her mouth was all blue, I said maybe it was adderall now she's at the ER under observation for 6-8 hours. It's awful luck but she's fine But then Brie blew up and said I'm a disaster and I'm taking her down with me- then I heard her hysterically crying to doctor saying I'm mentally ill, I've totally exhausted her ECT. But she can't do that shit- she also complained to my psychiatrist last week I was seeing Steve he can't go around complaining or else someone could try and take baby It's really fucked up- I don't know if I can see her anymore honestly. I'm not telling her that now obviously Even my dad said I should stay away from her

8:57 AM

Tara Walsh to Rashmi Narendra:

This is the box he took with him of materials to test He broke mirrors, doors, sink, dishwasher, holes in wall (covered in spackle), took handles off doors and cabinets Disassembled sockets- my dad helped me clean up with cleaning person- just need to get handyman

Rashmi Narendra to Tara Walsh:

Omg, the security was right ..

Tara Walsh to Rashmi Narendra:

Yeah- it's ok now though much better They are staging a major intervention he fired them. But they are still watching him.

Rashmi Narendra to Tara Walsh:

That's sweet of them.

Tara Walsh to Rashmi Narendra:

My dad was just blown away- steve was trying to explain to him this place has poison and spyware all over it. My dad just was shaking his head But then made him handshake he would stay away from me until my dad met with his security team *Which is never going to happen*

Rashmi Narendra to Tara Walsh:

They know, it is dangerous for him and others around him for him to be so sick .. He can think strangers are spy's and do something .. and get into trouble .. I pray that he gets the help he needs

Tara Walsh to Rashmi Narendra:

Yeah me too I've been praying for him- it kills me at times bc she looks exactly like him. But I feel wayyy better today after good sleep.

10:05 AM

Tara Walsh to Steve Russell:

Andrea is ok, but it's expensive- how can you go about paying for her? I seriously can't afford it.

Steve Russell to Tara Walsh:

Call me back?

Tara Walsh to Steve Russell:

Just got to pediatrician can't talk Will call after

Steve Russell to Tara Walsh:

Did you tell Don (Don Ackerman local security team manager) that I can't come over? I need to go to airport then.

Tara Walsh to Steve Russell:

No Steve wait I seriously can't talk You should say goodbye to her U need to add her to insurance they said.

Steve Russell to Tara Walsh:

Call me What is your father's phone number Don has me on lockdown. I have no charger for my computer.

10:37 AM

Chris Van Buren to Tara Walsh:

Did you get ahold of Don?

Tara Walsh to Chris Van Buren:

Yeah talking to him now.

Tara Walsh to Steve Russell:

I tried to call Don just in now waiting for doc he said your not with security anymore

Steve Russell to Tara Walsh:

I tried to add her [to insurance] call me

Tara Walsh to Steve Russell:

Just did I need to stay away from my stated Sister Cleo may have ingested piece of adderall

Steve Russell to Tara Walsh:

Ok

Tara Walsh to Steve Russell:

Was going to try and take a nap, can I call after? [Steve Walsh Contact Card] He said he is fine to talk to you.

5:06 PM

Tara Walsh to Steve Russell:

I will come down to u with baby when you get here

5:49 PM

Tara Walsh to Steve Russell:

I am worried about the baby

Steve Russell to Tara Walsh:

What's changed in the last hour. I am here or will be very shortly

7:11 PM

Tara Walsh to Brienne Walsh:

I'm really sorry it's just really bad luck that that happened I think she will be totally fine though too- if i could I would be there to help you Evie is fine just had to carry stroller up stairs but I'm fine

Brienne Walsh to Tara Walsh:

It's been really rough she had to get an IV and X-ray

Tara Walsh to Brienne Walsh:

I know I saw the iv - it's makes me really sad it was a total accident though I heard what you were saying to the doctor and I'm really upset about it. I wasn't paying attention to what Cleo was doing bc I was worried about Evie. I'm doing my best job to take care of her and don't need that to be put in jeopardy.

Brienne Walsh to Tara Walsh:

It needs to be said, but no you are not. You are letting a psychotic lunatic rule your data and nights just so you can get money from him when you already have money. You are taking drugs as they are no prescribed. You need to get your shit together and you cannot blame me for any of this You are not protecting your baby as well as you can

Tara Walsh to Brienne Walsh:

Ok well I need to stay away from you bc that's not true- I'm not taking any drugs as not prescribed. You have no idea what you are talking about- your being evil

7:25 PM

Tara Walsh to Steve Russell:

Call me back off phone The baby nurse gets here at 8 I need to stop crying though

Steve Russell to Tara Walsh:

Yes you do! You are great and this will all be fine. You ok? Wish you were both coming to SF

[Steve Russell has dinner with Joe Prendergast and Erik Hendriks. They are shown some of the communications with CA team, get partial explanation, say they understand now and seem to apologize sincerely]

Tara Walsh to Steve Russell:

I will love you forever. Try and stick around and maybe I can do something. I wish we could just run away together- to our own little paradise with our angel. Ok?

9:32 PM

Tara Walsh to Caleb Ziperer:

I just want you to know today was a total accident with Cleo- I had no idea there was any adderall in my purse. I felt really horrible after it happened. Thank god she is ok. I'm just having really bad luck the past few days but I'm doing my best.

Tara Walsh to Steve Russell:

Was this good to say to Caleb? It's hard to not just have you come up here and sleep in bed with me. One day soon hopefully The world can be such a cruel place

Tara Walsh to Linda Russell:

Major major drama with sister today and she complained to pediatrician about situation I need to stay away from her- even my dad agreed I'm just having really bad luck between him and family wish I was there too I know you would help me So we were at Pediatrician, my niece Cleo was going through all my bags in exam room dumping out, ECT. Apparently a small piece of adderall was in a bag and she put in her mouth. Total total accident. Sister had to go to ER- she's totally fine. But heard her hysterically crying complaining to the doctor about me and the situation How much she was suffering ECT- she can't do that- she already complained to psychiatrist

2/3/2018

9:53 AM

Steve Russell to Tara Walsh:

Why is it so hard for you to do the right thing? I had good reasons for doing what I did.

Tara Walsh to Steve Russell:

They are still here. I just wish we could have some middle ground- your not going to like staying here with a night nurse sleeping in the living room anyway

Steve Russell to Tara Walsh:

There is no good middle ground. We are either a family or not. If we are to be separated I really need to head home and stop living out of a suitcase.

12:29 PM

Tara Walsh to Steve Russell:

I'm thinking about it- I understand why you are sick of staying at hotels. We can always get more stuff from under the bed- there's a lot. Still will family at French place.

Steve Russell to Tara Walsh:

I will come by and get my things. I decided to head home. What you are doing is wrong and I can't let you continue to wreak havok like this in my life.
What time is good to get my things and say goodbye to you and baby?

12:58 PM

Tara Walsh to Steve Russell:

Early evening- my friend Colette is coming over at 2. You don't need to leave, there are other options.

2:52 PM

Steve Russell to Tara Walsh:

Can I come over now?

Tara Walsh to Steve Russell:

No my sister is here

Steve Russell to Tara Walsh:

Why can't I come when your sister is there? Maybe send her away and call me.

Tara Walsh to Steve Russell:

Collette her also. Would rather see you just us Jesse also coming for an hour. 6:30 is best. My sister will freak out seriously.

Steve Russell to Tara Walsh:

Tell your sister you were wrong. I already received an apology from the security folks. I was right and justified in the actions I took and I need you to stop pretending to your family that I did something wrong. It harms me and harms our family.

Tara Walsh to Steve Russell:

My sister will freak if u come seriously I'm trying to get rid of her Please please wait though- I can't let u up with her here Please just trust me It will be really really bad for us if you come here now- she needs more time

6:07 PM

Tara Walsh to Steve Russell:

You can come up now. Everyone is gone.

10:28 PM

Tara Walsh to Steve Russell:

One day we will be all together I just hope sooner rather then later. I love you forever [Heart Emoji]

Steve Russell to Tara Walsh:

You need to simply decide to stop lying and live in the world. Let me know if you do.

2/4/18

12:03 PM

Steve Russell to Tara Walsh:

Day 4 since you blew up our family

Tara Walsh to Steve Russell:

Why don't you come over and watch the superbowl I'll make dinner

Steve Russell to Tara Walsh:

Because you still haven't apologized or attempted to fix what you did. Can I arrange for a handyman to fix up the house? You will need to be out of the house for about a day.

1:27 PM

Steve Russell to Tara Walsh:

Do you read/listen to what I keep saying to you? I am absolutely going to give up on you if you don't get the message.

Tara Walsh to Steve Russell:

Yes I'm really lonely being alone with Evie all day. I wish you could be here

2:41 PM

Tara Walsh to Steve Russell:

Doing so much- baby up a lot-but I apologize for hurting you. I don't want to raise Evelyn alone and want us to be a family desperately. I just wish you could see that. I understand you were trying to protect us, not harm us.

2:55 PM

Tara Walsh to Brienne Walsh:

I'm really really mad at you bc the Peditrician asked me what is the deal with Steve and if a social worker was involved. I wouldn't be surprised if they called child protective services. I'm doing a great job taking care of her- I don't deserve this. I don't think I can have you around us anymore bc I'm afraid that will happen again Now I need to find a new Peditrician.

Brienne Walsh to Tara Walsh:

All of that stuff was in the paperwork from the hospital it has nothing to do with me

Tara Walsh to Brienne Walsh:

That's not true I just read it all- it says nothing about him

Brienne Walsh to Tara Walsh:

Tara you got yourself into this situation not me. You also almost severely hurt my daughter with your carelessness. You can try to turn it around and blame me for everything that has happened but it is not my fault. I have been patient and kind and good to you every step of the way. I am at the end of my rope.

8:15 PM

Tara Walsh to Steve Russell:



2/11/2018

8:10 PM

Tara Walsh to Matan Gavish:

Steve is leaving tomorrow so you can come see them Shit I need to set up their walker Steve is being a real dick shocker Do you think I'm dumb?

Matan Gavish to Tara Walsh:

Why r u letting a lottery winner fuck with your ego

Tara Walsh to Matan Gavish:

It's just hard bc I'm relying on him and still not talking to my sister I have this really important appointment with cardiologists for her heart murmur on Thursday I just need help going to

Matan Gavish to Tara Walsh:

I didn't know u aren't talking to Brie That's silly

2/12/2018

9:42 AM

Tara Walsh to Matan Gavish:

Bc she reported me to my Peditrician and they asked me if a social worker was involved ECT- when I confronted her she freaked out

2/14/2018

3:21 PM

Tara Walsh to Rashmi Narendra:

I got flowers! But by default they gave them to me at SAKS bc Steve bought me diamond earrings [Picture]

Rashmi Narendra to Tara Walsh:

That's not so bad...WOW you got diamonds for Valentines Day

Tara Walsh to Rashmi Narendra:

Yeah I need to get him something ASAP! I didn't get him anything I don't know if all men are like this, but ever since I had the baby he's like a new man.

2/15/2018

8:27 PM

Tara Walsh to Collette (Friend):

I know it's amazing experience to have a child. Coco is really cute- but a lot of work based on Cleo! Omg I had the worst nightmare experience with my sister- Cleo went into my bag at doc and ate a piece of adderall! She's fine but had to go to Er. I had no idea it was there

Collette to Tara Walsh:

Was your sis freaking out?

Tara Walsh to Collette:

Yeah my sister freaked out and didn't talk to me for a bit- and told the Peditrician I was mentally unstable and Steve was- it was awful

Collette to Tara Walsh:

Ugh - is all ok with Steve or at least getting a little better

Tara Walsh to Collette:

Yeah it's fine- just bad luck. Yes much better with Steve he's really stepped up- but still need to stay off adderall.

2/18/2018

9:12 PM

Tara Walsh to Rashmi Narendra:

It's hard to talk bc night nurse is here I'm going to bed soon- ru ok? Steve is threatening to not give me money for the night nurse and to support me bc I don't want to live to sf yet I fucking hate him right now To move to sf immediately Like blackmailing me is going to make me hop right on a plane [...] I think his mom is encouraging it I might have no choice but to go bc I really need his financial help I'm down like two clients and the baby is a lot of work during the day And then it will probably blow up and it can be his idea I need to come back here He can be such a jerk- I told him I have zero trust for him anymore

Rashmi Narendra to Tara Walsh:

what does your folks says ..

Tara Walsh to Rashmi Narendra:

They will say no way go back there! Duh

2/20/2018

3:23 PM

Tara Walsh to Matan Gavish:

Steve is trying to blackmail me to move to sf- been such a wonderful experience...No it kind of is bc baby is a lot of work and not sure how I can build or keep business- and he's taken back his offer to support me here- only if I am there. To be a "family" or else

Matan Gavish to Tara Walsh:

Lawyer Up

Tara Walsh to Matan Gavish:

Well he is going to buy a \$2.3 million dollar apartment in sf and put it in a trust under Evie's name I can also control So his mom said to just come there for a few weeks then can always sell it and say 🖐️ [Fuck You]

Matan Gavish to Tara Walsh:

Trusts can be altered

Tara Walsh to Matan Gavish:

In what way?

Matan Gavish to Tara Walsh:

You are losing to him already You are being strung along and manipulated

Tara Walsh to Matan Gavish:

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.

Matan Gavish to Tara Walsh:

Okay, have a fun 40 years

Tara Walsh to Matan Gavish:

More like 6 months...I think he will also marry me if I submit to him then I can just divorce him I really mostly hate him at this point- not sure I can manage to hold myself back. But would be the sweetest revenge if I could

2/21/2018

3:20 PM

Tara Walsh to Matan Gavish:

I think I can stay here and figure out a way to make it work I think there's a risk of me exploding at some point if I go to sf and casing physical harm to steve- which means the baby could be taken from me. Not risk almost a guarantee

3/1/2018

6:36 PM

Tara Walsh to Rashmi Narendra:

Want to fly on a private jet back with me to sf on Saturday for the night?? I need help bringing the baby and the dogs and my help fell through 😞 I can probably find someone else just thought it would be fun! Long story with me going back...it's been tough on my own.

3/2/2018

5:10 PM

Tara Walsh to Matan Gavish:

Maybe you can kidnap me and Evie so we don't have to leave I really don't want to I just can't do it on my own

3/3/2018

5:10 PM

Tara Walsh to Steve Walsh (Father):

Will get it to you tomorrow long day about to get some rest. Arrived safely all going well and Evie is doing great

3/5/2018

10:42 AM

Tara Walsh to Zar (Friend +1 480 326 4584):

Oh god major drama with my sister- I found out and finally looked up the stuff she wrote about me on that stupid blog And confronted her and she's freaking out- my dad also told he to take it down and is really angry

Zar to Tara Walsh:

You live in a constant state of drama. That's just your comfort zone I guess.

Tara Walsh to Zar (Friend):

The baby is doing much better here by the way- so far she barely cries. I came home to **this [picture of baby asleep on Steve Russell's chest]** last night after my dog walk. I hope it lasts it's better for us



I just looked at this sick house steve put an offer on But I'm not getting my hopes up he will get it bc it's a partial stock deal It's sick though- like tototally our style minamlitic sleek

8:18 PM

Tara Walsh to Matan Gavish:

Text me on Signal

LERNER • POOLE, LLP
ATTORNEYS AT LAW
535 PACIFIC AVENUE, 2ND FLOOR
SAN FRANCISCO, CALIFORNIA 94133-4635
(415) 391-6000
FACSIMILE: (415) 391-6011

1 Stacey Poole, Esq., (SBN 202964)
LERNER • POOLE, LLP
2 535 Pacific Avenue, Second Floor
San Francisco, CA 94133
3 Telephone: 415-391-6000
Fax: 415-391-6011
4 stacey@cafamilylaw.com

5 Attorneys for Petitioner
STEPHEN RUSSELL

ENDORSED
FILED
Superior Court of California
County of San Francisco
JUL 09 2018
CLERK OF THE COURT
BY: KELLY DAVIES
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 distain 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
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

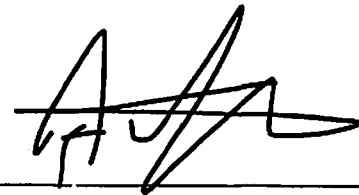
part of her mental illness, and in reality Mr. Russell does want her to get better. Mr. Russell is a good person who provided for everything Ms. Walsh and baby needed and had many close family and staff nearby. Even though Ms. Walsh fired me twice, I came back because of Evie who is the happiest baby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

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

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

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

Dated: 7/6/2018



Abby Tedla