

**Exhibit M: Unsigned
Declaration of Withholding
Witness**

DECLARATION OF RICHARD ALBERTINI

Richard Albertini, being duly sworn, deposes and says:

I am a Witness in the matters of Case 5:24-cv-01930-TJH-DTB (Taft v. Paul Barresi, Adam R. Waldman, and Does 1-10), currently pending in the U.S. District Court of the Central District of California.

I am above the age of 18 and reside in California. At the time of these events, I have repeatedly changed my residency, and primarily resided in California and South Carolina.

The facts stated in this affidavit are true and correct to the best of my knowledge and belief. I have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true.

I am competent to testify as the facts stated herein in a court of law and will so testify if called upon.

Relevant Facts

1. I am a Witness and I have observed events of the Viper Room and assaults that Johnny Depp did to men and women. I have a witness list of approximately over 20 witnesses, that includes numerous named individuals involved in the Viper Room nightclub.
 2. Approximately July to September, I discussed with Plaintiff Taft, who I have known since May 2022, the friendships I had in the Viper Room and afterwards with Chris Stanco, Bruce Witkin, Tracy Jacobs, Bruce Corkum, and others related to these social circles. I continued to know Johnny's circle of friends for decades after employment at the Viper Room nightclub.
 3. I have information as to how Paul Barresi started using the tapes to coerce individuals, including myself, and Adam Waldman facilitated with knowing the danger increasing, continually, to reward and direct him. This is continuous and ongoing into 2024.
 4. Defendants Barresi and Waldman continue to use the audio tape of me and potential witness Ed Shaw and other audio recordings to prevent witness testimonies into 2024.

1 5. Between May 2022 to August 2022, Plaintiff Taft verified that I was a witness and I am a
2 key witness that wanted to testify. In my knowledge and observation, Defendants Barresi and
3 Waldman aggressively suppressed me, other witnesses, and Plaintiff.

4 6. I was first intimidated by Defendant Paul Barresi when I wanted to testify against Johnny
5 Depp, who I was friends with. Approximately 1992 I became friends with Ricky Beck Mahler
6 and Isaac Baruch.

7 7. Through Ricky and Isaac I was introduced to Johnny and to work at the Viper Room
8 Nightclub in West Hollywood beginning in 1993. I have knowledge of former friends of Depp,
9 Isaac Baruch, Ricky Beck Mahler, Paul Schindler, and Robert Pfeiffer.

10 8. In April 2019, I was a cooperating witness to testify for Amber Heard through the Law Firm
11 of Browne George Ross LLP, whose lawyers had her as a client. For months, I was still a witness
12 against Johnny Depp.

13 9. I communicated to Plaintiff Taft what had happened to ~~me~~ which caused me to withhold my
14 testimony and information from Heard's case against Johnny Depp. Defendants threatened me,
15 corruptly persuaded and deceived me.

16 10. I introduced Plaintiff Taft to Claudia Jamison in July 2022 who was from the Viper Room
17 nightclub and had moved to New York and was my ex-girlfriend. She tried to open up Bruce
18 Corkum and Jack the bartender to being open to speaking.

19 11. I was interviewed by Plaintiff Taft with all of my witnessing related to me wanting to
20 testify. I witnessed Taft be intimidated by Defendants for this.

21 12. I have witnessed and have personal knowledge Johnny screams and yells at people, and
22 punches holes in the walls. I saw him put cigarettes out on people, throw coffee cups and beer
23 bottles at people, and verbally assault practically everyone around him.

24 13. I was an eye witness to how aggressive and violent Johnny Depp can get, as the time he
25 got violently abusive, pulled her hair back, put a cigarette out on Stacy Lee Lopez's head when
26 she was dancing with Kate Moss. I observed Kate Moss pushed by Johnny Depp before Depp
27 attacked Stacy. I saw my friend Paul Schindler pull Stacy Lee Lopez away from Johnny Depp.
28 Schindler was dating Stacy's friend Nina.

14. I have knowledge of how Johnny Depp would start talks with individuals and then Paul
Schindler would jump on the person and drag them outside.

15. I know that Amber Heard had a case that she was assaulted by Johnny Depp.

16. At the time, Richard Schwartz was speaking with witnesses who wanted to testify for his client Heard's litigation. I told him immediately that Johnny Depp put the cigarette out on a model, Stacy Lee Lopez in an attempt to discuss how dangerous Johnny Depp is. I spoke to Schwartz about Anthony Fox.

17. I observed Johnny Depp threaten to kill Paul Schindler for pulling Stacy out of his way and how he got violent punching holes in the walls.

18. I have knowledge of how Sal Jenco spoke with Seven McDonald to make this story go away so no corporations or modeling agencies knew to dry up the pool of models. I have knowledge of Johnny Depp drinking and using and is under the influence.

19. I was then intimidated by Defendant Paul Barresi, after wanting to testify against Depp.

20. In July 2019, Barresi started to intimidate me, and coerced me into giving him an audio recording with Big Ed Shaw of the Viper Room. Big Ed Shaw was a friend of mine. Barresi starting using the tape and blackmailing me.

21. I've been damaged by Barresi. I gave him many names of friends and former employees of the Viper Room to be witnesses. I didn't want him to intimidate them or for Waldman to conspire with Barresi.

22. I told him a friend of mine, Paul Schindler, admitted to me that he killed missing co-owner Fox and I didn't want to tell the tabloids that Johnny had anything to do with it. Barresi threatened me to release the audio tape of me with Ed Shaw with edits.

23. I wanted to testify on assaults and abuse of women and men that I saw Johnny do. I told Ed Shaw that Schindler was dangerous, that Bob Pfeiffer wanted to use Schindler as a hitman against his wife Maria. Ed Shaw agreed with me that he was violent in his observations. I asked Ed Shaw if he knew if Schindler took out/killed Anthony Fox. Defendant Barresi took this tape and coerced us with this tape to never again testify.

24. Barresi told me he killed Shalimar Seuli, who wanted to testify. He texted me and confessed to me. He admitted an individual ended up dead, one who would not recant about a celebrity.

1 25. 2019 ongoing, I told other potential witnesses that there's a hitman, defendant Barresi, put
2 after me for being a witness against Johnny Depp.

3 26. I have information and knowledge that Defendant Barresi being and/or acting as a hitman.
4 Barresi told me he was a hitman in his conduct, behavior, and his fascination with death of
5 potential witnesses.

6 27. After a restraining order was filed on Mr. Barresi he started looking for our location.

7 28. I fear for my life and I have been afraid of my location being found, hence it caused me to
8 move multiple times.

9 29. I told Defendant Adam Waldman about the audio tape and that Barresi is a hitman that
10 worked with Pellicano and at first I believed Johnny's lawyer would assist me.

11 30. Adam told me witnesses would call him after Barresi intimidated them.

12 31. Adam Waldman did a deal with Barresi approximately in 2020. I have knowledge that Mr.
13 Waldman and Mr. Barresi had financial negotiations and a "Deal."

14 32. I warned Johnny's counsel Ben Chew. Barresi kept lying to me that he wasn't doing this
15 for Johnny so that I would never testify.

16 33. Barresi threatened to shoot me during the trial of Depp v Heard so I wouldn't testify at all.

17 34. Adam Waldman was communicating with Barresi to silence me from testifying, which led
18 me to file a police report. I have observed documentation of their communications to stop me
19 from testifying against Depp.

20 35. In July 2022, I reported that Waldman had financial transactions with Barresi to "fix" for
21 Depp. I reported to the FBI and there were FBI agents assigned to the first South Carolina police
22 report.

23 36. I have knowledge that Paul Schindler confessed to killing missing co-owner Fox and
24 bragged about it.

25 37. I witnessed Paul Schindler crack someone's head open with a 357 magnum because the guy
26 was bothering Johnny and Johnny asked Paul to handle it.

1 38. I observed that Johnny Depp would send Paul Schindler to handle matters for him.

2 39. I have knowledge that Paul's job was to handle matters that Johnny and the nightclub did
3 not want to get sued for. I witnessed Paul hurting individuals in order to handle matters at the
4 Viper Room for Depp. I know that Paul was paid cash on purpose and was not on payroll so that
it can allow him to handle all these matters for Johnny Depp, going unnoticed.

5 40. Bob Pfeiffer was friends with Johnny Depp and was Alice Cooper's Manager. I know that
6 my former friend Bob Pfeiffer, President of Hollywood Records, hired Anthony Pellicano to
7 collect and use audio recordings of a woman, Maria. I have knowledge of when she wanted to
8 leave Bob, he threatened to kill her. He then invited Paul Schindler and Michael Dewey and
9 wanted them to kill Maria. I have knowledge that Paul and Michael both said yes to the request.

10 41. I witnessed Mickey Rourke ask Paul Schindler if he would kill Christian Slater and Carre
11 Otis. Paul was ready to do it. I witnessed individuals go to Paul Schindler when they wanted to
ask him to kill someone for them.

12 42. I have knowledge that my friends Bob Pfeiffer and David Nicherie used Pellicano, who
13 worked with Defendant Barresi, to harm people both in business and in their relationships. The
14 federal government had me be a witness and informant. Barresi took information from Bert
15 Field's Office against the lawyer's client Shafir to Nicherie.

16 43. I have knowledge that Defendant Barresi was put after me for being a witness against
17 Johnny Depp. I have knowledge of how Barresi intimidated witnesses.

18 44. I have knowledge of how many individuals were intimidated by Defendant Paul Barresi
19 and Defendant Adam Waldman.

20 45. I observed other notes by Barresi of me when I was a cooperating witness where my
21 statements were changed, including those with potential criminal and civil liabilities.

22 46. I have observed Defendant Paul Barresi constantly embellishing and changing statements.

23 47. I have knowledge of how several individuals wanted to put Johnny in rehab, but they dont
24 due to him being the one who pays everyone's bills.

25 48. Ray O'Hagen has been missing, he disappeared for a while. He was Johnny Depp's
26 sponsor in Alcoholics Anonymous.

1 49. I know Johnny Depp sends bouncers on people to intimidate them and for other means.

2 50. My friend Bruce Corkum and former assistant of Depp got angry at me after I was
3 intimidated by Barresi and I started to say things for Johnny. Bruce wanted me to be a witness
4 against Depp.

5 51. I know Johnny Depp hired an attorney to handle the embezzlement allegations against Sal
6 Jenco in ownership of the Viper Room.

7 52. I have information from Adam Waldman that Richard Schwartz and Eric George wanted to
8 be disconnected from ties to Barresi.

9 53. I have information of how Paul Barresi contacted Jalee Carter - who knew Donna from the
10 modeling circuits and brought Donna to stay at the house. Bobby Pastorelli was Jalee's husband.
11 I have knowledge that Donna wanted to meet Johnny again and in order to see Johnny again she
had to do sexually lewd acts to his friends in order to see Johnny again.

12 54. I have seen Johnny Depp push Donna after saying they're both from Kentucky and Johnny
then had Ed Shaw mangle and physically abuse Donna and throw her out of the club.

13 55. Paul Barresi brought up Jalee Carter and then intimidated Plaintiff and I for wanting to re-
interview her.

14 56. I have knowledge of individuals in the film business that end up recanting their stories due
15 to Paul Barresi.

16 57. I have information as to how Paul Schindler had a list of names for kill, Schindler's list,
which included a list of names that are for kill that will be claimed as death by suicide. Schindler
had a tattoo 'Johnny Depp Til Death.'

17 58. Paul Schindler had an inheritance and he wanted to hire a hitman to be at his funeral to kill
18 Johnny, Ricky, Isaac, and Sal. He was angry at Johnny for ignoring him. Johnny wore a skull
ring that represented 'Death Is Certain.'

19 59. I have knowledge that other bodyguards and individuals such as Hunter who worked for
20 Leonardo DiCaprio are also trained to stay out of situations no matter what they witness or see.
21 Schindler was hired to be Leonardo's bodyguard in Mexico and he was fired.

60. I have information how Johnny Depp had Paul Schindler work off books to do threats, or coercive acts to individuals, and used Schindler until he was done doing so.

61. I have knowledge that Barresi used a check to pay Olivia Barash.

62. I observed many people in the Viper Room, including Maria McKee, friend Seven McDonald, Hunter Thompson, Aileen Getty, Josh Richmond, Brent Bolthouse, Jennifer Akari, Olivia, Chris, Ricky Beck Mahler.

63. There were children who were in the Viper Room. Alan Ginsburg, to my belief, was there to look for children.

64. I have seen Eileen Grund being underage, at the Viper Room, being used.

65. I witnessed Carre's face bruised outside the Viper Room one night.

66. I observed that Johnny Depp used art and guitars with Ricky Beck Mahler, and other overpriced items, to hide his assets by transferring worth to his friends. I have knowledge that my former friend Ricky has the stock corp Chud King Inc, that in my belief is a shell corp, and another associate owns The Wolves business in downtown Los Angeles. I told Plaintiff that Isaac Baruch's house on Sweetzer given by Johnny used to be Betty Sue's house. I've been to the Eastern Columbia loft for dinner although Amber was not there.

67. I observed that the Viper Room had additional fake names on the payroll like Joey Woodpecker to increase our pay, and this got the club into tax trouble, that was paid off by Johnny. I observed ways of more sophisticated money laundering later in life.

68. I have information on how Johnny Depp fabricated that Bruce Witkin, Tracy Jacobs, and Peter Nichols embezzled and stole his money.

69. I have information as to how Johnny Depp uses individuals to his benefit, who will do what he says and who will keep his secrets, and how he gets rid of them once he finalizes using that individual.

70. I witnessed Johnny being abusive to his girlfriends, yelling, screaming threats towards them

71 I witnessed Johnny get violent and hit men

1 72. I have knowledge of how fixers, publicists and lawyers determine outcomes.

2 73. I have knowledge of how individuals turn on others due to nepotism, and bribery, such as
3 setting people up with their own nightclubs to own or manage.

4 74. I have knowledge that Johnny Depp required women to perform lewd acts or have sexual
5 intercourse with Big Ed Shaw before Johnny allows the women to talk to him or accompany
6 him.

7 75. I observed that Chris Jenco is afraid of Johnny Depp and to his belief, he feared that
8 Johnny Depp tried to have Big Ed Shaw killed because he knew too much, and knew that Big Ed
9 Shaw was going to start talking. Big Ed Shaw was in an accident which left him a quadrapalegic
10 a couple years later. Johnny gave payments to Ed Shaw for years after the accident until
allegations of his friends stealing.

11 76. I believe Paul Schindler killed his best friend, he was arrested for killing him but due to
12 extenuating circumstances he got out of the case and no charges filed, claimed it was an
13 accident.

14 77. I have information as to how Paul Schindler was Johnny Depp's personal assistant and
15 worked as his bodyguard at the Viper Room, and he took credit that he killed Anthony Fox.

16 78. I witnessed Paul Schindler pull out his gun and take two shots at an individual.

17 79. I have knowledge that Barresi denied, when he approached me when I was a witness to
18 testify against Johnny Depp, of him knowing Marty Singer, which I know was a lie.

19 80. A few days after that, I was allegedly offered money from Barresi where he claimed the
20 money would come from Marty Singer, to go bribe a cop about evidence from Shalimar's death.

21 81. I witnessed Barresi was trying to make me look inconsistent when he falsified information
22 to others about what I actually said.

23 82. In my observation, Ricky and Isaac knew that Johnny needed rehab and he was self-
destructive. I had been invited to the engagement party for Johnny and Amber, and I did not
25 attend. Back then my social circles, including inner circles of Johnny's, had nothing bad to say
about Amber prior to the lawsuit involving Adam Waldman, as Johnny's attorney. When they
26 were first dating or when they first came around the time of the engagement party, everybody
loved her; and the friends were not complaining about Amber until after the separation.

27
28 PAGE 8 OF 10

1
2 83. I explained to Plaintiff Taft about my knowledge of a night of violence against Amber that
my friends knew of that happened in the Eastern Columbia building and about the scene that
Isaac kept claiming about.

3
4 84. I have many additional observations on my former friend Isaac Baruch, some observations
that I unfortunately told Defendant Paul Barresi who then exploited the information.

5
6 85. I have witnessed Barresi do death threats to Ms. Taft and that she shouldn't be alive.

7
8 86. I was and still am afraid for the life of Plaintiff Taft and Amber Heard's life.

9
10 87. I have also been afraid for my own life since 2022 onward while observing the escalations
between Defendants Barresi and Waldman. I nearly lost my life in October of 2022 from Barresi
and Waldman during the time Barresi stated I was "dead silent" and should not have "air."

11
12 88. During my interviews with Ms. Taft, I told her all my observations and everything I
witnessed with Johnny Depp, Paul Barresi and Adam Waldman.

13
14 89. I would have attested for other cases against Johnny Depp, not only in Amber Heard's
Case. Rocky Brooks was another case. I told his lawyer Pat Harris, I would testify for him and
additional witnessing that I saw relevant to violence from Depp and film sets.

15
16 90. Into 2024, Mr. Barresi regularly contacts me to make me withhold my testimony as being a
witness against Mr. Depp, and wanted me to not have accurate interviews by the Department of
Consumer Affairs, and to no longer report to the FBI.

17
18 91. To this day, Barresi intimidates me and told me to "Go get that bitch" about Plaintiff Taft.

19
20 92. To this day, Barresi continues to contact me, call me, and to intimidate me and Plaintiff
Taft.

21
22
23 I attest that lines 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 70, 72, 81, 82, 83, 84, 85, 86, 87,
88, 89, 90, 91, 92, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 109, 110, 111,
112, 116, 117, 120, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140,
141, 143, 149, 152, 153, 164, 168, 172, 184, 187, 193, 207, 215, 216, 218, 219, 220, 229, 235,
240, 258, 269, 307, 308, 311, 312, 315, 326, 334, 335, 336, 344, 345, 348, 359, 371, 395, 397,
412, 433, 540, and 542, and I attest to all the footnotes referencing my witnessing in the lawsuit
of Plaintiff Taft are true and correct.

I have additional knowledge and information I can declare and attest to, inclusive of defendants ongoing activities. I assert that I can provide said evidence to the facts stated above.

I, Richard Albertini, as a declaring witness to testify if so called upon, do hereby declare under penalty of perjury that the information provided herein is true and accurate to the best of my knowledge. This declaration has been verified and is made in good faith.

DATED this ____ day of _____, 2024.

Signed: _____
Name: Richard Albertini

SUBSCRIBED and SWORN to before me
this _____ of _____, 2024.

NOTARY PUBLIC in and for said State,
in the United States of America
OFFICIAL SEAL

**EXHIBIT N: VIOLATION OF
CALIFORNIA'S STAND
AGAINST NDAs ACT**

EXHIBIT N



Christina Taft <taftchristina.ceo@gmail.com>

Taft v. Barresi, et al. (Case No. 5:24-cv-01930)

Christina Taft <taftchristina.ceo@gmail.com>

To: Melissa Lerner <mllerne@lavelysinger.com>

Cc: Lucy Hanna <legalstructureconsulting@gmail.com>, Mel Sue H <melodyesue@gmail.com>, "ceo.taft@rescue-social.com" <ceo.taft@rescue-social.com>, " <taft.christina@yahoo.com>, Roya Hassas <rhasas@lavelysinger.com>, Max Fabricant <mfabricant@lavelysinger.com>

Ms. Lerner:

For the Judge's Consideration, Exception (b) - The Answer is "No" to these demands

The demand to "withdraw any complaints or reports made with any other authority or agency" violates statutes:

- **California Code of Civil Procedure § 1001 and Stand Against NDAs SB 331:** Prohibits agreements or actions aimed at silencing individuals from
- **Federal Whistleblower Protection Laws:** Protect individuals from retaliation when reporting illegal activity to federal agencies.

To Lavely & Singer - In consideration of former clients of law firms that may report against 'fixers' and witnesses reporting:

- During Defendant Waldman and Defendant Barresi escalating attacks against Plaintiff Taft and reporting witnesses, a very crucial redaction of a former
- **Former clients and attached clients of Barresi can be exploited and intimidated, including to not report him to authorities, and to be silenced forceful attachment by Defendant Barresi obstructs investigations and from stopping his exploitation.**
- A 10 year old, 2006 article from ABC reported that "Barresi collected dirt on Sylvester Stallone" (while still claiming to 'work' for him) was redacted.
 - "Barresi said that Pellicano hired him to "get dirt on" Sylvester Stallone" (*original report from 2006 retrieved in early 2022*) *the report exploitation with no notation of redaction (2022 redacted onward).*

Violation of 2022 California Law on No NDAs Silencing Criminal or Unlawful Conduct

- **Law Violation, California's Stand Against Non-Disclosure Agreements Act (SB 331), effective January 1, 2022, prohibits certain settlement agreements that prevent the disclosure of information about unlawful acts, including harassment, discrimination, and retaliation.**
 - California Code of Civil Procedure § 1001. Protects whistleblowers and victims from being silenced about unlawful activities.

Violation of Rule 3.10 of California Bar Association Codes of Conduct:

- **Rule 3.10:** Lawyers are prohibited from threatening criminal, administrative, or disciplinary charges solely to obtain an advantage in litigation.
In violation of Rule 3.10, the 3 years licensed Max Fabricant escalated to threaten after repeatedly calling and text me Florida Melodye Haynes for allegedly Writing/Editing legal pleadings of Plaintiff, for providing legal consulting to Plaintiff, and for Haynes to settle (accompanying violation of the 2022 California Law that confidentiality agreements cannot stop reporting unlawful activity).
<https://apps.calbar.ca.gov/attorney/Licensee/Detail/333859>
 - Attached Two Exhibits of Text Messages
 - After Plaintiff already wrote there was no authorization to contact Haynes

Federal Authorities Encourage Court Access and Equal Protection:

- **FBI agent Greg suggested that a lawsuit would be helpful at our interview.**
- **Reports under oath cannot be revoked and my lawsuit is under oath to prevent revocation**
- **Plaintiff Keeps Rights and Rule of Law from the Federal US Law against witness, victim, and informant tampering.**

Intimidation or Threats by Lawyers - Potential Violations:

- **18 U.S.C. § 1512 (Witness Tampering):** Includes intimidating or threatening witnesses to prevent lawful reporting or participation in legal proceedings.
- **California Penal Code § 136.1:** Criminalizes preventing or dissuading a witness or victim from making a report to law enforcement or other authorities.
- **Threatening civil, administrative, or criminal consequences to discourage complaints violates California Rule of Professional Conduct 3.10.**

You should tell your supervisor, Marty Singer.

- **(b) Exceptions.** The court may admit this evidence for another purpose, such as proving a witness's bias or prejudice, negating a conclusion, or **an effort to obstruct a criminal investigation or prosecution.**

Regards,
Christina Taft

Founder & Entrepreneur | Innovator | Egalitarian, Humanitarian, American
[LinkedIn](#)

On Tue, Nov 26, 2024 at 7:01 PM Melissa Lerner <mllerne@lavelysinger.com> wrote:

CONFIDENTIAL AND PRIVILEGED SETTLEMENT COMMUNICATION (FRE 408)

Taft v. Barresi, et al. (Case No. 5:24-cv-01930)

Christina Taft <taftchristina.ceo@gmail.com>
To: Christina Taft <taftchristina.ceo@gmail.com>

Thu, Jan 9, 2025 at 12:57 PM

----- Forwarded message -----

From: **Melissa Lerner** <mlerner@lavelysinger.com>
Date: Tue, Nov 26, 2024 at 7:01 PM
Subject: Re: Taft v. Barresi, et al. (Case No. 5:24-cv-01930)
To: Christina Taft <taftchristina.ceo@gmail.com>
Cc: Lucy Hanna <legalstructureconsulting@gmail.com>, Mel Sue H <melodyesue@gmail.com>, ceo.taft@rescue-social.com <ceo.taft@rescue-social.com>, taft.christina@yahoo.com <taft.christina@yahoo.com>, Roya Hassas <rhassas@lavelysinger.com>, Max Fabricant <mfabricant@lavelysinger.com>

CONFIDENTIAL AND PRIVILEGED SETTLEMENT COMMUNICATION (FRE 408)

Ms. Taft,

To avoid incurring further attorneys' fees and costs and in order to resolve this matter without additional motion practice before the Court, we propose the following terms for settlement.

1. Mutual releases of all claims, known or unknown, existing at effective date of settlement agreement (with customary Civil Code 1542 waiver)
2. Mutual non-disparagement
3. Mutual non-contact
4. Takedowns
 - a. Provision requiring that, within 7 days after execution of agreement, each Party take down any material (videos, articles, blogs, tweets, etc.) that he/she (or his/her representatives or agents) has publicly posted about the other Party and submit requests to any other site/company where such material has been published
 - b. Within 10 days after execution of agreement, Parties must sign and return to each other signed and notarized statements attesting under oath that all material about the other Party has been removed from the Internet (from sites under the parties' control and/or that of their agents/representatives) and attaching copies of letters sent to any other sites/companies/publications requesting removal of such material
 - c. Provision prohibiting the parties and their agents/representatives from posting about the other Party or discussing one another in any context or any way
5. Any breaches of the non-disparagement, non-contact or takedown provisions to constitute material breach to be resolved via expedited procedures at JAMS in Los Angeles, CA
6. Taft to withdraw any complaints or reports made against Barresi with any other authority or agency
7. Taft to dismiss with prejudice the action pending in federal court no later than 10 days after execution of the agreement
8. Taft to pay \$20,000 to Barresi (c/o Lavely & Singer Client Trust Account) for his attorneys' fees and costs incurred in this action
9. Confidentiality of agreement and payment terms

Please provide your response before the Thanksgiving holiday. It would be in the parties' best interest to resolve this matter.

My client's rights and remedies are reserved.

Sincerely,

Melissa Lerner

From: Melissa Lerner <mlerner@lavelysinger.com>
Date: Wednesday, November 6, 2024 at 3:15 PM
To: Christina Taft <taftchristina.ceo@gmail.com>
Cc: Lucy Hanna <legalstructureconsulting@gmail.com>, Mel Sue H <melodyesue@gmail.com>, ceo.taft@rescue-social.com <ceo.taft@rescue-social.com>, taft.christina@yahoo.com <taft.christina@yahoo.com>, Roya Hassas <rhassas@lavelysinger.com>, Max Fabricant <mfabricant@lavelysinger.com>
Subject: Re: Taft v. Barresi, et al. (Case No. 5:24-cv-01930)

Hi Ms. Taft,

The allegations against Mr. Barresi, Lavely & Singer P.C. ("L&S"), my colleagues and me and/or clients of L&S contained in your emails dated November 1-2, 5 and 6 and Ms. Hanna's October 31 email are denied in full.

I do not agree that your filing a motion for a preliminary injunction is relevant to the issue of a response date to the operative complaint or that it belongs in a stipulation on the subject, but you are certainly able to propose changes to what I sent you in Word format. Instead, I understand your email to mean that you received advice from your legal consultants, Lucy Hanna and Melodye Sue Hannes, to reject the proposal of entering into a stipulation. Unless you indicate that this understanding is mistaken, we will be proceeding with our motion to dismiss the Complaint pursuant to FRCP 12(b).

All of my client's rights, remedies, claims and defenses, whether arising in law or in equity, remain expressly reserved.

Sincerely,

EXHIBIT O: HARM TO REBECCA BERRY



Rebecca Berry



2:29 PM

christina i think he hired a hitman

to kill me i'm serious

i may be paranoid but

i don't think so

call me when you can

paul baressi

something really fucking weird
and terrifying just happened
to me i'm ok but i think i came
very close to being raped and
murdering



murdered

and i just freaked out the girl i'm
trying to become friends with's

mom by breaking out about it



| Text message



EXHIBIT P: DEATH THREAT TRANSCRIPT

1 TIME IN HERE.

2 A WELL, THERE'S A CURRENT REPORT IN
3 BURBANK. THERE'S A CURRENT REPORT IN SOUTH CAROLINA.
4 AND WE'RE MEETING WITH THE LOS ANGELES POLICE NEXT
5 WEEK.

6 Q WHEN WAS THE ONE MADE IN BURBANK?

7 A THE ONE IN BURBANK WAS MADE TWO WEEKS
8 AGO.

9 Q DO YOU HAVE A COPY OF IT?

10 A I DON'T HAVE IT HERE.

11 Q THIS IS YOUR TRIAL TODAY, SIR.

12 A I UNDERSTAND, SIR, BUT PLEASE LET ME
13 ANSWER THAT. MY COLLEAGUE WHO IS IN POSSESSION OF ALL
14 THE RECORDS AND FILES; A WOMAN, SHE'S BEEN RECEIVING
15 DEATH THREATS FROM PAUL BARRESI. SHE WAS SUPPOSED TO
16 BE HERE THIS MORNING, BUT SHE WAS UNABLE TO MAKE IT.
17 SHE'S SCARED. HER NAME IS CHRISTINA TAFT.

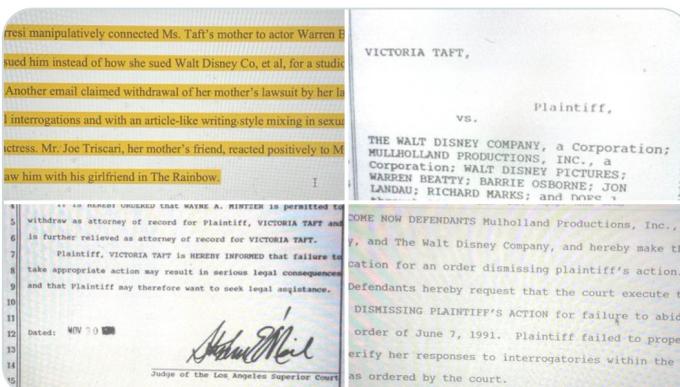
← Post



Paul Barresi
@PaulBarresi1

Follow ...

Contrary to Christina Taft's FALSE CLAIMS, the FACTS SHOW, her mother VICTORIA was a 'Tits & Ass' actress & movie extra who sued Warren Beatty. Her lawyer did quit cause she failed to answer interrogatories. The judge fined her & subsequently threw her case out.



Last edited 3:09 PM · Dec 15, 2024 · 361 Views

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Sergio Gorgone @sergio_gor{} · 18h ...



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Christina Taft



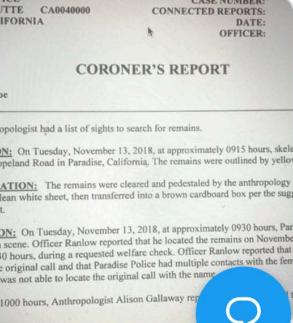
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← Post

 **Paul Barresi** ...
@PaulBarresi1

WAS PRECIOUS TIME WASTED TO SAVE HER MOM? Christina Taft told CNN Anderson Cooper she & her mother [Victoria Taft] were sleeping when their neighbor Alice knocked on their door. Taft said, "So, because of her warning we knew that there was an evacuation. My mom came in, also woke me up, and then. you know, also, we didn't know how severe it was so I kinda just went and took a shower."

10:20 PM · Jan 3, 2025 · 117 Views

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10:47

ID #:790

91

**Laura B** @LauraB99737382 · Jan 4

...

Your house is burning and you take a shower? Yeah right

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**Paul Barresi** ✅

@PaulBarresi1

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...

My precise sentiment. Brain dead people cost lives, or they are so f--kin wrapped up in themselves, they have no concern for other people. Hmmm ... Sounds like these two wretches.



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**Laura B** @LauraB99737382 · Jan 4

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