

Galveston County Texas Malicious Prosecution & Other Acts of Terrorism

Summary with Attached Statements & Emergency Response Transcript

with evidence of False Testimony/ Perjury committed by Rawan Issa Al-Najjar, Samia Adel Marmash, and Lisa Salazar

On December 23, 2020 at 7:17 PM CST, League City police department dispatched heavily armed SWAT and officers after receiving a complaint from Lisa Salazar of a domestic incident. Lisa and her husband Edward Salazar, were instructed by Hatem, to get off his property after they had entered without permission. Lisa Salazar called the police while inside of Hatem Al-Ghuti's home. In the emergency response call, Lisa Salazar complained "*he's refusing to leave 'his house', she 'his wife' told him to leave, **he will not leave** (police transcript — line 21)*". Lisa Salazar acknowledging in her statement that Hatem refused to leave because it is his house, and "*He said that he had nowhere else to go*" (see page 5).

Lisa continued by stating "*the man has an ak47, he was aiming it at his wife, they are Muslim, hes threatening to shoot her,*" an allegation not found in any of the affidavit's submitted by witnesses. The Operator questioned "*are you there right now?*", Lisa replied "*yes i am*", operator appeared to be confused why Lisa is calling the police inside of Hatem's house, if, according to Lisa, he is a "**extremely violent Muslim**" with an AK-47 was threatening them. The Operator asked "*is he holding the gun to you as well?*", with a confused expression evident by elongating "*he*"... Lisa replied, "*he was NOT holding the gun to me, but he was holding it to his wife, and when we walked in he put it down,*" again, no other person witnessed this, not even Lisa's husband Edward Salazar (refer to page 3 in the Accounts below, and attached Exhibit 3 through 6). Operator... "*did he say anything about not letting y'all leave?*", Lisa replied **no**. Operator once more asked, "*so is he kinda like keeping y'all where you are?*", Lisa "**Nnn.**"

Rawan Al-Najjar sought for her husband to leave the house immediately without a chance to collect his belongings, as evidenced in the four of the eighteen statements she wrote in the police report (refer to Exhibit-3, statement #3, 7, 13, 17), as well as Samia (exhibit-4, statement #10), Lisa (exhibit-5, statement #12), Edward's (exhibit-6, statement #13, 19, 22) statements. Investigator COX, E. W. (241239) also noted in the case supplemental report that "*Rawan said that she'd told her husband to get out of the house, and said that she didn't want him to come back. **I informed her that we couldn't evict him from the residence,** and when I asked her if she wanted to file charges on him, she said that she did not. **When I explained about filing charges and EPO's, Rawan advised that she'd like an EPO against her husband, but that she didn't;**"*

Hatem Al-Ghuti was arrested without charge, and released (12/25/20) on a \$2,500.00 bond after being detained in a forty degree cell for about thirty-one hours, notified he is prohibited from getting near Edward and Lisa's property, denied his request to call his wife, and forced him to sign the attached Magistrates order for Emergency Protection — see **Exhibit- 7**.

The Magistrate protective order failed to instruct Rawan Al-Najjar return the medication her husband had been taking at the time. Rawan Al-Najjar, a physician was fully aware of the dangerous health risks associated with disrupting the medication, which has dangerous side-effects and withdrawal symptoms including Seizures, Depression, Anxiety, Irritability, Insomnia (only to name a few). She also withheld his laptop, ID's, and over five years of work material, Rawan refused to return his property.

Hatem Al-Ghuti did not sleep while he was detained for 31 hours, and began to suffer from withdrawal symptoms, which resulted in him not sleeping for over 72 hours after his release. He was not able to visit with his physician prior to January 5, 2021 due to the winter holiday. Apart from severe withdrawal symptoms, Hatem became ill shortly after his release, suffering from Covid like symptoms. Hatem's sister and brother-in-law—who he had been staying with later tested positive with Covid, only one week after Hatem noticed serious symptoms such as high fever.

On December 27, 2020, Rawan Al-Najjar hired the Skillern Law-firm to file a LIFETIME protective order, to prevent Hatem Alghuti from ever seeing his daughter (see Exhibit-10). Note Hatem Al-Ghuti has no prior criminal history. Matthew Allen Skillern assisted Rawan with changing the statements she made in the police report (see Exhibit-3) to the contradicting allegations made in the affidavit attached herein as Exhibit-9. The highlighted portion of the affidavit (below paragraph 7), implies the events conveyed in Lisa and Edward's police statements occurred within a 3 to 4 minute window (see incoming call time (7:13 PM) in the highlighted area — **Exhibit-1**, and 9 one-one call time (7:17 PM— **Exhibit -2**).

On December 29, 2020 Daryl Zavesky issued a Complaint/ Probable Cause Affidavit, and warrant for Hatem Al-Ghuti's arrest with a \$10,000 bond, alleging Hatem violated the protective order by inquiring about the "SWATTING" incident. Mr. Zavesky states that *"One of the last messages he 'Hatem' sent to ALNAJJAR that I observed read, **'I want to die'**, and **'Im not afraid of anything'**" (see **Exhibit -8**) Note: Hatem Al-Ghuti only had \$5.10 in his account.*

On Friday January 10, 2021, a order was handed to Hatem Al-Ghuti demanding he appear in court on Thursday January 14, 2021, giving him only three business days to hire an attorney and come up with \$5,000. Tad Nelson joined Matthew Skillern and his client in mocking Hatem about his inability to afford attorney fees, stating *"he is using daddy's money"*, he also mocked my private writings which Rawan decided to file in the court records without permission. Tad Nelson also failed to advise me about the hearing and engaged in the misconduct. On January 15, Hatem was released from Galveston County prison on a \$10,000 bond. Tom Dickens presented the evidence found in this document to Galveston DA Jack Roady. Jack Roady refused to drop the false charges, instead seeking for Hatem to serve upto one year in prison.

The court also denied Hatem Al-ghuti's request for the return of his personal property, financial assistance to seek the services of a mental health professional, and requests for a photo of his daughter—which violates the protective order according to Matthew Skillern (see email Exhibit).

FIRST ACCOUNT

Rawan Alnajjar: I had a small argument with my husband tonight, he got really upset and got outside to the backyard ^{R.1} ; He started calling me names, with the "f" word, shouting, calling me arrogant and that I will be destroyed with my family ^{R.2} ; I told him i don't want to be with him anymore, and that he needs to leave ^{R.3} ; He said he wont leave. he was shouting so loud that the neighbors next door heard him ^{R.4}.

Samia Marmash: Initially I heard shouting in the backyard. Then another shouting ^{S.1} ;

R: 4 | S: 1

SECOND ACCOUNT

Rawan Alnajjar: After about 20 minutes, he came inside to the office and slammed the door ^{R.6} ;

Samia Marmash: Then Hatem entered into the study ^{S.2} ;

R: 1 | S: 1

THIRD ACCOUNT

Rawan Alnajjar: I went in and told him i want a divorce, and he needs to leave ^{R.7} ;

Samia Marmash: Rawan entered to speak with him ^{S.3} ;

R: 1 | S: 1

FOURTH ACCOUNT

Rawan Alnajjar: He started shouting, yelling again using the "f" word; ^{R.8}

Samia Marmash: Suddenly he shouted loud, using foul language directed towards Rawan; ^{s.4}

R: 1 | S: 1

FIFTH ACCOUNT

Rawan Alnajjar: My mom came to calm him down, he called us "son of bitches" and he slammed the desk with his hands twice; ^{R.9}

Samia Marmash: I entered the office to speak with Hatem to calm the situation; ^{S.5}

R: 1 | S: 1

SIXTH ACCOUNT

Rawan Alnajjar: My mom got scared and left; ^{R.10}

Samia Marmash: Then Hatem shouted at me; ^{S.6}

R: 1 | S: 1

SEVENTH ACCOUNT

Rawan Alnajjar: At this time, the neighbors next door Lisa and Edward Salazar came to calm him down, and he was still very angry and yelling and shouting; ^{R.11}

Samia Marmash: Lisa and Edward came to the house; ^{S.7}

Lisa Salazar: The grandmother opened the door I was shaking; ^{L.5}

Edward Salazar: We knocked on the door and the lady that called my wife opened the door; ^{E.4}

R: 1 | S: 2 | L: 1 | E: 1

EIGHTH ACCOUNT

Rawan Alnajjar: He said he was in a war with me now and my family that i am a "whore" and a piece of shit, that me and my family will be destroyed and ruined, just wait and see; ^{R.12}

Samia Marmash: Then he started using foul language towards everyone-informal language used to imply he became increasingly defensive-vulgar, using offensive language, ect; ^{S.8}

Samia Marmash: Then he said you are my enemy, and would pursue my family; ^{S.11}

Lisa Salazar: Hatham was yelling at his wife; ^{S.6}

Edward Salazar : Hathem was in the office sitting in the chair; ^{E.5}

Lisa Salazar: 911 Transcripts -

Line 2- *"the man has an ak47, he was aiming it at his wife, they are Muslim, hes threatening to shoot her"*

Line 13- *"he was not holding the gun to me, but he was holding it to his wife, and when we walked in he put it down",*

Edward Salazar : They were yelling at each other; ^{E.7}

R: 1 | S: 2 | L: 1 | E: 2

NINTH ACCOUNT

Rawan Alnajjar: I told him to leave, he insisted that he wont leave; ^{R.13}

Rawan Alnajjar: He had a gun in his office, "not sure if it was loaded or not", he held the gun and threatened me and the neighbor not sure the exact words he said, i cant recall; ^{R.14}

Samia Marmash: Then lifted-held-carried, the rifle. He threatened Rawan, and her family. And he said i am a reject; ^{S.9}

Samia Marmash: Then he started saying things to Rawan, that he wouldn't leave the house; ^{S.10}

Samia Marmash: And he continued to say things I didn't understand, because I don't understand English ^{S.11}

Lisa Salazar: The husband and wife were yelling at each other in Arabic; L.8

Note: Lisa Salazar states the incident involving a rifle occurred before she arrived to the house, which does not match any of the statements made by Rawan Alnajjar, Samia Marmash, or Edward Salazar.

Lisa Salazar: The grandmother asked us not to leave or he would kill all of them; (Samia omitted S.6- S.7)

Lisa Salazar: He has his AR-15 at the side of his leg; L.9

Lisa Salazar Police Transcript: Line 17– "when you walk in to the ... when you walk into the house on the right hand side of the office, thats where he's at, if you're facing the office on the left hand-side there's a bookshelf, and its on the far right hand-side of that bookshelf, it's against the... the wall, your not going to be able to see it when you walk in, but it's on the left-hand side at the end of that wall",

Lisa Salazar: He called her a whore and put a gun to her and said he would kill her; L.10

Lisa Salazar: We said to calm down. The Grandmother asked (still shaking) us to call the police, her English isn't good; L.11

Edward Salazar: Hatem then reached beside the cabinet in the office and grabbed a weapon that looked like an AR-15; E.8

Edward Salazar: He had it in his hand. He held it for 10 seconds to 30 seconds. He then put it back where he grabbed it from; E.9

R:2 | S:4 | L: 5 | E: 2

Key Takeway: Lisa Salazar states the incident involving a rifle occurred before she arrived to the house, which does not match any other account. It contradicts statements made by Rawan Alnajjar, Samia Marmash, or Edward Salazar. Refer to Exhibit-4

TENTH ACCOUNT

Rawan Al Najjar: At that time, Liza Salazar went inside and called the police; ^{R.15}

Rawan Al Najjar: I was still with her husband Edward at the office door; ^{R.16}

Rawan Al Najjar: He said go ahead call the police, and i told him to just leave peacefully, he wont leave; ^{R.17}

Rawan Al Najjar: Was very angry, shouting, yelling using bad language, saying that he will take the baby from me. After that i went inside and he left with Edward the neighbor; ^{R.18}

Lisa Salazar: We asked him to come to our house, and he said he is not leaving; ^{L.12}

Lisa Salazar: He said that if he leaves, its an all-out war; ^{L-13}

Lisa Salazar: He said that he had nowhere else to go; ^{L-14}

Lisa Salazar: I went with the grandmother to check on the children, one baby and one 9-year-old; ^{L-15}

Lisa Salazar: I called 911, *the grandmother said to clarify it was me calling, not her*; ^{L-16}

Edward Salazar: My wife went to the back of the house with mother in law; ^{E-10}

Edward Salazar: The wife, Rawan, kept asking to leave. She was at the door to the office; ^{E-11}
cross-reference ^{R-16}

Edward Salazar: I was in the hall between the office and the front door; ^{E-12}

Edward Salazar: When she would keep telling him to leave, he would say he is not leaving; ^{E-13}

Edward Salazar: He said he is not leaving without a war ^{E-14}; Rawan walked away to the back of the house; ^{E-15}

Edward Salazar: I stepped to the doorway of the office. I kept trying to make small talk and calm him down; ^{E-16}

Edward Salazar: He told me him holding the weapon was not directed at me or my wife; ^{E-17}

Edward Salazar: I knew that the mother in law and my wife were on the phone with the police; ^{E-18}

R: 4 | S: 2 | L: 5 | E: 8

OTHER ACCOUNTs

Edward Salazar: I decided to try to get Hatem to leave the house and separate from the weapon since he said he was not leaving without a war; ^{E-19}

Edward Salazar: I got him to agree to go for a drive and we came to my house and took my wives SUV ^{E-20}; We went to Starbucks on 518 near I-45; ^{E-21}

Edward Salazar: He said he was very upset because Rawan was following him around the house nagging and harassing him; ^{E-22}

Edward Salazar: We got coffee and came back to the house. Police got both of us out of my SUV. ^{E-23}

E: 4

Case Supplement Report

Investigator: COX, E. W. (241239)

Details: “Rawan said that she`d told her husband to get out of the house, and said that she didn`*t* want him to come back. **I informed her that we couldn`*t* evict him from the residence**, and when I asked her if she wanted to file charges on him, she said that she did not. **When I explained about filing charges and EPO`s, Rawan advised that she`d like an EPO against her husband, but that she didn`*t*:**”

TRANSCRIPTION OF EMERGENCY RESPONSE CALL

TRANSCRIPT

1. **"Operator"**: "league city 911 what is the address of the emergency?",
2. **"Lisa"**: "ok were address is 4706 so its the house to the left of use, there is a domestic dispute, the man has an ak47, he was aiming it at his wife, they are Muslim, hes threatening to shoot her",
3. **"Operator"**: "ok, ok, ok, ok...4706 is next to it, on what street?",
4. **"Lisa"**: its the house to the left of us
5. **"Operator"**: "ok if you are looking at your house from your street is it the house to the left",
6. **"Lisa"**: "yes, and he is extremely violent, he is armed ",
7. **"Operator"**: "I understand he has an ak and he pointed it at his wife",
8. **"Lisa"**: "yes, and we are the neighbors and they call us over",
9. **"Operator"**: "are you there right now?",
10. **"Lisa"**: "yes i am",
11. **"Lisa"**: "he is very, very violent",
12. **"Operator"**: "is he holding the gun to you as well?",
13. **"Lisa"**: "he was not holding the gun to me, but he was holding it to his wife, and when we walked in he put it down",
14. **"Lisa"**: "and he just had a baby less than a month ago",
15. **"Operator"**: "where is it at right now?",
16. **"Operator"**: "where is the gun at right now?",

17. **"Lisa"**: "when you walk in to the ... when you walk into the house on the right hand side of the office, thats where he's at, if you're facing the office on the left hand-side there's a bookshelf, and its on the far right hand-side of that bookshelf, it's against the... the wall, your not going to be able to see it when you walk in, but it's on the left-hand side at the end of that wall",
18. **"Operator"**: "so right when you come in its at the study... in the office",
19. **"Lisa"**: "it's in the study yes...",
20. **"Operator"**: "ok",
21. **"Lisa"**: "yes, i don't know if... i don't know if it's loaded, he called his wife a whore, he's refusing to leave, she's told him to leave, he will not leave, he told her if he leaves it will be am all out war, the only way he's leaving out this door, and that she's a whore and she's prostituting because she let the neighbors know, she's a pediatrician neurosurgeon on maternity leave right now, her son is here he's nine, he's in the back of the house on the far left, her mother is here, her mother doesn't speak English ",
22. **"Operator"**: "maam is anyone intoxicated, taking any drugs or drinking alcohol?",
23. **"Lisa"**: "no, they don't drink alcohol, but he is an extremist Muslim",
24. **"Operator"**: "ok",
25. **"Operator"**: "ok, so where... is anybody with him in the study right now or no?",
26. **"Lisa"**: "no, we are standing out in the hallway talking to him, my husband is right there just trying to make sure nothing happens, but I don't want us to get shot in the process",
27. **"Operator"**: "i gotcha, is there any y'all could get out of the house safely?",
28. **"Lisa"**: "um...Ya, i don't know, should they all leave the house?",
29. **"Operator"**: "if there is a way to exit the house safely ... go ahead and do it",
30. **"Operator"**: "ok",
31. **"Lisa"**: "ok",
32. **"Operator"**: "that way y'all are away from him, and away from the gun",
33. **"Operator"**: "has it been physical at all tonight, do you know?",

34. **"Lisa"**: "the lady only speaks Arabic, so she doesn't, , she was trying to talk to me but she said he had the ak47 at her face, when I walked in i saw the ak47, he told her the only way he's getting out of the house is through all out war",
35. **"Operator"**: "oh, the only way he is getting out his house is through all out war?",
36. **"Lisa"**: "yeah",
37. **"Operator"**: "did he say anything about not letting y'all leave?",
38. **"Lisa"**: "no",
39. **"Lisa"**: "no, i just told him Hatem y'all love each other let just try to, you know why don't you just come to our house for just a little bit, and he's like no I'm fine, we're getting divorced or we are divorced, i don't know , i extremely freaked out right now, because I'm just getting to know them",
40. **"Operator"**: "gotcha, I gotcha",
41. **"Lisa"**: "please, please, please hurry...",
42. **"Operator"**: "take a deep breath, is there, so is he kinda like keeping y'all where you are?",
43. **"Lisa"**: "Nnn, ",
44. **"Operator"**: "or could y'all maybe like go out the back door?",
45. **"Lisa"**: "im going to talk to the lady real quick, I'm going to talk to the lady really quick because I don't know what is going on, and it's gotten really quite I need to get out",
46. **"Operator"**: "I understand, if you have to just, if you have to put the phone down, just keep it in your hand, just down hang up on me ok?",
47. **"Lisa"**: "ok",

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EXHIBIT's

EXHIBIT- 3

RAWAN ISSA AL-NAJJAR

- Statement - 1 I had a small argument with my husband tonight, he got really upset and got outside to the backyard;
- Statement - 2 He started calling me names, with the "f" word, shouting, calling me arrogant and that I will be destroyed with my family;
- Statement - 3 I told him i don't want to be with him anymore, and that he needs to leave;
- Statement - 4 He said he wont leave. he was shouting so loud that the neighbors next door heard him;
- Statement - 5 I went inside;
- Statement - 6 After about 20 minutes, he came inside to the office and slammed the door;
- Statement - 7 I went in and told him i want a divorce, and he needs to leave;
- Statement - 8 He started shouting, yelling again using the "f" word;
- Statement - 9 My mom came to calm him down, he called us "son of bitches" and he slammed the desk with his hands twice;
- Statement - 10 My mom got scared and left;
- Statement - 11 At this time, the neighbors next door Lisa and Edward Salazar came to calm him down, and he was still very angry and yelling and shouting;
- Statement - 12 He said he was in a war with me now and my family that i am a "whore" and a piece of shit, that me and my family will be destroyed and ruined, just wait and see
- Statement - 13 I told him to leave, he insisted that he wont leave;
- Statement - 14 He had a gun in his office, "not sure if it was loaded or not", he held the gun and threatened me and the neighbor not sure the exact words he said, i cant recall;
- Statement - 15 At that time, Liza Salazar went inside and called the police;
- Statement - 16 I was still with her husband Edward at the office door;
- Statement - 17 He said go ahead call the police, and i told him to just leave peacefully, he wont leave;
- Statement - 18 Was very angry, shouting, yelling using bad language, saying that he will take the baby from me. After that i went inside and he left with Edward the neighbor;

SEE HAND-WRITTEN AND SIGNED STATEMENT BELOW

EXHIBIT- 4

SAMIA ADEL MARMASH

- Statement - 1 Initially I heard shouting in the backyard. Then another shouting;
- Statement - 2 Then Hatem entered into the study;
- Statement - 3 Rawan entered to speak with him;
- Statement - 4 Suddenly he shouted loud, using foul language directed towards Rawan;
- Statement - 5 I entered the office to speak with Hatem to calm the situation;
- Statement - 6 Then Hatem shouted at me;
- Statement - 7 Lisa and Edward came to the house;
- Statement - 8 Then he started using foul language towards everyone-informal language used to imply he became increasingly defensive-vulgar, using offensive language, ect;
- Statement - 9 Then lifted-held-carried, the rifle. He threatened -Rawan- and her family. And he said i am a reject;
- Statement - 10 Then he started saying things to Rawan, that he wouldn't leave the house;
- Statement - 11 Then he said you are my enemy, and would pursue my family;
- Statement - 12 And he continued to say things I didn't understand, because I don't understand English;

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SEE HAND-WRITTEN AND SIGNED STATEMENT BELOW

EXHIBIT -5

LISA SALAZAR

- Statement - 1 Grandmother called, said to hurry to her house;
- Statement - 2 Hatham put a gun to his wife and threatened to kill her;
- Statement - 3 The grandmother told me to hurry, he wants to kill the wife;
- Statement - 4 I told my husband to join me and see the situation;
- Statement - 5 The grandmother opened the door I was shaking;
- Statement - 6 Hatham was yelling at his wife;
- Statement - 7 The grandmother asked us not to leave or he would kill all of them;
- Statement - 8 The husband and wife were yelling at each other in Arabic;
- Statement - 9 He has his AR-15 at the side of his leg;
- Statement - 10 He called her a whore and put a gun to her and said he would kill her;
- Statement - 11 We said to calm down. The Grandmother asked, still sharking, us to call the police, her English isn't good;
- Statement - 12 We asked him to come to our house, and he said he is not leaving;
- Statement - 13 He said that if he leaves, its an all-out war;
- Statement - 14 He said that he had nowhere else to go;
- Statement - 15 I went with the grandmother to check on the children, 1 baby, and 1 9-year-old;
- Statement - 16 I called 911, the grandmother said to clarify it was me calling, not her;
- Statement - 17 I came out and saw Hatham and my husband were gone. My husbands shoes were gone. I saw the police in the front. I became very scared;
- Statement - 18 I searched for my husband at my house and didnt see him there. My children and I went outside to meet the cops. We were taken to the front porch of Hathams opposite neighbor and waited until my husband returned in the car with Hatham.

EXHIBIT- 6

EDWARD SALAZAR

- Statement - 1 My wife and I were at home;
- Statement - 2 My wife got a call from the neighbors at 4704 Eagle Cove;
- Statement - 3 The mother of the wife that owns the house Asked my wife to please come over;
- Statement - 4 We knocked on the door and the lady that called my wife opened the door;
- Statement - 5 Hatem was in the office sitting in the chair;
- Statement - 6 The wife was at the door to the room;
- Statement - 7 They were yelling at each other;
- Statement - 8 Hatem then reached beside the cabinet in the office and grabbed a weapon that looked like an AR-15;
- Statement - 9 He had it in his hand. He held it for 10 seconds to 30 seconds. He then put it back where he grabbed it from;
- Statement - 10 My wife went to the back of the house with mother in law;
- Statement - 11 The wife, Rawan, kept asking to leave. She was at the door to the office;
- Statement - 12 I was in the hall between the office and the front door;
- Statement - 13 When she would keep telling him to leave, he would say he is not leaving;
- Statement - 14 He said he is not leaving without a war;
- Statement - 15 Rawan walked away to the back of the house;
- Statement - 16 I stepped to the doorway of the office. I kept trying to make small talk and calm him down;
- Statement - 17 He told me him holding the weapon was not directed at me or my wife;
- Statement - 18 I knew that the mother in law and my wife were on the phone with the police;
- Statement - 19 I decided to try to get Hatem to leave the house and separate from the weapon since he said he was not leaving without a war;
- Statement - 20 I got him to agree to go for a drive and we came to my house and took my wifes SUV;
- Statement- 21 We went to Starbucks on 518 near I-45;
- Statement - 22 He said he was very upset because Rawan was following him around the house nagging and harassing him;
- Statement - 23 We got coffee and came back to the house. Police got both of us out of my SUV.

SEE HAND-WRITTEN AND SIGNED STATEMENT BELOW

EXHIBIT -8

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

BEFORE ME, the undersigned authority, on this day personally appeared Daryl Zavesky who, after being by me duly sworn, on oath deposes and says: That heretofore, to-wit, on or about the 29 of December, 2020, and before the making and filing of this Complaint, in the County of Galveston and the State of Texas, Hatem Tawfiq Alghuti

Did then and there unlawfully,

intentionally and knowingly violate the terms of an order issued by Judge McCumber of the #2 [court name and number] of Galveston County, Texas, on #12/24/2020, under authority of Article 17.292 of the Texas Code of Criminal Procedure, by intentionally and knowingly communicating with Raman Alnajjar and Samia Marmash, the protected individual and a member of the family or household, by text messaging, and which conduct was the violation of an order that prohibited any communication with a member of the family or household OR protected individual.

This action was a violation of:

VIOL PROTECT ORDER BIAS/PREJUDICE, 25.071, PC, MA, CJIS #: 38990013

The AFFIANT bases his belief on the following facts: (Probable Cause Statement)

On 12/29/2020, at 1005 hours, Affiant was dispatched to 4704 Eagle Cove Ln in reference to a Violation of an Emergency Protective Order. Affiant made contact with the victims, Rawan Alnajjar and Samia Marmash, the wife and mother-in-law of the suspect, Hatem Alghuti. Alnajjar and Marmash showed me their phones and numerous text messages from Alghuti. On 12/25/2020, Alghuti text messaged Alnajjar twice and Marmash ten (10) times. On 12/26/2020, Alghuti text messaged Marmash six (6) time. On 12/27/2020, Alghuti text messaged Marmash twice. On 12/28/2020, Alghuti text messaged Marmash fourteen (14) times. On 12/29/2020, Alghuti text messaged Alnajjar nineteen (19) times and Marmash eighteen (18) times. At the time of the report, Alghuti was still text messaging both Alnajjar and Marmash about various things to which they were not responding.

Alghuti texted Alnajjar and Marmash about "Swatting" and stating that they falsely accused him which is why he was arrested and that he would pursue the matter. His text messages became increasingly harassing and one of the last messages he sent Alnajjar that I observed read, "I want to die" and "I'm not afraid of anything. I do not accept the terms of the protective order." These text messages, combined with the overwhelming number of text messages, alarmed the victims and caused Alnajjar and Marmash to fear that Alghuti may come back to the residence to cause them harm. The Emergency Protective Order states Alghuti cannot communicate any threat or harassing text messages to either Alnajjar or Marmash.

Due to Alghuti's repeated and harassing communication attempts with Alnajjar and Marmash, a warrant request was filed for Violate Protective Order. Judge McCumber advised to set the bond at \$10,000.

Affiant is Daryl Zavesky, employed by the League City Police Department. Affiant is currently assigned to the Patrol Division where his duties are to investigate all crimes that occur inside the city to include the crime of:

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EXHIBIT C- APPLICANT'S SUPPORTING AFFIDAVIT

Paragraph- 1

My name is **RAWAN AL-NAJJAR**. I am above the age of eighteen years, and I am fully competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

Paragraph- 2

I, RAWAN AL-NAJJAR, am the applicant in the above Application for a Protective Order. I am above the age of eighteen years, and I am seeking protection from dating violence. I am fully competent to make this affidavit. The facts and circumstances alleged are true to the best of my knowledge and belief.

Paragraph- 3

I am the Applicant in this case. **HATEM TAWFIQ ALGHUTI** (herein after referred to as **HATEM**) is the Respondent in this case and is my Husband. **HATEM** and I have a three week old daughter, **SARAH HATEM ALGHUTI** (herein after referred to as **SARAH**). I also have a son from a prior marriage, **MOHAMMAD ALI AB SHARIFEH** (herein after referred to as **ALI**) who I have visitation rights to.

Paragraph- 4

On December 23, 2020, my mother, both children, **HATEM** and I were at home at our residence in League City, Texas. After an argument broke out about who our three week old daughter looked like, we moved into the home office and **HATEM** pulled out his AR-15. He pointed the gun directly at me and threatened to kill me. **HATEM** has a history of anger and fits of rage and at that moment I thought that he was going to kill me. He pulled the gun on my neighbors when they came to my aid and was waving with the gun. **HATEM** is not stable mentally and I fear for my safety as well as my children's safety. The events that led up to **HATEM** pulling the gun on me are as follows:

Paragraph- 5

HATEM was showing me baby pictures and said that our newborn baby **SARAH** looks like his mom. I replied that his mom is beautiful, but the baby doesn't look like his mom, she actually looks like me. He replied that she doesn't look like me. I asked him why he gets upset and worked up whenever people mention that the baby looks like me since this was not the first time he was upset at a comment like this. **HATEM** then got mad, started saying that I am crazy and delusional, then pointed at me with his hands to go away and he left to the back yard.

Paragraph- 6

After a few minutes, I went to the back yard and asked him why he is saying I am crazy and delusional. He got extremely angry and started yelling "go fuck yourself" and

kept repeating the same statement over and over again. I wasn't even able to say anything because he was talking over me. He kept yelling so loud and saying that I am arrogant, and my family is arrogant. HATEM threw the backyard furniture on the floor. He continue to repeated the same phrase "go fuck yourself" so I went back inside and left him outside to calm down.

After about 20-30 minutes, HATEM came inside the house and went to his office where he slammed the door really loud. I went in and asked him what's wrong with him and he kept yelling and shouting to get the fuck out of there and that he doesn't want to talk to me. He started saying that I am arrogant again and to go fuck myself. My mom who is here from Jordan with us at the house came to calm things down. She said "Hattem, darling what's wrong why are you shouting like that?" He stood up and slammed both hands against the desk. He then got his AR 15 which was there in the office at the time and pointed it at me and threatened to kill me. My mom was shaking so I told her to get out of the office and go call his mother.

At this time I was already telling him to leave the house and that I don't feel safe with him being there and he declined still with extreme rage and anger. Our next-door neighbors Lisa and Edward Salazar entered from the front door of the house at this point. My mom had called them after HATEM pulled the rifle at me. Lisa started telling him to calm down and that "you guys love each other and just had a beautiful baby, to go have some tea or coffee at their house to calm down." HATEM refused. HATEM again started yelling saying that he is not leaving the house, that this is his property and his land, and that I am his enemy and it will be all war if he leaves. HATEM started calling me a whore and a prostitute, piece of shit and me and my family sons of bitches. He threatened that me and my family will never be safe, and to "wait and see what will happen." He again got his AR-15 and pointed it at me and also at the neighbors who were still there. He slammed his hands against the desk and said that this is the problem "women don't know their place and they don't respect their husbands."

Lisa went inside and called the police. I went again and told my mom to stay inside with the baby. At this time Edward convinced HATEM to leave and go have coffee. The police arrived and they searched the house, they took his weapon and my and my mom's statements and they asked me if I want to press charges. I declined out of fear for retaliation. The police then took him to jail after he came back with Edward and

See Note #1
Paragraph- 7

Refer to
Exhibit 1 & 2
Time log and
Emergency
Response Call
Time

Paragraph- 8


Paragraph- 9

Paragraph- 10

See Note # 2

took both Lisa and Edward's statements.

10 The police said that I will be given an emergency protective order and they will charge him with terroristic threat. He stayed in jail for almost 24 hours and was bailed by his father. Since his release, HATEM has violated the Emergency Protective Order and has contacted me directly and has been sending my mother threatening messages as well that are meant for me. He has said that we betrayed him and he will never forgive us. HATEM has said that he is "charging us of an attempt murder of an officer of God" and that he didn't drop that charge. He sent one message with an entity he created and said he put Sarah's custody under "Al-hijaz." HATEM is not mentally well and has violent outbursts and tendencies that have escalated. I'm very concerned about his state of mind as it has taken a downturn over the last two years. He has been unemployed for two years and has been spending long hours in the home office locking himself in saying that he is "working on numbers" from the holy Quran and attaching these numbers to everyday life matters and trying to give them meaning. He has ended all his relationships with his friends and family for the last two years and recently purchased the AR-15. I'm very concerned for my safety and that of my family.

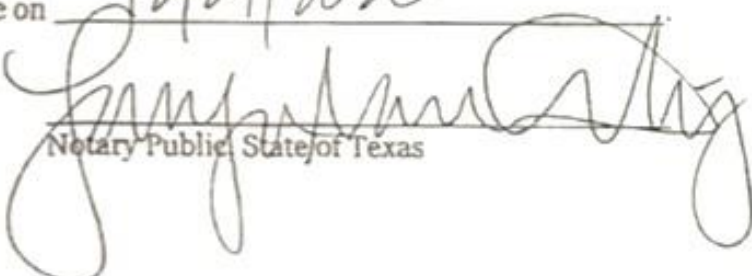

RAWAN AL-NAJJAR, Affiant

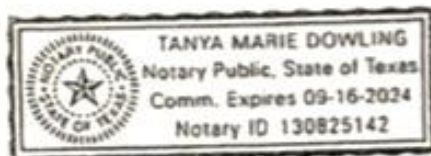
State of Texas
County of Galveston

§
§

SIGNED under oath before me on

12/29/2020


Notary Public, State of Texas



CAUSE NO. 20-FD-2694

RAWAN AL-NAJJAR	§	IN THE DISTRICT COUNTY
AND	§	
	§	COURT AT LAW NO. 2
	§	
HATEM TAWFIQ ALGHUTI	§	GALVESTON COUNTY, TEXAS

APPLICANT'S RELIEF REQUESTED AT PROTECTIVE ORDER HEARING

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **RAWAN AL-NAJJAR**, Applicant, in the above entitled and numbered cause, and respectfully requests the following relief from the Court on Temporary Orders in this matter:

FINDINGS

_____ The Court finds that the Applicant and Respondent are in and intimate or dating relationship and are members of the same household.

_____ The Court finds that family violence has occurred.

_____ The Court finds that family violence is likely to occur again in the future.

_____ The Court finds that Respondent committed an act constituting a felony offense involving family violence against the applicant or a member of the applicant's family or household, regardless of whether Respondent has been charged with or convicted of the offense.

_____ The court therefore grants a lifetime protective over against Respondent for the protection of Applicant, Rawan Al-Najjar, SAMIA ADEL MARMASH and the minor children SAMIA ADEL MARMASH, MOHAMMAD ALI ABU SHARIFEH ("Protected Persons").

_____ The court finds that the protective order is in the best interest of the child.

ORDERS

It is therefore ORDERED that Respondent is prohibited from:

- a. _____ Committing family violence as described in section 71.004 of the