SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

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| In the Matter of the Application of<br>STEPHEN GRANT RUSSELL,<br>Petitioner,<br>For a Judgment Pursuant to Article 78 of the Civil Practice Law and Rules,<br>— against —<br>HON. MICHELLE I. SCHAUER, F.C.J., et al.,<br>Respondents. | **AUTHENTICATION AFFIDAVIT**<br>*(CPLR § 2106)*<br><br>Index No. _____ |

I, **STEPHEN GRANT RUSSELL**, being the Petitioner in the above-captioned proceeding, appearing *pro se*, affirm the following to be true under the penalties of perjury pursuant to CPLR § 2106:

1. Petitioner makes this Authentication Affirmation in authentication of the exhibits annexed to the Verified Petition. Petitioner has personal knowledge of the matters asserted herein except as alleged on information and belief, and as to those matters Petitioner believes them to be true.

2. The exhibits authenticated below are true and correct copies of: (a) judicial orders and transcripts from court files, NYSCEF, the California Court of Appeal, and the San Francisco Superior Court; (b) correspondence sent, received, or whose receipt by counsel of record Petitioner personally verified; (c) sworn declarations and pleadings filed in *Russell v. Walsh*, CGC-18-570137, and its appellate review at A165356; (d) regulatory records pertaining to the OASAS revocation of P. Raymond Griffin's CASAC credential; and (e) contemporaneous documentation maintained in the canonical evidence index publicly hosted at chappaquapoison.com with SHA-256 verification.

3. Each exhibit is bound and tabbed in the Exhibit Volume in the sequence set out below. Each tab cover-sheet displays the exhibit identifier and a brief description.

Public copy: a private street address and personal email addresses are removed. Otherwise as filed.

**TAB AUTHENTICATIONS**

***Cause I — The Appellate Division Has Held; the Family Court Has Not Conformed***

4 (Tab 1). *Matter of Walsh v. Russell*, 214 A.D.3d 890 (2d Dep't 2023). Source: certified slip opinion, LexisNexis Certified; on disk at ExR_01 / B-12. Authentication: certified public-record slip opinion of the Appellate Division, Second Department, dated March 22, 2023.

5 (Tab 2). February 2, 2022 Order of Custody and Visitation, Form GF-16 (8/2010), File No. 154703. Source: NYSCEF; on disk at Tab 2 (ExR_02). Authentication: certified public docket entry of the Westchester County Family Court.

6 (Tab 3). February 2, 2022 Order of Protection, Form GF-16 (8/2010), File No. 154703. Source: NYSCEF; on disk at Tab 2 (ExR_02). Authentication: certified public docket entry of the Westchester County Family Court.

7 (Tab 4). Bowman Retroactive Record Alteration Memo, February 2026. Source: Petitioner's contemporaneous record; on disk at Tab 4 (ExSS_03). Authentication: Petitioner's contemporaneous notes to be matched against the certified February 3, 2026 Bowman Support Hearing Transcript when produced from the Westchester County Family Court — Yonkers.

8 (Tab 5). Tab 5 (Doc 151), Order of Dismissal of Motion 14, April 21, 2026. Source: NYSCEF File No. 154703. Authentication: certified public docket entry.

9 (Tab 6). Tab 6 (Doc 153), Order of Dismissal of Motion 15, April 22, 2026. Source: NYSCEF File No. 154703. Authentication: certified public docket entry.

***Cause II — Jurisdictional Foundation on Admitted Fraud***

10 (Tab 7). Respondent Walsh's sworn November 23, 2020 letter to the Chappaqua Police Department. Source: on disk at F-052 / Doc 19 Ex. E. Authentication: sworn letter on Chappaqua Police record; reciprocally produced via Doc 19 Ex. E in *Russell v. Walsh* Discovery.

10A (Tab 7A). Westchester Family Court Order to Show Cause — UCCJEA, July 16, 2018, signed by Hon. Arlene Gordon-Oliver, J.F.C., File No. 154703, Docket No. O-06917-18A. Source: NYSCEF Doc 19 Ex. G (Westchester FC, F-08146-18/25F, filed Dec. 22, 2025). Authentication:

certified public Westchester Family Court order pursuant to DRL §§ 75-g, 76-d, 77-g, 77-h; verified by Walsh July 12, 2018; OSC entered July 16, 2018; the order on its face omits the § 76-c(3) duration period and contains no § 77 sister-state-court communication record.

11 (Tab 8). November 7, 2018 Temporary Order of Protection, signed by Hon. Arlene Gordon-Oliver, Westchester County Family Court. Source: Doc 19 Exs. H, I; Westchester FC. Authentication: certified public Family Court order.

12 (Tab 9). October 2018 SF Superior Court Emergency Custody Order, *Russell v. Walsh*, CGC-18-570137. Source: SF Superior Court file. Authentication: certified public SF Superior Court order.

13 (Tab 10). June 4, 2018 Uber audio recording. Source: *Russell v. Walsh* Discovery production. Authentication: captured by security infrastructure operated by Petitioner; foundational testimony in *Russell v. Walsh* Discovery establishing chain of custody.

***Cause III — California Adjudications and Walsh's Westchester Defaults***

14 (Tab 11). San Francisco Domestic Violence Restraining Order, July 9, 2018. Source: SF Family Court; PDF_SF_DVRO_JUL2018. Authentication: certified SF Family Court order.

15 (Tab 12). San Francisco DV Trial Day 1 Transcript, August 29, 2018, *Russell v. Walsh*. Source: SF Family Court; Tab 12 (ExH_03 / PDF_DV_TRIAL_TRANSCRIPT). Authentication: certified SF Family Court trial transcript.

16 (Tab 13). Walsh DV-120 Response form. Source: SF Family Court; Tab 13 (C-6). Authentication: certified SF Family Court filing.

17 (Tab 14). Abrehet (Abby) Tedla Sworn Declaration, July 9, 2018. Source: *Russell v. Walsh*, San Francisco Superior Court Case No. FPT-18-377425; Tab 14 (LEGAL-TEDLA-DECL). Authentication: filed sworn declaration on file with the San Francisco Superior Court; reciprocally produced in *Russell v. Walsh* Discovery. Operative drugging-confession passage at ¶ 9 of the declaration ("she told me and Dan Ochoa that she 'did it all the time'").

18 (Tab 15). Second Amended Judgment on Jury Verdict, *Russell v. Walsh*, CGC-18-570137, filed August 11, 2022 (Hon. Garrett L. Wong). Source: ExG_01. Authentication: certified SF Superior Court entered judgment.

19 (Tab 16). *Russell v. Walsh*, No. A165356, Cal. Ct. App. 1st Dist., Div. 4, Sept. 15, 2023. Source: California Court of Appeal. Authentication: certified California Court of Appeal decision; remittitur November 16, 2023.

20 (Tab 17). Humphrey Hearing Transcript, January 26, 2021. Source: Westchester FC; Tab 17 (ExTR_03). Authentication: certified Family Court transcript.

21 (Tab 18). Humphrey Order Setting Motion Schedule, March 10, 2021. Source: Westchester FC; ExTR_06_03 / B-7_02. Authentication: certified Family Court order.

22 (Tab 19). Petitioner's Letter to Hon. Humphrey, March 24, 2021. Source: Westchester FC; Tab 19 (ExO_02). Authentication: certified filing, Westchester FC.

23 (Tab 20). Humphrey Recusal Order, April 6, 2021. Source: Westchester FC; Tab 20 (ExTR_05_03). Authentication: certified Family Court order.

24 (Tab 21). February 6, 2020 Hearing Transcript Before Hon. Morales-Horowitz, on which the Default 1 Order against Petitioner was based. Source: Westchester FC; Tab 21 (ExTR_04). Authentication: certified Family Court hearing transcript (Aaron's Court Reporting; Valeri Wilson, Transcriber).

25 (Tab 22). Hon. Schauer First-Appearance Transcript, May 19, 2021. Source: Westchester FC; Tab 22 (ExTR_09_05). Authentication: certified Family Court transcript.

***Cause IV — Harm to Child Reported, Documented, Refused***

26 (Tab 23). Visit 15 Bruise Location Diagram, March 31, 2019. Source: G-36_04, SLE-051-DIAGRAM, Tab 23 (EB3_MASTER_057). Authentication: contemporaneous body diagram compiled from the shared visit notes of the court-appointed Supervision Services supervisor (Franceska Christina Anilus), the family's nanny (Talia Kleiman), Petitioner, and Kelly Turnure, marking the

bruise locations discovered on E.W. on arrival at Visit 15 on March 31, 2019; preserved in Petitioner's canonical evidence archive at chappaquapoison.com with SHA-256 verification.

27 (Tab 24). Deep Pinch Mark Documentation Reported to AFC Jennifer M. Jackman, March–April 2019. Source: Tab 24 (ExP_01). Authentication: contemporaneous communication of record documenting the photograph of E.W.'s injury and its transmission to the court-appointed Attorney for the Child Jennifer M. Jackman; preserved in Petitioner's canonical evidence archive with SHA-256 verification. The court-appointed supervisor's contemporaneous written visit report referenced in the body of the Verified Petition was struck from the record under Hon. Morales-Horowitz's directive (see Doc 10 ¶ 54) and is therefore not annexed.

28 (Tab 25). Talia Kleiman Nanny Eyewitness Account, March 30–31, 2019. Source: Tab 25 (EB3_MASTER_056). Authentication: contemporaneous email statement of record from Talia Kleiman [redacted] describing her observations of E.W. across the March 30–31, 2019 supervised visits; preserved in Petitioner's canonical evidence archive at chappaquapoison.com with SHA-256 verification.

29 (Tab 26). Chappaqua Police Department Detective Ragni's Written Report, April 2019. Source: Chappaqua PD. Authentication: certified police report (Phase 0 — pull from Chappaqua PD records request).

30 (Tab 27). Attorney John C. Guttridge Letter to Court, April 10, 2019. Source: Westchester FC file; Tab 27 (ExX_01). Authentication: certified counsel correspondence.

31 (Tab 28). AFC Jennifer Jackman Email to Counsel, April 16, 2019. Source: counsel correspondence; G-2 / LETTER_JACKMAN_BRUISES_DISMISSIVE. Authentication: correspondence in Petitioner's possession.

32 (Tab 29). Russell Munchausen-by-Proxy Concern Email to Counsel, March 29, 2019. Source: EMAIL_STEVE_EVIE_VISITS_MUNCHAUSEN / D-11_03. Authentication: email in Petitioner's possession; cc'd to multiple counsel.

33 (Tab 30). Linda Russell's August 2021 Filed Letter to Hon. Schauer. Source: Westchester FC; Tab 30 (ExO_06 / F-060 / SLE-008). Authentication: certified filed letter in Westchester County Family Court file.

34 (Tab 31). Claudette E. LaMelle, ACSW, LMSW, Sworn Affidavit, September 25, 2019. Source: Tab 31 (ExT_01 / SLE-036 / SLE-135). Authentication: sworn affidavit by court-appointed visitation supervisor.

35 (Tab 32). Walsh Abuse Memorandum and Exhibits, 2019. Source: Westchester FC; PDF_WALSH_ABUSE_MOTION_02 / Tab 32 (PDF_WALSH_ABUSE_MOTION_W_EXHIBITS). Authentication: certified Westchester FC filing.

36 (Tab 33). Brienne Walsh Published Blog Admissions ("A Brie Grows in Brooklyn"). Source: Tab 33 (ExQQ_06 / BLOG-046), EB3_SPREAD_IMG023-024, ABUSE-1, BR-43, Tab 33 (SLE-072), plus blog archive at BR-10 through BR-53. Tab 33 includes (i) the May 9, 2010 post "Happy Mother's Day!" (BLOG-046) and (ii) the January 21, 2018 post "Another Uncomfortably Candid Post About Pregnancy" (ExQQ_06), both from the Tumblr blog *A Brie Grows in Brooklyn* (abriegrowsinbrooklyn.com). Authentication: publicly available blog posts under Brienne Walsh's name and authorship; preserved via SHA-256 in the canonical evidence archive at chappaquapoison.com; independent third-party preservation available via the Internet Archive's Wayback Machine for posts whose original URLs remain indexed; reciprocally drawn upon in Petitioner's then-counsel's Walsh Abuse Memorandum (Tab 32), which incorporated the same admissions as Walsh-family record evidence in *Russell v. Walsh*.

37 (Tab 34). Maura Walsh Deposition. Source: Tab 34 (SLE-015). Authentication: certified *Russell v. Walsh* Discovery deposition transcript.

***Cause V — Retaliation Against Whistleblower***

38 (Tab 35). Closed-Loop Patronage System Research Memo, February 13, 2026. Source: Russell counsel's federal-complaint research memo; Tab 35 (ExRR_05). Authentication: research memo prepared by Petitioner's counsel; public records confirmations annexed.

39 (Tab 36). AFC Jackman Billing Records. Source: Miller Zeiderman & Wiederkehr LLP, 140 Grand Street, 5th Floor, White Plains; Tab 36 (ExBB_01). Authentication: law firm billing letterhead; counsel correspondence in Petitioner's possession.

40 (Tab 37). Documentation of Sixteen Supervised Visits × Six Supervisors Favorable Evaluations. Source: Tab 37 (ExDD_02). Authentication: aggregated supervisor reports from Tab 40 (ExDD_01) and individual visit-records.

41 (Tab 38). Hymowitz Order of Appointment. Source: Westchester FC; DOC-025 / DOC-028. Authentication: certified Family Court order.

42 (Tab 39). Petitioner's 25-Page Rebuttal of Walsh Representations to Hymowitz. Source: Tab 39 (PDF_HYMOWITZ_FABRICATIONS) / DOCX_HYMOWITZ_DISCREPANCIES. Authentication: Petitioner's filing in *Russell v. Walsh* / Westchester FC.

43 (Tab 40). Farquharson Supervisor Documentation. Sources: Tab 40 (F-040 / EB2_MASTER_026 / ExDD_01), Tab 37 (ExDD_02), Tab 40 (EB2_MASTER_132). Authentication: contemporaneous public records + third-party investigative reporting.

44 (Tab 41). Gootzeit Supervisor Appointment Order (Gordon-Oliver). Source: Tab 41 (ExL_04). Authentication: certified Family Court order.

45 (Tab 42). Griffin CASAC Certificates 2014 and 2017. Source: Westchester FC; Tab 42 (ExS_01 / ExS_02). Authentication: certified Family Court filings.

46 (Tab 43). OASAS Revocation of Griffin's CASAC Credential, October 2020. Source: Tab 43 (F-041 / F-051 / ExK_01). Authentication: regulatory record; certified public action of the New York State Office of Alcoholism and Substance Abuse Services.

47 (Tab 44). *Journal News* / LoHud Investigation, October 5, 2020. Source: Tab 44 (F-007 / SLE-005). Authentication: published news investigation; preserved via SHA-256 in canonical evidence archive.

48 (Tab 45). Hon. Schauer Hearing Transcript, August 27, 2021. Source: Westchester FC; Tab 45 (ExTR_01). Authentication: certified Family Court transcript.

49 (Tab 46). AFC Genovese's Orders to Show Cause, October 14, 2021. Source: Tab 46 (F-044 / SLE-004). Authentication: certified Family Court filing.

50 (Tab 47). Walsh Sr. Sworn Declaration, October 7, 2021. Source: Tab 47 (ExPP_01) / 211007_Stephen_Walsh_Declaration_ISO_Response.pdf. Authentication: sworn declaration in Petitioner's possession from *Russell v. Walsh* Discovery; reciprocally filed in Westchester FC as part of the OSC packet.

51 (Tab 48). November 5, 2021 Schauer Hearing Transcript. Source: Tab 48 (ExTR_10). Authentication: certified Family Court transcript.

52 (Tab 49). November 5, 2021 Order on Default. Source: Tab 2 (ExR_02) / F-038. Authentication: certified Family Court order; pages 1–3 (Order on Default) and 4–6 (Order on Consent against Linda Russell).

53 (Tab 50). Walsh's November 16, 2021 Email to Michaelanne Petrella. Source: Tab 50 (ExMM_09) / MED-003. Authentication: email + downstream evidence of the silenced podcast.

54 (Tab 51). Sgt. Caraway SFPD Contemporaneous Text. Source: Tab 51 (SCREENSHOT_SGT_CARAWAY_COURT_ORDER). Authentication: text screenshot in Petitioner's possession.

55 (Tab 52). January 5, 2022 Inquest Transcript. Source: LEGAL-INQUEST-TRANSCRIPT. Authentication: certified Family Court transcript.

56 (Tab 53). 2020 CJC Complaint. Source: Tab 53 (ExEE_02_05). Authentication: filed complaint in Petitioner's possession.

57 (Tab 54). February 23, 2026 CJC Complaint Cover Letter + 272-Page Evidence Packet. Source: Petitioner's filing. Authentication: filed complaint in Petitioner's possession.

58 (Tab 55). AGC File W-350-26 Materials. Source: Petitioner's response to Attorney Grievance Committee 9th Judicial District. Authentication: AGC correspondence and Petitioner's filed response.

59 (Tab 56). *Chappaqua Poison: An American Tragedy*. Source: Petitioner's publication. Authentication: registered ISBN 979-8-9955749-0-3, Publisher: Prism, First Edition March 2026; published edition on file.

60 (Tab 57). *ChappaquaPoison* Documentary Blog Canonical Bundle. Source: chappaquapoison.com. Authentication: SHA-256 hash verification; canonical evidence index publicly hosted.

***Cause VI — Pattern Continues; No Internal Cure***

61 (Tab 58). NYSCEF Tab 58 (Doc 146). Source: NYSCEF File No. 154703. Authentication: certified public NYSCEF docket entry.

62 (Tab 59). NYSCEF Tab 59 (Doc 148). Source: NYSCEF File No. 154703. Authentication: certified public NYSCEF docket entry.

63 (Tab 60). NYSCEF Tab 60 (Doc 38). Source: NYSCEF F-08146-18/25F (support side); on disk. Authentication: certified public NYSCEF docket entry; copy on disk.

64 (Tab 61). NYSCEF Tab 61 (Doc 32). Source: NYSCEF F-08146-18/25F. Authentication: certified public NYSCEF docket entry (Phase 0 — pull primary-source PDF from NYSCEF docket).

65 (Tab 62). NYSCEF Tab 62 (Doc 39) — "Written Objections to Support Magistrate's Orders of February 3, 2026 and March 12, 2026; and Motion to Vacate Pursuant to CPLR § 5015(a)(3) and (a)(4)," filed March 23, 2026. Source: NYSCEF F-08146-18/25F; on disk. Authentication: certified public NYSCEF docket entry; copy on disk.

66 (Tab 63). Gordon-Oliver Signed Recusal Order. Source: Westchester FC; Tab 63 (F-042). Authentication: certified Family Court order (Phase 0 — pull signed PDF from Westchester FC docket).

67 (Tab 64). Schauer June 1, 2021 Reset Transcript. Source: Westchester FC; transcribed text on disk at Tab 64 (ExTR_10a_Schauer_Hearing_Transcript_Jun1_2021.txt) (transcribed by Aarons Court Reporting / Valeri Wilson, Transcriber, Yonkers Family Court, Part 17, virtual proceeding before Hon. Michelle I. Schauer). Authentication: certified Family Court transcript on file with the

Court (Phase 0 — pull certified PDF copy from Westchester FC for sworn use; transcribed text available as research-backstop).

68. Each exhibit annexed hereto is a true and correct copy of the document or recording it purports to be. Petitioner has personally reviewed each annexed exhibit against its source on the date of this Affirmation. Where a tab paragraph above notes "Phase 0 — pull from [source]," the underlying document is identified for the Court's reference but the authentication and annexation will be completed upon production from the named custodian of record; this Affirmation does not purport to authenticate Phase 0 items not yet annexed. Exhibits extracted from authenticated sources — transcripts, NYSCEF dockets, regulatory records, the *Russell v. Walsh* Discovery production — are produced in the form maintained by their respective custodians of record. Exhibits derived from publicly hosted sources (the chappaquapoison.com canonical evidence index; the published Brienne Walsh blog at archived URLs preserved via SHA-256 hash and also indexed at the Internet Archive's Wayback Machine; the *Journal News* investigation) are preserved with SHA-256 hash verification in the canonical archive and are accessible to the Court for independent verification.

69. The Exhibit Volume comprises the seventy-nine numbered Tabs authenticated above (Tabs 1 through 87, with intervening gaps for tabs dropped in prior editorial cycles as deduplicative or uncited). No additional appendix collections are bundled into the filing copy of the Exhibit Volume; analytical re-presentations of the same authenticated tab evidence are reserved for the body of the Verified Petition and the Memorandum of Law.

I affirm the foregoing under the penalties of perjury pursuant to CPLR § 2106, in lieu of and with the same force and effect as a sworn affidavit.

Dated: May 18, 2026
Santa Barbara, California



**STEPHEN GRANT RUSSELL**
Petitioner, *pro se*
[redacted]
Santa Barbara, California 93101
[redacted]

*End of Authentication Affidavit.*