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4 **UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF  
CALIFORNIA, EASTERN DIVISION**

5 CHRISTINA TAFT ) Case No.: 5:24-cv-01930-TJH (DTB)  
6 vs. Plaintiff, )  
7 PAUL BARRESI, et al, ) **OBJECTION TO REPORT AND**  
8 Defendants. ) **RECOMMENDATION DENYING**  
9 ) **PRELIMINARY INJUNCTION**  
10 )  
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12 **OBJECTIONS TO REPORT AND RECOMMENDATION DENYING PRELIMINARY  
INJUNCTION**

13 Plaintiff Christina Taft, pro se, strongly objects to Magistrate Judge David T. Bristow's Report  
14 and Recommendation dated December 23, 2024, which recommends denying her October 24, 2024  
15 Emergency Motion for Preliminary Injunction. Taft urgently seeks a writ of authority to reply to the  
16 defendant's opposition and reconsideration of her request for injunction.

17 Taft's amended complaint unveils systematic witness intimidation, evidence destruction, and  
18 manipulation of judicial proceedings. Adopting the Magistrate Judge's Report without granting Taft  
19 the opportunity to reply would constitute a serious procedural error and violate her right to due  
20 process. The gravity of these allegations and potential for irreparable harm demand immediate  
21 attention. Taft respectfully requests the court to reject the current recommendation, allow her to file  
22 a reply, and grant the injunction to ensure a full and fair examination of her claims.

23 Defendant Barresi was nearly immediately revoked of his license by the Attorney General of  
California (Exhibit A, 30). He is not safe to contact witnesses without licensed intermediaries.  
24 Defendant is a known Hollywood Fixer engaging in manipulative, threatening, coercive, and

1 harassing conduct resulting in Plaintiff and witnesses to fear for their lives and resultantly withhold  
2 evidence related to Defendant's ongoing conduct.

3 **PROCEDURAL ERRORS AND DENIAL OF DUE PROCESS**

4 The Magistrate Judge's denial of Plaintiff's right to file a reply to Defendants' opposition dated  
5 December 13, 2024, constitutes a significant procedural error. A reply is essential to address new  
6 arguments and factual inaccuracies presented by Defendants. Additional evidence and witness  
7 declarations were not considered with ongoing activity by Defendant Paul Barresi, a "Hollywood  
8 Fixer," with the initial action proceeding within claims for relief of elements related to obstruction  
9 of justice, tampering with a witness, victim, or informant and supporting equal protection. The  
10 November 6, 2024 Memorandum in Support of Plaintiff's Motion to Amend Complaint and  
11 Continued Injunction Requests with Points and Authorities and two additional licensed private  
12 investigator declarations (Mr. Kountz and Mr. Echler) were not considered in the decision. Three  
13 more witnesses (Mr. Herndon, Ms. Beaton, and Mr. Nitrini) come forward in this objection for due  
14 process for supporting a writ of authority to protect them, Plaintiff, and family from Defendants'  
15 intimidation, threats, and invasions. Witnesses of the Viper Room, including Mr. Albertini, have  
16 already been jeopardized by Defendant to withhold and evidence is presented.

17 **WITNESS DECLARATIONS AND EVIDENCE TO SUPPORT ALLEGATIONS AND  
CHARACTER OF DEFENDANTS**

18 Plaintiff presents continuing evidence Defendants' ongoing threats against Plaintiff and  
19 witnesses, including intimidation tactics involving coercive communication and threats of physical  
20 harm, references to organized crime, and systematic efforts to obstruct justice by manipulating  
21 testimony and destroying evidence.

22 Witness Declarations

1       The following are evidentiary Declarations in support of Ms. Taft's request to reject the court's  
2 current recommendation, allow her to file a reply, and grant the injunction to ensure a full and fair  
3 examination of her claims.

4       **I. Declaration of Ian Herndon (Exhibit B, 46)**

5       Ian Herndon's declaration paints a disturbing picture of Barresi's behavior. He states  
6 unequivocally, "I've witnessed Barresi threaten death, mortality, and danger to people". This stark  
7 statement sets the tone for the rest of the declaration, which details Barresi's coercion of Angela and  
8 Christina Taft, particularly after obtaining an audio recording of their conversation about abuse and  
9 violence in 2022. The declaration emphasizes the persistent fear experienced by Christina Taft.  
10 Herndon notes with concern, "from 2022 to this very day, I have observed Christina Taft be in  
11 constant fear of Paul Barresi, supported by ongoing contact by him using threatening and harassing  
12 language". This ongoing intimidation began when Barresi became aware of Taft's support for  
13 Amber Heard and other witnesses in 2022. Herndon observed Barresi inciting Richie Albertini to  
14 attack Taft and noted that Taft felt unable to help Angela due to the audio tape Barresi had obtained  
15 of their conversation.

16       In a particularly alarming incident, Herndon reports, "Angela advised me on numerous  
17 occasions that a Hollywood Fixer, believed to be Paul Barresi, was sent to intimidate and silence  
18 her, and at one point he showed up where she was in person and pointed a gun at her head". This  
19 escalation to physical threats underscores the severity of the situation. The declaration further states  
20 that Taft's fear was so intense that she felt compelled to move from California to Hawaii in search  
21 of safety from Barresi.

22       Herndon also "observed Barresi inciting Richie Albertini to attack and noted  
23 that Taft felt unable to help Angela due to the audio tape Barresi had obtained of their  
24 conversation." (Exhibit B, 47.)

1           **Declaration of Michael Kountz (Exhibit C, 55)**

2           Michael Kountz is a licensed private investigator in New Mexico who became involved in the  
3 case when Plaintiff Christina Taft requested assistance from Superior Court Investigations on  
4 May 1, 2023. His role was to locate and interview James Conner regarding an audio recording  
5 edited and published by Defendant Paul Barresi. With consideration, licensed private investigator  
6 and retired LAPD Mike McCormick's declaration further reveals Barresi's efforts to obstruct  
7 justice, including intimidation tactics against witnesses. These tactics included coercion of  
8 individuals through audio recordings and spreading fear among potential witnesses. The declaration  
9 also details Barresi's intimidating statements, including claims of being a murderer, which instilled  
10 fear in Plaintiff. Additionally, McCormick highlights Barresi's connections to Waldman and his  
11 actions against witnesses, as well as the harm caused in related cases involving Amber and Anthony  
12 Fox. These findings substantiate the deliberate and malicious nature of Defendants' conduct. These  
13 actions represent a course of conduct rather than isolated incidents and were directed specifically at  
14 Plaintiff.

15           In declaration number three, Kountz states, "I located and interviewed James Conner in June of  
16 2023. James Conner advised me he was a licensed private investigator. I observed that Conner  
17 appeared to be disabled by his own admission." He further states in numbers four and five that he  
18 was not aware of the audio recording contained in edited video nor authorized permission for the  
19 recording. After the interview, Conner contacted Declarant warning of Barresi. "After leaving the  
20 interview with James Conner, I received a phone call from him advising that Paul Barresi was  
21 dangerous, and that he was in fear for his life due to his involvement."

22           Kountz's review of recording provided insight into Barresi's conduct. "I reviewed the audio  
23 tape contained in the video by Barresi. Contained in the audio tape done by Paul Barresi of James  
24 Conner, are alterations that he was an FBI agent and that her mother Victoria Taft had witnessed a

1 mob murder by the Gottis. It distressed Taft about her mother Victoria Taft and her death. James  
2 Conner advised me he was never an FBI agent. The tape showed images of a man dead from the  
3 mafia, members of the mafia, and a gun. In the beginning of the tape, Barresi discussed a photo of  
4 Amber Heard with Plaintiff Taft to James Conner, that they were arm in arm, yet at the same time  
5 indicating danger to life through comparing to an assailant. I have information that Plaintiff is still  
6 fearful to this day that this audio tape is either to make someone shoot her or to shoot Amber. Or  
7 that a death could occur. I have information that Defendant Barresi acted aggressively to terrify Taft  
8 and others contained in the content of the audio tape.”

9 In further describes of Mr. Barresi’s harassment and states, “On September 05th, 2023, I  
10 received an email from Plaintiff Taft containing a screenshot of a text message chain from the  
11 phone number (908) 656-5712, which she advised was Defendant Paul Barresi’s phone number. I  
12 observed the following message, portrayed in the screenshot to have been sent from the above  
13 number to Plaintiff Taft on Nov 7, 2022: “Stacy is your sister” and sexual expletives. Taft advised  
14 that the text referred to Stacy Hagman in Texas and requested that I interview her. She had  
15 compliments for Stacy and was fearful that Barresi could access her. I was able to locate a phone  
16 number for Stacy but have not been able to reach her through it.”

17 **II. Declaration of Molly Beaton (Exhibit D, 59)**

18 Molly Beaton is a witness who received direct threats from Defendant Barresi, causing her to  
19 fear for her life and safety. Contained in Declaration 1 she explains, “Knowing I could be a witness,  
20 Defendant Paul Barresi has continued to contact me to this day, and I want his brutal, continual  
21 threats and harassment to stop. I am afraid of him, and I haven’t told him directly that I am  
22 testifying for Plaintiff. I do not want Barresi who acts like a hitman going to my house for being a  
23 witness.”

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1 Contained in number 2, she attests, "Since first interacting with witnesses and then Barresi from  
2 2021, 2022 to December 2024, I personally have reported that he is a 'hitman' as I provided that to  
3 Florida State Police (Case 48-2021-NM-002537). Two witnesses corroborated Barresi's imminent  
4 dangerousness to threaten and kill." In number six, she declares, "I continued to see Defendant  
5 Barresi harassing and stalking Plaintiff Taft for 2 years. As recent as January 5th, 2024, I saw that  
6 Barresi was stalking Taft's location, residency, about her mother's death, all in his alarming efforts  
7 as a criminal fixer, and to eliminate witnesses that may have turned to assist Heard."

8 In number 15, she states in part, "...Albertini knew I was supportive of Amber when he was  
9 contacting me before and when Barresi was contacting him. I do not want any more instigated  
10 harassment by Barresi, and I do not want to be contacted ever again by either of them or threatened.  
11 It is a nightmare." She states in number 17, "Defendant Barresi initially contacted me in 2022 in his  
12 interests in fighting Richie Albertini, who I know has information against Johnny Depp, although I  
13 did not know about the assaults in the Viper Room done by Depp. In the same documentation I sent  
14 the Florida police in 2021, Albertini was referencing Amber Heard, who is an assault victim like I  
15 am an assault victim. In number 18, she states, "I've seen messages of witness Ian Herndon  
16 messaging in 2021 to Roberta Kaplan, who was Amber's attorney, about problems of harming rape  
17 victims and monitoring rape victims, with "alleged ties to Johnny Depp, Anthony Pellicano, and  
18 Paul Barresi" in the message. Ian was trying to help me. Richie tagged @adam\_waldman and  
19 @Barresi\_paul in many postings attacking me and Amber, after showing me the text from Barresi  
20 to Richie of "Hey, that tranny had it coming. If it wasn't me to have done her in, it would've been  
21 somebody else."

22 **III. Declaration of Erik R. Eichler (Exhibit E, 68)**

23 Erik Eichler is a private investigator of Eichler Investigative Services LLC., in South Windsor,  
24 CT. On October 29, 2024, Mr. Eichler drove to the residence of Rebecca Berry. Declarant spoke

1 with Ms. Berry and her mother, Joan Berry, in the driveway. Mr. Eichler provided Ms. Berry with a  
2 copy of the Complaint in this matter, Christina Taft v. Paul Barresi, 5:24-CV-09130-TJH-DTB. The  
3 Declarant provided a letter from Christina Taft requesting a witness declaration in this case. The  
4 mother to Ms. Berry stated, "What is this about?" Ms. Berry replied, "Remember that guy [Paul  
5 Barresi] who confessed to me about killing people?" Ms. Berry said she would contact Christina  
6 Taft or the Declarant at another time and terminated the interview.

7 **IV. Unsigned Declaration of Withholding Witness**

8 The Declaration provides context for the pattern of intimidation and threats, detailing  
9 Barresi's unlawful conduct. It describes ongoing witness intimidation by Barresi and Waldman,  
10 utilizing audio recordings to prevent testimony into 2024. The Declarant recounts firsthand  
11 experiences of threats and coercion aimed at suppressing testimony against Johnny Depp, as well as  
12 eyewitness accounts of violent incidents against both women and men that were instigated by Depp  
13 and his associates in the Viper Room.

14 Alarmingly, the Declaration includes claims of death threats and involvement in witness  
15 deaths, with assertions that Barresi acts as a "hitman" to manage sensitive matters. The severity of  
16 the situation is highlighted by three direct quotes from the Declaration:

- 17 a. *"Barresi threatened to shoot me during the trial of Depp v  
Heard so I wouldn't testify at all."*
- 18 b. *"I have witnessed Barresi do death threats to Ms. Taft and  
that she shouldn't be alive."*
- 19 c. *"To this day, Barresi intimidates me and told me to 'Go get  
that bitch' about Plaintiff Taft."*

20 The unsigned status of the Declaration is a testament to the climate of fear surrounding this  
21 case. This underscores the potential for irreparable harm and emphasizes the critical need for court  
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1 intervention, highlighting the necessity of granting Taft's motion for a restraining order to protect  
2 witnesses and ensure a fair judicial process.

3 **V. Nitrini Emails and Social Media Posts (Exhibit F)**

4 Mario Nitrini was threatened with a “mortal danger threat” by Defendant Barresi after  
5 Nitrini posted that he was asked for a witness declaration by Plaintiff. On December 9, 2024, Nitrini  
6 explained to Taft, “A gang murder took place, and my son testified for the prosecution. Because  
7 Paul Barresi posted his post pertaining to my son and me, some very bad people have been looking  
8 for me. I'm very seriously contemplating filing a criminal complaint against Paul Barresi for  
9 attempted murder. As far as Anthony Fox's disappearance goes, I have my own evidence on whom I  
10 believe killed Anthony Fox on Johnny Depp's request...” (Exhibit F, 71). Nitrini responded to a  
11 subpoena (Exhibit L, 110) in this case, demonstrating Defendant Barresi interfering with the  
12 Ventura police investigation in 2021, after Barresi engaged with Defendant Waldman and years  
13 after Detective Furlong first requested assistance to solve Fox’s case in July 2019 (Exhibits F, 70).  
14 The exhibits suggest that, according to Nitrini, Defendant Barresi pressured Fox's brother Charles  
15 and inserted himself into the situation to obscure the possibility of Fox being killed. Barresi also  
16 appeared focused on obtaining the contact information of Fox's legal team. Fox's daughter  
17 Constance was further interviewed with Barresi's notes to Nitrini showing insertion to cast doubt.  
18 Barresi also appeared focused on contacting Fox's legal team where he stated "notice how he is  
19 avoiding me" about attorney Cutler. (Exhibits G, 77.)

20 Defendant Barresi and an associate of Barresi are threatening Nitrini that he is a ‘non-entity’  
21 and for being a witness in Taft’s lawsuit (Exhibit H, 79).

22 **VI. Emails to Taft (Exhibit I)**

23 Furthermore, evidence of ongoing harassment by Defendant Barresi is demonstrated through a  
24 series of disturbing emails sent to Plaintiff. On November 19, 2022, Barresi sent an email to

1 Plaintiff attaching a coroner's report of her mother Victoria Taft, making Taft afraid for her life, and  
2 accusing her of speaking to the press (Exhibit I, 81). On December 13, 2022, Barresi sent a  
3 disturbing email referencing Plaintiff's deceased mother's body parts (Exhibit I, 82). On August 19,  
4 2024, Barresi sent an email inflicting pain onto Plaintiff about her mother's death, using Plaintiff's  
5 pleading for "mommy mommy mommy," Defendant knowing the cruelty he was inflicting, to turn  
6 her mother Victoria into financial worth (Exhibit I, 83). On September 26, 2024, after service of this  
7 case, Barresi sent an email to Plaintiff threatening that his lawyers would pursue conservatorship  
8 against her. (Exhibit I, 84).

9 **VII. Barresi's Account Posts (Exhibit J)**

- 10 a. On January 1, 2025, Barresi made posted about Taft on X containing false and  
11 inflammatory statements about Plaintiff's personal life and family tragedy, further  
12 evidencing his continued harassment (Exhibit J, 86).
- 13 b. On January 2, 2025, Barresi invaded Plaintiff's location of residency even outside of the  
14 country, to inflict a sense of imminent harm and being unsafe, with flight path tracking  
15 images between Taft and another victim, and posted, "Christina Taft has allegedly  
16 already begun to upset people in France, I am informed" (Exhibit J, 87). The "I am  
17 informed" piece by Barresi is to make Taft be apprehensive of the danger that others  
18 could be monitoring her relationships even outside of the United States, which  
19 Defendant Barresi directed her to flee from, seen in her initial and amended complaint.
- 20 c. Another post on January 2, 2025, threatening Taft's mortality states she should have  
21 never "ever breathed air" (Exhibit J, 88). Defendant Barresi heightened his monitoring  
22 that Taft could speak with another potential witness for due process in this case. With  
23 recent changes in legal consultants, Plaintiff, being pro se, again struggles for equal  
24 protection.

- 1           d. On January 4, 2025, he taunts Taft with a post applying a crude narrative to her mother's  
2           death, mainly to harass and intimidate Plaintiff as well as taint witnesses. (Exhibit J, 89.)  
3           e. On January 7, 2025, he again taunts Taft, with a post stating, "No her mother was burned  
4           to a crisp, nothing left but a few charged bones and most of her heart." (Exhibit J, 90.)  
5           f. As evidence of Barresi's ongoing harassment and desiring Plaintiff's death, he posted  
6           the following on January 12, 2025, "Christina Taft, CEO of Rescue Social, is fucking  
7           evil to the core. Not a more evil vicious [sic] human being has ever breathed air."  
8           g. On page, 140 of Exhibit P, as shown in a post on his X account, Defendant Barresi  
9           states, "VICTORIA was a 'Tits & Ass' actress & movie extra who sued Warren Beaty."  
10           In this post he attaches records cursing her as a Hollywood Fixer. Such records do not  
11           exist in the LA Superior Court docket websites, nor does Plaintiff have any records of  
12           this lawsuit of her mother's. Barresi intimidated and pained Taft with these invasions.  
13           h. Defendant Barresi posts her mother's coroner report in a post noted on page 141 of  
14           Exhibit P, with childhood photos of Taft involved, stating "WAS PRECIOUS TIME  
15           WASTED TO SAVE HER MOM? Christina Taft told CNN Anderson Cooper..."  
16           i. Among these postings, including flight tracking photos with finding her address in  
17           France, Defendant Barresi repeatedly posted Plaintiff's photo with potential witness  
18           Amber Heard, including calling them both "brain dead" and "wrenches" on January 4<sup>th</sup>,  
19           2025 (Exhibit P, 142). In erratic behavior, Barresi uses a double persona to victimize.  
20           j. These recent account posts were made just days before this objection was filed.

21           **VIII. History of Restraining Orders for Individuals (Exhibit K)**

22           A Judge issued a restraining order in Burbank, CA, protecting victim Richard Albertini from  
23           Barresi's violence. The filing threats of violence by Barresi "working for Johnny Depp," threatening  
24           to shoot him, and to hit him across the head substantiated in recording. (Exhibit K, 100). At a

1 hearing on October 19, 2022, for Case No. Albertini v. Barresi, a transcription notes police reports  
2 against Barresi then, “I understand sir, but please let me answer that. My colleague who is in  
3 possession of the records and files; a woman, she’s been receiving death threats from Paul  
4 Barresi...She’s Scared. Her name is Christina Taft” (Exhibit P).

5 **I. Threat of Harm to Rebecca Berry (Exhibit O)**

6 As demonstrated in Exhibit O, witness Rebecca Berry describes her concern of Barresi hiring a  
7 hitman to kill her. “Christina I think he hired a hitman” and “I’m okay but I think I came really  
8 close to being raped and murdered.” PI Echler’s declaration demonstrates Berry is still afraid.

9 **II. Violation of California’s 2022 Stand Against NDAs Act (Exhibit N)**

10 In response to Plaintiff's plea for an injunction, Defendant Barresi through his lawyers  
11 demanded that she withdraw her reports to law enforcement and any other agency in a settlement as  
12 well as pay them egregiously \$20,000. Meanwhile, attorney Fabricant at their firm repeatedly texted  
13 and called the known disbarred legal consultant who hardly communicated with Taft. This violated  
14 the law of California's Stand Against Non-Disclosure Agreements Act (SB 331), effective January  
15 1, 2022, that prohibits confidentiality agreements in settlement agreements that prevent the  
16 disclosure of information about unlawful acts, including harassment, discrimination, or other illegal  
17 behavior. Plaintiff cited this law and that FBI Agent Greg recommended Taft to file a lawsuit.

18 Plaintiff's Emergency Motion for Injunctive Relief was based on the urgent need to prevent  
19 harm as well as intimidation, harassment, witness interference, and invasions of unauthorized  
20 contact information by the Defendants.

21 The Magistrate Judge’s Report and Recommendation issued December 24, 2024, fails to  
22 adequately address key evidence, procedural fairness, and public interest, resulting in prejudice to  
23 the Plaintiff and potential witnesses.

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1 Moreover, the Magistrate Judge erroneously excluded critical supplementary evidence and  
2 failed to allow Plaintiff to file a reply to Defendants' opposition, violating principles of procedural  
3 fairness. These errors have resulted in a recommendation that, if adopted, would leave Plaintiff and  
4 key witnesses vulnerable to continued harassment and intimidation, undermining the integrity of the  
5 judicial process.

6 For these reasons, and further detailed below, Plaintiff respectfully requests that the Court reject  
7 the Magistrate Judge's Report and Recommendation and grant Plaintiff's Emergency Motion for  
8 Preliminary Injunction.

9 **OBJECTIONS**

10 1. Procedural Error Depriving Right to Reply

11 The Court erred in denying Plaintiff the opportunity to file a reply to Defendant's opposition  
12 dated December 13, 2024. This denial violates well-established procedural protections afforded by  
13 pro se litigants under federal law and constitutes an abuse of discretion.

14 The Supreme Court has long held that pro se pleadings are held to less stringent standards than  
15 pleadings drafted by lawyers. *Haines v. Kerner*, 404 U.S. 519, 520-521 (1972). This principle  
16 ensures that pro se litigants have meaningful access to the courts and are not unfairly disadvantaged  
17 by their lack of legal training.

18 Furthermore, the Ninth Circuit has emphasized that courts must provide pro se litigants with  
19 meaningful opportunities to present their claims. *McGuckin v. Smith*, 974 F.2d 1050, 1055 (9th Cir.  
20 1992). This obligation extends to ensure that pro se litigants have a fair chance to respond to  
21 arguments raised by opposing parties.

22 Courts must provide meaningful opportunities for pro se litigants to present their claims. By  
23 denying Plaintiff the opportunity to file a reply, the Court deprived her the chance to address critical  
24 issues raised in Defendant's Opposition including (1) Mischaracterization of evidence presented in

1 support of the preliminary injunction, (2) Erroneous application of the legal standard for injunctive  
2 relief, and (3) New arguments and factual assertions introduced in the opposition.

3 The Supreme Court has recognized that denying procedural opportunities to pro se litigants may  
4 result in reversible error. *Kane v. Garcia Espitia*, 546 U.S. 9, 10 (2005). In this case, the Court's  
5 denial of a reply to prejudiced Plaintiff's ability to fully present her case for injunctive relief and  
6 respond to Defendant's arguments.

7 **2. Improper Exclusion of Supplementary Evidence**

8 The Magistrate Judge erred excluding critical evidence submitted with Plaintiff's Motion to  
9 Amend Complaint, including declarations from three licensed private investigators and additional  
10 witness statements. This exclusion significantly undermines Plaintiff's ability to demonstrate  
11 ongoing intimidation and immediate harm.

12 The Supreme Court has held that courts must consider all evidence relevant to the determination  
13 of substantial harm. *Bell v. Wolfish*, 441 U.S. 520, 533 (1979). By excluding the supplementary  
14 evidence, the Court failed to account for the cumulative threats and intimidation faced by Plaintiff  
15 and witnesses, resulting in an incomplete assessment of irreparable harm.

16 Furthermore, the Supreme Court has emphasized the importance of liberally allowing  
17 amendments and supplementary filings to ensure justice is served. *Foman v. Davis*, 371 U.S. 178,  
182 (1962).

19 The Court should review the supplementary evidence in its entirety to accurately assess the  
20 full extent of the threats and intimidation, ensuring a fair and comprehensive evaluation of  
21 Plaintiff's request for injunctive relief.

22 **3. Failure to Address Harassment and Witness Protection**

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1       The Magistrate Judge's recommendation downplays Defendant Barresi's repeated and  
2 documented harassment of Plaintiff and witnesses, which constitutes actionable misconduct under  
3 California law and federal statutes.

4       California Code of Civil Procedure. § 527.6(b)(3) defines harassment as including "a knowing  
5 and willful course of conduct directed at a specific person that seriously alarms, annoys, or harasses  
6 the person, and that serves no legitimate purpose." The evidence presented meets this standard.  
7 Furthermore, in *Doe v. Fitzgerald*, 2022 WL 423495, at 4 (C.D. Cal.), the Court held that harassing  
8 speech falls outside First Amendment protections. This principle is particularly relevant given  
9 Barresi's pattern of intimidating communications. The Ninth Circuit has emphasized the importance  
10 of protecting witnesses from intimidation. In *United States v. Fulbright*, 105 F.3d 443, 449 (9th Cir.  
11 1997), the Court noted that witness intimidation "not only harms the individual but also undermines  
12 the judicial process" by discouraging truthful testimony and participation."

13       The recommendation fails to give proper weight to substantial evidence of Defendant Barresi's  
14 harassing and intimidating conduct including:

- 15       a. The "soft landing" remarks, which carry a clear threat with Defendant's understanding of  
16           reports against him for using the death of one of his subjects falling off a roof to convey to  
17           witnesses and Plaintiff that the same would occur to them. See Declaration of Mike  
18           McCormick (Exhibit C).
- 19       b. The "undertaker" comments, threatening mortality and potential violence against witnesses.  
20           (Exhibit J, 92-94).
- 21       c. Repeated attempts to contact and pressure witnesses even after being instructed to cease  
22           such communications.

23       This pattern of behavior demonstrates clear intimidation of witnesses and obstructs justice,  
24 directly undermining the integrity of the judicial process. Injunctive relief is not only warranted but

1 necessary to protect witnesses and preserve the integrity of these proceedings. The Magistrate  
2 Judge's failure to adequately address this critical issue constitutes a significant oversight that this  
3 Court should rectify.

4 **4. Erroneous Application of Preliminary Injunction Standards**

5 The Magistrate Judge misapplied the four-part test for preliminary injunctions established in  
6 *Winter v. NRDC*, 555 U.S. 7, 20 (2008). A proper application of this test demonstrates that Plaintiff  
7 is entitled to injunctive relief.

8 a. **Likelihood of Success on the Merits**

9 The Magistrate Judge improperly dismissed substantial evidence of Defendants' harassing  
10 conduct. The Supreme Court has held that past misconduct is compelling evidence of future harm.  
11 *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953). Here, Plaintiff has demonstrated a clear  
12 pattern of harassment and intimidation by Defendants, including threats to witnesses and  
13 unauthorized contact with Plaintiff's legal consultants. Defendant continues to harass and intimidate  
14 the Plaintiff via social media platform, X, as recent as January 12, 2025.

15 Additionally, the Ninth Circuit has held that "serious questions going to the merits" suffice  
16 when the balance of hardships tips sharply in the plaintiff's favor. *Alliance for the Wild Rockies v.*  
17 *Cottrell*, 632 F. 3d 1127, 1135 (9<sup>th</sup> Cir. 2011). Given the significant hardships faced by Plaintiff,  
18 this lower threshold should apply.

19 b. **Irreparable Harm**

20 The Magistrate Judge incorrectly characterized Plaintiff's claims of irreparable harm as  
21 speculative. Plaintiff has provided substantial evidence of ongoing harm, including emotional  
22 distress and threats to safety of witnesses. The Ninth Circuit has held that irreparable harm must be  
23 immediate and significant but need not be certain. *Simula, Inc. v. Autolive, Inc.* 175 F.3d 716, 725  
24 (9<sup>th</sup> Cir. 1999) The evidence presented by Plaintiff clearly meets this standard.

### c. Balance of Equities

The recommendation fails to properly weigh the balance of hardships. Granting the injunction imposes no undue burden on Defendant while preventing significant harm to the Plaintiff. The Ninth Circuit has held that the balance of equities tips sharply in favor of protecting fundamental rights. *Rodriguez v. Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013). Here, Plaintiff's right to safety and access to justice clearly outweighs any minimal inconvenience to Defendant.

d. Public Interest and Witness Protection

The Magistrate Judge's cursory dismissal of public interest arguments fails to consider the importance of protecting witnesses and preserving judicial integrity. The Ninth Circuit has recognized that the mandatory injunctions serve the public interest when safeguarding fundamental legal protections. *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015).

Granting the injunction supports broader public interests in judicial integrity and the protection of participants in the legal process. Defendant Barresi's conduct jeopardizes these principles, as evidenced by witness fears and documented threats.

The Supreme Court has long recognized the paramount importance of maintaining judicial integrity and protecting the administration of justice. In *United States v. Nixon*, 418 U.S. 683, 709 (1974), the Court emphasized that the “ends of criminal justice would be defeated if judgments were to be founded on a partial or speculative presentation of the facts.” This principle extends to civil proceedings, where the integrity of the judicial process relies on the ability of witnesses to testify freely and without fear of intimidation.

The public interest in protecting witnesses and maintaining the integrity of judicial proceedings is further underscored by the broad support for related cases addressing similar issues. The involvement of over ninety organizations as amici curiae in cases dealing with witness protection

1 and judicial integrity demonstrates the far-reaching implications of the present matter<sup>1</sup>. The  
2 widespread participation by diverse stakeholders highlights the significant public interest in  
3 ensuring that the legal system remains free from intimidation and coercion. This aligns with the  
4 fundamental public interest in maintaining a fair and accessible justice system, as recognized in  
5 numerous federal court decisions.

6 **STANDARD OF REVIEW**

7 Pursuant to 28 U.S.C. § 636(b)(1), objections to a Magistrate Judge's report and  
8 recommendation are reviewed de novo. Under this standard, the District Court must independently  
9 evaluate the objected-to portions of the recommendation, considering all relevant evidence and  
10 arguments. The reviewing Court may accept, reject, or modify the recommendation in whole or in  
11 part.

12 In cases involving pro se litigants, courts are additionally required to ensure that procedural  
13 errors do not prejudice the litigant's substantive rights, as emphasized in *Haines v. Kerner*, 404 U.S.  
14 519, 520-21 (1972). This heightened standard of fairness ensures the preservation of due process  
15 and equitable access to justice.

16 The Magistrate Judge erred in applying the four-part test for preliminary injunctions established  
17 in *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7 (2008). Specifically, the  
18 recommendation:

- 19 a. Improperly dismissed substantial evidence of Defendant Barresi's harassing conduct.

---

20  
21 <sup>1</sup> Thomas F. Urban II of Fletcher, Heald and Hildreth filed a motion on November 23, 2022, seeking permission to  
22 submit an amicus brief to the Virginia appeals court on behalf of press groups, women's advocates, and organizations  
23 working with abuse victims. Urban argued that the case has intensified fears about speaking out against powerful  
individuals, stating: "People, especially those who have been the victims of abuse, are afraid of speaking out against  
those who have more power and money. The current case has exacerbated that fear with its precedent." The briefs  
contended that the Virginia case should not have proceeded, given that a prior case in the United Kingdom had already  
determined Heard's allegations to be true.

24 (Matthew Renda, "Attorneys see path for Amber Heard's appeal in defamation case," Courthouse News Service,  
December 5, 2022, <https://www.courthousenews.com/attorneys-see-path-for-amber-heards-appeal-in-defamation-case/>.)

- 1        b. Incorrectly characterized Plaintiff's claims of irreparable harm as speculative.
  - 2        c. Failed to properly weigh the balance of equities between the parties; and,
  - 3        d. Inadequately considered the public interest in protecting witnesses and maintaining judicial
  - 4        integrity.

## **LEGAL ARGUMENTS:**

6 The Plaintiff presents the following arguments in support of instant objections raised.

## 5. Right to Reply as Fundamental Fairness

8 The denial of Plaintiff's right to reply to the Defendant's Opposition to Plaintiff's Emergency  
9 Motion for Preliminary Injunction dated December 13, 2024, undermines Plaintiff's ability to  
10 address critical arguments and evidentiary issues. This omission violates the principle of  
11 fundamental fairness and procedural due process. In *Haines v. Kerner*, 404 U.S. 519, 520-21  
12 (1972), the Supreme Court emphasized that pro se litigants' pleadings and filings must be held to  
13 less stringent standards than those of attorneys. By denying Plaintiff the right to reply, the Court  
14 failed to account for Plaintiff's limited legal expertise, thus denying Plaintiff a meaningful  
15 opportunity to clarify Plaintiff's arguments and respond to mischaracterizations in the opposition.

## 6. Denial of Reply Violates Procedural Due Process

17 The denial of Plaintiff's right to reply also constitutes a violation of procedural due process,  
18 which mandates that litigants be given a meaningful opportunity to present their case. In *Mathews v.*  
19 *Eldridge*, 424 U.S. 319, 333 (1976), procedural due process requires notice and an opportunity to be  
20 heard in a meaningful time and manner. By refusing Plaintiff the right to reply, the Court failed to  
21 ensure that Plaintiff's claims were fully and fairly evaluated, especially given the complexity of the  
22 legal issues involved.

## 7. Courts' Obligation to Ensure Fairness for Pro Se Litigants

1 Pro se litigants are at a disadvantage when navigating complex legal systems. Courts have a  
2 duty to mitigate this disadvantage by affording procedural safeguards. In *McGuckin v. Smith*, 974  
3 F.2d 1050, 1055 (9th Cir. 1992), the Ninth Circuit recognized that pro se litigants must be given  
4 meaningful opportunities to present their claims. This includes procedural accommodation like  
5 granting the right to reply, particularly in matters involving complex motions such as requests for  
6 preliminary injunctions.

## 8. Liberal Interpretation of Pro Se Pleadings

8 The Court erred by not liberally construing Plaintiff's filings, including the Motion to Amend  
9 Complaint and the Continued Injunction Requests. In *Boag v. MacDougall*, 454 U.S. 364, 365 (1982),  
10 the Supreme Court held that courts must interpret pro se filings with leniency, ensuring that  
11 procedural technicalities do not obstruct justice. By failing to consider Plaintiff's supplementary  
12 filings and arguments, the Court disregarded this principle.

## **9. Improper Exclusion of Supplementary Evidence**

14 The Court’s refusal to consider supplementary evidence attached to Plaintiff’s Motion to Amend  
15 Complaint deprived Plaintiff of the ability to fully substantiate Plaintiff’s claims of harassment and  
16 irreparable harm. In *Foman v. Davis*, 371 U.S. 178, 182 (1962), the Supreme Court emphasized that  
17 amendments and supplementary filings should be freely allowed when justice requires. Plaintiff’s  
18 supplementary evidence, including investigator declarations and witness statements, directly supports  
19 Plaintiff’s claims and should have been considered.

## **PRELIMINARY INJUNCTION STANDARDS**

## 10. . Likelihood of Success on the Merits

22 Plaintiff demonstrated a strong likelihood of success on Plaintiff's harassment claims, supported  
23 by documented threats and witness declarations. In *Winter v. NRDC*, 555 U.S. 7, 20 (2008), the  
24 Supreme Court established that the likelihood of success on the merits is a key factor in granting a

1 preliminary injunction. Plaintiff's detailed evidence of ongoing threats and harassment satisfies this  
2 requirement.

3 **11. Serious Questions on the Merits**

4 Even if success on the merits is not certain, Plaintiff raised fundamental questions that justify  
5 injunctive relief when balanced against the hardships she faces. In *Alliance for the Wild Rockies v.*  
6 *Cottrell*, 632 F.3d 1127, 1135 (9th Cir. 2011). The Ninth Circuit allows a "sliding scale" approach  
7 where significant questions on the merits, combined with significant hardships, can support a  
8 preliminary injunction. Plaintiff's case meets this standard due to the extensive evidence of  
9 harassment.

10 **12. Irreparable Harm is Well-Demonstrated**

11 Plaintiff established that she and her witnesses face irreparable harm, including threats to safety,  
12 emotional distress, and interference with legal proceedings. In *Simula, Inc. v. Autoliv, Inc.*, 175 F.3d  
13 716, 725 (9th Cir. 1999), the Ninth Circuit recognizes that irreparable harm must be immediate and  
14 significant. Plaintiff's evidence of threats and intimidation satisfies this requirement.

15 **13. Balance of Hardships Favors Plaintiff**

16 The balance of hardships strongly favors Plaintiff, as the denial of an injunction leaves Plaintiff  
17 is vulnerable to continued threats and harassment. In *Rodriguez v. Robbins*, 715 F.3d 1127, 1145  
18 (9th Cir. 2013), the court recognized that Courts must weigh hardships and favor the party facing  
19 greater harm. Here, the risks to Plaintiff's safety and judicial participation outweigh any  
20 inconvenience to Defendants.

21 **14. Public Interest Supports Injunction:**

22 Granting the injunction aligns with the public interest by protecting judicial integrity and  
23 ensuring witness safety. In *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015), the Ninth  
24

1 Circuit emphasized that injunctions should advance the public interest, particularly in safeguarding  
2 participants in the judicial process.

3 **HARASSMENT AND WITNESS PROTECTION**

4 **15. Witness Protection is a Judicial Priority**

5 Protecting witnesses from intimidation is essential to maintaining judicial integrity and ensuring  
6 fair proceedings. In *United States v. Fulbright*, 105 F.3d 443, 449 (9th Cir. 1997), the Ninth Circuit  
7 held that courts must act to prevent witness intimidation, as it directly undermines the  
8 administration of justice.

9 **16. Defendant's Threats Constitute Harassment:**

10 Defendant Barresi's statements, including the "soft landing" remark, meet the legal definition of  
11 harassment under California law. Under Cal. Code Civ. Proc. § 527.6(b)(3), harassment includes a  
12 willful course of conduct that causes substantial emotional distress without legitimate purpose.  
13 Defendant's remarks clearly fall within this definition.

14 **17. Unlawful Interference with Witnesses**

15 Defendant's conduct interferes with the ability of witnesses to participate in legal proceedings,  
16 constituting obstruction. Under 18 U.S.C. § 1512, Federal law prohibits tampering with witnesses  
17 through intimidation or threats, underscoring the need for injunctive relief.

18 **18. First Amendment Does Not Protect Harassment**

19 Defendant's speech, including threats and intimidation, is not protected by the First  
20 Amendment. Per *Doe v. Fitzgerald*, 2022 WL 423495, at 4 (C.D. Cal.), harassing speech directed at  
21 specific individuals is outside the scope of constitutional protection.

22 **19. Past Misconduct Predicts Future Harm**

23  
24  
25

1 Defendants' history of harassment and threats is indicative of future harm, justifying injunctive  
2 relief. Per *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953), explains that past conduct is a  
3 reliable indicator of probable future violations.

4 **PUBLIC INTEREST AND BROADER IMPLICATIONS**

5 **20. Judicial Integrity Requires Protection**

6 Allowing harassment of witnesses and participants erodes confidence in the judicial process.  
7 In *United States v. Nixon*, 418 U.S. 683, 708 (1974), the Supreme Court emphasized that courts  
8 must act to preserve public confidence in judicial proceedings.

9 **21. Witness Safety is a Fundamental Interest**

10 Ensuring witness safety is vital to upholding the integrity of the legal system. In *Taylor v. Illinois*,  
11 484 U.S. 400, 409 (1988), the Supreme Court recognized that protecting witnesses is essential for  
12 the truth-seeking function of trials.

13 **GROUNDS FOR OBJECTION**

14 **22. Denial of the Right to File a Reply Violates Procedural Due Process**

15 The Court's denial of Plaintiff's right to file a reply to Defendant's opposition dated  
16 December 13, 2024, constitutes a fundamental procedural error, which deprived Plaintiff of her  
17 constitutional right to a fair hearing. In this case, denying Plaintiff the right to reply to obstructed  
18 Plaintiff's ability to address Defendant's arguments and evidence, directly prejudicing Plaintiff's  
19 ability to advocate for a preliminary injunction.

20 The Supreme Court has held that procedural due process requires notice and an opportunity  
21 to be heard "at a meaningful time and in a meaningful manner." *Matthews v. Eldridge*, 424 U.S.  
22 319, 333 (1976). By denying Plaintiff the opportunity to reply, the Court failed to ensure that all  
23 issues potentially influencing his decision were fully addressed. A reply is critical in addressing new  
24 arguments and evidence raised in opposition and ensuring the Court evaluates the matter based on a

1 complete and balanced record, and every litigant must be afforded a fair opportunity to present their  
2 case, including responding to material introduced by the opposing party.<sup>2</sup>

3 23. Failure to Properly Apply the Four-Part Preliminary Injunction Test

4 The Magistrate Judge's recommendation reflects a failure to correctly apply the established  
5 four-part test for preliminary injunctions as set forth in *Winter v. NRDC*, 555 U.S. 7, 20 (2008) that a  
6 party seeking a preliminary injunction must establish (a) A likelihood of success on the merits, (b) A  
7 likelihood of irreparable harm in the absence of preliminary relief; (c) The balance of equities tips  
8 in their favor; and, (d) The injunction is in the public interest.

9 The Judge's analysis of success on the merits applied too high a standard, requiring clear proof  
10 of harassment rather than evaluating whether the plaintiff raised "serious questions going to the  
11 merits" as allowed by the Ninth Circuit precedent.

12 The Judge's dismissal of Plaintiff's claims of irreparable harm as speculative, citing the delay in  
13 filing the motion as evidence of a lack of urgency. However, this reasoning may not fully account  
14 for ongoing or escalating harm, which can still justify injunctive relief even if there was some delay  
15 in filing.

16 The judge stated that the court was "unable to find that the balance of hardships weighs in the  
17 Plaintiff's favor." However, this conclusion may not have adequately weighed the potential harm to

18  
19 \_\_\_\_\_  
20 <sup>2</sup> Procedural and ministerial errors required a writ of mandamus in a related case, "On August 8, 2022, Fletcher, Heald & Hildreth filed a petition with the Court of Appeals of Virginia for a writ of mandamus directed to the Circuit Court of Fairfax County, Virginia to compel Judge Penney S. Azcarate to release copies of transcripts relating to the Depp v. Heard case or to compel the Fairfax County Circuit Court Clerk, John Frey, to furnish copies of the transcripts. The Court of Appeals concluded that mandamus does lie for the Clerk of Fairfax County Circuit Court..."  
21 "In its Decision, the Virginia Court of Appeals held that it has original jurisdiction to issue writs of mandamus, prohibition, and habeas corpus in cases in which it would have appellate jurisdiction."  
22 "Therefore, Fletcher, Heald & Hildreth was able to open to the public the courthouse files to allow access to records and transcripts of court hearings and trials in Virginia."  
23  
24

25 <https://www.commlawblog.com/2022/12/articles/litigation/fhh-files-mandamus-in-depp-v-heard-case>

1 the plaintiff (ongoing harassment and intimidation) against the minimal burden on the defendant of  
2 refraining from certain communications.

3 The judge briefly dismissed the public interest arguments, stating that granting the injunction  
4 would not serve the public interest in protecting witnesses and maintain the integrity of judicial  
5 proceedings.

6 The Judge's analysis appears to have focused primarily on the first factor (likelihood of success)  
7 without giving equal consideration to the other three factors. This approach may not align with the  
8 requirement to consider all four factors collectively, as mandated by *Winter* and subsequent 9<sup>th</sup>  
9 Circuit decisions. This incomplete analysis undermines the fairness and accuracy of the ruling  
10 including, leading to an unjustified denial of Plaintiff's motion.

11 **24. Exclusion of Supplementary Evidence Constitutes Prejudicial Error**

12 The Magistrate Judge erroneously excluded critical evidence submitted with Plaintiff's Motion  
13 to Amend Complaint, including declarations from private investigators and witnesses, which were  
14 directly relevant to the injunction request. The Supreme Court has held that courts must consider all  
15 relevant evidence to evaluate claims of irreparable harm, particularly in cases involving ongoing  
16 harm, *Bell v. Wolfish*, 441 U.S. 520, 533 (1979). Relevant evidence must be evaluated in its entirety  
17 to assess the necessity of equitable relief. By excluding this evidence, the Court failed to account for  
18 the cumulative threats and intimidation faced by Plaintiff and witnesses, resulting in an incomplete  
19 assessment of irreparable harm.

20 **25. Mischaracterization of Irreparable Harm as Speculative**

21 The recommendation incorrectly dismissed Plaintiff's evidence of irreparable harm as  
22 speculative, despite documented threats, emotional distress, and interference with witnesses. The  
23 Supreme Court clarified that irreparable harm must be "likely," not certain, and that ongoing harm  
24 requiring immediate relief satisfies the criterion. *Winter v. NRDC*, 555 U.S. 7, 22 (2008). Harm that

1 is continuous and directly impacts the ability to access justice or safety meets the threshold for  
2 irreparable injury. Plaintiff provided substantial evidence, including declarations and documented  
3 threats, demonstrating that irreparable harm was not only likely but ongoing, contrary to the Court's  
4 conclusion.

5 **26. Denial of Witness Protection Undermines Judicial Integrity**

6 The Court's refusal to grant an injunction leaves witnesses vulnerable to continued intimidation,  
7 jeopardizing their participation and the integrity of the judicial process. The Ninth Circuit has held  
8 that witness intimidation not only harms individuals but also undermines the integrity of the judicial  
9 process by discouraging truthful testimony and participation. *United States v. Fulbright*, 105 F.3d  
10 443, 449 (9<sup>th</sup> Cir. 1997). Courts have a duty to protect witnesses from threats and intimidation to  
11 ensure the integrity of judicial proceedings. Defendant Barresi's ongoing threats, such as the "soft  
12 landing" comment and other intimidating statements, directly endanger witnesses, requiring  
13 injunctive relief to safeguard judicial integrity.

14 **29. Failure to Account for Past Misconduct as a Predictor of Future Harm**

15 The Magistrate Judge erred by failing to recognize Defendant Barresi's documented history of  
16 harassment as a reliable indicator of future threats, warranting preventative measures.

17 **LEGAL AUTHORITY**

18 In *United States v. W.T. Grant Co.*, 345 U.S. 629, 633 (1953), the Supreme Court emphasized  
19 that past misconduct is a strong predictor of future harm and may justify injunctive relief to prevent  
20 its recurrence. Courts must consider historical behavior when evaluating the likelihood of continued  
21 harm. Here, Defendant's repeated acts of intimidation, including harassing communications and  
22 threats against witnesses, establish a pattern requiring judicial intervention to prevent further harm.

23 **30. Improper Balancing of Equities**

24

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1       The recommendation improperly weighed the balance of hardships, prioritizing Defendant's  
2 minimal inconvenience over Plaintiff's substantial risks to safety and access to justice. In *Rodriguez*  
3 *v. Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013), The Ninth Circuit held that when balancing  
4 equities, courts must favor the party facing greater harm, particularly in cases involving  
5 fundamental rights. The balance of hardships must prioritize the protection of parties facing  
6 immediate and substantial harm over those experiencing minimal inconvenience. Granting an  
7 injunction would impose minimal restrictions on Defendant while preventing significant harm to  
8 Plaintiff and witnesses, tipping the balance decisively in Plaintiff's favor.

9       31. Public Interest Overwhelmingly Supports Injunction

10      The Magistrate Judge's recommendation fails to adequately consider the public interest in  
11 safeguarding judicial integrity, protecting witnesses, and ensuring access to justice.  
12 In *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015), the Ninth Circuit recognized that  
13 injunctions must serve the public interest, particularly in cases involving fundamental legal  
14 protections and the integrity of judicial proceedings.

15       32. Mischaracterizations of First Amendment Protections

16      The Court improperly implied that Defendant's harassing statements may be protected by the  
17 First Amendment, ignoring well-established exceptions for threats and intimidation. In *Doe v.*  
18 *Fitzgerald*, 2022 WL 423495, at 4 (C.D. Cal.), the Court held that harassment and intimidation  
19 directed at specific individuals fall outside the scope of First Amendment protection. The First  
20 Amendment does not protect speech that constitutes harassment, threats, or intimidation intended to  
21 harm others. Defendant's statements, including threats against Plaintiff and witnesses, clearly fall  
22 into the category of unprotected speech, justifying injunctive relief.

23       33. Improper Consideration of Delay in Filing

24

25

1 The recommendation incorrectly penalized Plaintiff for a perceived delay in seeking injunctive  
2 relief, despite the ongoing nature of the harm. In *Miller v. California Pacific Medical Center*, 991  
3 F.2d 536, 544 (9th Cir. 1993), the Ninth Circuit held that delays in seeking relief do not negate  
4 irreparable harm when the harm persists or escalates. Courts must evaluate the ongoing nature of  
5 harm, rather than focusing exclusively on the timing of the motion. Plaintiff's evidence  
6 demonstrates continuous harassment, making the injunction necessary despite any delay in filing.

## PRAYER FOR RELIEF

8 | For the reasons stated, Plaintiff respectfully requests that the Court:

- 9 A. Reject the Magistrate Judge's Report and Recommendation.

10 B. Grant Plaintiff's Emergency Motion for Preliminary Injunction.

11 C. Consider the supplementary evidence provided with the Continued Injunction Requests.

12 D. Allow Plaintiff to file a reply to address the opposition's arguments.

13 E. Issue a Writ of Mandamus, if necessary, to compel appropriate judicial action in the interest

14 of justice.

15 || Dated: January 13, 2025

Respectfully Submitted,

Christie Tapp

**CHRISTINA TAFT**  
*Plaintiff pro se*

## VERIFICATION:

I do hereby verify that the contents of the above Objections to Report and Recommendation  
Denying Preliminary Injunction are true to the best of my knowledge and belief.

21 || Dated: January 13, 2025

Respectfully Submitted,

Christie Taft

**CHRISTINA TAFT**  
*Plaintiff pro se*

1

2 TABLE OF EXHIBITS

3	<b>Exhibit A: Consumer Affairs Order .....</b>	<b>30</b>
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**EXHIBIT A:**  
**Department of**  
**Consumer Affairs**  
**Order dated**  
**12/07/2011**

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NOV-28-2011 14:09 ATTY GENERAL OFFICE

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BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
~~DEPARTMENT OF CONSUMER AFFAIRS~~  
FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

PAUL BARRESI DBA HOLLYWOOD  
CONFIDENTIAL INVESTIGATIONS  
11660 Church Street, #434  
Rancho Cucamonga, CA 91730  
Private Investigator License No. PI 26529

Respondent.

Case No. A1 2010 0805

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Director of Consumer Affairs and the Bureau of Security and Investigative Services as the Decision and Order in the above entitled matter.

This Decision shall become effective on January 7, 2012  
It is so ORDERED DEC 07 2011

*Doretha J. Johnson*  
FOR THE DIRECTOR OF CONSUMER AFFAIRS  
BUREAU OF SECURITY AND INVESTIGATIVE  
SERVICES

*[Signature]*  
TOTAL P.08

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*Attorneys for Complainant*

7  
8 BEFORE THE  
9 DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
STATE OF CALIFORNIA

10  
11 In the Matter of the Accusation Against:

8050  
Case No. A1 2010 0805

12 PAUL BARRESI DBA HOLLYWOOD  
13 CONFIDENTIAL INVESTIGATIONS  
14 11660 Church Street, #434  
15 Rancho Cucamonga, CA 91730  
16 Private Investigator License No. PI 26529

STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER

Respondent

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
18 entitled proceedings that the following matters are true:

19 PARTIES

20 1. Connie Bouvia (Complainant) is the Deputy Chief of the Bureau of Security and  
21 Investigative Services. She brought this action solely in her official capacity and is represented in  
22 this matter by Kamala D. Harris, Attorney General of the State of California, by Shawn P. Cook,  
23 Deputy Attorney General.

24 2. Respondent Paul Barresi dba Hollywood Confidential Investigations (Respondent) is  
25 represented in this proceeding by attorney Graham Berry, Esq., Graham Berry, Esq., whose  
26 address is 3384 McLaughlin Ave., Los Angeles, CA 900663.

27 3. On or about September 2, 2009, the Bureau of Security and Investigative Services  
28 issued Private Investigator License No. PI 26529 to Paul Barresi dba Hollywood Confidential

1  
STIPULATED SETTLEMENT (A1 2010 0805)

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1 Investigations (Respondent). The Private Investigator License was in full force and effect at all  
1 times relevant to the charges brought in Accusation No. A1 2010 0805 and expired on September  
2 30, 2013, unless renewed.  
3

JURISDICTION

4 4. Accusation No. A1 2010 0805 was filed before the Director of Consumer Affairs  
5 (Director), for the Bureau of Security and Investigative Services (Bureau), and is currently  
6 pending against Respondent. The Accusation and all other statutorily required documents were  
7 properly served on Respondent on November 16, 2011. A copy of Accusation No. A1 2010 0805  
8 is attached as exhibit A and incorporated herein by reference.  
9

ADVISEMENT AND WAIVERS

10 5. Respondent has carefully read, fully discussed with counsel, and understands the  
11 charges and allegations in Accusation No. A1 2010 0805. Respondent has also carefully read,  
12 fully discussed with counsel, and understands the effects of this Stipulated Settlement and  
13 Disciplinary Order.

14 6. Respondent is fully aware of his legal rights in this matter, including the right to a  
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at  
16 his own expense; the right to confront and cross-examine the witnesses against him; the right to  
17 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel  
18 the attendance of witnesses and the production of documents; the right to reconsideration and  
19 court review of an adverse decision; and all other rights accorded by the California  
20 Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
22 every right set forth above.

CULPABILITY

23 8. Respondent admits the truth of each and every charge and allegation in Accusation  
24 No. A1 2010 0805.  
25  
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1       9. Respondent agrees that his Private Investigator License is subject to discipline and he  
1       9. ~~Respondent agrees that his Private Investigator License is subject to discipline and he~~ set forth in the Disciplinary Order  
2       agrees to be bound by the Director's imposition of discipline as set forth in the Disciplinary Order  
3       below.

CONTINGENCY

4       10. This stipulation shall be subject to approval by the Director of Consumer Affairs or  
5       his designee. Respondent understands and agrees that counsel for Complainant and the staff of  
6       the Bureau of Security and Investigative Services may communicate directly with the Director  
7       and staff of the Department of Consumer Affairs regarding this stipulation and settlement,  
8       without notice to or participation by Respondent or his counsel. By signing the stipulation,  
9       Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the  
10      stipulation prior to the time the Director considers and acts upon it. If the Director fails to adopt  
11      this stipulation as the Decision and Order, the Stipulated Settlement and Disciplinary Order shall  
12      be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action  
13      between the parties, and the Director shall not be disqualified from further action by having  
14      considered this matter.

16       11. The parties understand and agree that facsimile copies of this Stipulated Settlement  
17      and Disciplinary Order, including facsimile signatures thereto, shall have the same force and  
18      effect as the originals.

19       12. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an  
20      integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
21      It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
22      negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary  
23      Order may not be altered, amended, modified, supplemented, or otherwise changed except by a  
24      writing executed by an authorized representative of each of the parties.

25       13. In consideration of the foregoing admissions and stipulations, the parties agree that  
26      the Director may, without further notice or formal proceeding, issue and enter the following  
27      Disciplinary Order:

28       111

(Page 7 of 170)

Dec 01 11 11:27a GRAHAM E BERRY  
12/05/09 12:08PM HP LASERJET FAX  
NOV-26-2011 14:09 RTTY GENERAL OFFICE

3107453771 p.6  
p.01  
2138975328 P.06

DISCIPLINARY ORDER  
DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Private Investigator License No. PI 26529 issued to Respondent Paul Barresi dba Hollywood Confidential Investigations (Respondent) is revoked.

ACCEPTANCE

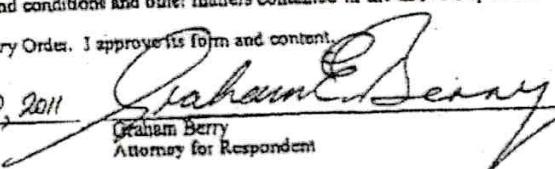
I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Graham Berry. I understand the stipulation and the effect it will have on my Private Investigator License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of Consumer Affairs.

DATED: Nov 29, 2011

  
PAUL BARRESI DBA HOLLYWOOD  
CONFIDENTIAL INVESTIGATIONS  
Respondent

I have read and fully discussed with Respondent Paul Barresi dba Hollywood Confidential Investigations the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: Nov. 30, 2011

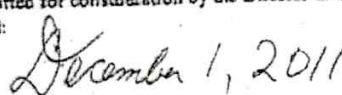
  
Graham Berry  
Attorney for Respondent

ENDORSEMENT

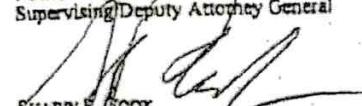
The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Director of Consumer Affairs.

Respectfully submitted,

Dated:

  
December 1, 2011

KAMALA D. HARRIS  
Attorney General of California  
MARC D. GREENBAUM  
Supervising Deputy Attorney General

  
SHAWN F. COOK  
Deputy Attorney General  
Attorneys for Complainant

LA2011500874

4  
STIPULATED SETTLEMENT (A1 2010 0805)

(Page 9 of 170)

1 KAMALA D. HARRIS  
2 KAMALA D. HARRIS  
Attorney General of California  
3 MARC D. GREENBAUM  
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Telephone: (213) 897-9954  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

7 BEFORE THE  
8 DEPARTMENT OF CONSUMER AFFAIRS  
9 FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
STATE OF CALIFORNIA

10  
11 In the Matter of the Accusation Against:  
12 PAUL BARRESI DBA HOLLYWOOD  
CONFIDENTIAL INVESTIGATIONS  
13 11660 Church Street, #434  
Rancho Cucamonga, CA 91730  
14 Private Investigator License No. PI 26529  
15 Respondent.

Case No. A1 2010 8050

ACCUSATION AND PETITION TO  
REVOKE PROBATION

16  
17 Complainant alleges:

18 PARTIES

19 1. Connie Trujillo (Complainant) brings this Accusation solely in her official capacity as  
20 the Deputy Chief of the Bureau of Security and Investigative Services, Department of Consumer  
21 Affairs.

22 2. On or about September 2, 2009, the Bureau of Security and Investigative Services  
23 issued Private Investigator License Number PI 26529 to Paul Barresi dba Hollywood Confidential  
24 Investigations (Respondent). The Private Investigator License was immediately revoked, with  
25 revocation stayed, and Respondent placed on three (3) years probation subject to certain terms  
26 and conditions. A true and correct copy of the terms and conditions of probation imposed on  
27 Respondent's license are attached hereto as Exhibit A. The Private Investigator License was in

(Page 10 of 170)

1 full force and effect at all times relevant to the charges brought herein and will expire on  
1 full force and effect at all times relevant to the charges brought herein and will expire on  
2 September 30, 2012, unless renewed

3 JURISDICTION

4 3. This Accusation and Petition to Revoke Probation is brought before the Director of  
5 Consumer Affairs (Director) for the Bureau of Security and Investigative Services, under the  
6 authority of the following laws. All section references are to the Business and Professions Code  
7 unless otherwise indicated.

8 4. Section 22 of the Code states:

9 "(a) 'Board' as used in any provisions of this Code, refers to the board in which the  
10 administration of the provision is vested, and unless otherwise expressly provided, shall include  
11 'bureau,' 'commission,' 'committee,' 'department,' 'division,' 'examining committee,' 'program,' and  
12 'agency.'

13 "(b) Whenever the regulatory program of a board that is subject to review by the Joint  
14 Committee on Boards, Commissions, and Consumer Protection, as provided for in Division 1.2  
15 (commencing with Section 473), is taken over by the department, that program shall be  
16 designated as a 'bureau.'

17 5. Section 118, subdivision (b), of the Code provides that the suspension/ expiration/  
18 surrender/ cancellation of a license shall not deprive the Board/Registrar/Director of jurisdiction  
19 to proceed with a disciplinary action during the period within which the license may be renewed,  
20 restored, reissued or reinstated.

21 6. Section 150 of the Code states: "The department is under the control of a civil  
22 executive officer who is known as the Director of Consumer Affairs."

23 7. Section 475 of the Code states:

24 "(a) Notwithstanding any other provisions of this code, the provisions of this division shall  
25 govern the denial of licenses on the grounds of:

26 "(1) Knowingly making a false statement of material fact, or knowingly  
27 omitting to state a material fact, in an application for a license.

28 "(2) Conviction of a crime.

(Page 11 of 170)

"(3) Commission of any act involving dishonesty, fraud or deceit with the intent to substantially benefit himself or another, or substantially injure another.

"(4) Commission of any act which, if done by a licensee of the business or profession in question, would be grounds for suspension or revocation of license.

"(b) Notwithstanding any other provisions of this code, the provisions of this division shall govern the suspension and revocation of licenses on grounds specified in paragraphs (1) and (2) of subdivision (a).

"(c) A license shall not be denied, suspended, or revoked on the grounds of a lack of good moral character or any similar ground relating to an applicant's character, reputation, personality, or habits."

8. Section 477 of the Code states:

As used in this division:

"(a) 'Board' includes 'bureau,' 'commission,' 'committee,' 'department,' 'division,' 'examining committee,' 'program,' and 'agency.'

"(b) 'License' includes certificate, registration or other means to engage in a business or profession regulated by this code."

9. Section 480 of the Business and Professions Code provides, in pertinent part, that a board may deny a license if the applicant has been convicted of a crime substantially related to the qualifications, functions or duties of the business or profession for which application is made, has committed any act involving dishonesty, fraud or deceit, has committed any act which if done by a licensee would be grounds for suspension or revocation of a license, or has knowingly made a false statement of fact required to be revealed in the application.

10. Section 490 of the Code provides, in pertinent part, that a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued..

11. Section 493 of the Code states:

(Page 12 of 170)

1       "Notwithstanding any other provision of law, in a proceeding conducted by a board within  
1       "Notwithstanding any other provision of law, in a proceeding conducted by a board within  
2       the department pursuant to law to deny an application for a license or to suspend or revoke a  
3       license or otherwise take disciplinary action against a person who holds a license, upon the  
4       ground that the applicant or the licensee has been convicted of a crime substantially related to the  
5       qualifications, functions, and duties of the licensee in question, the record of conviction of the  
6       crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,  
7       and the board may inquire into the circumstances surrounding the commission of the crime in  
8       order to fix the degree of discipline or to determine if the conviction is substantially related to the  
9       qualifications, functions, and duties of the licensee in question.

10       "As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and  
11       'registration.'"

12       12. Section 7512.1 of the Code states that as used in this chapter, "director" means the  
13       Director of Consumer Affairs.

14       13. Section 7520 of the Code states that no person shall engage in a business regulated by  
15       this chapter; act or assume to act as, or represent himself or herself to be, a licensee unless he or  
16       she is licensed under this chapter; and no person shall falsely represent that he or she is employed  
17       by a licensee.

18       14. Section 7531 of the Code provides that a licensee shall at all times be legally  
19       responsible for the good conduct in the business of each of his or her employees or agents,  
20       including his or her manager.

21       15. Section 7538 of the Code states in pertinent part:

22       "After a hearing the director may deny a license unless the applicant makes a showing  
23       satisfactory to the director that the applicant, if an individual, has not, or if the applicant is a  
24       person other than an individual, that its manager and each of its officers have not:

25       "(a) Committed any act, which, if committed by a licensee, would be a ground for the  
26       suspension or revocation of a license under this chapter.

27       "(b) Committed any act constituting dishonesty or fraud.

28

(Page 13 of 170)

1                 "(c) Committed any act or crime constituting grounds for denial of licensure under Section  
1                 "(c) Committed any act or crime constituting grounds for denial of licensure under Section  
2                 480, including illegally using, carrying, or possessing a deadly weapon.

3                 16. Section 7539, subd. (b) of the Code states: "No licensee or officer, director, partner,  
4                 manager, or employee of a licensee shall knowingly make any false report to his or her employer  
5                 or client for whom information was being obtained."

6                 17. Section 7561.1 of the Code provides in pertinent part: "The director may deny,  
7                 suspend, or revoke a license issued under this chapter if he or she determines that the licensee or  
8                 his or her manager, if an individual, or if the licensee is a person other than an individual, that any  
9                 of its officers, directors, partners, or its manager, has:

10                 (I) Committed any act which is a ground for denial of an application for a license under this  
11                 chapter."

12                 18. Section 7561.4 of the Code provides in pertinent part that the director may suspend or  
13                 revoke a license issued under this chapter if he or she determines that the licensee or his or her  
14                 manager, if an individual, or if the licensee is a person other than an individual, that any of its  
15                 officers, directors, partners, or its manager, has committed any act in the course of the licensee's  
16                 business constituting dishonesty or fraud.

17                 "Dishonesty or fraud" as used in this section, includes, in addition to other acts not  
18                 specifically enumerated herein:

19                 "(a) Knowingly making a false statement relating to evidence or information obtained in the  
20                 course of employment, or knowingly publishing a slander or a libel in the course of business.

21                 ....

22                 "(c) Manufacture of evidence.

23                 19. Section 7562 of the Code provides that the record of conviction, or a certified copy  
24                 thereof, shall be conclusive evidence of the conviction as that term is used in this article, or  
25                 sections 7538 or 480. A plea or verdict of guilty or a conviction following a plea of nolo  
26                 contendere is deemed a conviction within the meaning of this article, or sections 7538 or 480.

27                 20. Section 125.3, subdivision (a), states, in pertinent part: "Except as otherwise  
28                 provided by law, in any order issued in resolution of a disciplinary proceeding before any board

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1 within the department . . . the board may request the administrative law judge to direct a licensee  
1 within the department . . . the board may request the administrative law judge to direct a licensee  
2 found to have committed a violation or violations of the licensing act to pay a sum not to exceed  
3 the reasonable costs of the investigation and enforcement of the case."

## ACCUSATION

#### FIRST CAUSE FOR DISCIPLINE

(Dishonesty or Fraud-False Statement)

7       21. Respondent is subject to disciplinary action under section 7561.4, subd. (a), in that  
8       Respondent has knowingly made a false statement relating to evidence or information obtained in  
9       the course of employment, or knowingly published a slander or a libel in the course of business.  
10      The circumstances are as follows:

11       22. In or about April and May, 2010, Respondent, identifying himself as a private  
12 investigator, contacted the human resources department at Pomona Valley Hospital Medical  
13 Center (PVH) and informed them that he was conducting an investigation against [REDACTED]  
14 ([REDACTED]), who worked at PVH as a registered nurse in the Neo-natal ICU. Thereafter, PVH  
15 officials conducted a pharmaceutical inventory check for drugs and controlled substances  
16 accessible to [REDACTED] and found no discrepancies and that Respondent's allegations were without  
17 merit.

18       23. On or about May 11, 2010, Respondent wrote a letter addressed to Pomona Valley  
19 Hospital Medical Center (PVH) and the Hesperia, CA police department, with a letterhead stating  
20 "PAUL BARRESI STATE OF CALIFORNIA PRIVATE INVESTIGATOR, License No.  
21 P126529." In the letter, Respondent made false statements concerning [REDACTED]

22 [REDACTED], a registered nurse employed at PVH and with whom Respondent had a previous  
23 relationship. Respondent published the following false statements about [REDACTED]

24 a. [REDACTED] met Respondent's process server at her door on May 11, 2010 holding a glass  
25 pipe (controlled substance apparatus) in her hand.

26 b. [REDACTED] yelled and screamed uncontrollably at the process server and appeared  
27 disoriented.

b. [REDACTED] yelled and screamed uncontrollably at the process server and appeared disoriented.

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1           24. By letter dated June 25, 2010, Respondent wrote to the human resources department  
1           24. By letter dated June 25, 2010, Respondent wrote to the human resources department  
2 at PVH and admitted that the allegations he had made in April and May, 2010 against [REDACTED]  
3           alleging drug abuse is absolutely false and without fact or basis." Respondent further admitted  
4           that he "lodged said claims out of retaliation because [REDACTED] had terminated our relationship" and  
5           stated that [REDACTED] was "an extremely competent, highly respected, conscientious nurse, at the top  
6           of her field, and not once did she ever demonstrate the slightest indication to the contrary."

7           25. On or about May 26, 2010, Respondent wrote a letter referenced "DRUG ABUSE  
8 COMPLAINT: [REDACTED], CA Registered Nurse" addressed to the California Board  
9 of Nursing, attention "NURSE COMPLAINT EXAMINERS", with a letterhead stating "PAUL  
10 BARRESI CALIFORNIA STATE PRIVATE INVESTIGATOR, LIC. NUM. P126529." In the  
11 letter, Respondent published the following false statements concerning Alvarez under penalty of  
12 perjury:

13           a. [REDACTED] filed a petition for TRO against Respondent after Respondent told her that  
14           he intended to report her for "drug abuse (Smoking methamphetamine and use of non-prescribed  
15           prescription drugs.)"

16           b. Respondent personally witnessed [REDACTED] take his "own personal doctor prescribed  
17           medication."

18           c. Respondent witnessed [REDACTED] take on "characteristics and symptoms associated with  
19           methamphetamine abuse, including unexplained rise in her body temperature (low grade fevers),  
20           tweaking, eye twitching, high blood pressure, liver pain, mood swings, weight gain, extreme  
21           weight loss, insomnia, irritability and dilated pupils."

22           d. Respondent stated that after he had been "dating" [REDACTED] for two months, [REDACTED]  
23           asked him to "run a criminal check on" [REDACTED] male housemate, "confiding that [the  
24           housemate] was not forthcoming with [REDACTED] on the extent of his drug abuse".

25           e. Respondent stated that [REDACTED] "drug abuse is low intensity and she prefers to smoke  
26           it, the potential harm and possible death she may cause in her profession should not go  
27           uninvestigated."

28

(Page 16 of 170)

f. Respondent stated that [REDACTED] on May 11, 2010, appeared at the door when  
f. Respondent stated that [REDACTED] on May 11, 2010, appeared at the door when  
Respondent's process server attempted to serve her and that [REDACTED] was "disoriented, screaming  
at him out of control, and holding a glass pipe (apparatus used for smoking crystal meth)."

26. By letter dated July 2, 2010, Respondent wrote to the Department of Consumer Affairs, Board of Registered Nursing ("Board"), and admitted that the allegations he had made in his complaint that he filed with the Board against [REDACTED] alleging drug abuse "was without fact or basis and is completely and utterly false." Respondent further admitted that he "lodged said complaint" alleging drug use "from an evil and improper motive on my part, for no reason other than to retaliate against her for having broken off a year long relationship I had with her. . . . The truth is that I have never seen her take a controlled substance of any kind whatsoever, prescription drugs or otherwise."

## SECOND CAUSE FOR DISCIPLINE

(Slander/or Libel in the Course of Business)

14       27. Respondent is subject to disciplinary action under section 7561.4, subd. (a), in that  
15       Respondent has knowingly published a slander or a libel in the course of business. The  
16       circumstances are as alleged in the preceding paragraphs 22 through 26 and all subparts, which  
17       are incorporated here by this reference.

### THIRD CAUSE FOR DISCIPLINE

(Manufacturing Evidence)

20       28. Respondent is subject to disciplinary action under section 7561.4, subd. (c), in that  
21 Respondent has manufactured evidence. The circumstances are as alleged in the preceding  
22 paragraphs 22 through 26 and all subparts, which are incorporated here by this reference.

#### FOURTH CAUSE FOR DISCIPLINE

**(Making False Report)**

25        29. Respondent is subject to disciplinary action under section 7539 subd. (b), in that  
26        Respondent made a false report. The circumstances are as alleged in the preceding paragraphs  
27        25, subpart (d) and 26.

28 // 111

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FIFTH CAUSE FOR DISCIPLINE  
FIFTH CAUSE FOR DISCIPLINE

(Acts that Would be Grounds for Denial)

30. Respondent is subject to disciplinary action under section 7561., subd. (l) in  
conjunction with sections 7538, subdivisions (a) through (c), and 480. The circumstances are as  
alleged in the preceding paragraphs 22 through 26 and all subparts, which are incorporated here  
by this reference.

PETITION TO REVOKE PROBATION

FIRST CAUSE FOR REVOCATION

(Obey All Laws)

31. Respondent's probation with the Bureau contained as Condition Six, the requirement  
that Respondent "[s]hall obey all federal, state and local laws and all rule and regulations  
governing the programs regulated by the Bureau."

32. Respondent has violated the term and condition of his probation that he obey all laws.  
The circumstances are as alleged in the preceding paragraphs 22 through 26 and all subparts,  
which are incorporated here by this reference.

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Accusation and Petition to Revoke Probation

Page 14 of 170

1  
2  
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4  
5  
6  
7 PRAYER  
8

9 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
10 and that following the hearing, the Director of Consumer Affairs issue a decision:

- 11 1. Revoking or suspending Private investigator License Number PI 26529, issued to  
12 Paul Barresi dba Hollywood Confidential Investigations;
- 13 2. Ordering Paul Barresi to pay the Bureau of Security and Investigative Services the  
14 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
15 Professions Code section 125.3;
- 16 3. Lifting the stay of revocation imposed under Paul Barresi's existing probation with  
17 the Bureau and revoking Private Investigator License Number PI 26529, issued to Paul Barresi  
18 dba Hollywood Confidential Investigations, and
- 19 4. Taking such other and further action as deemed necessary and proper.

20 DATED: July 7, 2011

21 

22 CONNIE TRUJILLO  
23 Deputy Chief  
24 Bureau of Security and Investigative Services  
Department of Consumer Affairs  
State of California  
*Complainant*

25 LA2011500874  
26 accusation.rtf

## **Exhibit B: Declaration of Ian Herndon**

1                   **DECLARATION OF IAN HERNDON**

2                   **STATE OF FLORIDA**

3                   **COUNTY OF PINELLAS**

4 Ian Herndon, being duly sworn, deposes and says:

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

8 I am above the age of 18 and reside in Florida. At the time of these events, I  
9 resided in Florida

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

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

15  
16 1. I am a witness that has personal knowledge of Defendants Paul Barresi and  
17 Adam Waldman of their continuous harm, harassment, threats to kill, threats to  
18 assault, and maliciousness against Witnesses, Victims of Assaults, and Taft with  
19 intimidating and dangerous activities to interfere to obstruct reports to law  
20 enforcement and testimony for cases.

21 2. I first became aware of Paul Barresi through Richard Albertini. Albertini  
22 appeared to be in communication with Barresi at the time, and manipulated and  
23 provoked by him. I've witnessed Barresi threaten death, mortality, and danger to  
24 people.

25 3. I witnessed the coercion caused by Barresi against Angela and Plaintiff Taft  
26 when he obtained an audio recording of their conversation speaking of abuse and  
27 violence in 2022. Angela completely shifted after Barresi communicated with her  
28 after he became aware of her and I being in contact. To this day, and between 2022

1 to 2025, I observed that Angela and Taft are being coerced by Barresi. I witnessed  
2 the death threats of Barresi towards Angela and his intent to signal Taft to fear  
3 mortality and personal danger.

4 4. Richie and I met when he was having a dispute with Corey Feldman about  
5 Johnny Depp's Viper Room. Approximately 2019 to 2020, Richie and I went back  
6 and forth.

7 5. Richie Albertini introduced me to Angela, who is Jane Doe in Plaintiff Taft's  
8 lawsuit, and advised me that Angela was a victim of a famous actor who wasn't  
9 going to speak out about it, and Richie didn't want to talk with her any longer.

10 6. Richie gave me Angela's contact information and upon making contact with her  
11 first. Angela, though a victim of assault by Marton Csokas, was in contact with  
12 Richie and Richie was angry because of Johnny Depp. Back then he was  
13 affirmatively against Johnny Depp. I did not approve of the way he was treating  
14 her. Angela told me that Richie criticized her experience with Marton and other  
15 past abusive circumstances.

16 7. From that moment forward, Angela talked to me directly about having been  
17 abused by Marton Csokas. After getting to know each other over a period of  
18 months, they made plans to finally meet in person in Louisiana, during the 2015  
19 filming season 2 of the Badlands.

20

21 8. On November 25, 2020, Angela and I spoke with each other directly by phone  
22 for hours multiple nights in a row. Angela told me she first communicated with  
23 Marton Csokas online, then eventually met him in New Orleans in 2015, and was  
24 drugged and kept for days to torture and sexually assault her. Angela advised that  
25 she had to be taken to the hospital, and also provided graphic photos to depict her  
26 injuries.

27 9. Angela sent me photos of injuries to depict how she was tortured by Martin, and  
28 I have knowledge of a letter that was threatening her.

1       10. Paul Barresi silenced what Marton did to Angela for years by making her afraid  
2       of retaliation.  
3       11. Angela told me over the phone that a man named Paul Barresi showed up at  
4       locations she was at and in one instance pointed a gun at her face.  
5       12. Angela told me on multiple occasions there are about ten women who are also  
6       victims of Csokas, and how one was in the middle of a Court case in Italy with  
7       Marton at the time. Angela said the custody court case was after the young woman  
8       had been raped by Marton and had a child.  
9       13. Angela stated to me she is afraid to pursue anything criminally against Marton  
10      related to raping or torturing her, over a period of multiple days, and is afraid to  
11      pursue anything against or about Paul Barresi.  
12      14. On November 25, 2020 at 1:27pm, Angela forwarded a copy of a letter, an  
13      email from Eric Hessler (hessler.law@gmail.com, attorney at law from New  
14      Orleans, Louisiana to Richie Albertini. The original email date stamp was April  
15      21st 2015 at 1:32pm with the email subject titled Marton Csokas. – In summary it  
16      states: The author of the letter has been contacted by Marton Csokas regarding a  
17      possible police investigation by the New Orleans Police Department regarding  
18      reports of false imprisonment and sexual torture. The author of this letter  
19      references Marton Csokas and Eric Hessler as if they are not the authors of this  
20      letter and instead a third individual is.  
21      15. The letter further advises with “unyielding advice” for Angela to not move  
22      forward in any way regarding Marton Csokas and the New Orleans Police.  
23      16. Furthermore, the letter also states that attorney Erirc J Hessler is aware of the  
24      criminal report of torture & assault, and if Angela moves forward with her police  
25      case actions, Eric Hessler will charge Angela.  
26      17. In this same letter, Angela was also instructed that Eric Hessler would be  
27      checking Angela’s phone on a regular basis to *illegally* identify her location and/or  
28      scare Angela into believing she could be located at any time.

1       18. Additionally, the letter states if Marton Csokas name is released in the media,  
2 not only should Angela be afraid of the police, but she should be afraid of the  
3 author of this letter because as stated "*I myself will come and find you and the*  
4 *consequences of that will be dire*"  
5       19. Angela advised me on numerous occasions that a Hollywood Fixer, believed to  
6 be Paul Barresi, was sent to intimidate and silence her, and at one point he showed  
7 up where she was in person and pointed a gun at her head.  
8       20. After some time speaking with Angela, it became clear she was far too scared  
9 to expose anything about what happened to her in 2015 at the hands of Marton  
10 Csokas.  
11      21. Not long after learning about this letter, Richie Albertini started repeatedly  
12 posting copies of her medical injury photos publicly on Twitter. This action by  
13 Richie Albertini immediately alarmed and worried Angela, because she stated to  
14 me she was deathly afraid of Paul Barresi thinking she is talking about what  
15 Marton Csokas did to her in 2015.  
16      22. Richie Albertini provided my personal contact info as well as my wife's,  
17 directly to Paul Barresi.  
18      23. Paul Barresi having my name and contact # was immediately concerning to me  
19 due to me already hearing directly from Angela what he has done to her.  
20      24. Paul Barresi called my wife and said "Your husband needs to stop". I have  
21 knowledge that she told Barresi, 'I have no clue what you are talking about' and  
22 hung up.  
23      25. While fact checking Richard Albertini on the things he stated previously about  
24 his past affiliation with Johnny Depp's club named 'The Viper Room' as well as  
25 various acquaintances Richie claimed to know, I contacted Olivia Barash on July  
26 24, 2021 at 2:02PM and asked if she can confirm that Richie Albertini ever worked  
27 at The Viper Room.  
28

1       26. Olivia responded quickly, just a day later on July 25 at 1:20pm, and asked  
2 stated “Whats up? The timing of your inquiry, is odd. Are you making a Viper  
3 Room documentary, too? Lol Can you give me some more info”  
4       27. In my next response to Olivia, I clarified that I am not making a documentary,  
5 and instead I was threatened by Richard Albertini that I would be highlighted in  
6 some documentary he is part of regarding the Viper Room.  
7       28. Olivia never responded to me again after her first response, but later I received  
8 a copy of a text message from Olivia to Richie Albertini, advising him that Olivia  
9 was offered \$20k by Barresi regarding her involvement in a documentary about the  
10 Viper Room.  
11      29. These events surrounding Olivia and a documentary led me to believe there is  
12 clear coercion and attempts to silence individuals who worked at the Viper Room  
13 and/or around Johnny Depp.  
14      30. After losing contact with Olivia via LinkedIn, Richard Albertini, still provoked  
15 by Defendant Paul Barresi and Defendant Adam Waldman, began targeting other  
16 female victims of assault.  
17      31. Based on my time interacting with Richie Albertini since 2020, I believe he  
18 and Paul Barresi were collaborating. What I have seen regarding Paul Barresi and  
19 Richie Albertini, shows indications of individuals who are trying to silence victims  
20 of famous individuals.  
21      32. Sometime between 2021 and 2023, Paul Barresi personally produced a copy of  
22 the letter with the header for Eric Hessler law, and that letter has Paul Barresi’s  
23 name removed from it.  
24      33. Paul claims the letter is fake, purely by producing a second version that is  
25 identical except for Paul’s name being removed.  
26      34. Paul admitted to not only being aware of the letter in 2020 after Angela had  
27 shared it with Richie and myself, but that he also possessed his very own copy of it  
28 (although conveniently with his name missing).

1       35. Paul did not realize that despite refuting the authenticity of the letter as a  
2 whole, he accidentally validated the authenticity of her claims and the remarks of  
3 the letter from 2015 the moment he produced a copy himself. Paul's name not  
4 being included on the letter changes nothing about the facts contained within the  
5 letter, such as the repeated threatening remarks.

6       36. The email address Angela received the threatening letter from,  
7 Hessler.law@gmail.com needs data from it subpoenaed for any account activity  
8 the month prior, during, and after Angela received the email from that address:  
9 March 2015, April 2015, and May 2015.

10      37. I observed in 2022 when Paul Barresi became aware of Christina Taft's support  
11 for Amber Heard and Witnesses, including Richie Albertini, that he began  
12 targeting Taft.

13      38. I observed that Barresi was inciting Albertini to attack Taft, as I observed of  
14 their behavior prior. Christina stated to me she felt unable to help Angela due to  
15 the audio tape Barresi obtained of them speaking together and exploiting them.

16

17      39. I observed that Taft did not retract that Richie was a witness against Depp and  
18 that Angela was victimized by Csokas despite coercion and manipulation by  
19 Defendants Barresi and Waldman.

20      40. In the last 2 years I have known Christina Taft, she has been afraid for her life,  
21 and concerned Paul Barresi is going to find her or send someone to harm her. At  
22 one point she told me she had to move out of the state of California all the way to  
23 Hawaii just for some sense of safety from Paul Barresi.

24

25      41. Roberta Kaplan told me on the phone that when she joined the legal team, she  
26 removed Barresi off Amber's case.

27      42. From 2022 to this very day, I have observed Christina Taft be in constant fear  
28 of Paul Barresi, supported by ongoing contact by him using threatening and

1 harassing language. I fully support Taft getting a restraining order and injunctions  
2 against Defendants and Barresi being restrained from contacting witnesses to  
3 harass them or invade their privacy.

4

5 43. I have observed Paul Barresi obtaining commercial gain through reputational  
6 enhancement. I saw his book titled, "Johnny Depp's Accidental Fixer" and many  
7 different articles with him that he can solve any problem without any boundaries  
8 up to and including murder. High profile people are seeing his association with  
9 Johnny Depp, and in turn it portrays that he is valuable to them as a 'fixer.'

10

11 44. Based on my personal witness interactions with Paul Barresi and witnesses  
12 manipulated by Barresi, including Richie Albertini, I am afraid of them and others  
13 should be too. My exposure to Paul and potential witnesses he manipulates has  
14 shown me they are exploitative of other individuals living through complex and  
15 difficult criminal situations.

16

17 I attest that lines 207, and 267, of the lawsuit of Plaintiff Taft are true and correct;  
18 and all lines in the footnotes of the lawsuit referencing myself are true and correct.

19

20 I have additional knowledge and information I can declare and attest to, inclusive  
21 of defendants ongoing activities.

22

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

27

28

DATED this 10th day of January, 2025.

Signed: Ian Herndon

Name: Ian Travis Herndon

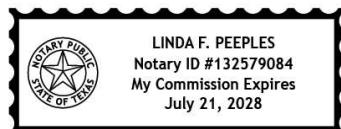
State of Texas  
County of Brazoria

**SUBSCRIBED and SWORN to before me**

this 10th of January, 2025. By Ian Travis Herndon.  
Linda F. Peeples, Online Notary Public

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

**OFFICIAL SEAL**



This notarial act was an online notarization via  
two-way webcam and audiovisual technology.

Produced Florida Driver License as identification along with multi-factor KBA authentication.

**Exhibit C:  
Declaration of  
Michael  
Kountz**

1  
2                   **DECLARATION OF MICHAEL KOUNTZ**  
3  
4                   **STATE OF NEW MEXICO )**  
5                    ) SS:  
6                   **COUNTY OF BERNALILLO )**

7 Michael Kountz, being duly sworn, deposes and says:  
8  
9 I am a Witness in the matters of Case 5:24-cv-01930-TJH-DTB (Taft v. Paul Barresi, Adam R.  
10 Waldman, and Does 1-10), currently pending in the U.S. District Court of the Central District of  
California.

11 I am above the age of 18 and reside in New Mexico. At the time of these events, I resided in  
12 New Mexico.

13 The facts stated in this affidavit are true and correct to the best of my knowledge and belief.  
14 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.

15                   **Events**  
16  
17 1. I am a licensed private investigator in New Mexico. Plaintiff Taft requested help from  
18 Superior Investigations on May 1, 2023 to locate and interview James Conner regarding an audio  
recording contained in an edited video by Paul Barresi which claimed to portray a phone call  
between Paul Barresi and James Conner. Taft understood that we adhere to legal practices, that  
we have witnesses feel safe to speak, and she was in fear from the coercion by Defendants.  
Plaintiff Taft was exploited by this tape for some time. I have knowledge there were fearful  
voicemails left to Superior Investigations and Auriella, while she was in Colorado while visiting  
witness Joe Triscari.

20 2. It is my belief that the audio by Paul Barresi was exploited on purpose to be used to facilitate  
21 tactics similar to blackmail, and use of the audio, inclusive of either with influence on the  
witness and/or edits, was essential for him to do this.

23 3. I located and interviewed James Conner in June of 2023. James Conner advised me he was a  
24 licensed private investigator. I observed that Conner appeared to be disabled by his own  
admission.

1  
2 4. James Conner advised that he was not aware of the audio recording contained in edited videos  
3 by defendant Paul Barresi, which contained allegedly James Conner speaking about Plaintiff  
Christina Taft. James Conner advised that he did not know he was being recorded by Defendant  
Barresi during a phone call to him by Barresi.

4  
5 5. James Conner advised that he did not give permission to be recorded by Barresi.

6  
7 6. James Conner advised me that the audio was taken out of context. He further advised me that  
the audio did not reflect the actual nature of the conversation in which Conner had with  
Defendant Barresi.

8  
9 7. James Conner advised me that he did not consent to the use of his voice in that manner and  
desired help in having the audio and the videos removed.

10  
11 8. James Conner further advised me that the things he was portrayed as saying in the call  
regarding Plaintiff Taft were hearsay.

12  
13 9. After leaving the interview with James Conner, I received a phone call from him advising me  
that Paul Barresi was dangerous, and that he was in fear for his life due to his involvement.

14  
15 10. James Conner then advised that he was flying to his property in Alaska out of fear of reprisal  
from Barresi, and that I should be careful about my involvement with Defendant Barresi, as I  
could face reprisal as well.

16  
17 11. I reviewed the audio tape contained in the video by Barresi. Contained in the audio tape done  
by Paul Barresi of purportedly James Conner, are alterations that he was an FBI agent and that  
her mother Victoria Taft had witnessed a mob murder by the Gotti's. It distressed Taft about her  
mother Victoria Taft and her death. James Conner advised me he was never an FBI agent. The  
tape showed images of a man dead allegedly from the mafia, members of the mafia, and a gun.  
In the beginning of the tape, Barresi discussed a photo of Amber Heard with Plaintiff Taft to  
James Conner, that they were arm in arm, yet at the same time indicating danger to life through  
comparing to an assailant. I have information that Plaintiff is still fearful to this day that this  
audio tape is either to make someone shoot her or to shoot Amber. Or that a death could occur. I  
have information that Defendant Barresi acted aggressively to terrify Taft and others contained  
in the content of the audio tape.

23  
24 12. I was informed by Taft that she had an "Executive Protector PI" Juan Brooks for multiple  
months in 2023 with continuing fear and activities by Defendants.

1  
2 13. Taft stated her mother had connections to Hollywood and although she'd been in social  
3 circles, never had any relation to these groups. Taft feared this was an underlying threat to her  
4 constantly, that she should be afraid of a murder of her or other people. James did not mention  
5 Gotti to me. Taft showed a photo that Barresi released referring to her and other witnesses of  
6 himself with Victoria Gotti where he wrote "Gambino family gathering" and Johnny Depp  
within the context. While I was on a call with Auriella, Auriella asked Taft if this had to do with  
Depp, and she was hesitant to say a case connection.

7 14. I have personal knowledge that Aurelia Barajas and I had a telephone interview with Jesse  
8 Adams at the Department of Consumer Affairs against Barresi's coercion. Mr. Adams accepted  
our report.

9 15. On September 05<sup>th</sup>, 2023, I received an email from Plaintiff Taft containing a screenshot of a  
10 text message chain from the phone number (908) 656-5712, which she advised was Defendant  
11 Paul Barresi's phone number. I observed the following message, portrayed in the screenshot to  
have been sent from the above number to Plaintiff Taft on Nov 7, 2022: "Stacy is your sister"  
12 and sexual expletives. Taft advised that the text referred to Stacy Hagman in Texas and  
requested that I interview her. She had compliments for Stacy and was fearful that Barresi could  
13 access her. I was able to locate a phone number for Stacy, but have not been able to reach her  
through it.  
14

15 16. On October 19<sup>th</sup>, 2023, I spoke with a sister of James Conner, who previously owned Argus  
16 Private Investigations and Security Agency in Texas. She did not want interference with her  
brother, and approved that Barresi should not be licensed and that he was under investigation.  
17 In October 2023, I supported that Taft should have a restraining order against Barresi and I still  
support that she should have a restraining order. I have knowledge that Taft lives in Hawaii for  
her safety.  
18

19 17. Plaintiff Taft advised in emails to me that Defendant Barresi continued to harass her during  
20 2024, sending an email stating "Your Brother is a Monster," referring to probably Sean Conner,  
who may be Taft's half brother. I have knowledge that this email contained audio tapes that  
21 Barresi has, including one with Defendant Adam Waldman. I had previously tried reaching out  
to Sean Conner but was unable to make contact.  
22

1  
2 18. Plaintiff Taft advised that she sent this email of Barresi to Jesse Adams at the Department of  
Consumer Affairs in California, but received no response.  
3

4 I attest that lines 270, 271, 272, 275, 276, 288, of the lawsuit of Plaintiff Taft are true and  
correct.  
5

6 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.  
7

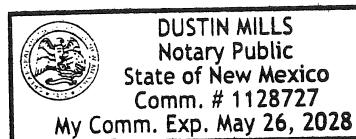
8 I, Michael Kountz, as a declaring witness to testify if so called upon, do hereby declare under  
penalty of perjury that the information provided herein is true and accurate to the best of my  
knowledge. This declaration has been verified and is made in good faith.  
9

10 DATED this 4th day of November, 2024.  
11

12  
13 Signed: Michael Kountz  
Name: Michael Kountz  
14

15  
16 SUBSCRIBED and SWORN to before me  
this 4TH Day of November, 2024.  
17

18  
19   
NOTARY PUBLIC in and for said State,  
in the United States of America  
20



21 OFFICIAL SEAL  
22  
23  
24  
25  
26  
27  
28 PAGE 4 OF 4

## **Exhibit D: Exhibit of Molly Beaton**

1                   **DECLARATION OF MOLLY BEATON**

2                   **STATE OF FLORIDA**

3                   **COUNTY OF ORANGE**

4                   Molly Moreen Skye Beaton, being duly sworn, deposes and says:

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

8                   I am above the age of 18 and reside in Florida. At the time of these events, I  
9                   resided in Florida.

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

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

15

16                  1. Knowing I could be a witness, Defendant Paul Barresi has continued to contact  
17                  me to this day, and I want his brutal, continual threats and harassment to stop. I am  
18                  afraid of him and I haven't told directly that I am testifying for Plaintiff. I do not  
19                  want Barresi who acts like a hitman going to my house for being a witness.

20                  2. Since first interacting with witnesses and then Barresi from 2021, 2022 to  
21                  December 2024, I personally have reported that he is a 'hitman' as I provided that  
22                  to Florida State Police (Case 48-2021-NM-002537). Two witnesses corroborated  
23                  Barresi's imminent dangerousness to threaten and kill.

24                  3. Barresi has tried to make me provide information about Plaintiff Christina Taft  
25                  and described Angela, who is Jane Doe in Plaintiff's lawsuit, a "non-entity," which  
26                  I find disturbing. She is absolutely an 'entity' that is important. I find Barresi's  
27                  description disturbing because I have observed Barresi's credible threats and  
28                  behaviors leading me to believe he is an erratic criminal for hire and dangerous.

1  
2 4. As recent as December 28, Defendant Barresi has contacted me which I see as  
3 harassing, dangerous, invasion of privacy, threatening, and malicious. His emails  
4 are eerily intimidating, manipulative, and controlling. He was trying to force me to  
5 say or do things I do not agree with. I'm an innocent victim that was brought in  
6 related to victims of sexual assault. Barresi is a criminal stalker.

7

8 5. Plaintiff Taft first contacted me in 2022, and I witnessed escalations of  
9 intimidation towards her by Defendants Barresi and Waldman. I witnessed  
10 escalations of vandalism, TROs filed, and that "witnesses are still being harassed"  
11 discussed between Barresi and Waldman as they wanted to "END" Amber Heard  
12 and as a result, endanger anyone nonsensiblly who did not agree with him.

13

14 6. I continued to see Defendant Barresi harassing and stalking Plaintiff Taft for 2  
15 years. As recent as January 5th, 2024, I saw that Barresi was stalking Taft's  
16 location, residency, about her mother's death, all in his alarming efforts as a  
17 criminal fixer, and to eliminate witnesses that may have turned to assist Heard.

18

19 7. Barresi is orchestrating people to attack Taft repeatedly, as a paid fixer and  
20 obsession with her, to control, and to make people perceive her the way he wants.  
21 Barresi uses her mother to try to make her die, which is what a fixer does.

22 8. I saw disturbing activities after Barresi first contacted me, uninvited, through a  
23 social media account in 2022. He later called me September 28, 2022 and I was not  
24 comfortable talking with him. Barresi keeps focusing irrationally on me, witnesses,  
25 Taft, and a letter he is obsessed with that witness Mario Nitrini sent to me.

26 9. Angela is in an audio recording with Taft. I've seen Paul Barresi maliciously  
27 exploit their private telephone call to intimidate and coerce them for years now.

28

1       10. Angela personally communicated to me that a Hollywood Fixer, believed at the  
2 time to be Paul Barresi, put a gun to her head on a hiking trial in Lake Mary,  
3 Florida, to silence her from ever successfully reporting or talking about the sexual  
4 assault of her by actor Marton Csokas. We bonded by being victims of assault and  
5 in the industry.

6       11. Angela first reached out to me on July 8th, 2021. She wanted me to email about  
7 her to a celebrity, Tygh Runyan, from a television show. I barely knew her, the  
8 email was embellished to promote her, I didn't like it, and I didn't send it. I was  
9 making a show for broadway. She wanted me to get in touch with Johnny Depp's  
10 agent about a song she wrote about him and I think Depp is an abuser.

11      12. A week later, I helped Angela, Jane Doe, with her music video and stayed with  
12 her in Tennessee at her house. Angela paid for my flight ticket and not for assisting  
13 her work. I saw that she had large scars on her legs and body that were from her  
14 surviving days long torturous attacks from Actor Marton Csokas.

15      13. We disagreed about compensation and argued, however, still communicated on  
16 well-being, safety, and music production. We were concerned about Barresi as a  
17 hitman and Richie who changed sides to harass us. Originally Richie convinced me  
18 that he wanted to help us, alerting that Barresi was a hitman and a Hollywood  
19 Fixer, and then he started to torment escalating to needing police intervention.  
20 2021, I asked Mario Nitrini, about Barresi and Richie "he confessed to murder"

21      14. Angela was afraid for her life from "fixers" acting to benefit Actor Csokas  
22 when her name is used. I sent to the police in their investigation a text message  
23 from Angela on September 14, 2021 stating, "My police officers actually already  
24 warned him. He putting my life in danger every time he says my name." Angela  
25 asked me, "Have you tried the fbi?"

26      15. Since April of 2022 and since Taft showed Albertini that Barresi was  
27 oppressing him with Waldman to benefit Depp with documentation, he has stopped  
28 contacting me for two years. Albertini knew I was supportive of Amber when he

1 was contacting me before and when Barresi was contacting him. I do not want  
2 anymore instigated harassment by Barresi and I do not want to be contacted ever  
3 again by either of them or threatened. It is a nightmare.

4

5 16. In May 2022, Angel for Artists was harassing people supporting me, talking  
6 about “an actor and his goons” harming her, making up stories about the letter,  
7 how documents were obtained, photos, and making up stories about me. I corrected  
8 the stories in text messages to Angela and Angela replied strangely.

9

10 17. Defendant Barresi initially contacted me in 2022 in his interests in fighting  
11 Richie Albertini, who I know has information against Johnny Depp, although I did  
12 not know about the assaults in the Viper Room done by Depp. In the same  
13 documentation I sent the Florida police in 2021, Albertini was referencing Amber  
14 Heard, who is an assault victim like I am an assault victim.

15 18. I’ve seen messages of witness Ian Herndon messaging in 2021 to Roberta  
16 Kaplan, who was Amber’s attorney, about problems of harming rape victims and  
17 monitoring rape victims, with “alleged ties to Johnny Depp, Anthony Pellicano,  
18 and Paul Barresi” in the message. Ian was trying to help me. Richie tagged  
19 @adam\_waldman and @Barresi\_paul in many postings attacking me and Amber,  
20 after showing me the text from Barresi to Richie of “Hey, that tranny had it  
21 coming. If it wasn’t me to have done her in, it would’ve been somebody else.”

22 19. Instead of productive activities by Richie, who kept being instigated by Barresi,  
23 he decided to be a witness for my abuser Dargan Watts for a film/modeling related  
24 job, who I have a civil court case with after he provided false pretense that I would  
25 be his employee, and assaulted me in his home. I’m here to help Taft not Richie.

26 20. I’ve witnessed from this nightmare related to cases that Defendant Barresi  
27 manipulates people to conspire with him to attack anyone who complains about the  
28 powerful, while those who don’t agree with him are then ominously harmed.

1     21. I am requesting that this court issues injunctions and restraining orders against  
2     Paul Barresi, to protect witnesses like me and Taft from his intimidation, stalking,  
3     and relentless pursuit to crush witnesses, even if they die as a result of his pursuit. I  
4     and others will have imminent and continuing harm, as well as severe emotional  
5     distress from Defendant Barresi's continuing harassment, invasions, and threats.

6

7     22. In my personal observations, Paul Barresi is erratic, psychopathic, and a danger  
8     to anyone around him. I'm afraid of what he'll do next.

9

10    23. For reports to the Florida police I sent: "hit man Paul Baressi attacking  
11    survivors of elite sex crimes" on September 14, 2021 at 3:27:33 PM EDT To:  
12    cestep@maitlandpd.org (Case number: 48-2021-NM-002537) and again "hit man  
13    Paul Barresi and survivor Angela" September 14, 2021 at 3:28:53 PM EDT To:  
14    cestep@maitlandpd.org as well as images of postings by Mario Nitrini "People  
15    connected to Johnny Depp" a sexual attack allegation was made re: actor Marton  
16    Csokas and "Porn actor Paul Barresi sent me several 'messages' (Despicable)"  
17    Another image related to Angela showed representing brutal injuries to her.

18    24. Barresi disturbs me in his activities as a criminal for hire fixer. On October 22,  
19    2024 at 5:26:43 PM EDT Barresi emailed me, "The alleged victim or aka Jane Doe  
20    is really a non entity. Evidence shows Taft and Albertini partnered in a scheme to  
21    accuse me of heinous felonious acts including death threats." Barresi emailed me  
22    Oct 21, 2024 during his stalking activities and obsessions with Richie and Taft.

23

24    25. Paul Barresi emailed me unwantingly at Sat, Dec 28, 2024 at 12:51 PM  
25    claiming Christina Taft "She invokes your name in her lawsuit. [Attached]" where  
26    Barresi highlighted multiple lines on Obstruction of Justice and Witness, Victim,  
27    and Object Tampering, coercion, threatening to kill, and "fixing" for Depp.

28

1 Defendant Barresi thinks I am a witness that could testify for Taft. I find Barresi is  
2 vengeful, manipulative, and controlling and any contact by him is very alarming.  
3 26. Highlighted by Barresi while he's trying to control and manipulate me to say  
4 things I don't agree with in his pursuit: "Plaintiff aims to prevent coercion and  
5 protect individuals from being subjected to such unlawful and oppressive conduct  
6 in California, ensuring alignment with fundamental principles of justice and  
7 constitutional rights. In addition, Plaintiff addresses elements related to  
8 Obstruction of Justice as outlined in 18 U.S.C. § 1512(b)(1) and (2), which prohibit  
9 witness tampering through intimidation, threats, and corrupt persuasion. These  
10 provisions are designed to protect the integrity of the justice system by preventing  
11 any attempts to unduly influence witnesses or hinder their ability to testify in legal  
12 proceedings... Defendants conspired, co-conspired, and continue to conspire and  
13 co-conspire as of today's date, by threatening to kill, continuously mentioning  
14 harm towards, civilly harass, invade privacy of, and intentionally and negligently  
15 inflicting emotional distress to Plaintiff Ms. Taft, as well as to multiple  
16 individuals... Defendants, in their "fixing" activities to benefit Mr. Depp, engaged  
17 in conduct to tamper with physical evidence relevant to investigations and potential  
18 investigations by the Police, Federal Authorities, and the FBI."

19

20 27. I do not want anymore chaos, harassment, assaults, manipulation, or  
21 intimidation in my life, initiated by Paul Barresi in his evil schemes.

22 28. I have faith that the court and honorable judge can consider restraining  
23 Defendant Barresi and issuing a writ of authority to protect witnesses.

24

25 29. A true and correct copy of Defendant Barresi's harassing email to me on  
26 December 28th, 2024 is attached to my Declaration as Exhibit 1.

27 30. A true and correct copy of Angela's text to me on September 14, 2021 is  
28 attached to my Declaration as Exhibit 2.

1 31. A true and correct copy of Defendant Barresi's intimidating email to me on  
2 October 22, 2024 is attached to my Declaration as Exhibit 3.  
3 32. A true and correct copy of Defendant Barresi's message to me to get on a phone  
4 call with him on September 28, 2022 is attached to my Declaration as Exhibit 4.

5  
6 I have additional knowledge and information I can declare and attest to, inclusive  
7 of defendants ongoing activities.

8  
9 I, Molly Moreen Skye Beaton, as a declaring witness to testify if so called upon, do  
10 hereby declare under penalty of perjury that the information provided herein is true  
11 and accurate to the best of my knowledge. This declaration has been verified and is  
12 made in good faith.

13  
14 DATED this 13th day of January, 2025.

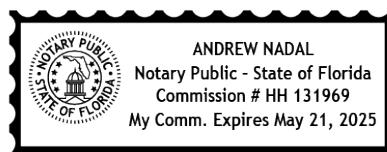
15  
16 Signed: Molly - Moreen Beaton *Molly - Moreen Beaton*

17 Name: Molly - Moreen Beaton

18 State of Florida  
19 County of Miami-Dade  
20 Sworn to affirmed and subscribed before me on this 13th day of January 2025  
21 by Molly-Moreen Beaton who appeared by means of online notarization and  
produced a Drivers License as identification.

22 Andrew Nadal Andrew Nadal  
23 NOTARY PUBLIC in and for said State,  
24 in the United States of America This notarial act was an online notarization.

25 OFFICIAL SEAL



## **Exhibit E: Declaration of Erik Eichler**

Case 5:24-cv-01930-TJH-DTB Document 18 Filed 11/06/24 Page 48 of 50 Page ID #:348

**STATE OF CONNECTICUT**

5:24-CV-01930-TJH-DTB

UNITED STATES

TAFT, CHRISTINA

DISTRICT COURT OF

V.

CENTRAL CALIFORNIA

BARRESI, PAUL,

EASTERN DIVISION

WALDMAN, ADAM R.

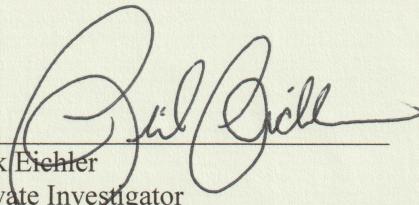
November 5, 2024

The undersigned, being duly sworn, deposes and states:

1. My name is Erik R. Eichler, and I am over eighteen years of age.
2. I believe in the obligation of oath and am competent to testify to the matter stated herein.
3. I am a Private Investigator employed by Eichler Investigative Services, LLC., in South Windsor, CT, according to the Connecticut Department of Public Safety License # A-2834.
4. On October 29, 2024, at approximately 2:00 p.m., I traveled to the residence of an individual known as Rebecca M. Berry, located at [REDACTED]  
[REDACTED].
5. On that date, I spoke with Rebecca M. Berry and her mother, Joan Berry, in the driveway at that location.
6. I provided Rebecca M. Berry with a copy of the United States District Court complaint, *Christina Taft v. Paul Barresi and Adam R. Walkman*, 5:24-CV-01930-TJH-DTB.
7. I provided Rebecca M. Berry with a letter from Christina Taft requesting a Witness Declaration for the above-said case.
8. Ms. Joan Berry asked Rebecca M. Berry, "What is this about?"

Case 5:24-cv-01930-TJH-DTB Document 18 Filed 11/06/24 Page 49 of 50 Page ID #:349

9. At that time, I witnessed Rebecca Berry respond, "Remember that guy [Paul Barresi] who confessed to me about killing people?"
10. Rebecca M. Berry said she would contact Christina Taft or this investigator later and terminated the interview.
7. That I have read the above affidavit and understand it completely.



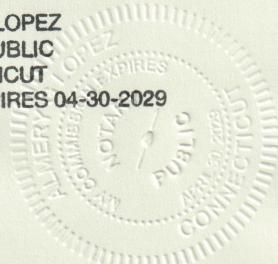
Erik Eichler  
Private Investigator  
Eichler Investigative Services, LLC.

Subscribed and sworn to before me on this 6 day of November, 2024.



Notary Public  
My Commission Expires: 4/30/29

ALMERY G LOPEZ  
NOTARY PUBLIC  
CONNECTICUT  
MY COMMISSION EXPIRES 04-30-2029



## **Exhibit F: Nitrini Emails**



Christina Taft <taftchristina.ceo@gmail.com>

---

## Motion - Explain “Mortal Danger Threat”

---

**Mario George Nitrini** <nitrinimario3@gmail.com>  
To: Christina Taft <taftchristina.ceo@gmail.com>

Mon, Dec 9, 2024 at 5:22 PM

It's in this post of mine



<https://x.com/nitrini1950/status/1864465838755205489>

W

where I screenshot Paul Barresi's post about my son.

My son got involved with the wrong crowd. A gang murder took place and my son testified for the prosecution.

Because Paul Barresi posted his post pertaining to my son and me, some very bad people have been looking for me.

I'm very seriously contemplating filing a criminal complaint on Paul Barresi for attempted murder.

As far as Anthony Fox's disappearance goes, I have my own evidence on whom I believe killed Anthony Fox on Johnny Depp's request. It's hearsay, but these people who I talked to are "in the know."

Mario George Nitrini 111

-----  
The OJ Simpson Case

[Quoted text hidden]



Christina Taft <taftchristina.ceo@gmail.com>

---

## Motion - Explain “Mortal Danger Threat”

---

**Mario George Nitrini** <nitrinimario3@gmail.com>  
To: Christina Taft <taftchristina.ceo@gmail.com>

Mon, Dec 9, 2024 at 5:29 PM

You're welcome Christina.  
I'll keep you posted regarding how I'm going to go about filing a criminal complaint on Paul Barresi.

Mario George Nitrini 111

-----  
The OJ Simpson Case  
[Quoted text hidden]



Christina Taft <taftchristina.ceo@gmail.com>

---

## Fwd: Anthony Fox Missing Person Investigation VPD 01-18806

---

Mario George Nitrini 111 <[maronit111@gmail.com](mailto:maronit111@gmail.com)>  
To: [taftchristina.ceo@gmail.com](mailto:taftchristina.ceo@gmail.com)

Sat, Jan 4, 2025 at 4:42 PM

Christina.

This is the email that Paul Barresi sent me pertaining to his emails to the Ventura County Sheriff's Department, and Maud Fox's will pertaining to the subpoena I received regarding your federal lawsuit case against Paul Barresi & Adam Waldman.

Barresi's last sentence is very telling trying to coerce the Ventura County detective's that Johnny Depp had nothing to do with the disappearance of Anthony Fox



"Charles agreed that the possibility of Johnny Depp having anything whatsoever to do with his brother's disappearance is next to zero"

Mario George Nitrini 111

-----  
The OJ Simpson Case

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

From: <[paulbarresi@aol.com](mailto:paulbarresi@aol.com)>  
Date: Thursday, April 28, 2022  
Subject: Fwd: Anthony Fox Missing Person Investigation VPD 01-18806  
To: "maronit111@gmail.com" <[maronit111@gmail.com](mailto:maronit111@gmail.com)>

CONFIDENTIAL

Mario, Here is investigative report I sent detectives. Listen to my interview with Anthony Fox's brother, Charles and read mother's Will. KEEP FILE for story.

CONFIDENTIAL

-----Original Message-----

From: [paulbarresi@aol.com](mailto:paulbarresi@aol.com)  
To: [pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov) <[pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov)>  
Cc: [amorales@cityofventura.ca.gov](mailto:amorales@cityofventura.ca.gov) <[amorales@cityofventura.ca.gov](mailto:amorales@cityofventura.ca.gov)>  
Sent: Thu, Dec 9, 2021 4:56 pm  
Subject: Anthony Fox Missing Person Investigation VPD 01-18806

Dear Det. Furlong,

I spoke with lead Detective Morales earlier this week. He said he was immersed in a priority kidnap investigation and that he will contact me to get brought up to

speed on my updated findings re, Anthony Fox's disappearance.

Meanwhile, I now provide you with Anthony Fox's mother Maud Fox's Will along with [30 minute] audiotaped interview I conducted with his Anthony's eldest brother

**Charles Fox** this a.m.

Charles stated his mother **Maud Fox**, told him she had received a letter from Anthony just before Christmas 2001.

As you are well aware, Anthony disappeared just before Christmas 2001 on the 19th. Therefore, he wrote the letter which his mother refused to disclose likely days

prior to his disappearance. What makes this even more bizarre is that Charles asked his mother what Anthony said in the letter but she stubbornly refused to tell

him. And when Charles pressed her to tell her what the letter said, she told him she destroyed it.

Following Maud's death, Charles told me that he searched everywhere for the mysterious letter but it was nowhere to be found.

**Maud Fox had a secret she was keeping for her Anthony so worth protecting, she took it to her grave.**

As evident in a previous report I sent you, however, this was not the first time Maud covered for Anthony. When he filed for bankruptcy, she helped him fabricate a fraudulent laundry list people and businesses to whom he alleged he owed money and even went so far as to include her own name to the bogus list.

Charles was very surprised to hear that Johnny Depp turned over his interests in the Viperoom to Anthony's daughter. Despite it being widely reported, Charles said he was not aware.

What surprised him even more was to learn that his mother added Anthony's daughter to her Will because his she didn't think too kindly of Constance.

I suspect Anthony's letter to his mom included a plea for her to care for his daughter because his mother's [revised Will] makes generous provisions for her including

10,000 pounds in addition to Anthony's share of the estate, as stipulated in Will, after he is deemed dead in 2006. It appears this date 2006 was just pulled out of the hat which leads to only more suspicion. it is likely Maud wanted to honor her son's wishes that she provide for his daughter.

**Irrespective of what Anthony's letter said, writing the letter only days before his disappearance is suspect.**

**Anthony's mom's refusal to say what was in the letter is further suspect.**

**To my mind, Anthony vanishing into thin air was not something he didn't see coming.**

Charles believes Anthony's daughter Constance knows more than what she has disclosed.

I told Charles that Johnny Depp is a very generous good hearted man and that over the years he has helped many people, paying their rent, bills, medical expenses, etc.

Charles confided that there is a stronger likelihood that Anthony is either still alive and just wanted to create the impression he disappeared or he committed suicide."

Charles agreed that the possibility of Johnny Depp having anything whatsoever to do with his brother's disappearance is next to zero.

End Report

Paul Barresi  
cell no. 908-656-5712

**FYI**

**Charles Fox**, Tel no. 011-44-1255-312-524 age 75, resides with wife Morna at [8A Catharine Place, Bath, Avon, BA1 2PR- England](#)  
[https://en.wikipedia.org/wiki/Bath,\\_Somerset](https://en.wikipedia.org/wiki/Bath,_Somerset)

-----Original Message-----

From: Furlong, Patrick <[pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov)>  
To: [paulbarresi@aol.com](mailto:paulbarresi@aol.com) <[paulbarresi@aol.com](mailto:paulbarresi@aol.com)>  
Sent: Wed, Jul 31, 2019 12:40 pm  
Subject: Ref Anthony Fox Missing Person Investigation VPD 01-18806

Per our phone conversation, I am reaching out to you to inquire about any information regarding the Missing Person investigation for Anthony Fox (VPD 01-18806).

Thanks again,

Patrick Furlong

Criminal Investigative Technician  
Sex Offender Registration / Missing Persons  
Ventura Police Department  
**1425 Dowell Dr., Ventura, CA 93003**  
(805) 339-4473 Office

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

---

### 3 attachments

-  **Johnny Depp - Charles Fox call\_09-36-18\_OUT\_16699291319017.amr**  
3001K
-  **Maud Fox Will 1.pdf**  
528K
-  **Maud Fox Will 2.pdf**  
30K

## **Exhibit G: No record of Fox's Legal Team**



**State Bar number: 151058**

Information about individual licensees is only provided for those who are active, inactive, disbarred, resigned, or not entitled. Limited information is provided for judges and deceased licensees. See the license status definitions for more information.

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## **Exhibit H: Nitrini Non-Entity Threat**

8:09      85

Replying to @nitrini1950  
@jaybee556677 and 37 others  
The OJ Simpson Case

Yesterday, I received a request  
to fill-out a ...

3 1 2 276

 **Hannu Huttunen** Follow ...  
@hannuhu

Your name on Taft's delusional lawsuit. WOW,  
you've really made it big time! Her lawsuit is  
as dead as OJ, whose name you're riding on.  
It's easy to ride a dead horse, isn't it?

8:21 PM · Dec 18, 2024 · 39 Views

1 1 1

 **Paul Barresi** ✅ @PaulBarresi1 · 22h ...  
That ugly bastard is a non entity. He has zero  
to do with the preceding. He is a homeless,  
mentally ill convicted felon-- The  
quintessential loser in life. He sired a loser  
son who became accomplice in covering up  
a murder. Anybody with a face like this has  
got to be a loser.

House Search Lock Mail More

x.com

< > Up Book Double

## **Exhibit I: Emails to Taft**



Christina Taft <taftchristina.ceo@gmail.com>

---

**(no subject)**

---

**paulbarresi@aol.com <paulbarresi@aol.com>**

Sat, Nov 19, 2022 at 5:27  
PM

Reply-To: paulbarresi@aol.com

To: "taftchristina.ceo@gmail.com" <taftchristina.ceo@gmail.com>

What you told the press and why the coroner report says conflict bitch.  
Did you leave your mom to die?



**Vitoria Taft Coroner Report .pdf**

525K



Christina Taft <taftchristina.ceo@gmail.com>

---

(no subject)

paulbarresi@aol.com <paulbarresi@aol.com>  
Reply-To: paulbarresi@aol.com  
To: "taftchristina.ceo@gmail.com" <taftchristina.ceo@gmail.com>

Tue, Dec 13, 2022 at 12:58 PM

**INTACT HEART, FRAGMENTED BONES & TEETH.**

**ALL THAT WAS LEFT OF YOUR POOR MOM.**

**BUT YOU MADE SURE YOU GOT AWAY WITH ALL YOUR  
BELONGINGS DIDN'T YOU WITCH?**

**HOW CAN YOU LIVE WITH YOURSELF?**



Christina Taft <taftchristina.ceo@gmail.com>

---

**mommy, mommy, im sorry mommy, im sorry.....**

---

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

Mon, Aug 19, 2024 at 10:00 AM

When you are lounging on the beach enjoying the sun with the blood money you received for abandoning your mother to suffer unimaginable agony before she struggled to take her last breath, do you ever think of her.



Christina Taft <taftchristina.ceo@gmail.com>

---

**(no subject)**

---

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

Thu, Sep 26, 2024 at 11:58 AM

My God you are one severely mentally ill, bat shit crazy bitch. My lawyer says you need to be in a conservatorship, and we will do all we can to help you.

## **Exhibit J: Barresi's Social Media Account Posts**

7:14      33%

← Post

 **Paul Barresi**   
@PaulBarresi1

Follow  ...

In Nov 2018 Christina Taft packed up the car & drove off leaving her blind & fragile mom to die in the Paradise CA campfire. When she returned, all that was left of her weak & disabled mom were her teeth, charred bones & a near intact heart. Christina was awarded a fortune in a wrongful death suit. Today, she uses the money not to honor her mother but to cast a vail of shadow over her memory.

 B18-00065  
x designated paper bag designated "B18-00065", "18-19633", and "DOE sheet with bone fragments described below. There are also three bags H" and the other two have only the case number.  
EXAMINATION  
umerous bone fragments that are calcined and charred. There are larger bones, including vertebrae, and portions of pelvis. Reportedly, the portions of pelvis were anthropologized and determined to be possibly female. Further examination  
umerous small, fragmented, calcined and charred bones. These are ex  
bones, including calvarium, long bones, and phalanges. There is a larg  
fragment of skull due to charring, but there is a heart found w  
cardium is submitted for DNA analysis. Other tissue is present, incl  
gallbladder (possible stones)  
ent muscle is submitted for toxicology. No identifying features are found  
H" is submitted for dental comparison.

Last edited 3:28 PM · Jan 1, 2025 · 759 Views 

       
  x.com   
    

8:08

23

Show more



9

6

37

1.6K



**VeritasNumquamP** @vernumquamp · 6h ...

Ugh, we don't want her in France thanks 😞



9

6

1

25



**Paul Barresi** 

@PaulBarresi1

Follow



...

Christina Taft has allegedly already begun to upset people in France, I am informed.

4:35 AM · Jan 2, 2025 · 17 Views

9

6

1



🔒 x.com





int muscle is submitted for toxicology. No identifying features are found.  
H" is submitted for dental comparison.

4

7

46

1.2K



You're unable to view this Post because this account owner limits who can view their Posts.  
[Learn more](#)



**Paul Barresi**

@PaulBarresi1

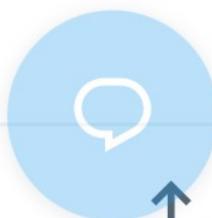
Follow



...

I could not agree with you more. You will find very few people on the planet that would disagree with you. To my mind, not a more evil human has ever breathed air. She and her cohorts. All fuckin' rotten demons.

11:38 AM · Jan 2, 2025 · 34 Views





**Xayide27** @Xayide2\_07 · Jan 4

...

I don't know.

Somewhere i read that the mother refused to leave and that her daughter "respected her choice".



1



32



**Paul Barresi**

@PaulBarresi1

Follow



...

Leaving your mother to burn to death is no expression of respect by any stretch of the imagination.

11:43 AM · Jan 4, 2025 · 29 Views



2



3



7:58 22

I have questions 🍀

2 1 28

 **Paul Barresi**   
@PaulBarresi1

Follow  ...

No her mother was burned to a crisp, nothing left but a few charged bones and most of her heart.

1:02 PM · Jan 7, 2025 · 19 Views

---

1 1



**Paul Barresi**

@PaulBarresi1

Follow



...

Christina Taft, CEO of Rescue Social, is fucking evil to the core. Not a more evil vicious human being has ever breathed air.

5:31 AM · Jan 12, 2025 · 171 Views



1



1



5



**Laura B** @LauraB99737382 · Jan 12

...

Amber Heard? 😭



1



5



96



11:49

83%

← Post



Paul Barresi

@PaulBarresi1

Follow ...

Christina Taft v. Adam Waldman/Paul Barresi

I'm not a hitman. I don't care what the undertaker says. [youtube.com/watch?v=\\_PlvUG...](https://youtube.com/watch?v=_PlvUG...)



that Mr. Waldman is the "Consigliere" that he communicates with for these activities. In their association have repeatedly engaged in approximately five years, and two years ago, in violation of 18 U.S.C. § 1512, 18 U.S.C. § 1961 and 18 U.S.C. § 1962.

11:05 AM · Oct 2, 2024 · 118 Views



4



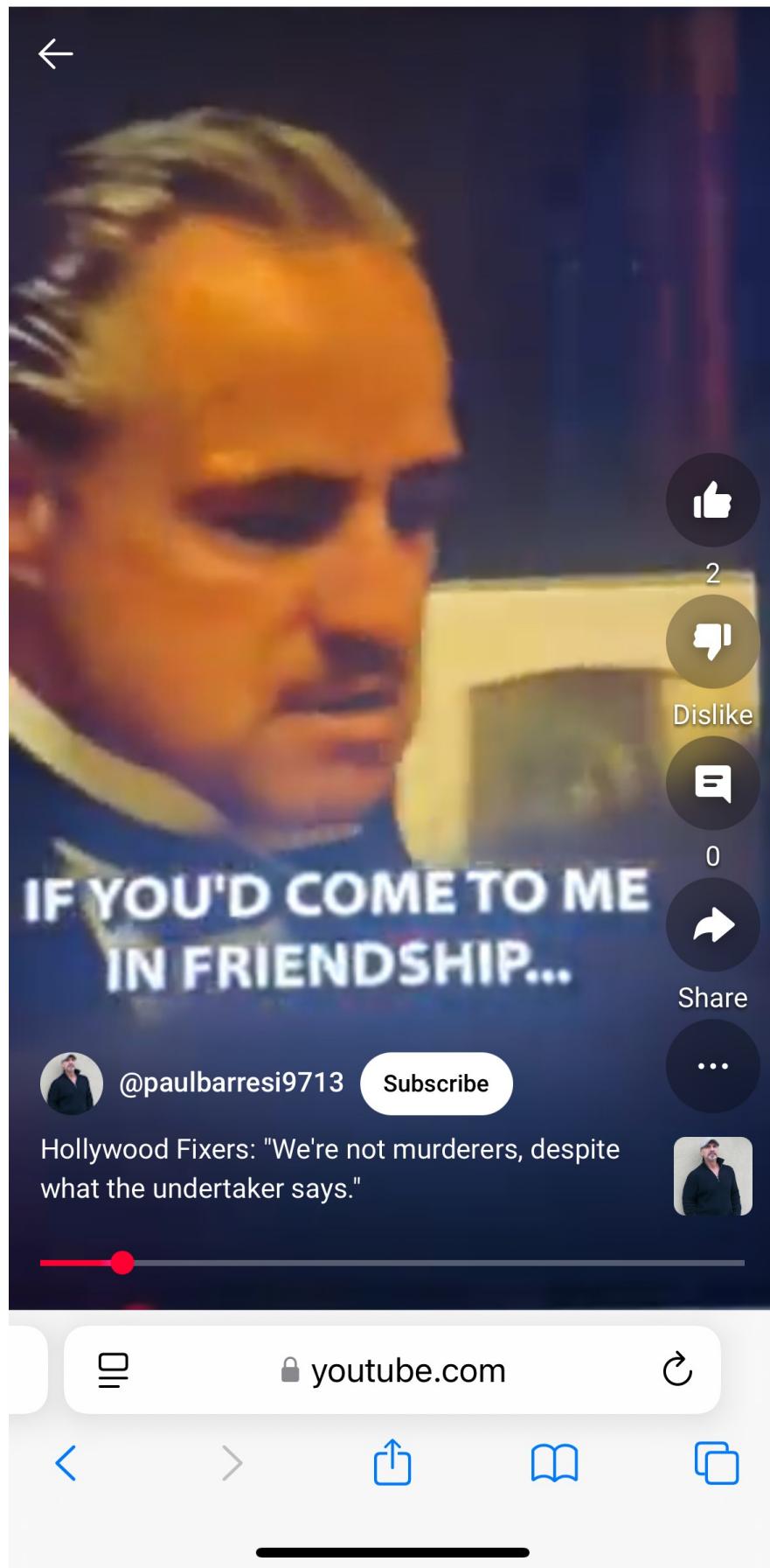
AA

x.com



3:26

46



Search



@paulbarresi9713

Subscribe

Hollywood Fixers: "We're not murderers,  
despite what the undertaker says."

## **Exhibit K: History of Restraining Orders**

**CH-109**

**Notice of Court Hearing**

**① Person Seeking Protection**

a. Your Full Name:

Richard Albertini

Your Lawyer (if you have one for this case):

Name: \_\_\_\_\_ State Bar No.: \_\_\_\_\_

Firm Name: \_\_\_\_\_

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.)

Address: 1510 N PASS AVE

City: BURBANK State: CA Zip: 91505

Telephone: 213-302-9688 Fax: \_\_\_\_\_

Email Address: Richie.albertini.305@gmail.com

Clerk stamps date here when form is filed.

**FILED**  
Superior Court Of California  
County Of Los Angeles

**SEP 13 2022**

Sherri R. Carter, Executive Officer/Clerk  
By Wendy Delgado, Deputy

Fill in court name and street address:

**Superior Court of California, County of**

**LASC-NORTH CENTRAL DISTRICT  
BURBANK COURTHOUSE  
300 EAST OLIVE AVENUE  
BURBANK, CA 91502**

Court fills in case number when form is filed.

**Case Number:**

**22 PDR 001308**

**② Person From Whom Protection Is Sought**

Full Name: Pavil Garresi

The court will complete the rest of this form.

**③ Notice of Hearing**

A court hearing is scheduled on the request for restraining orders against the person in ②:

Name and address of court if different from above:

**Hearing Date**

Date: OCT 05 2022

Time: 8:30 AM

Dept.: 5

Room: \_\_\_\_\_

**LOS ANGELES SUPERIOR COURT  
NORTHEAST DISTRICT - PASADENA  
300 EAST WALNUT STREET  
PASADENA, CA 91101**

**④ Temporary Restraining Orders** (Any orders granted are on form CH-110, served with this notice.)

- a. Temporary Restraining Orders for personal conduct and stay-away orders as requested in form CH-100, *Request for Civil Harassment Restraining Orders*, are (check only one box below):
- (1)  All **GRANTED** until the court hearing.
- (2)  All **DENIED** until the court hearing. (Specify reasons for denial in b, below.)
- (3)  Partly **GRANTED** and partly **DENIED** until the court hearing. (Specify reasons for denial in b, below.)

Case Number:

22 PDR 001308

b. Reasons for denial of some or all of those personal conduct and stay-away orders as requested in form CH-100, *Request for Civil Harassment Restraining Orders*, are:

- (1)  The facts as stated in form CH-100 do not sufficiently show acts of violence, threats of violence, or a course of conduct that seriously alarmed, annoyed, or harassed the person in ① and caused substantial emotional distress.
- (2)  Other (specify):  As set forth on Attachment 4b.

*All threats are verbal. No actual violence.*

---

---

---

---

---

---

⑤ Confidential Information Regarding Minor

- a.  A *Request to Keep Minor's Information Confidential* (form CH-160) was made and **GRANTED**. (See form CH-165, Order on Request to Keep Minor's Information Confidential, served with this form.)
- b. If the request was granted, the information described in item ⑦ on the order (form CH-165) must be kept **CONFIDENTIAL**. The disclosure or misuse of the information is punishable as a sanction, with a fine of up to \$1,000 or other court penalties.

⑥ Service of Documents for the Person in ①

At least ~~✓~~ five  days before the hearing, someone age 18 or older—not you or anyone to be protected—must personally give (serve) a court's file-stamped copy of this form CH-109 to the person in ② along with a copy of all the forms indicated below:

- a. CH-100, *Request for Civil Harassment Restraining Orders* (file-stamped)
- b.  CH-110, *Temporary Restraining Order* (file-stamped) **IF GRANTED**
- c. CH-120, *Response to Request for Civil Harassment Restraining Orders* (blank form)
- d. CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*
- e. CH-250, *Proof of Service by Mail* (blank form)
- f.  CH-170, *Notice of Order Protecting Information of Minor* and CH-165, *Order on Request to Keep Minor's Information Confidential* (file-stamped) **IF GRANTED**
- g.  Other (specify): \_\_\_\_\_

Date: SEP 12 2022

Judicial Officer

*John Kralik*  
JOHN KRALIK, JUDGE

Case Number:  
22PDR001308

### To the Person in ①:

- The court cannot make the restraining orders after the court hearing unless the person in ② has been personally given (served) a copy of your request and any temporary orders. To show that the person in ② has been served, the person who served the forms must fill out a proof of service form. Form CH-200, *Proof of Personal Service*, may be used.
- For information about service, read form CH-200-INFO, *What Is "Proof of Personal Service"?*
- If you are unable to serve the person in ② in time, you may ask for more time to serve the documents. Use form CH-115, *Request to Continue Court Hearing and to Reissue Temporary Restraining Order*.

### To the Person in ②:

- If you want to respond to the request for orders in writing, file form CH-120, *Response to Request for Civil Harassment Restraining Orders*, and have someone age 18 or older—not you or anyone to be protected—mail it to the person in ①.
- The person who mailed the form must fill out a proof of service form. Form CH-250, *Proof of Service by Mail*, may be used. File the completed form with the court before the hearing and bring a copy with you to the court hearing.
- Whether or not you respond in writing, go to the hearing if you want the judge to hear from you before making an order. You may tell the judge why you agree or disagree with the orders requested.
- You may bring witnesses and other evidence.
- At the hearing, the judge may make restraining orders against you that could last up to five years and may order you to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms that you own or possess.



### Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to [www.courts.ca.gov/forms](http://www.courts.ca.gov/forms) for *Disability Accommodation Request* (form MC-410). (Civ. Code, § 54.8.)

(Clerk will fill out this part.)

### —Clerk's Certificate—

I certify that this *Notice of Court Hearing* is a true and correct copy of the original on file in the court.

Clerk's Certificate

[seal]

Date: \_\_\_\_\_

Clerk, by \_\_\_\_\_, Deputy

**CH-100**

**Request for Civil Harassment  
Restraining Orders**

Read *Can a Civil Harassment Restraining Order Help Me? (form CH-100-INFO)* before completing this form. Also fill out *Confidential CLETS Information (form CLETS-001)* with as much information as you know.

**1 Person Seeking Protection**

- a. Your Full Name:

*Richard Alberini* Age: 57

Your Lawyer (if you have one for this case)

Name: \_\_\_\_\_ State Bar No.: \_\_\_\_\_

Firm Name: \_\_\_\_\_

- b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.)

Address: 1510 N Pass

City: Burbank State: CA Zip: 91505

Telephone: 213-302-9688 Fax: \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

Clerk stamps date here when form is filed.

**FILED**

Superior Court Of California  
County Of Los Angeles

**SEP 13 2022**

Sherri R. Carter, Executive Officer/Clerk  
By *[Signature]* Deputy  
Wendy Delgado

Fill in court name and street address:

Superior Court of California, County of

**LASC-NORTH CENTRAL DISTRICT**  
**BURBANK COURTHOUSE**  
**300 EAST OLIVE AVENUE**  
**BURBANK, CA 91502**

Court fills in case number when form is filed.

Case Number:

**22 PDR 001308**

**2 Person From Whom Protection Is Sought**

Full Name: Paul Barnes Age: 73

Address (if known): 12994 Claret

City: Rancho Cucamonga State: CA Zip: 91739

**3 Additional Protected Persons**

- a. Are you asking for protection for any other family or household members?  Yes  No If yes, list them:

Full Name	Sex	Age	Lives with you?	How are they related to you?
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

- b. Why do these people need protection? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

**This is not a Court Order.**

Case Number  
22PDRO01308

**4 Relationship of Parties**

How do you know the person in (2)? (Explain below):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

He is a private investigator for Johnny Depp

**5 Venue**

Why are you filing in this county? (Check all that apply):

- a.  The person in (2) lives in this county.  
b.  I was harassed by the person in (2) in this county.  
c.  Other (specify): I live here

**6 Other Court Cases**

- a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

Yes  No (If yes, check each kind of case and indicate where and when each was filed.)

Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1) <input type="checkbox"/> Civil Harassment			
(2) <input type="checkbox"/> Domestic Violence			
(3) <input type="checkbox"/> Divorce, Nullity, Legal Separation			
(4) <input type="checkbox"/> Paternity, Parentage, Child Custody			
(5) <input type="checkbox"/> Elder or Dependent Adult Abuse			
(6) <input type="checkbox"/> Eviction			
(7) <input type="checkbox"/> Guardianship			
(8) <input type="checkbox"/> Workplace Violence			
(9) <input type="checkbox"/> Small Claims			
(10) <input type="checkbox"/> Criminal			
(11) <input checked="" type="checkbox"/> Other (specify): <u>Depp vs Heard 2019</u>			

- b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)?  No  Yes (If yes, attach a copy if you have one.)

**7 Description of Harassment**

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

- a. Tell the court about the last time the person in (2) harassed you. He called to say he would kill me + Shooked up a house

(1) When did it happen? (provide date or estimated date): Fill me + Shooked up a house

(2) Who else was there? Ruben Polomares

Shanell Torres

**This is not a Court Order.**

Case Number:  
22PDRD01308

- 7 a. (3) How did the person in (2) harass you? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

1 Threats - 2 - Inciting violence 3 - Stalker  
4 - Baited mail 5 - ?

Telephone threats - recordings

Showed up at my former home  
after calling to say he was going to shoot me

- (4) Did the person in (2) use or threaten to use a gun or any other weapon?

Yes  No (If yes, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

He Said He Had a gun

He is a P.I. Working for Conn PD  
Depo

- (5) Were you harmed or injured because of the harassment?

Yes  No (If yes, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

Mentally

- (6) Did the police come?  Yes  No

If yes, did they give you or the person in (2) an Emergency Protective Order?  Yes  No

If yes, the order protects (check all that apply):

Me  The person in (2)  The persons in (3).

(Attach a copy of the order if you have one.)

- b. Has the person in (2) harassed you at other times?

Yes  No (If yes, describe prior incidents and provide dates of harassment below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

SINCE 2019

This is not a Court Order.

Case Number:  
22PDRO01308

**Check the orders you want.**

**8  Personal Conduct Orders**

I ask the court to order the person in (2) **not** to do any of the following things to me or to any person to be protected listed in (3):

- a.  Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b.  Contact the person, either directly or indirectly, in **any** way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- c.  Other (specify):  
 Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

**9  Stay-Away Orders**

a. I ask the court to order the person in (2) to stay at least 100 yards away from (check all that apply):

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Me.                                | (8) <input type="checkbox"/> My vehicle.                                 |
| (2) <input type="checkbox"/> The other persons listed in (3).   | (9) <input type="checkbox"/> Other (specify):<br>_____<br>_____<br>_____ |
| (3) <input checked="" type="checkbox"/> My home.                |  |
| (4) <input type="checkbox"/> My job or workplace.               |  |
| (5) <input type="checkbox"/> My school.                         |  |
| (6) <input type="checkbox"/> My children's school.              |  |
| (7) <input type="checkbox"/> My children's place of child care. |  |

b. If the court orders the person in (2) to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job?  Yes  No (If no, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

**10 Guns or Other Firearms and Ammunition**

Does the person in (2) own or possess any guns or other firearms?  Yes  No  I don't know

If the judge grants a protective order, the person in (2) will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is in effect. The person in (2) will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any guns or firearms within his or her immediate possession or control.

**This is not a Court Order.**

Case Number:

22 PDR 001308

**(11)  Temporary Restraining Order**

I request that a Temporary Restraining Order (TRO) be issued against the person in (2) to last until the hearing. I am presenting form CH-110, *Temporary Restraining Order*, for the court's signature together with this Request.

Has the person in (2) been told that you were going to go to court to seek a TRO against him/her?

Yes  No (*If you answered no, explain why below:*)

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Temporary Restraining Order" for a title.

---

---

**(12)  Request to Give Less Than Five Days' Notice of Hearing**

You must have your papers personally served on the person in (2) at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.

---

---

---

**(13)  No Fee for Filing or Service**

- a.  There should be no filing fee because the person in (2) has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b.  The sheriff or marshal should serve (notify) the person in (2) about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c.  There should be no filing fee and the sheriff or marshal should serve the person in (2) for free because I am entitled to a fee waiver. (*You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.*)

**(14)  Lawyer's Fees and Costs**

I ask the court to order payment of my  lawyer's fees  Court costs.

The amounts requested are:

<u>Item</u>	<u>Amount</u>	<u>Item</u>	<u>Amount</u>
\$ _____	\$ _____	\$ _____	\$ _____
\$ _____	\$ _____	\$ _____	\$ _____
\$ _____	\$ _____	\$ _____	\$ _____

Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

**This is not a Court Order.**

Case Number:  
22PDR001308

**(15)  Possession and Protection of Animals**

I ask the court to order the following:

- a.  That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.  
*(Identify animals by, e.g., type, breed, name, color, sex.)*

---

---

I request sole possession of the animals because (*specify good cause for granting order*):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.*
- 
- 

- b.  That the person in ② must stay at least \_\_\_\_\_ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

**(16)  Additional Orders Requested**

I ask the court to make the following additional orders (*specify*):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested," for a title.*
- 
- 

**(17) Number of pages attached to this form, if any:** 5

Date: 9-13-2022

Lawyer's name (if any)

► Lawyer's signature

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

Date: 9-13-2022

RICHARD ALBERTINI  
Type or print your name

► PAUL O.  
Sign your name

**This is not a Court Order.**

TFW Wi-Fi

3:48 PM

3

1 0

Describe  
HARVEYNEST

Search Twitter

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ATTACHMENT TO CH-100

Log in

Sign up

Movies &amp; TV



Fashion



Micl

Keanu Reeves



Popular videos



Coo

**Paul Barresi** @PaulBarresi1 · Jul 9

...

Replies to @HailsLouis3

Albertini is a reminder we must be careful about who they sidle up with. He was one of the first people I interviewed. It took me two seconds to realize he has zero credibility. His actions on social media stems from an improper and evil motive, with malice, to do others harm.



1



12

**Paul Barresi** @PaulBarresi1 · Jul 8

...

Replies to @ThatUmbrella

Barresi is approachable anytime by calling 908-656-5712 directly.



1



4



AA



twitter.com





4 75% 9:22 AM

22 PDR 001308

← Paul Barresi  
+1 908-656-5712



: Described harassment  
Attachment to  
Ch-100

Fri, Oct 16

P

I still got that taped conversation of you and Big Ed. The one where you do your damndest to try and get him to say horrible lies about Johnny Depp. Hmmm, I wonder what I should do with it you fucking moron

1:11 PM

Anything you want.. That is old news you old fag.

1:11 PM

P

If you ever contact me again it will be a Enquirer headline and it will be broadcast as well promise you

1:13 PM

You know Paul that sounds like Blackmail. You should stop drinking.. Your a silly old fag. Enquirer Lol.. I'll send it to Andy Tillit Now.

1:14 PM

Enter message



Send



EXHIBIT K

S



Paul Barresi  
49 Tweets

Q : ·

Tweets

Tweets &amp; replies

Media

Described as loss

Attachment

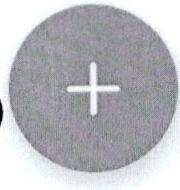
To: CH-WW@PBO  
100**Paul Barresi** @PaulB... · 18m

Replies to @Corey\_Feldman

I got that scumbag Richie Albertini where you want him too. Been trying to reach you. Call 908-656-5712

**Angenette Levy** ✅ @... · 4d

NEW INFO: @radar\_online reporting talks underway to settle lawsuit between Rocky Brooks and #JohnnyDepp. I heard from a source earlier this week that talks were underway. Hoped to get more info to report yesterday but didn't. radaronline.com/p/johnny-depp-..... (cont) @LawCrimeNetwork



ID #:756

22 PDR001308

# Paul Barresi

## 79 Tweets



Attachment

Ch-100

sets

## Tweets & replies

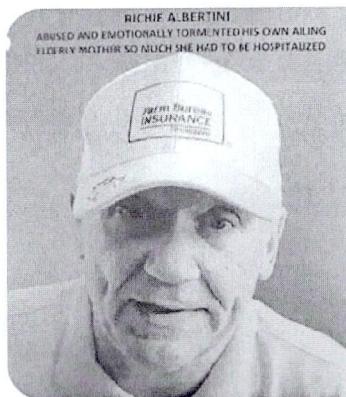
Media

Like



**Paul Barresi** @PaulBa... · 4h

Richie Albertini, who Amber Heard fans love, brutally tormented and mentally abused his own sick ailing mother so much, she had to be hospitalized. His allegations against Johnny Depp are as baseless as is he. Not a more cowardly, weakling of a little man has ever breathed air.



4

12

23



Paul Barresi @PaulB...

US ARMY GREEN BERET SGT.



① Describe harassment

1 Barresi Threatens Richie to Hit Him July 1 2022

1c20220701023025n+1 908-656-5712\_0.amr.m4a *Attachment*

**Speaker1 (Barresi):** [00:00:00] Now, if I did. If I did, it was an accident. *Oh-~~100~~ 100*

**Speaker 2 (Albertini):** [00:00:03] All right, well, stop having so many accidents. I mean, unless you've got something to say.

**Speaker1 (Barresi):** [00:00:11] I told you, I got nothing. Oh, I got something to say. What's up with that lazy eye, left eye man? You got lazy eye and your big old potbelly.

**Speaker 2 (Albertini):** [00:00:19] Yeah.

**Speaker1 (Barresi):** [00:00:20] What's up with that?

**Speaker 2 (Albertini):** [00:00:20] I don't know. Why don't you come in?

**Speaker1 (Barresi):** [00:00:25] I say you want to see a right hook coming across your fucking ugly head?

**Speaker 2 (Albertini):** [00:00:29] Well, you're saying you're going to hit me?

## **Exhibit L: Subpoena to Nitrini**



Christina Taft <taftchristina.ceo@gmail.com>

---

## Motion - Explain “Mortal Danger Threat”

---

**Mario George Nitrini** <nitrinimario3@gmail.com>  
To: Christina Taft <taftchristina.ceo@gmail.com>

Mon, Dec 9, 2024 at 5:29 PM

You're welcome Christina.  
I'll keep you posted regarding how I'm going to go about filing a criminal complaint on Paul Barresi.

Mario George Nitrini 111

-----  
The OJ Simpson Case

[Quoted text hidden]



Christina Taft <taftchristina.ceo@gmail.com>

---

## Motion - Explain “Mortal Danger Threat”

---

**Mario George Nitrini** <nitrinimario3@gmail.com>  
To: Christina Taft <taftchristina.ceo@gmail.com>

Mon, Dec 9, 2024 at 5:22 PM

It's in this post of mine



<https://x.com/nitrini1950/status/1864465838755205489>

W

where I screenshot Paul Barresi's post about my son.

My son got involved with the wrong crowd. A gang murder took place and my son testified for the prosecution.

Because Paul Barresi posted his post pertaining to my son and me, some very bad people have been looking for me.

I'm very seriously contemplating filing a criminal complaint on Paul Barresi for attempted murder.

As far as Anthony Fox's disappearance goes, I have my own evidence on whom I believe killed Anthony Fox on Johnny Depp's request. It's hearsay, but these people who I talked to are "in the know."

Mario George Nitrini 111

-----  
The OJ Simpson Case

[Quoted text hidden]



Christina Taft &lt;taftchristina.ceo@gmail.com&gt;

**Fwd: ANTHONY FOX - ENDANGERED MISSING PERSONS INVESTIGATION, NO. VPD 01-18806**

**Mario George Nitrini 111** <[marionit111@gmail.com](mailto:marionit111@gmail.com)>  
 To: [taftchristina.ceo@gmail.com](mailto:taftchristina.ceo@gmail.com)

Sat, Jan 4, 2025 at 4:50 PM

The OJ Simpson Case

The transcript of what Paul Barresi sent me pertaining to his interview with Anthony Fox's lawyer Brett Curlee.

Mario George Nitrini 111

-----

The OJ Simpson Case

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

From: <[paulbarresi@aol.com](mailto:paulbarresi@aol.com)>  
 Date: Thursday, April 28, 2022  
 Subject: ANTHONY FOX - ENDANGERED MISSING PERSONS INVESTIGATION, NO. VPD 01-18806  
 To: "marionit111@gmail.com" <[marionit111@gmail.com](mailto:marionit111@gmail.com)>

**CONFIDENTIAL**

Mario, This is transcript of my interview with Anthony Fox's lawyer Brett Curlee which I forwarded to detectives. Notice how he is avoiding me.

**CONFIDENTIAL**

-----Original Message-----

From: [paulbarresi@aol.com](mailto:paulbarresi@aol.com)  
 To: [pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov) <[pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov)>; [amorales@cityofventura.ca.gov](mailto:amorales@cityofventura.ca.gov) <[amorales@cityofventura.ca.gov](mailto:amorales@cityofventura.ca.gov)>  
 Sent: Mon, Dec 13, 2021 5:49 pm  
 Subject: ANTHONY FOX - ENDANGERED MISSING PERSONS INVESTIGATION, NO. VPD 01-18806

Dec 13, 2021

**VENTURA POLICE DEPARTMENT**  
**Endangered Missing Persons Division**  
**1425 Dowell Dr., Ventura, CA 93003**

**DETECTIVE CPL. A. MORALES and**  
**DETECTIVE PATRICK FURLONG**

**Investigative Report****ANTHONY FOX - ENDANGERED MISSING PERSONS INVESTIGATION, NO. VPD 01-18806**

**Dear Detectives Morales and Furlong,**

**I spoke with Anthony Fox's estate lawyer, James Goldman and his wife Laura, today.**

**I told him about the letter Anthony Fox wrote to his mother before he disappeared. He said he knew nothing**

**about it. And when I told him the endangered missing person's case remains open on Fox, he was very**

**surprised. Then he put me on the phone with his wife Laura.**

**Laura Goldman stated that after Anthony's disappearance, although Constance Fox was originally going to**

**stay with Brett Curlee, [lawyer handling Anthony's lawsuit against Johnny Depp and others] she**

ended up

going with the Goldman's who took care of her until arrangements could be made for her to move into her

boyfriend's parents' home sometime after Christmas [2001].

Neither Jim Goldman nor Laura Goldman knew what became of the answering machine.

Laura said, "Losing her father was a very dramatic experience for Constance. She was just a kid-- understandable how she confused which one of her father's lawyers took her in."

I also spoke with Anthony Fox's former lawyer, Brett Curlee, [who eventually put a lien on Fox's estate],

However, he was not as forthcoming as the Goldman's.

I asked Mr. Curlee if he knew what became of the answering machine but he would not say one way or

the other. He used the excuse that it was a long time ago.

I told Mr. Curlee that a crucial piece of evidence that might potentially hold the key to Anthony Fox's disappearance, I don't think is something that could be so easily forgotten.

continuing...

Paul: Have you spoken with the detectives investigation Fox's disappearance?

Curlee: They contacted me but it's been a long while.

Paul: Are you aware that Anthony wrote a letter to his mother just before he disappeared?

Curlee: I'm not at liberty to talk about anything involving the case.

Paul: May I know whether you ever spoke with Detective Furlong?

Curlee: No, someone else, I can't recall the name. Just have the detectives call me. Sorry I can't be of more

help but just have them call me.

End Call

Contact information:

James Goldman, Esq. <https://lawyers.usnews.com/lawyers/james-l-goldman/90137092>. Home no. 805-320-6587

Brett Curlee, Esq. <https://apps.calbar.ca.gov/attorney/Licensee/Detail/151058>

End Report



Christina Taft <taftchristina.ceo@gmail.com>

---

## Fwd: Anthony Fox Missing Person Investigation VPD 01-18806

---

Mario George Nitrini 111 <[marionit111@gmail.com](mailto:marionit111@gmail.com)>  
To: [taftchristina.ceo@gmail.com](mailto:taftchristina.ceo@gmail.com)

Sat, Jan 4, 2025 at 4:42 PM

Christina.

This is the email that Paul Barresi sent me pertaining to his emails to the Ventura County Sheriff's Department, and Maud Fox's will pertaining to the subpoena I received regarding your federal lawsuit case against Paul Barresi & Adam Waldman.

Barresi's last sentence is very telling trying to coerce the Ventura County detective's that Johnny Depp had nothing to do with the disappearance of Anthony Fox



"Charles agreed that the possibility of Johnny Depp having anything whatsoever to do with his brother's disappearance is next to zero"

Mario George Nitrini 111

-----

The OJ Simpson Case

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

From: <[paulbarresi@aol.com](mailto:paulbarresi@aol.com)>  
Date: Thursday, April 28, 2022  
Subject: Fwd: Anthony Fox Missing Person Investigation VPD 01-18806  
To: "marionit111@gmail.com" <[marionit111@gmail.com](mailto:marionit111@gmail.com)>

CONFIDENTIAL

Mario, Here is investigative report I sent detectives. Listen to my interview with Anthony Fox's brother, Charles and read mother's Will. KEEP FILE for story.

CONFIDENTIAL

-----Original Message-----

From: [paulbarresi@aol.com](mailto:paulbarresi@aol.com)  
To: [pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov) <[pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov)>  
Cc: [amorales@cityofventura.ca.gov](mailto:amorales@cityofventura.ca.gov) <[amorales@cityofventura.ca.gov](mailto:amorales@cityofventura.ca.gov)>  
Sent: Thu, Dec 9, 2021 4:56 pm  
Subject: Anthony Fox Missing Person Investigation VPD 01-18806

Dear Det. Furlong,

I spoke with lead Detective Morales earlier this week. He said he was immersed in a priority kidnap investigation and that he will contact me to get brought up to

speed on my updated findings re, Anthony Fox's disappearance.

Meanwhile, I now provide you with Anthony Fox's mother Maud Fox's Will along with [30 minute] audiotaped interview I conducted with his Anthony's eldest brother

**Charles Fox** this a.m.

Charles stated his mother **Maud Fox**, told him she had received a letter from Anthony just before Christmas 2001.

As you are well aware, Anthony disappeared just before Christmas 2001 on the 19th. Therefore, he wrote the letter which his mother refused to disclose likely days

prior to his disappearance. What makes this even more bizarre is that Charles asked his mother what Anthony said in the letter but she stubbornly refused to tell

him. And when Charles pressed her to tell her what the letter said, she told him she destroyed it.

Following Maud's death, Charles told me that he searched everywhere for the mysterious letter but it was nowhere to be found.

**Maud Fox had a secret she was keeping for her Anthony so worth protecting, she took it to her grave.**

As evident in a previous report I sent you, however, this was not the first time Maud covered for Anthony. When he filed for bankruptcy, she helped him fabricate a fraudulent laundry list people and businesses to whom he alleged he owed money and even went so far as to include her own name to the bogus list.

Charles was very surprised to hear that Johnny Depp turned over his interests in the Viperoom to Anthony's daughter. Despite it being widely reported, Charles said he was not aware.

What surprised him even more was to learn that his mother added Anthony's daughter to her Will because his she didn't think too kindly of Constance.

I suspect Anthony's letter to his mom included a plea for her to care for his daughter because his mother's [revised Will] makes generous provisions for her including

10,000 pounds in addition to Anthony's share of the estate, as stipulated in Will, after he is deemed dead in 2006. It appears this date 2006 was just pulled out of the hat which leads to only more suspicion. it is likely Maud wanted to honor her son's wishes that she provide for his daughter.

**Irrespective of what Anthony's letter said, writing the letter only days before his disappearance is suspect.**

**Anthony's mom's refusal to say what was in the letter is further suspect.**

**To my mind, Anthony vanishing into thin air was not something he didn't see coming.**

Charles believes Anthony's daughter Constance knows more than what she has disclosed.

I told Charles that Johnny Depp is a very generous good hearted man and that over the years he has helped many people, paying their rent, bills, medical expenses, etc.

Charles confided that there is a stronger likelihood that Anthony is either still alive and just wanted to create the impression he disappeared or he committed suicide."

Charles agreed that the possibility of Johnny Depp having anything whatsoever to do with his brother's disappearance is next to zero.

End Report

Paul Barresi  
cell no. 908-656-5712

**FYI**

**Charles Fox**, Tel no. 011-44-1255-312-524 age 75, resides with wife Morna at [8A Catharine Place, Bath, Avon, BA1 2PR- England](#)  
[https://en.wikipedia.org/wiki/Bath,\\_Somerset](https://en.wikipedia.org/wiki/Bath,_Somerset)

-----Original Message-----

From: Furlong, Patrick <[pfurlong@cityofventura.ca.gov](mailto:pfurlong@cityofventura.ca.gov)>  
To: [paulbarresi@aol.com](mailto:paulbarresi@aol.com) <[paulbarresi@aol.com](mailto:paulbarresi@aol.com)>  
Sent: Wed, Jul 31, 2019 12:40 pm  
Subject: Ref Anthony Fox Missing Person Investigation VPD 01-18806

Per our phone conversation, I am reaching out to you to inquire about any information regarding the Missing Person investigation for Anthony Fox (VPD 01-18806).

Thanks again,

Patrick Furlong

Criminal Investigative Technician  
Sex Offender Registration / Missing Persons  
Ventura Police Department  
1425 Dowell Dr., Ventura, CA 93003  
(805) 339-4473 Office

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### 3 attachments

-  **Johnny Depp - Charles Fox call\_09-36-18\_OUT\_16699291319017.amr**  
3001K
-  **Maud Fox Will 1.pdf**  
528K
-  **Maud Fox Will 2.pdf**  
30K



Christina Taft &lt;taftchristina.ceo@gmail.com&gt;

**Fwd: ANTHONY FOX'S DAUGHTER CONSTANCE**

**Mario George Nitriini 111** <[marionit111@gmail.com](mailto:marionit111@gmail.com)>  
To: [taftchristina.ceo@gmail.com](mailto:taftchristina.ceo@gmail.com)

Sat, Jan 4, 2025 at 4:46 PM

The OJ Simpson Case

Paul Barresi sent me this.  
It's his interview with Anthony Fox's daughter Constance.

Mario George Nitriini 111

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The OJ Simpson Case

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

From: <[paulbarresi@aol.com](mailto:paulbarresi@aol.com)>  
Date: Thursday, April 28, 2022  
Subject: ANTHONY FOX'S DAUGHTER CONSTANCE  
To: "marionit111@gmail.com" <[marionit111@gmail.com](mailto:marionit111@gmail.com)>

CONFIDENTIAL

Mario, Here is my interview with Anthony Fox's daughter Constance. Read all material sent to you thus far and I want you to take notes on paper and deliver the high points for a story. There are a lot of people I feel who know something but are keeping very quiet. Paul

DONFIDENTIAL

**Major Piece of Evidence Gone:**

Anthony Fox's daughter believes letter he wrote to his mother told her of his intentions to disappear.

**Another Major Piece of Evidence Gone**

Candace was forced to leave home that she shared with her father so quickly, she abandoned the answering machine filled with many voice messages, likely some from her father, she never got a chance to listen too...

Police never took the answering machine, or the voice recordings left on the answering machine into evidence.

**Candace's unlikely guardians**

Lawyers suing Johnny Depp on behalf of Anthony Fox of all people cared for their client's daughter, following their client's disappearance.

CANDADE FOX – CALL – DEC 11 – 9:45 A.M.

Paul: Good morning

Constance: Hi, how are you?

Paul: Hi, who is this?

Constance: Constance Fox

Paul: I was wondering if you had a chance to look at the Will, but I also wanted to tell you—By the way, how's the little guy doing? It's a little quieter. Now, my conversation with Charles [Fox]...There are little things—He said he was sorry he couldn't be of more help but often when you talk to people, they recall things that they don't realize the significance of it. And he seems to be as taken aback and absolutely puzzled over Anthony writing a letter either on the day he disappeared or just before he disappeared. He [Charles] was able to figure it out that your grandmother got the letter just before Christmas. The letter probably takes six or seven days to get to London, so it was likely written either just before he disappeared or when he disappeared. And I want to ask you, why do you suppose your dad wrote your grandma as opposed to another member of the family. I know he was very close to you and I'm curious as to why he didn't write the letter to you.

Constance: Because I was barely 16 maybe. I mean my assumption is that he was giving her, you know...

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<https://mail.google.com/mail/u/1/?ik=fcf2a400f0&view=pt&search=all...>

Paul: Instructions or letting her know...

Constance: Yeah, what his intention or plans were.

Paul: That's what we thought too. He was giving her sort of an account of what his next move. But the thing is, why do you suppose he would leave so many in pain, especially you. Why would he leave so them in pain unless he told your grandma to let them know that I'll be okay, but she decided not to do it. She went so far as to destroy that letter and that letter is a significant piece and the detectives believe that as well. The letter might have been the answer.

Constance: Yeah, I mean, the letter for me is something that I did not know about, and it brought up a lot of questions. I need a little more time to process some of this. I also want to speak with Charles. I am trying to figure out a time when I can do that. Given the time difference. I'm with my kid so I would like to try and have that conversation without any distraction.

Paul: I think they are about 9 hours ahead. Now on the Will, did you get a chance to look at it?

Constance: Not really, I mean honestly, I don't know how these things work, but I would imagine that anything that should have come to me after all this time, it's probably too late. I don't have a lot of expectations.

Paul: I understand. The letter that he wrote though, did it give you a little piece of mind? In other words, if the letter is what we think, that it was his plan of what he intended to do, supports your belief that likely, he did go off the grid.

Constance: Yeah, that's entirely possible. I can never really say without reading the letter.

Paul: Yeah, we can never really say for sure. Okay, I will leave you with your thoughts and we can talk in a couple of weeks if you want.

Constance: That sounds good. I am going to speak with Charles. It's been 16 or 17 years since we last spoke. I tried to reach out to him when I went to London after I graduated to sort of pay my respects to my father and find my grandmother's place via my grandmother's lawyer, who was the only person I had a contact number for because he had to give me that money from the Will. I don't know if the message [I gave the lawyer] ever made its way to Charles—This is a lot of personal stuff, I apologize.

Paul: Well, now you do have Charles' address and his phone number, and you can talk to him. He is an awfully nice guy.

Constance: Yeah, I know. I remember him, fondly.

Paul: Final question, I want to ask you. Did you dad ever say to you that he was in fear of his life or that he was in danger?

Constance: I don't know if would have shared that with me honestly if he was.

Paul: So, he may have been, but he never shared it with you.

Constance: **No, I mean, I saw in the year leading up to his disappearance, I saw my father lose his temper and become uncollected. My father was always a very calm, collected, and lovable person. I saw him suffer more frustration and desperation in that last year than I did many years prior, in my entire childhood. Fear, I never knew my father to be a fearful man.**

Paul: It wasn't like he got any threatening calls or anything like that that you know of.

Constance: This was way before cell phones. I was a teenage girl, I had to beg him to get a landline. He didn't even have a landline-- An answering machine, I mean.

Paul: I see

#### **ANOTHER IMPORTANT PIECE OF EVIDENCE GONE...**

Constance: **So, this is the other very unfortunate piece—Whether there was also a letter for me or not, I will never know. You know, I had to leave home [after my father went missing] because I was a minor alone. I had my own life, I was self-sufficient, I had a boyfriend, I was working. He [Anthony Fox] was working. Point being, [after he disappeared] I left quite suddenly in the middle of night to stay with someone. And when I came back to get my things, it was very much like, we had to get in and get my stuff and get out. So, I didn't really get a chance to do a once over. When I went to the answering machine there were so many messages. The mailbox was full, [but it may have well been empty] because I didn't get to look at anything so whether he [Anthony] called or not, I don't know. We had phone records. I don't know whether anybody [people who went in and cleaned up, missing persons detectives or whomever] looked at these things.**

Paul: Why did you leave abruptly?

Constance: Because the police came, and then I could not be alone. I literally had just turned 16. I could not be alone.

Paul: Was this after they [the police] found the [Anthony's abandoned] truck and everything?

Constance: No, this was before the truck. I went to work, and I thought, 'I haven't seen my dad in a couple of days'. My co-workers were adamant that I call the police. So, I called the police and reported that I hadn't seen him for a while.

Paul: Now, before you left abruptly, did the police search the place?

Constance: No, they asked a couple of questions. This isn't on record? None of this is in the report? [Note: Constance should have damn-well gotten a report but never did.]

Paul: I am more of a provider of information than a receiver of information, but I am sure because you're involved, they [the police detectives looking for your father] will tell you more than they are going to tell me. This works better for the police because whenever an outside investigator is involved, there is another pair of eyes, heart and mind involved, so they prefer rather not to lead me anywhere. Their attitude is, 'Okay if there is new intelligence, something we might have missed, you find it and let us know. [The many messages left in the answering machine—so many that they filled the answering machine to the limit, for example, is an extraordinary piece of evidence that may have gleaned valuable information as to Anthony's whereabouts.]

Constance: Do you work with the police department or did someone else hire you.

Paul: I am assisting the detectives directly. I keep forgetting that you were a minor at the time. When you called the police was it on the 19<sup>th</sup> of Dec or before the 19<sup>th</sup> of Dec [2001]?

Constance: I think it was before the 19<sup>th</sup>. What is the significance of the 19<sup>th</sup>.

Paul: Well because this is the [official] date that was reported when he allegedly disappeared. I thought that when his vehicle was found on Jan 2, [2002] that was the date I went by but when your uncle told me there was a letter, you understand, that gave it a closer timeline. Your uncle said he [Anthony] wrote a letter just before he disappeared. And your grandmother said she received it just before Christmas, that tells me that the 19<sup>th</sup> or in the middle of December is on or about the time he would have mailed the letter. But if you think you called the police before the 19<sup>th</sup> that still falls within the timeline even if it was on the 14<sup>th</sup> or 15<sup>th</sup> of December.

Constance: My father was going through a legal battle, so I stayed with one of the lawyers. [Note: This 'lawyer' is the 'someone' Constance stated she stayed with after she had to abruptly leave her home.] I stayed with one of [my father's lawyer's because I didn't have a lot of friends, so I stayed with one of the lawyers for like a week or so, I want to say.]

Paul: I'm sorry, a lawyer for whom?

Constance: For his [Anthony my father's] case. One his lawyers from his team.

Paul: You were staying with your father's lawyer? Do you remember his name?

Constance: Jim Goldman, [James L. Goldman, Esq, Pircher, Nichols & Meeks – 1925 Century Park /east, 17<sup>th</sup> floor, Los Angeles /ca 90067-6077 was the conservator for the Estate of Anthony Fox] So, Brett Curlee [Brett B. Curlee, Esq. 11355 W. Olympic Blvd. Ste 100, Los Angeles, CA 90064 handled Fox's Bankruptcy] [See Exhibits 1 thru 7] was my dad's primary lawyer. [He was the first lawyer on the case. He came to pick me and my dog. And he let me stay with him and his wife. They just had a baby. Then he let me go stay with my boyfriend's dad and stepmother. And this was all approved by the court. They asked me to stay for Christmas and soon after that my father's truck was found.

[Note: This is highly suspect. Why of all people, did Constance go with Anthony's lawyers?]

Paul: Now the case Anthony Fox vs Johnny Depp etc., I looked at this case early on when it was filed. Was your dad close to getting a settlement?

Constance: There was a lot of back and forth on that. The lawyers seemed very perplexed by his disappearance because they felt confident the case was close to nearing an end.

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<https://mail.google.com/mail/u/1/?ik=fccf2a400f0&view=pt&search=all...>

Paul: The court documents were sky-high, and I know your dad hit a couple of brick roads along the way. I did discover on my own that Sal Jenco—I don't know if you know the name.

Constance: Yeah, I do. He was the manager [of the Viperoom].

Paul: He stole.

Constance: Yeah, I knew that.

Paul: He stole, and he ripped-off Johnny and I guess in ripping off Johnny, he ripped off your dad.

Constance: Yes.

Paul: I was trying to get a hold of him because there is a documentary, Johnny vs Amber, but he didn't want to talk, I assume because he knew everyone had already known he was a thief. Did your dad ever indicate to you that Jenco was ripping him off?

Constance: Yeah, that's what part of the legal battle was.

Paul: I mean did he [your dad] ever express any of that to you directly.

Constance: Yes, I went to a couple of the court dates, and I remember meeting Sal. And he was likeable but in a sleazy way. And my dad something. It was a British thing...He was never one to slander someone, but he made it clear to me that Sal was not one to be trusted

Paul: Sal was a bad apple. I think Johnny Depp was in it for the rock and roll because that was his first love, bands and being around bands and he didn't realize, I don't know, maybe he did, I don't know, but people were stealing from him left and right.

Constance: I think he [Johnny Depp] did. They were doing things that were directly misusing the company trademark. It was more than just a misuse of company funds, skimming off the top.

Paul: Do you know who got those tape messages you had to abandon? What if your dad called about fifteen times?

Constance: That's something I will never know.

Paul: Maybe you can ask your guardian what became of it. **[The notion that the police didn't take the message tape recorder that might have very well contained recorded messages from Anthony, into evidence, is crazy as the old lady destroying Anthony's letter.]**

Constance: My dad didn't have a lot of material attachment. He was the type to take whatever you need in a backpack and leave everything else behind. Move out and get the security deposit back, that was it.

Paul: He was a minimalist which is good for a people that like to just Up and Go, right?

Constance: My dad was very much an Up and Go person. He was very much a wonderer. Prior to having me, he traveled the whole world with his first wife, and he could his whole life in that existence. I know he loved being a parent. He fought very hard in his custody battle for me when I was a child. He was a good father.

End