

ORIGINAL

6-26 22

1 Marieke Randoy
2 668 Citadel Parade #2006
3 Vancouver, British Columbia V6B1W6

4 RESPONDENT – IN PRO PER

FILED
Superior Court of California
County of Los Angeles

5 SUPERIOR COURT OF THE STATE OF CALIFORNIA JUN 17 2015

6 FOR THE COUNTY OF LOS ANGELES Sherri R. Carter, Executive Officer/Clerk
7 By [Signature], Deputy Pedro Martinez

8 REED RANDOY,

9 Petitioner,

10 v.

11 MARIEKE RANDOY,

12 Respondent

) CASE NO. BD621137
)
) SPECIAL APPEARANCE RESPONSE
) DECLARATION OF RESPONDENT
) MARIEKE RANDOY
)
) Date: June 26, 2015
) Dept.: 22
) Time: 8:30 AM
)
)

13 I, MARIEKE RANDOY, DO HEREBY DECLARE:

- 14 1.) I am the Respondent in the above captioned matter. I offer my declaration in lieu of personal
- 15 testimony pursuant to Sections 2009 and 2015.5 of the California Code of Civil Procedure; Rule
- 16 1225 of the California Rules of Court; Reifler v. Superior Court (1974) 39 Cal.App.3d 479; and
- 17 Marriage of Stevenot (1984) 154 Cal.App.3d 1051. The facts stated herein are personally known
- 18 to me and if called as a witness and sworn, I could competently testify thereto except to those
- 19 facts, which are stated on information and belief, and as to those facts, I believe them to be true.
- 20 2.) I am the mother of minor child Hunter Randoy ("Hunter") (D.O.B. 4/10/12)
- 21 Hunter's father.
- 22 3.) I am specially appearing in this matter for the sole purpose of responding to Petitioner's Ex Parte
- 23 Application, and I am not accepting the general jurisdiction of this court. I submit this Response
- 24 Declaration in response to Petitioner's false and slanderous allegations made in his Ex Parte
- 25
- 26
- 27
- 28

CIT/CASE: BD621137
 LRA/DE#: 1137
 RECEIPT #: FINE/20150611
 DATE PAID: 06/17/15 11:40:00 AM
 PAYMENT: \$435.00
 RECEIVED:
 CHECK:
 CASH:
 CHANGE:
 CARD:
 \$45.00
 \$0.00
 \$0.00
 \$0.00
 310

1 Application executed June 5, 2015.

2 **FACTS**

3 4.) On or about April 1, 2014, Reed Randoy ("Petitioner") leased an apartment for him and I to
4 cohabitate in with our son, Hunter, in Vancouver, British Columbia, while I pursued a career in the
5 arts in Canada. The plan was for him to sell all of his belongings and property in the States so that
6 we may move up as a family. We had agreed on this plan together and made the mutual decision to
7 relocate and establish our home in Canada.
8

9 5.) On January 5, 2015, Petitioner imported my car, which I drove while residing in California, to
10 Canada (**Exhibit A**) for me to drive while in Canada (**Exhibit B**) with our son, while he returned
11 to Los Angeles to resume working.

12 6.) On April 10, 2012, Petitioner and I obtained a Certificate of Canadian Citizenship (**Exhibit C**) for
13 Hunter, so that he may legally travel to Canada with us and reside there while I pursue my career.
14

15 7.) Petitioner has supported Hunter and I by transferring \$5,000.00 to a bankcard for me to pay rent
16 and purchase food with every month for the past year that we spent in Canada without him.

17 8.) At or around April 26, 2015, I became very ill and returned to the states with Hunter to see a
18 doctor that was covered by our family's insurance. Upon return and after spending the weekend
19 with Petitioner, our son became very ill and required medical attention. After five weeks of
20 treatment and recovery, he was cured and feeling better. Through the entire process, my intention
21 was to take Hunter back to Canada once he was cured, because Canada was where we resided for
22 over a year and where he had his own room filled with his toys and belongings.
23

24 9.) At the time, Petitioner resided on a boat and had no permanent residence. While in Los Angeles,
25 Hunter and I were forced to stay in a motel and on friends' couches because we had nowhere else
26 to go. The address for Petitioner, listed on all of the court documents, is for a P.O. Box and not a
27 real residence.
28

1 10.) Petitioner alleges that I am a flight risk and that I kidnapped our son and took him to Canada
2 without his consent or knowledge. Petitioner knew that once Hunter was cured, we would return to
3 our residency in Canada because it was our home. Petitioner has never been denied permission or
4 access to see Hunter, and has always been welcome to visit. As his primary caretaker, I took
5 Hunter back to Canada where we have established our home.

6
7 11.) Petitioner alleges that he had no knowledge of my return to Canada, and yet paid the rent for the
8 Canada home the night before the Ex Parte hearing, in addition to the \$300.00 he sent for food
9 **(Exhibit D).**

10 12.) Throughout the marriage, and especially towards the end of it, Petitioner was adamant about
11 bringing me back to Los Angeles and did whatever he could to make sure that I did not have a
12 choice but to move back. Every time Petitioner and I were involved in a dispute, he would threaten
13 to charge me with kidnapping; a tactic he used to intimidate me. He claimed that he would cut off
14 all financial support if I did not move back to Los Angeles in his texts "If you won't move here
15 then you're on your own" **(Exhibit E)**. Additionally, Petitioner refused to grant me a travel letter,
16 which made me wary as to his intentions.

17
18 13.) Petitioner decided that because I had not shown a significant increase in booked jobs that my move
19 to Canada and our plan to establish my career was "a lost cause and you and Hunter need to come
20 back here."

21
22 14.) At or around June 8, 2015 after Petitioner cut off all of my resources and money, ensuring that I
23 have no way to return to Los Angeles with Hunter, I asked Petitioner why he did not let me bring
24 Hunter back, and he responded "I control your arms and legs now" **(Exhibit F)**. Petitioner knew
25 that I depended on him for financial support and waited until I had returned to Canada to file for
26 the ex parte hearing, so that once he cut me off, I would have no way to return to the states with
27 Hunter, and would therefore be violating court orders.
28

1 15.) In regards to Petitioner's allegations of my supposed diagnosis of bipolar disorder, I have a letter
2 from my doctor of thirteen years, disputing this diagnosis and proving that my depression has been
3 under control through the use of antidepressants for the past eight years. Additionally, I had been
4 taking this medication three years prior to meeting Petitioner. I have contacted my doctor in
5 regards to this letter and can provide documentation upon the court's request.
6

7 **PRAYER FOR RELIEF**

- 8 16.) I respectfully request this court order that I am granted sole legal and physical custody of Hunter.
9 17.) I respectfully request this court order that Petitioner be granted one weekend a month visitation.
10 18.) I respectfully request this court dismiss the temporary restraining order.
11 19.) I respectfully request this court order that Canada is the appropriate jurisdiction for this matter
12 because the minor child and I have resided in Canada since April 14, 2014.
13 20.) I respectfully request this court make any other orders it deems just and necessary for the best
14 interest of Hunter's health, safety, welfare and education.
15
16

17 I declare under penalty of perjury that the foregoing is true and correct to best of my knowledge.

18 Executed on the 17th day of June 2015 in Los Angeles, California.
19

20 By: Marieke Randoy
21

22 MARIEKE RANDOY, RESPONDENT
23
24
25
26
27
28

EXHIBIT A



Canada Border Services Agency
Agence des services frontaliers du Canada

PROTECTED / PROTÉGÉ **A** when completed / une fois rempli

Duty paid stamp - Timbre de droits acquittés

CBSA/ASFC

2015/01/05

PAID/PAYE

Douglas 220 Hwy 99
Surrey B.C. V3S 9N7

CASUAL GOODS ACCOUNTING DOCUMENT

DÉCLARATION EN DÉTAIL DES MARCHANDISES OCCASIONNELLES

Acct. Per./Pér. / Compt.: 0008658

Date: 2015/01/05 Time/Heure: 19:27

Importer's name - Nom de l'importateur
RANDOY, Reed

Importer's address - Adresse de l'importateur
**668 Citadel Parade
Vancouver
BRITISH COLUMBIA V6B1W6**

Reference No. - N° de référence

Country of export - Pays d'exportation
OWA

Exchange rate - Taux de change
1.172800

Accounting document No. - N° de la déclaration en détail

P#840039319 T

Quantity / Quantité	Description of goods / Désignation des marchandises	Classification No. / N° de classement	Value for duty (CAN dollars) / Valeur en douane (Dollars CAN)	TT	Rate of duty / Taux de droit	E.T. rate / Taux de T.A.	GST/HST rate / Taux de TPS/TVH	PST rate / Taux de TVP	Duty / Droit	Excise tax / Taxe d'accise	Provincial liquor mark-up/Fee / Frais/Majoration prov. sur l'alcool	Provincial tobacco tax / Taxe provinciale sur le tabac	GST/HST / TPS/TVH	Provincial sales tax / Taxe de vente provinciale
01.00001	véhicules avec A/C	8703.9050090	\$1,759.20	10	0.00000	100.00000	0.00000	0.00000	\$0.00	\$100.00	\$0.00	\$0.00	\$92.96	\$0.00
<p>Import of 2002 Toyota Erius VIN#JT2BK18U620065284 Subject offered 90 days to import vehicle (purchased on credit and must settle up loan or get notice from credit agency to allow import) Must import on or before 05APR2015</p>														

CBSA/ASFC DOUGLAS
220-Hwy 99 DOUGLAS P.O.E
SURREY, BC, V3S9N7
8004619999
MID: 17322731688
T#: 0000000000000000

SALE

Exp: 01/01/15
Swiped

01/05/2015 19 28 02 Inv#: 39315
Record#: 120019 Batch#: 005001
Retrieval#: 00000048

Total: \$192.96

Auth Code 085777

Customer copy

Summary - Sommaire

Duty / Droit	\$0.00
Excise tax / Taxe d'accise	\$100.00
GST/HST / TPS/TVH	\$92.96
Provincial liquor mark-up/Fee / Frais/Majoration provinciale sur l'alcool	\$0.00
GST/HST on provincial liquor fee / TPS/TVH sur les frais provinciaux sur l'alcool	\$0.00
Provincial tobacco tax / Taxe provinciale sur le tabac	\$0.00
Provincial sales tax / Taxe de vente provinciale	\$0.00

Money tendered - Argent présenté

Cash - CAN / Comptant - CAN	\$0.00
Cash - U.S. / Comptant - É.-U.	\$0.00
U.S. exchange / Taux de change É.-U.	0.000000
VISA - POS / RDD	\$192.96
TOTAL	\$192.96

20383

EXHIBIT B

From: **Reed Phillip Randoy** reedrandoy@yahoo.com
Subject: **Royal Finance CAN Letter**
Date: **March 21, 2015 at 6:51 PM**
To: **Reed Randoy** reedrandoy@me.com



10/15/2010 08 53

45088 P 002/002

ROYAL FINANCE GROUP

**15720 Ventura Blvd., Suite # 511
Encino, CA. 91436
Tel: (818)995-0988
Fax: (818)385-0221**

**HEAD QUARTERS
1200 S. Hope St., Suite #100
Los Angeles, CA 90015
BY APPOINTMENT ONLY**

March 16, 2015

To Whom It May Concern:

Our records show that Mr. Reed P. Randoy has an open account with us with the following details

Year: 2002 Make: TOYOTA Model: PRIUS VIN #: JT2BK18U620065284

As long as Royal Finance Group retains legal Ownership of the above referenced vehicle until time in which the car is paid in full and is listed as loss payee on all insurance documents we will allow the vehicle to be imported.

If you have any questions, please do not hesitate to call us.

Thank You,



Erica Joesting
Office Manager

EXHIBIT C



Certificate of *Certificat de*
Canadian Citizenship *Citoyenneté canadienne*

The Minister of Citizenship and Immigration *Le ministre de la Citoyenneté et de l'Immigration*
hereby certifies and declares that *certifie et déclare par la présente que*

HUNTER SAMSON REED RANDOY

is a Canadian citizen and, as such, is entitled to *est citoyen/ne canadien/ne et, à ce titre, jouit de tous*
all the rights and privileges and bears all the *les droits et privilèges d'un sujet canadien et assume*
responsibilities, obligations and duties of a *l'ensemble des responsabilités, obligations*
Canadian subject *et devoirs qui lui incombent.*



2012/04/10

K1785444

Effective / En vigueur

Minister of Citizenship and Immigration
Ministre de la Citoyenneté et de l'Immigration

OATH OF CITIZENSHIP**SERMENT DE CITOYENNETÉ**

I swear (or affirm)
 That I will be faithful
 And bear true allegiance
 To Her Majesty Queen Elizabeth the Second
 Queen of Canada
 Her Heirs and Successors
 And that I will faithfully observe
 The laws of Canada
 And fulfil my duties as a Canadian citizen.

Je jure (ou j'affirme solennellement)
 Que je serai fidèle
 Et porterai sincère allégeance
 À Sa Majesté la reine Elizabeth Deux
 Reine du Canada
 À ses héritiers et successeurs
 Que j'observerai fidèlement les lois du Canada
 Et que je remplirai loyalement
 Mes obligations de citoyen canadien.

This certificate is evidence that the person named hereon is a Canadian citizen.

Le présent certificat atteste que la personne ci-nommée est un/e citoyen/ne canadien/ne.

DESCRIPTION - SIGNALEMENT

Certificate no.: K1785444
 N° de certificat :

Effective date of citizenship (yyyy/mm/dd): 2012/04/10
 Date d'entrée en vigueur de la citoyenneté (aaaa/mm/jj) :

UCI: 92528689
 IUC :

Family name: RANDOY
 Nom de famille :

Given name(s): HUNTER SAMSON REED
 Prénom(s) :

Date of birth (yyyy/mm/dd): 2012/04/10
 Date de naissance (aaaa/mm/jj) :

Sex: MALE
 Sexe :

Certificate no.: 
 N° de certificat :

Date of birth: 
 Date de naissance :

Note: Please do not laminate this document.

Note : Veuillez ne pas laminer ce document.

EXHIBIT D

Messages with Reed Randoy

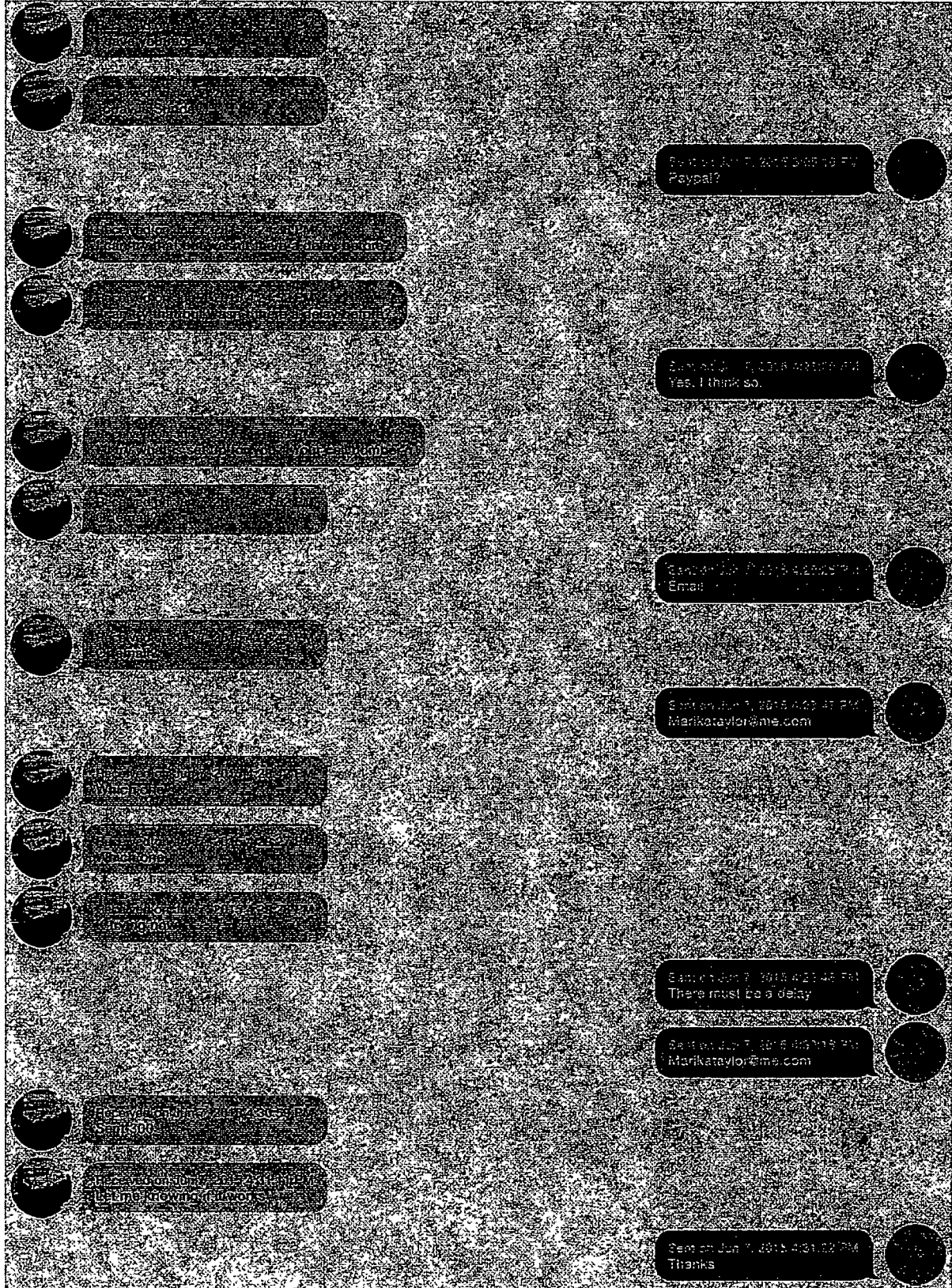


EXHIBIT E

Messages with Reed Randoy

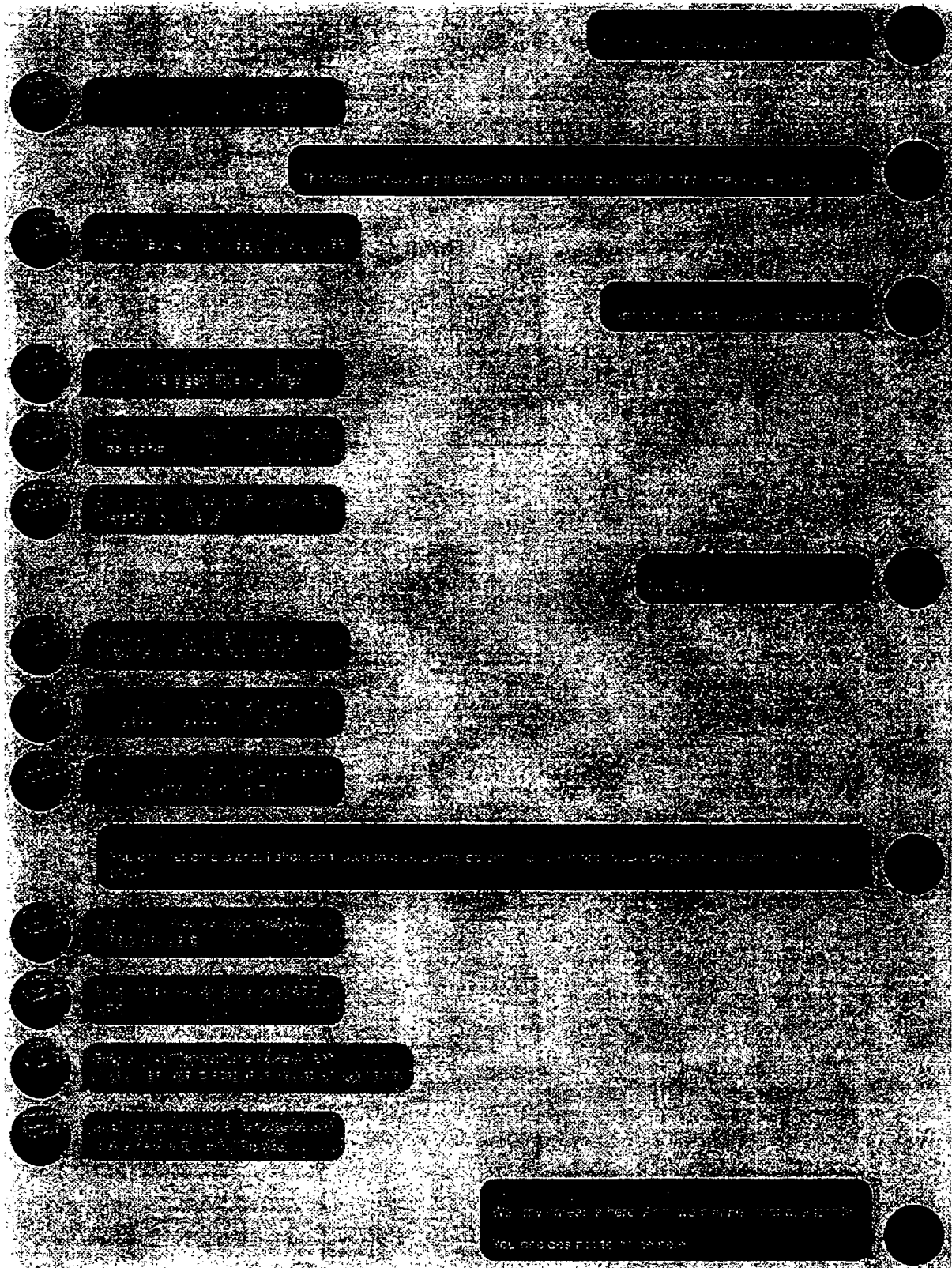


EXHIBIT F

Messages with Reed Randoy

