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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

CHRISTINA TAFT

Plaintiff,

vs.

**PAUL BARRESI, ADAM R
WALDMAN, and DOES 1-10, inclusive,
Defendants.**

CASE NO. 5:24-cv-01930-TJH-
DTB

[Hon. Terry J Hatter, District Judge]

**DECLARATION OF
PLAINTIFF IN SUPPORT OF
OBJECTION TO REPORT AND
RECOMMENDATION RE
PRELIMINARY INJUNCTION**

Date: May 2nd, 2025

Time: Under Submission

DECLARATION OF PLAINTIFF SUPPORTING WITNESSES IN
OBJECTION OF TRUE AND CORRECT EXHIBITS FOR PRELIMINARY
INJUNCTION

I, Christina Taft, declare on True and Correct Copies of Exhibits of Objection:

1. I am the Plaintiff in the above-captioned action. I have personal, first-hand knowledge of the facts stated herein and, if called as a witness, could and would testify competently thereto.
2. This Declaration is submitted in support of the witnesses and victims—including assault victims—whose autonomy, independence, and safety have been imperiled by the coercive conduct of Defendant Paul Barresi and persons acting in concert. Their lived experiences and testimony have been exploited to obstruct due process and to participation in matters, including for their successful careers and social wellbeing. The relief sought in the accompanying Objection and Motion for Preliminary Injunction is necessary to restore their freedom from intimidation and to protect the integrity of this Court
3. **“I would like to be remembered as someone who accomplished useful deeds, and who was a kind and loving person. I would like to leave the memory of a human being with a correct attitude and who did her best to help others,”**
– as stated by Grace Kelly, as is my intent with grace, gratitude, and respect.
4. **True-and-Correct Exhibit Schedule.** Attached hereto are the following documents, each of which is a true and correct copy as described:
5. **Exhibit 1 – Declaration of James Conner (March 26, 2025)**
A notarized declaration wherein James Conner attests that Defendant Paul

1 Barresi recorded a private phone conversation without consent, maliciously
2 edited it, and published it publicly to misrepresent his words. Mr. Conner
3 details ongoing harassment to himself and his family, describing Barresi as
4 dangerous and acting across state lines, thereby substantiating the need for
5 protective relief.

6 **6. Exhibit 2 – Certified Transcript of the “Shalimar Death / Roof**
7 **Incident” Call (July 30, 2023; audio recorded October 4, 2022)**

8 Transcript of a call between Paul Barresi and Rebecca Berry in which
9 Barresi makes disturbing remarks regarding the death of Shalimar, including
10 statements such as “deserved a pillow over his head” and “I threw her off the
11 roof.” These statements, delivered in malice, demonstrate a chilling pattern
12 of intimidation, normalization of violence, and emotional manipulation.

13 **7. Exhibit 3 – Transcript of PI Heather Cohen’s Interview with Witness**
14 **Angela Meador (March 21, 2025)**

15 8. "I asked her about the recording, and asked her if she had consented for that
16 call to be recorded and to be used, and if she had sent it over to the
17 Defendant. She said no, that she did not consent... she was visibly shaken. I
18 would say she was quite scared. She, she was shaking, um, and she, she
19 asked me if I was working for Mr. X. I said no she asked me if I was
20 working for the defendant, I said no. She asked me if I was working for
21 Molly. I'm not sure who Molly is, but eh, I told her no... I assured her that I
22 was not working for any of the people that she named, and that she was not
23 in danger by speaking to me... I thanked her for her time, and she said that if
24 my client wanted to contact her directly, that they could."

25 **9. Exhibit 4 - Support for Angela Gayle's Music Career and Positive**
26 **Background, haven't seen in 3 years-**

1 Leland Grant Business Partner emails "Hopes all is well" with Meador and
2 hasn't seen her in 3 years. Enthusiasm for music singles "Have You Told
3 Her" and "Love Yourself," among performances as an artist, "Be positive;
4 work hard; always be kind; and help whenever and wherever you can"
5 quoted from Meador.

6 **10.Exhibit 5 – Email Correspondence Between Christina Taft and Mario**
7 **Nitrini (April 8–27, 2025) – Emails and Audio from Mario Nitrini**
8 **Regarding the Disappearance of Anthony Fox (June 14, 2022 &**
9 **December 9, 2024)**

10 Documentation and recorded messages indicating that Barresi allegedly
11 interfered with law enforcement inquiries concerning Fox's disappearance
12 and pressured the Fox family. This conduct demonstrates obstruction of
13 justice and manipulation of potential witnesses.

14 **11.Exhibit 6 – Compilation of Harassing and Non-Consensual Audio**
15 **Exploitation (December 28, 2022 – July 30, 2024)**

16 A compilation of private recordings, including phone calls exploited without
17 consent and circulated, weaponizing altered private audio recordings of
18 phone calls for coercion, humiliation, and removing autonomy. This
19 constitutes harassment and retaliation.

20 **12. Exhibit 7 – Email Titled “Your Brother Is a Monster” from Barresi to**
21 **Plaintiff (July 30, 2024)** An email threatening to expose false family history
22 and linking to six unconsented audios in videos implicating vulnerability and
23 violence. This exhibit exemplifies Barresi's direct threats, coercive intent,
24 and emotional manipulation toward Plaintiff, family, and vulnerable victims.

25 **13. Exhibit 8 – Instagram Posts by Angela Meador: “9 Months of**
26 **Darkness” and “Coming Out of Hiding” (July 21, 2023 – January 27,**
27

1 **2024)**

2 Social media posts by Meador discussing her fear, trauma, and isolation
3 following threats and coercion linked to Marton Csokas and to Defendant
4 Barresi obstructing relief from Csokas. These are corroborative of
5 psychological harm and withdrawal from public life due to intimidation.

6 Angela Meador. These posts are retrievable from urls

7 True and Correct, July 2023 from AngelaGayle01 on “9 months of
8 darkness” https://www.instagram.com/angelagayle01/reel/Cu95B_TAWKK

9 True and Correct, September 2023 from AngelaGayle01 on “coming out of
10 hiding” <https://www.instagram.com/angelagayle01/p/Cxa0l99gxJZ>

11 **14. Exhibit 9 – Supplemental Declaration of PI Heather Cohen (March 26,**
12 **2025)**

13 A sworn and handsigned declaration in which private investigator Heather
14 Cohen. Confirms that Angela Meador did not consent to the recording, the
15 use of it, or the sending of it to Defendant Barresi. Witness Meador fears
16 Marton Csokas, Defendant Barresi, and a prior dispute with a different
17 witness.

18 **15. Exhibit 10 – Hawai‘i Temporary Restraining Order (TRO) File – Taft**
19 **v. Barresi (Case No. 3DSS-25-0000044) (January 22 – April 16, 2025)**

20 Court documents showing repeated TRO extensions due to Defendant’s
21 evasion of service and judicial recognition of danger posed to Plaintiff and
22 witnesses, including over 30 subpoenas issued.

23 **16. Exhibit 11 – Affidavit of Service by Ian Travis Herndon (April 14,**
24 **2025)**

25 Proof of personal service upon witnesses regarding intimidation,
26 demonstrating Plaintiff’s diligence and compliance with procedural rules.

- 1 **17. Exhibit 12 – Subpoena Duces Tecum and Exhibit A Issued to Rebecca**
2 **Berry (March 12, 2025)** A court order compelling Berry’s testimony and
3 evidentiary production to protect witness-victim Angela Gayle Meador. The
4 order notes credible intimidation risks.
- 5 **18. Exhibit 13 – Process-Server Logs of Attempts to Serve Meador & Berry**
6 **(March 31 – April 17, 2025)** Official logs documenting attempts to serve
7 protected witnesses, including law-enforcement involvement and
8 acknowledgment that Meador was in witness protection.
- 9 **19. Exhibit 14 – Certified Hearing Transcript in Albertini v. Barresi (Case**
10 **No. 22PDR001308) (October 19, 2022)** Defendant Barresi admits, under
11 oath, to “toying” with homicide accusations and sending messages claiming
12 to commit murder. These admissions support a finding of willful
13 intimidation and psychological abuse.
- 14 **20. Exhibit 15 – BSIS Complaint Alleging Unlicensed PI Activity (October**
15 **9, 2022)** A formal complaint filed with California’s Bureau of Security and
16 Investigative Services documenting unauthorized conduct, indicative of
17 ongoing misconduct and threat to public safety.
- 18 **21. Exhibit 16 – iMessage Conversations Among Taft, Meador, and Berry**
19 **(October 6–9, 2022)**
20 Screenshots showing fears, and unauthorized use of recordings.
21 Demonstrates obstruction of evidence transmission and witness chilling.
- 22 **22. Exhibit 17 – ServeManager Status – Angela Meador (March 31, 2025)**
23 System-generated note showing that service attempts were deferred due to
24 active law-enforcement witness protection measures.
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- 1 **23. Exhibit 18 – Third-Circuit Witness Subpoena for Remote Testimony**
2 **from Meador (March 28, 2025)** Court-ordered witness subpoena
3 compelling, reinforcing the need for protective procedural accommodations.
- 4 **24. Exhibit 19 – Email from Barresi to PI McCormick (July 27, 2022)** An
5 email urging the investigator to disregard survivors’ statements, labeling
6 them, and attempting to undermine lawful inquiry.
- 7 **25. Exhibit 20 – Voicemail from Richie Albertini Detailing Threats Against**
8 **Meador (April 17, 2022)** Recorded voicemail describing assaults and
9 threats to a rape survivor, including coercive emails and efforts to silence the
10 victim under threat of retaliation, including videos and on Defendant.
- 11 **26. Exhibit 21 – Email from Plaintiff to PI Hernandez Entitled “Alarming**
12 **Edit of Voicemail” (April 14, 2025)** Evidence suggesting Defendant’s
13 provocation of disputes to intimidate other witnesses, and to coerce a
14 witness Gayle with objects, and alarm of edits by Defendant.
- 15 **27. Exhibit 22 – Affidavit of PI Alejandro Hernandez (April 1, 2025)**
16 A sworn statement describing a relative, witness Strader who wanted peace
17 and no involvement with Defendant. Demonstrates broader intimidation.
- 18 **28. Exhibit 23 – Affidavit of Service by Jason Douglas on Rebecca Berry**
19 **(April 17, 2025)** Legal service affidavit showing substituted delivery due to
20 Berry’s reluctance. Confirms procedural validity of discovery efforts.
- 21 **29. Exhibit 24 – Wayback Archive Captures Showing**
22 **AngelaGayleOfficial.com Offline (October 4, 2022; March 25, 2023;**
23 **January 10, 2024)** Archives of witness Angela Gayle Meador’s public
24 website disappearing after intimidation escalated. Supports a finding of
25 coerced retreat from social life and career.
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Attached hereto as Exhibit 24 are true and correct copies of Wayback Captures – AngelaGayleOfficial.com Offline. Gayle’s Official Music Website was fully active and well on October 4, 2022 at url:

<https://web.archive.org/web/20221004004021/http://www.angelagayleofficial.com>

True and Correct, March 25, 2023, Angela Gayle Meador’s Official Music site was hidden and down, retrieved from Internet Archive at url:

<https://web.archive.org/web/20230325143809/https://www.angelagayleofficial.com>

True and Correct, January 10, 2024, Angela Gayle Meador’s Official Music site was still hidden and inactive, retrieved from Internet Archive at url:

<https://web.archive.org/web/20240110215735/http://www.angelagayleofficial.com>

30. Exhibit 25 – Compilation of Threats, Posts, and Forged “Exhibit A” (October 10, 2022 – April 27, 2025) A curated set of threats, tweets, and manipulated evidence used to impugn witnesses and Plaintiff. Documents an ongoing harassment campaign.

31. Exhibit 26 – Native Digital Repository (2015–2025) A collection of original media files (audio, video, metadata) demonstrating Defendant’s audio exploitation, intimidation, and violence implications.

32. Exhibit 27 – Affidavit of Process Server Jason Douglas (April 17, 2025) Sworn affidavit detailing substituted service on Rebecca Berry and mailing of subpoena documents. Validates proper service under applicable rules.

33. Exhibit 28 – Partial Transcript of Taft & Meador Discussion re Threats (July 27, 2022) Transcript showing Meador’s concern over after the assault by Marton Csokas of retaliation, reinforcing the network of intimidation.

- 1 **34. Exhibit 29 – Full Certified 52-Minute Audio and Transcript of Taft ↔**
2 **Meador Call (July 22, 2022; Certified March 18, 2025)**
3 Extensive conversation describing assault, abduction, drugging, and threats
4 of blackmail from Csokas to Meador. Establishes motive, scope, and fear.
- 5 **35. Exhibit 30 – iMessage / SMS Bundle – Meador and Taft (July –**
6 **October 2022)** Messages in which Meador expresses fear for her life,
7 references forged documents, and pleads for help. Shows real-time coercion
8 and trauma.
- 9 **36. Exhibit 31 – Email String Beginning with “Your Life Should Be a**
10 **Living Nightmare...” (January 11–29, 2024)** Multiple messages
11 containing threats, emotional abuse, references to Plaintiff’s deceased
12 mother Victoria Taft, and graphic harassment. Direct violation of privacy
13 and judicial decorum.
- 14 **37. Exhibit 32 – Follow-up Email: “Five More Going Up Today” (January**
15 **29, 2024)** Statement of intent by Barresi to post audios of phone calls videos
16 with violence on a continuing basis, even after FBI reports and previous
17 restraining order hearings. Demonstrates open defiance of judicial process.
- 18 **38. Exhibit 33 – Photograph and FBI Complaint – Defendant’s Hitman**
19 **Intimidation (January 10, 2024)** A screenshot and formal complaint
20 documenting Barresi’s threats, including hitman insinuations. Presented with
21 Plaintiff’s FBI report.
- 22 **39. Exhibit 34 – Emails showing lack of consent of Taft and Meador of**
23 **Defendant Barresi exploiting their audio phone call recording (April 21**
24 **2025)**

1 Continuing through the present day in 2025, I have acted with due diligence,
2 urgency, and sincere concern for the safety and dignity of those affected. Since at
3 least February 2023, I have made repeated efforts to retain competent legal counsel
4 to address the escalating pattern of intimidation, coercion, and retaliation
5 perpetrated by Defendants. Unfortunately, such counsel has proven insufficient in
6 protecting the uniquely vulnerable positions of the witnesses and victims
7 involved—many of whom are survivors of assault and subject to retaliatory
8 actions.

9 The Defendant's conduct has caused grave and ongoing harm to core tenets of
10 the American judicial system—namely, access to justice, protection of witnesses,
11 and integrity of evidentiary proceedings. This conduct not only jeopardizes the
12 autonomy and welfare of individual victims but presents a broader threat to public
13 safety and the orderly administration of justice.

14 Accordingly, I respectfully petition this Honorable Court to issue the protective
15 and injunctive relief requested in the accompanying motion, to safeguard the lives,
16 rights, and testimonies of those placed in peril due to Defendant's actions.

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18 I declare under oath and penalty of perjury under the laws of the United States
19 of America that the foregoing is true and correct.

20 Executed this 2nd day of May, 2025, in Hawaii, United States.

21 Respectfully submitted,

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25 _____
26 Christina Taft

27 *Plaintiff in Propria Persona*