

#16

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Nicholas A. Salick, Esq. (SBN 236583) Salick Family Law Group, APLC 11111 Santa Monica Blvd., Suite 1700 Los Angeles, CA 90025 TELEPHONE NO 310-492-4324 FAX NO (Optional) E-MAIL ADDRESS (Optional) nas@salickfamilylaw.com ATTORNEY FOR (Name) Petitioner, Reed Rando</p>	<p>FOR COURT USE ONLY</p> <p>FILED Superior Court of California County of Los Angeles JUN 05 2015 Sherri R. Carter, Executive Officer/Clerk By Nicholas J. Young, Deputy</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS 111 N. Hill St. MAILING ADDRESS 111 N. Hill St. CITY AND ZIP CODE Los Angeles, CA 90012 BRANCH NAME Central District</p>	<p>CASE NUMBER BD621137</p>
<p>PETITIONER/PLAINTIFF Reed Rando RESPONDENT/DEFENDANT Marieke Rando OTHER PARENT/PARTY</p>	
<p>REQUEST FOR ORDER <input checked="" type="checkbox"/> Child Custody <input type="checkbox"/> Child Support <input type="checkbox"/> Attorney Fees and Costs <input type="checkbox"/> MODIFICATION <input checked="" type="checkbox"/> Visitation <input type="checkbox"/> Spousal Support <input checked="" type="checkbox"/> Temporary Emergency Court Order <input checked="" type="checkbox"/> Other (specify): Please see #8</p>	

1. TO (name): Respondent, Marieke Rando
2. A hearing on this Request for Order will be held as follows: If child custody or visitation is an issue in this proceeding, Family Code section 3170 requires mediation before or at the same time as the hearing (see item 7.)

a. Date: 6-26-15 Time: 8:30 am ☒ Dept.: 22 ☒ Room: 519

b. Address of court ☒ same as noted above ☐ other (specify):

3. Attachments to be served with this Request for Order:

- a. A blank Responsive Declaration (form FL-320)
- b. ☐ Completed Income and Expense Declaration (form FL-150) and a blank Income and Expense Declaration
- c. ☐ Completed Financial Statement (Simplified) (form FL-155) and a blank Financial Statement (Simplified)
- d. ☒ Points and authorities
- e. ☒ Other (specify): Declarations of Petitioner, James J. **SEE ATTACHED** and Marieke Dotts

Date: 6/4/2015

Reed Rando

(TYPE OR PRINT NAME)

James J. **SEE ATTACHED** and Marieke Dotts

FACSIMILE SIGNATURE

(SIGNATURE)

COURT ORDER

4. ☐ YOU ARE ORDERED TO APPEAR IN COURT AT THE DATE AND TIME LISTED IN ITEM 2 TO GIVE ANY LEGAL REASON WHY THE ORDERS REQUESTED SHOULD NOT BE GRANTED.

5. ☒ Time for ☒ service ☒ hearing is shortened. Service must be on or before (date): forthwith
6. Any responsive declaration must be served on or before (date): 6-15-15; Reply 6-19-15
7. The parties are ordered to attend mandatory custody services as follows:

8. ☒ You are ordered to comply with the Temporary Emergency Court Orders (form FL-305) attached.

9. ☒ Other (specify): grd

Date: 6.5.15

TAMARA HALL OFFICER

To the person who received this Request for Order: If you wish to respond to this Request for Order, you must file a Responsive Declaration to Request for Order (form FL-320) and serve a copy on the other parties at least nine court days before the hearing date unless the court has ordered a shorter period of time. You do not have to pay a filing fee to file the Responsive Declaration to Request for Order (form FL-320) or any other declaration including an Income and Expense Declaration (form FL-150) or Financial Statement (Simplified) (form FL-155).

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Date Bar number, and address) Nicholas A. Salick, Esq. (BBN 236583) Salick Family Law Group, APC 11111 Santa Monica Blvd., Suite 1700 Los Angeles, CA 90025 TELEPHONE NO. 310-492-4324 FAX NO. (Optional) EMAIL ADDRESS (Optional) nas@salickfamilylaw.com ATTORNEY FOR (Name) Petitioner, Reed Randoy		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS 111 N. Hill St. MAILING ADDRESS 111 N. Hill St. CITY AND ZIP CODE Los Angeles, CA 90012 BRANCH NAME Central District		
PETITIONER/PLAINTIFF Reed Randoy RESPONDENT/DEFENDANT Marieke Randoy OTHER PARTY		
REQUEST FOR ORDER <input checked="" type="checkbox"/> Child Custody <input type="checkbox"/> Child Support <input type="checkbox"/> Attorney Fees and Costs <input type="checkbox"/> MODIFICATION <input checked="" type="checkbox"/> Visitation <input type="checkbox"/> Spousal Support <input checked="" type="checkbox"/> Temporary Emergency Court Order <input checked="" type="checkbox"/> Other (specify): Please see #6		
		CASE NUMBER BD621137

1. TO (name) Respondent, Marieke Randoy
 2. A hearing on this Request for Order will be held as follows: If child custody or visitation is an issue in this proceeding, Family Code section 3170 requires mediation before or at the same time as the hearing (see item 7.)

a. Date:	Time:	<input checked="" type="checkbox"/> Dept. 22	<input checked="" type="checkbox"/> Room 519
b. Address of court	<input checked="" type="checkbox"/> same as noted above <input type="checkbox"/> other (specify):		
3. Attachments to be served with this Request for Order:			
a. A blank Responsive Declaration (form FL-320)		c. <input type="checkbox"/> Completed Financial Statement (Simplified) (form FL-156) and a blank Financial Statement (Simplified)	
b. <input type="checkbox"/> Completed Income and Expense Declaration (form FL-150) and a blank Income and Expense Declaration		d. <input checked="" type="checkbox"/> Papers and exhibits	
Date: 06/04/2015 Reed Randoy		e. <input checked="" type="checkbox"/> Other (specify) Declarations of Petitioner, James S. Corbett, & Elaine Pettit	
(TYPE OR PRINT NAME)		SIGNATURE	

☐ COURT ORDER

4. ☐ YOU ARE ORDERED TO APPEAR IN COURT AT THE DATE AND TIME LISTED IN ITEM 2 TO GIVE ANY LEGAL REASON WHY THE ORDERS REQUESTED SHOULD NOT BE GRANTED.
5. ☐ Time for ☐ service ☐ hearing is shortened. Service must be on or before (date):
6. Any responsive declaration must be served on or before (date):
7. The parties are ordered to attend mandatory custody services as follows:
8. ☐ You are ordered to comply with the Temporary Emergency Court Order (form FL-323) attached.
9. ☐ Other (specify):

Date:

JUDICIAL OFFICER

To the person who received this Request for Order: If you wish to respond to this Request for Order, you must file a Responsive Declaration to Request for Order (form FL-320) and serve a copy on the other parties at least nine court days before the hearing date unless the court has ordered a shorter period of time. You do not have to pay a filing fee to file the Responsive Declaration to Request for Order (form FL-320) or any other declaration including an Income and Expense Declaration (form FL-150) or Financial Statement (Simplified) (form FL-155).

PETITIONER/PLAINTIFF: Reed Randoy	CASE NUMBER:
RESPONDENT/DEFENDANT: Marieke Randoy	BD621137
OTHER PARENT/PARTY:	

REQUEST FOR ORDER AND SUPPORTING DECLARATION
☒ **Petitioner** ☐ **Respondent** ☐ **Other Parent/Party** requests the following orders:

1. ☒ **CHILD CUSTODY** ☒ **To be ordered pending the hearing**
 - a. Child's name and age
HUNTER RANDOY, 3
 - b. Legal custody to (name of person who makes decisions about health, education, etc.)
Petitioner/father
 - c. Physical custody to (name of person with whom child will live)
Petitioner/father
 - d. ☒ As requested in form ☐ *Child Custody and Visitation Application Attachment (form FL-311)*
☐ *Request for Child Abduction Prevention Orders (form FL-312)*
☐ *Children's Holiday Schedule Attachment (form FL-341(C))*
☐ *Additional Provisions—Physical Custody Attachment (form FL-341(D))*
☐ *Joint Legal Custody Attachment (form FL-341(E))*
☒ Other (specify): XXXXXXXXXXXX Declaration of Reed Randoy
 - e. ☐ Modify existing order
(1) filed on (date):
(2) ordering (specify):
2. ☒ **CHILD VISITATION (PARENTING TIME)** ☒ **To be ordered pending the hearing**
 - a. As requested in: (1) ☐ Attachment 2a (2) ☐ *Child Custody and Visitation Application Attachment (form FL-311)*
(3) ☒ Other (specify): Declaration of Reed Randoy
 - b. ☐ Modify existing order
(1) filed on (date):
(2) ordering (specify):
 - c. ☐ One or more domestic violence restraining/protective orders are now in effect. (Attach a copy of the orders if you have one.) The orders are from the following court or courts (specify county and state).
(1) ☐ Criminal: County/state: (3) ☐ Juvenile: County/state:
Case No. (if known): Case No. (if known):
(2) ☐ Family: County/state: (4) ☐ Other: County/state:
Case No. (if known): Case No. (if known):
3. ☐ **CHILD SUPPORT (An earnings assignment order may be issued.)**
 - a. Child's name and age
 - b. ☐ I request support based on the child support guidelines
 - c. Monthly amount requested (if not by guideline)
\$
 - d. ☐ Modify existing order
(1) filed on (date):
(2) ordering (specify):

Notice: The court is required to order child support based on the income of both parents. It normally continues until the child is 18. You must supply the court with information about your finances by filing an *Income and Expense Declaration* (form FL-150) or a *Financial Statement (Simplified)* (form FL-155). Otherwise, the child support order will be based on information about your income that the court receives from other sources, including the other parent.

PETITIONER/PLAINTIFF: Reed Randoy	CASE NUMBER
RESPONDENT/DEFENDANT: Marieke Randoy	BD621137
OTHER PARENT/PARTY:	

4. ☐ SPOUSAL OR PARTNER SUPPORT (*An earnings assignment order may be issued.*)
- a. ☐ Amount requested (*monthly*): \$
- b. ☐ Terminate existing order
(1) filed on (*date*):
(2) ordering (*specify*):
- c. ☐ Modify existing order
(1) filed on (*date*):
(2) ordering (*specify*):
- d. ☐ The *Spousal or Partner Support Declaration Attachment* (form FL-157) is attached (*for modification of spousal or partner support after judgment only*)
- e. An *Income and Expense Declaration* (form FL-150) must be attached
5. ☐ ATTORNEY FEES AND COSTS are requested on *Request for Attorney Fees and Costs Order Attachment* (form FL-319) or a declaration that addresses the factors covered in that form. An *Income and Expense Declaration* (form FL-150) must be attached. A *Supporting Declaration for Attorney Fees and Costs Order Attachment* (form FL-158) or a declaration that addresses the factors covered in that form must also be attached
6. ☐ PROPERTY RESTRAINT ☐ To be ordered pending the hearing
- a. The ☐ petitioner ☐ respondent ☐ claimant is restrained from transferring, encumbering, hypothecating, concealing, or in any way disposing of any property, real or personal, whether community, quasi-community, or separate, except in the usual course of business or for the necessities of life.
☐ The applicant will be notified at least five business days before any proposed extraordinary expenditures, and an accounting of such will be made to the court.
- b. ☐ Both parties are restrained and enjoined from cashing, borrowing against, canceling, transferring, disposing of, or changing the beneficiaries of any insurance or other coverage, including life, health, automobile, and disability, held for the benefit of the parties or their minor children.
- c. ☐ Neither party may incur any debts or liabilities for which the other may be held responsible, other than in the ordinary course of business or for the necessities of life.
7. ☐ PROPERTY CONTROL ☐ To be ordered pending the hearing
- a. ☐ The petitioner ☐ respondent is given the exclusive temporary use, possession, and control of the following property that we own or are buying (*specify*):
- b. ☐ The petitioner ☐ respondent is ordered to make the following payments on liens and encumbrances coming due while the order is in effect:
- | <u>Debt</u> | <u>Amount of payment</u> | <u>Pay to</u> |
|-------------|--------------------------|---------------|
| | | |
8. ☒ OTHER RELIEF (*specify*):
- Order for the immediate return of Hunter Randoy to Petitioner's custody.
 - Order for the immediate turnover to Petitioner of all travel documents issued to Hunter including but not limited to all passports, visas, identification cards, etc.

NOTE: To obtain domestic violence restraining orders, you must use the forms *Request for Order (Domestic Violence Prevention)* (form DV-100), *Temporary Restraining Order (Domestic Violence)* (form DV-110), and *Notice of Court Hearing (Domestic Violence)* (form DV-109).

PETITIONER/PLAINTIFF: Reed Randoy	CASE NUMBER
RESPONDENT/DEFENDANT: Marieke Randoy	BD621137
OTHER PARENT/PARTY:	

- 9 ☒ I request that time for service of the *Request for Order* and accompanying papers be shortened so that these documents may be served no less than (*specify number*): _____ days before the time set for the hearing. I need to have this order shortening time because of the facts specified in item 10 or the attached declaration.
10. ☒ FACTS IN SUPPORT of orders requested and change of circumstances for any modification are (*specify*):
☒ Contained in the attached declaration. (*You may use Attached Declaration (form MC-031) for this purpose. The attached declaration must not exceed 10 pages in length unless permission to file a longer declaration has been obtained from the court.*)
 Declaration of Reed Randoy
 Declaration of James Joseph Campbell
 Declaration of Elaine Dotts
 Memorandum of Points and Authorities

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 6/4/2015

Reed Randoy _____
 (TYPE OR PRINT NAME)

SEE ATTACHED
 FACSIMILE SIGNATURE
 (SIGNATURE OF APPLICANT)



Requests 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 proceeding. Contact the clerk's office or go to www.courts.ca.gov/forms for *Request for Accommodations by Persons With Disabilities and Response* (form MC-410). (Civil Code, § 54.8)

PETITIONER/PLAINTIFF: Reed Randoy	CASE NUMBER
RESPONDENT/DEFENDANT: Marieke Randoy	BD621137
OTHER PARENT/PARTY:	

9. ☒ I request that time for service of the Request for Order and accompanying papers be shortened so that these documents may be served no less than (specify number) _____ days before the time set for the hearing. I need to have this order shortening time because of the facts specified in Item 10 or the attached declaration.

10. ☒ FACTS IN SUPPORT of orders requested and change of circumstances for any modification are (specify):

☒ Contained in the attached declaration. (You may use Attached Declaration (form MC-031) for this purpose.

The attached declaration must not exceed 10 pages in length unless permission to file a longer declaration has been obtained from the court.)

Declaration of Reed Randoy

Declaration of James Joseph Campbell

Declaration of Elaine Dotte

Memorandum of Points and Authorities

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 06/04/2015

Reed Randoy

(TYPE OR PRINT NAME)

(SIGNATURE OF AFFIRANT)



Requests 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 proceeding. Contact the clerk's office or go to www.courts.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Response (form MC-410) (Civil Code, § 54.6.)

PETITIONER/PLAINTIFF: Reed Randoy
 RESPONDENT/DEFENDANT: Marieke Randoy
 OTHER PARENT/PARTY:

CASE NUMBER
 BD621137

TEMPORARY EMERGENCY COURT ORDERS
Attachment to Request for Order (FL-300)

The court makes the following orders, which are effective immediately and until the hearing:

1. ☐ PROPERTY RESTRAINT

- a. ☐ Petitioner ☐ Respondent ☐ Claimant is restrained from transferring, encumbering, hypothecating, concealing, or in any way disposing of any property, real or personal, whether community, quasi-community, or separate, except in the usual course of business or for the necessities of life.
☐ The other party is to be notified of any proposed extraordinary expenditures, and an accounting of such is to be made to the court.
- b. ☐ Both parties are restrained and enjoined from cashing, borrowing against, canceling, transferring, disposing of, or changing the beneficiaries of any insurance or other coverage, including life, health, automobile, and disability, held for the benefit of the parties or their minor child or children.
- c. ☐ Neither party may incur any debts or liabilities for which the other may be held responsible, other than in the ordinary course of business or for the necessities of life.

2. ☐ PROPERTY CONTROL

- a. ☐ Petitioner ☐ Respondent is given the exclusive temporary use, possession, and control of the following property that the parties own or are buying (specify):
- b. ☐ Petitioner ☐ Respondent is ordered to make the following payments on liens and encumbrances coming due while the order is in effect:
- | Debt | Amount of payment | Pay to |
|------|-------------------|--------|
|------|-------------------|--------|

3. ☒ MINOR CHILDREN

- a. ☒ Petitioner ☐ Respondent will have the temporary physical custody, care, and control of the minor children of the parties ☒ subject to the other party's rights of visitation as follows:
No visits to Respondent
- b. ☐ Petitioner ☒ Respondent must not remove the minor child or children of the parties
 (1) ☒ from the State of California.
 (2) ☒ from the following counties (specify): *U.S.A.*
 (3) ☒ other (specify): *Los Angeles County*
- c. ☐ Child abduction prevention orders are attached (see form FL-341(B)).
- d. (1) Jurisdiction: This court has jurisdiction to make child custody orders in this case under the Uniform Child Custody Jurisdiction and Enforcement Act (part 3 of the California Family Code, commencing with section 3400).
 (2) Notice and opportunity to be heard: The responding party was given notice and an opportunity to be heard as provided by the laws of the State of California.
 (3) Country of habitual residence: The country of habitual residence of the child or children is
☒ the United States of America ☐ other (specify):
 (4) Penalties for violating this order: If you violate this order, you may be subject to civil or criminal penalties or both.

4. ☒ OTHER ORDERS (specify): *Immediate Return of minor*

☐ Additional orders are listed on Attachment 4. to U.S.A. into

Date: *6-5-15*

② Release of minor's passport and OR visas to the Petitioner's counsel.

JUDGE OF THE SUPERIOR COURT

TAMARA HALL

5. The date of the court hearing is (insert date when known): *6-26-15*

CLERK'S CERTIFICATE

[SEAL]

I certify that the foregoing is a true and correct copy of the original on file in my office.

Date:

Clerk, by _____, Deputy

PETITIONER/PLAINTIFF: Reed Randoy RESPONDENT/DEFENDANT: Marieke Randoy OTHER PARENT/PARTY:	CASE NUMBER BD621137
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SUPERVISED VISITATION ORDER

Attachment to Child Custody and Visitation (Parenting Time) Order Attachment (form FL-341)

1. Evidence has been presented in support of a request that the contact of ☐ Petitioner ☐ Respondent ☐ Other Parent/Party with the child(ren) be supervised based upon allegations of
- ☐ abduction of child(ren) ☐ physical abuse ☐ drug abuse ☐ neglect
☐ sexual abuse ☐ domestic violence ☐ alcohol abuse ☐ other (specify):

☐ Petitioner ☐ Respondent ☐ Other Parent/Party disputes these allegations and the court reserves the findings on these issues pending further investigation and hearing or trial.

2. The court finds, under Family Code section 3100, that the best interest of the child(ren) requires that visitation by ☐ Petitioner ☐ Respondent ☐ Other Parent/Party must, until further order of the court, be limited to contact supervised by the person(s) set forth in item 6 below pending further investigation and hearing or trial

THE COURT MAKES THE FOLLOWING ORDERS

3. CHILD(REN) TO BE SUPERVISED

<u>Child's Name</u>	<u>Birth Date</u>	<u>Age</u>	<u>Sex</u>
HUNTER RANDOY	4/10/2012	3	M

4. TYPE

- a. ☐ Supervised visitation b. ☐ Supervised exchange only

5. SUPERVISED VISITATION PROVIDER

- a. ☐ Professional (individual provider or supervised visitation center) b. ☐ Nonprofessional

6. AUTHORIZED PROVIDER

<u>Name</u>	<u>Address</u>	<u>Telephone</u>

☐ Any other mutually agreed-upon third party as arranged.

7. DURATION AND FREQUENCY OF VISITS (see form FL-341 for specifics of visitation):

8. PAYMENT RESPONSIBILITY Petitioner: % Respondent: % Other Parent/Party: %

9. ☐ Petitioner will contact professional provider or supervised visitation center no later than (date):
☐ Respondent will contact professional provider or supervised visitation center no later than (date):
☐ Other Parent/party will contact professional provider or supervised visitation center no later than (date):

10. THE COURT FURTHER ORDERS

Date: _____ JUDICIAL OFFICER _____

DECLARATION OF REED RANDOY

I, REED RANDOY, declare as follows:

1. I am the Petitioner in this matter and am over the age of eighteen (18) years. I have firsthand knowledge that the facts stated herein are true, except where I state "based on information and belief," in which case I believe those facts to be true. If called upon as a witness, I could and would testify competently thereto pursuant to Sections 2009 and 2015.5 of the California *Code of Civil Procedure*; Rule 5.113 of California *Rules of Court*; *Reifler v. Superior Court*, 39 Cal.App.3d 479 (1974); and *In re Marriage of Stevenot*, 154 Cal.App.3d 105 (1984).

2. I am submitting this declaration in support of my *Ex Parte* Request for Order Regarding Child Custody, Visitation, and Other Orders.

BASIS FOR EX PARTE RELIEF

3. I am filing this Ex Parte RFO because **Respondent, MARIEKE RANDOY (hereinafter referred to as "Marieke") has abducted our son, Hunter (age 3) and taken him to Vancouver, British Columbia, without my knowledge or consent.** Marieke was personally served with the Summons and Petition on Thursday, May 21, 2015. I will file the Proof of Personal Service of the Summons, Petition and other pleadings as soon as I receive it back from the process server. Marieke did email me and my attorney, Mr. Salick, on Tuesday, May 26, 2015 in which she refers to our divorce, admits she has personal knowledge and understands the Standard Family Law Restraining Orders on the back of the Summons, threatens to file a false police report and press charges against anyone who "is involved with your attempts to take my son from his home" and said that any attempts to "discredit" her to

1 the authorities will result in Hunter being placed in foster care immediately. A copy of her email
2 is attached hereto as **EXHIBIT "A"** and incorporated herein by this reference.

3 4. Marieke texted me the following a few days ago while in Canada with Hunter:

4 i. "You want to force me you [sic] move back to la you will need a court
5 order."

6 ii. "Reed I'm not a flight risk -/ coming home to vancouver doesn't mean you
7 can't force me to move back to LA!!"

8 iii. "You can get a court order // but you would have to show the judge your
9 plan and explain how that plan is in hunters best interest."

10 iv. "We are getting a divorce -/ I will have to comply with whatever the court
11 orders in the end... If the court says I have to move back I will... But you can't force me
12 to leave my home with no notice!!!"

13 v. "I'm not even allowed to move? I didn't need a travel letter!!"

14 vi. "You don't have the right to force me to do anything. You need a court
15 order."

16 A copy of the aforementioned text messages are collectively attached hereto as
17 **EXHIBIT "B"** and incorporated herein by this reference.
18

19 5. Marieke has 3-passports (U.S.A., Canada, and Belgium), and has proven to be
20 a flight risk. Marieke admits to abducting our son and going to Vancouver as evidenced in her
21 texts attached as **EXHIBIT "B"** and seems to taunt me and the Court to make orders to compel
22 her to return Hunter to Los Angeles. She rubbed in my face that she "didn't need a travel
23 letter!!"
24
25
26
27
28

1 6. Marieke and Hunter are dual citizens which add to the urgency of this RFO. This
2 RFO and Exhibits demonstrate that Marieke will do what she wants to do including taking our
3 son out of the United States in spite of the Standard Family Law Restraining Orders. Thus I
4 need sole legal and sole physical custody of our son, an order that Marieke turnover all of
5 Hunter's travel documents to me forthwith to prevent her from taking Hunter out of the country,
6 and an order that she only be permitted to have monitored visitation with Hunter. In the
7 alternative I request the Court grant my request for an order shortening time for hearing and
8 service of this RFO.
9

10 **BACKGROUND**

11 7. Marieke and I met online on April 11, 2010. We had a great relationship in the
12 beginning, she was fun and full of energy and beautiful. We talked about getting married and
13 starting a family right away. In fact that was one of the things we both agreed upon first, we
14 weren't even going to be involved with each other if we didn't want a family.
15

16 8. At the time we met I lived in Venice and she lived in Hollywood. She was
17 spending more and more time with me and was trying to convince me to cut my expenses (my
18 rent was \$2,400.00 per month) and move into my houseboat in Redondo Beach to save
19 money. I eventually agreed mostly due to her enthusiasm about living on a boat. I gave notice
20 at my apartment and we moved in together. I also had 2-dogs that lived with us and the small
21 boat was too cramped for us. A friend of mine had a 3-bedroom townhouse that she was
22 renting out and so I moved us into her place.
23

24 9. Marieke wanted to start trying to get pregnant since she thought it would take her
25 some time. We agreed that we would start to try and continue to start planning a wedding, so
26 we could be married before any child arrived.
27
28

1 10. Marieke's mother, who suffered from severe mental illness, lived in Belgium and
2 was going through some major issues at the time. Marieke traveled over there to try to help
3 her mother by sorting out her finances and making sure the hospital was taking proper care of
4 her. On her first visit, her mother told her that she was pregnant, but Marieke didn't know yet.
5 Once she came home, Marieke miscarried and just thought she just experienced a very bad
6 period. It was only later that we learned she had been pregnant. We kept trying to get pregnant
7 and did for a second time soon thereafter.
8

9 11. Once we were pregnant, Marieke's 'nesting instinct' really turned on. She wanted
10 me to sell everything I owned (i.e., my automobiles, houseboat, dogs, personal property) and
11 find us a better place to live that was closer to her friends and her sister near Hollywood. She
12 and a friend found home for us.
13

14 12. Marieke wanted to get rid of my 2-dogs whom I had owned for 6-years because
15 they were pitbull/staff terrier mixes and didn't want them around a tiny baby and risk anything
16 horrible happening. Her and her friend Tracey found them a nice home with a guy who had a
17 large yard. I tried to appease Marieke as much as I could, but I didn't want to sell my truck and
18 my boat which I owned prior to meeting her. I did have other vehicles that I sold. I had a 'dog
19 truck' that I would use when I carted my dogs around and I also had a Mercedes that I gave to
20 Marieke to drive. The Mercedes broke down while she was driving it though, so I paid for it to
21 be fixed. While it was being fixed Marieke started complaining about her not having a car to
22 drive and that she was "stuck in Redondo Beach." I would tell her to get outside and take a
23 walk or go to the beach and relax, and that if she really needed to go somewhere while I was
24 working, she could call a friend or take a bus until the car was fixed.
25
26
27
28

1 13. As we got further and further along with the pregnancy, she went to get her tests
2 done and the first ultrasound wasn't covered under her insurance. The bill was over \$2,000.00.
3 She told me we had to get married or this pregnancy was going to cost me thousands. I have
4 great insurance and I thought we had planned on getting married anyway, with a proper
5 wedding, etc., so getting the legal marriage done ahead of time would be better for us in the
6 long run. So we went to the Long Beach courthouse and were married by a legal marriage
7 business on the next day I had off.

9 14. From there things got worse. Marieke continued to urge me to move us closer
10 to Hollywood, to sell my things, to find us a smaller place, to sell my boat, to sell my truck, to
11 buy her a car, etc. I gave notice to my friend and we moved closer to my work in a 1-bedroom
12 apartment that was closer to her sister who lived in Beverly Hills and was going to help us with
13 the baby once he was born. We also were planning on having a home birth, so we were trying
14 to find a doula (also known as a birth companion and post-birth supporter) and preparing for
15 that as well.

17 15. Once the time came, Marieke's labor was intense. She was in labor for 36-hours
18 and once her water actually broke, we rushed to the hospital just in case anything was wrong.
19 The baby wasn't coming out and the doula wasn't comfortable with how things were
20 progressing. Hunter was born on April 10, 2012 by emergency C-section and was happy and
21 healthy.

23 16. After a few days in the hospital, we came home and Marieke and I began fighting
24 about everything, such as how to care for Hunter, what to do, having no savings, being totally
25 unprepared, having no help, etc. The first day we came home she was yelling at me so much
26
27
28

1 I closed the refrigerator door on my hand and broke it. We were back at the hospital that
2 morning getting an X-ray on my hand (I had broken 2-fingers).

3 17. Needless to say, I couldn't work as I could not drive a production vehicle so I
4 stayed home to help take care of Hunter and Marieke. I couldn't change diapers though at first
5 and Marieke would yell at me for not helping. After 4-weeks of both of us fumbling through
6 being new parents and listening to Marieke yell at me for not having savings and having to
7 borrow money to pay our bills, I went back to work. I was soon able to repay my parents and
8 pay our bills.
9

10 18. Marieke continued to complain and verbally abuse me about just about anything
11 she could – me working too much, not working enough, not having enough money, having too
12 many things, keeping old junk, etc. It seemed like she was never in a good mood. One day
13 when I was at work she called me frantic and had been in a car accident. She and Hunter
14 were driving the Mercedes and were hit by a drunk driver who tried to flee the scene. The car
15 was totaled out by the insurance company and we had to hire a personal injury attorney to sue
16 the insurance company to pay for Marieke's rehab and to reimburse us for the fair market value
17 of the Mercedes. With the proceeds I bought a Chevrolet Suburban truck from a friend of mine
18 for Maireke to drive. She thought it was a safe vehicle, but complained about the amount of
19 gas it used. Eventually I sold the truck and we bought Marieke a 2002 Toyota Prius which she
20 still has today.
21
22

23 19. Marieke's mother had passed away in the mental hospital about a year before
24 and she was dealing with sorting out her mother's estate – her mother had about €120,000.00
25 in an account that she had saved over the 30-years she was in the hospital. However she
26 never divorced from Marieke's father so there is presently a battle between Marieke and the
27
28

1 Belgium court system to get their money. The courts want to give it to her estranged father
2 who left her mother 40-years prior with 3-kids and is now living in the Canary Islands off the
3 coast of Africa, homeless and a puppeteer to tourists. All of this family drama added to
4 Marieke's stress and all of which she would take out on me in various ways.

5 20. About the time Hunter turned 2-years old Marieke decided that she had to move
6 to Canada to pursue acting and take Hunter with her. Because Marieke is a Canadian citizen,
7 her argument was that she had better opportunities to be cast in the smaller roles of the shows
8 that were shooting in Canada. Her friend Lucianna ("Luci") Carro had done that and was
9 currently on the show 'Helix.' She would often help her run lines and Luci would tell Marieke
10 she should go to Vancouver where all these shows were because she was sure that she would
11 be successful. I reluctantly agreed after she-told me that if I didn't support her in doing this, I
12 didn't love her or Hunter and didn't care about my family. Of course I did, so I went along with
13 the 'plan'. We gave up our apartment in Los Angeles so I would be able to save even more
14 money by living on my boat. I found us a nice place in Vancouver with all the amenities so
15 Marieke could go to the gym or spa right in her own building without having to drive anywhere.
16 I would fly up every 3- or 4- weeks to see them after I had worked a bunch of days to make
17 sure I could afford it. Over the year, the fights worsened with Marieke demanding that I send
18 her more money and accusing me of not caring about her or Hunter. In the last few months
19 she refused me sexually and would tell me to get a hooker and that she didn't care who I slept
20 with. The last trip, which was for Hunter's 3rd birthday, Marieke left as soon as I arrived – she
21 literally walked out the door as I came in. Marieke left Hunter in my custody and so I took him
22 to Seattle to visit with my mother and sister as they had planned a big 3rd birthday party for
23 Hunter with all of my family. Marieke was invited but did not come.
24
25
26
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28

EVENTS LEADING UP TO THIS EX PARTE

1
2 21. Marieke has 3-passports (U.S.A., Canada, and Belgium), and has proven to be
3 a flight risk. Marieke was in Los Angeles from April 25 through May 28, 2015 which is when I
4 later learned she abducted Hunter and fled to Vancouver, which was 1-week after being served
5 with my Summons and Petition. Before I filed for divorce I told Marieke that the whole Canada
6 'plan' wasn't working because she hadn't had any success booking any acting roles and that I
7 really needed to be in Hunter's life every day. Marieke accused me of trying to control her and
8 exclaimed that I couldn't dictate where and Hunter lived.
9

10 22. Marieke told me that she was going back to Canada to work as an actress and
11 taking Hunter, and that there wasn't anything I could do about it. Marieke said she wanted a
12 divorce in the next 10-days before she went back to Vancouver, so I filed for divorce and served
13 her on May 21, 2015. When she was served she was ecstatic, literally laughing and jumping
14 up and down. Her attitude changed when I advised her that the Standard Family Law
15 Restraining Orders on the back of the Summons prevented her from taking Hunter out of
16 California. Marieke was furious and threatened me, telling me she was going to divorce me
17 and take all my paycheck, garnish my wages, take my pension and make me sell my boat and
18 truck.
19
20

21 23. On Thursday, May 28, 2015, as explained in the attached Declarations of James
22 Campbell and my mother, Elaine Dotts, Marieke took Hunter from my mom and James under
23 the guise that she was taking Hunter to the park. When she finally told me she was back in
24 Vancouver I couldn't believe it. I told her she directly violated the Summons and she again
25 told me that I can't control her and there is nothing that I can do to stop her from what she
26 wants to do with her career (please see EXHIBITS "A" and "B"). Marieke then told me to send
27
28

1 her \$2,300.00 every other week and to pay the rent. She has repeatedly threatened to report
2 me to the IRS, file a restraining order against me and my friends, and call my work and family
3 to tell them I was neglecting my family and to give her money.

4 24. I am requesting sole custody of our son, Hunter, because Marieke is
5 unpredictable and has demonstrated she will do what she wants when she wants regardless
6 of what the Summons says. She abducted Hunter and took him to Vancouver in violation of
7 the Standard Family Law Restraining Orders. She has prevented me from seeing him and
8 even talking to him on the phone.
9

10 25. I have been with Hunter just about every day since the time he was born until
11 Marieke decided to be an actress and move to Vancouver. I wouldn't see him every day since
12 my work schedule is so challenging, but I would spend quality time with him during my days
13 off. Even when he was in Canada I tried to FaceTime or Skype him every day to say goodnight
14 and tell him that I love him. Sometimes when Marieke and I were fighting, she wouldn't allow
15 me to call Hunter or when I did, she would set the iPad in front of him with the TV on so he
16 would be distracted.
17
18

19 26. Marieke seems to be mentally unstable. She has been treated for bi-polar
20 disorder and depression, and I think she may be taking Wellbutrin but I don't know if she's
21 being supervised by a physician. As mentioned above her mother died in a mental hospital
22 and her sister has serious issues. That being said, Marieke seems to be a good mother to
23 Hunter but I have no idea what she does when I'm not there. I do know that often he is still
24 awake at 11:00 p.m. when she's texting me and I have to get up early to go to work. He loves
25 to watch cartoons – what kid doesn't? – but I think she just may prop him in front of the TV and
26 let it go while she goes on her hundreds of text tirades to me in the middle of the night and all
27
28

1 day. Marieke said she wants to homeschool Hunter but she doesn't have any training or
2 credentials to do so. I do not believe it is in Hunter's best interest to be stuck in the house all
3 day with his mother who may suffer from bi-polar disorder and depression.

4 27. Marieke has threatened that she will replace me with another man and that Hunter
5 will never know who I am.

6
7 28. I would like full custody of Hunter so I can raise him in a happy, healthy and
8 stable environment. My family has offered to help me in any transitional situation. I have a
9 new 2-bedroom apartment lined up and I have many friends and family members who have
10 offered help with Hunter while I work to take him to and from daycare when I am at work. On
11 my days off we will continue to do amazing father/son activities like boating, camping, beach,
12 sports, music and just being together. I have missed our bonding time while Marieke was in
13 Canada trying to find acting jobs. Now that we are divorcing Marieke needs to focus on
14 securing dependable employment which will Hunter to see his mother whenever she likes but
15 with supervision for the time being until she settles down. Neither Hunter nor I need another
16 situation like this one happening again. Marieke has 3-passports (U.S.A., Canada, and
17 Belgium), and has proven to be a flight risk.

18
19
20 **CONCLUSION**

21 Based on my pleadings I respectfully request this Court grant my requested relief.

22 I declare under penalty of perjury under the laws of the state of California that the
23 foregoing is true and correct. Executed on June 4th, 2015 in Los Angeles, California.
24

25
26 Please see signature on FL-300
27 REED RANDOY, Petitioner
28

DECLARATION OF JAMES JOSEPH CAMPBELL

I, JAMES JOSEPH CAMPBELL, declare as follows:

1. I am friends with Reed Randoy and through our friendship I know his wife, Marieke Randoy. I am the not a party to this action and am over the age of eighteen (18) years. I have firsthand knowledge that the facts stated herein are true, except where I state "based on information and belief," in which case I believe those facts to be true. If called upon as a witness, I could and would testify competently thereto pursuant to Sections 2009 and 2015.5 of the California *Code of Civil Procedure*; Rule 5.113 of California *Rules of Court*; *Reifler v. Superior Court*, 39 Cal.App.3d 479 (1974); and *In re Marriage of Stevenot*, 154 Cal.App.3d 105 (1984).

2. I am submitting this declaration in support of Reed Randoy's Ex Parte Application.

3. On Thursday, May 28, 2015 I was at my home with Reed's mother, Elaine Dotts, and Reed's son, Hunter. Reed's mother was in our guesthouse playing with Hunter in the living room. Reed was not present at my house at any time referenced in this Declaration.

4. There was a knock at the door. I went to answer it and it was Reed's wife, Marieke Randoy. I was a little surprised to see her at my home and she stated she just wanted to see Hunter for a little bit and she reiterated to me: "I just want to see Hunter." I responded that it was not a problem and I told her to wait outside and I went upstairs to the guesthouse and told Hunter that his mom was there to see him. I picked up Hunter and carried him downstairs into the backyard where I let him hang out with Marieke. I offered

1 Marieke something to drink (tea) which she accepted, and then I got something to drink for
2 Hunter as well.

3 5. As soon as she came into the backyard she picked up Hunter and gave him a
4 hug and a kiss. A few minutes later she asked me where Hunter got his haircut. I told her
5 that I was not sure who cut Hunter's hair but she immediately snapped back that: "It was the
6 bitch upstairs!" Marieke was referring to Reed's mother, Elaine Dotts. I immediately told
7 Marieke that I was not going to put up with any sort of behavior like that at my house and that
8 she was there for one reason – to see Hunter – and that she should play with Hunter. It
9 should be noted that Marieke called Reed's mother a "bitch" in front of Hunter as he was
10 standing right next to us playing in the courtyard.
11
12

13 6. Marieke then started talking about how Reed needs to let her go back to
14 Canada and that Canada was her home and that **if she did not get her way she was going**
15 **to destroy Reed because she has nothing to lose.** I then told her that they were getting a
16 divorce and that she should just make the best of it and do what is best for Hunter. Despite
17 my comment to her, Marieke kept badmouthing Reed and Reed's mother so I told her that if
18 she did not stop she would have to leave, and that she should just focus on playing with
19 Hunter. She finally stopped badmouthing Reed and his mother, and went into the backyard
20 with Hunter and they started playing.
21

22 ///

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7. After about 45-minutes I told Marieke that I had things to do and that she could come back later when Reed was present. She then asked if she could take Hunter to a park down the street. She stated that she did not have a car seat to take him in her car. I asked her why she needed to drive to the park which was only a few blocks away. Marieke insisted on driving Hunter to the park instead of walking. I gave Hunter's car seat to Marieke and Marieke loaded Hunter into her car. I asked Marieke if I would see her in a little while and she responded: "Yes." **Marieke never returned to my house with Hunter.**

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on June 4, 2015 in Los Angeles, California.

Please see the attached electronic signature
JAMES JOSEPH CAMPBELL, Declarant

park down the street. She stated that she did not have a car seat to take him in her car. I asked her why she needed to drive to the park which was only a few blocks away. Marieke insisted on driving Hunter to the park instead of walking. I gave Hunter's car seat to Marieke and Marieke loaded Hunter into her car. I asked Marieke if I would see her in a little while and she responded: "Yes." **Marieke never returned to my house with Hunter.**

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on June 4, 2015 in Los Angeles, California.


JAMES JOSEPH CAMPBELL, Declarant

In re Marriage of Randoy

BD621137
Declaration of James Joseph Campbell

LASC Case No

DECLARATION OF ELAINE DOTTS

I, ELAINE DOTTS, declare as follows:

1. I am Reed Randoy's mother. I am the not a party to this action and am over the age of eighteen (18) years. I have firsthand knowledge that the facts stated herein are true, except where I state "based on information and belief," in which case I believe those facts to be true. If called upon as a witness, I could and would testify competently thereto pursuant to Sections 2009 and 2015.5 of the California *Code of Civil Procedure*; Rule 5.113 of California *Rules of Court*; *Reifler v. Superior Court*, 39 Cal.App.3d 479 (1974); and *In re Marriage of Stevenot*, 154 Cal.App.3d 105 (1984).

2. I am submitting this declaration in support of Reed Randoy's Ex Parte Application.

3. On Tuesday, May 26th I was golfing in Mesa, Arizona with friends when Reed called and asked if I could come to LAX to babysit Hunter for 2-days so he could work. Reed told me that he had asked Marieke to babysit Hunter but she refused, so he needed my help. I purchased a ticket from PHX to LAX and from LAX to TUS, where my husband, Wayne, would pick me up for the drive back to Roswell. We were staying in a timeshare from Friday, May 22nd to Friday, May 29th.

4. On May 26th Reed and Hunter picked me up from LAX at approximately 10:45 p.m.

5. The following morning on May 27th Reed left the house around 6:30 a.m. Hunter was still asleep. When Hunter woke up at about 8:30 a.m. he opened the door and saw me. He was surprised and said, "I want my daddy." I said, "So do I! Let's have breakfast." He was happy. He ate and then he played with his Tommy trains and watched

1 Curious George on Netflix for a little while. I changed his diaper and got him dressed and we
2 walked to Washington Blvd. to have a little lunch. I also got him a haircut. I took him to get
3 his hair cut because when he was playing with his Tommy trains I noticed that he had to
4 keep his head at a bent angle in order to keep his hair out of his eyes. I had asked him if he
5 would like a haircut, and he said yes.

6
7 6. When we passed a barbershop on our walk, there were photos in the window of
8 various men's haircuts. I asked Hunter which one he would like for himself. He pointed to
9 the one he liked. Then we found another shop that wasn't busy, and the very nice stylist cut
10 his hair. Then we walked home. That evening Hunter and I shared dinner with Jim (James
11 Joseph Campbell) and Anne and Oscar (the landlords of the above-the-garage place where
12 we were staying). Around 8:00 p.m. I put Hunter to bed.

13
14 7. That day I started to receive numerous text messages from Marieke. I will try to
15 take screenshots of her texts to me on my phone but in the meantime below are some of the
16 messages she texted me recently:

17
18 **You are such a horrible person I hate you and I always will**

19 **You are an evil bitch**

20 **You disgust me. You are a horrible mother and a horrible grandmother**
21 **and horrible wife. Just horrible person. And I will see to it that you don't**
22 **get away with keeping me from my son.**

23 **You have no right to do what you are doing. You are a pig. A selfish pig.**

24 **And you will not get away with this. And I will never forgive you For as**
25 **long as you live.**
26
27
28

1 You don't deserve me or Hunter in your life. You have shown your true
2 colors today. The real you. The evil selfish bitch I always knew you were.
3 You are not happy, so you don't want anyone else to be. And you are a
4 cancer in my life. Toxic, sick, twisted and completely selfish. I will never
5 let you near me or my son again because you are a sociopath and you
6 have absolutely no respect for me as a mother, and human being, no
7 respect for my rights or the law. You are too arrogant and selfish and
8 cruel.
9

10 And a bold faced LIAR.

11 And you raised your son to be exactly like you.

12 Therefore you will be rooted out of my life for good.

13 But first I will let karma bite you in the ass. And I will just let you be you.

14 Go ahead - interfere.

15 Spend all your money on your grown son.

16 Enable him completely.

17 Pay for his apartment, his furniture, his taxes, his attorney, my attorney,

18 Yes.. You wanna get involved? Help him destroy his family?

19 Of course, afterall that's why you are here. And then when Reed has used
20 you completely and you just can't take it anymore... You can go home.

21 Rather than make a judgement on them, I will copy and mail them to you.

22 Suffice to say, they were threatening!
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1 8. Thursday morning was about the same as Wednesday morning. When Hunter
2 and I came back from our walk to lunch and the hair stylist to pay her cash, I put Hunter
3 down for a nap on the couch with Curious George playing very quietly in the background. He
4 was drifting off to sleep when Jim came upstairs to get him off the couch and carry him
5 downstairs so Marieke could "see" him. I set his pants, shoes and a new diaper out on the
6 porch so Marieke could get him dressed if she wanted. (Jim came up for the clothes at
7 Marieke's request.) I stayed upstairs.

9 9. I called Reed and he told me that Jim would have to leave for work shortly so I
10 went downstairs and sat on the bottom steps. I saw Jim carry a car seat out of his house. I
11 asked him why and he responded that Marieke wanted to take Hunter to the park, and he
12 exited the patio to put the car seat in a car she was driving. I asked Marieke why she needed
13 a car seat to drive to the park as it was close enough to walk to. She did not acknowledge
14 the question nor did she even look my way.

16 10. When Jim came back into the patio, she asked him to go up to the apartment to
17 get Hunter's diaper bag. I said, "I can get it for you." I went upstairs and checked the bag to
18 make sure it had an extra diaper and some snacks in it and brought it down to Marieke.
19 When I handed it to her, I asked her when she was going to bring Hunter back, and she
20 responded: "In a little while." She looked inside the diaper bag and said: "Oh look, Hunter,
21 there is only one diaper in here. We'll have to go get more diapers." I told her that there
22 were more diapers upstairs. She asked: "Could you get them for me?" I replied: "Well, if you
23 are only taking Hunter to the park and plan to bring him back in a little while, you really don't
24 need a lot of diapers, do you?" She looked surprised and said: "No." Marieke then took
25 Hunter and left.
26
27
28

1 11. Even though Marieke did not take any extra clothes, food or diapers, I had a
2 feeling that she was not planning to bring Hunter back that evening. Sure enough, she never
3 returned with Hunter. I flew home the next morning as planned.

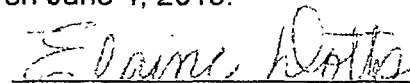
4 I declare under penalty of perjury under the laws of the state of California that the
5 foregoing is true and correct. Executed on June 4, 2015.
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7 Please see attached electronic signature
8 ELAINE DOTTS, Declarant
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11. Even though Marieke did not take any extra clothes, food or diapers, I had a feeling that she was not planning to bring Hunter back that evening. Sure enough, she never returned with Hunter. I flew home the next morning as planned.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on June 4, 2015.



ELAINE DOTTS, Declarant

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 I.

3 **INTRODUCTION**

4
5 Petitioner is filing this Ex Parte RFO because Respondent/mother intentionally and
6 willfully violated the Standard Family Law Restraining Orders on the back of the Summons by
7 abducting the parties' 3-year old son, Hunter, on May 28, 2015 and fleeing to Vancouver,
8 B.C. What makes Respondent's conduct so offensive is that she had been personally served
9 with the Summons on May 21, 2015 1-week before she abducted Hunter. Notwithstanding
10 knowledge of the Standard Family Law Restraining Orders, Respondent schemed to abduct
11 the parties' 3-year old son, Hunter, and flee to Vancouver, B.C., which is where they are
12 today. The attached pleadings demonstrate that Respondent knew she was not allowed to
13 travel to Canada but did it anyways.
14

15
16 Ex parte relief is warranted so Petitioner can facilitate the return of Hunter to Los
17 Angeles and to let Respondent know that Court orders must be followed, particularly when
18 their intended effect is to safeguard a minor child's health, safety and well-being.
19

20 II.

21 **POINTS AND AUTHORITIES**

22 **A. Irreparable Harm Will Occur If Petitioner's Ex Parte Relief is Not Granted.**

23 In an ex parte application, the applicant must make an affirmative factual showing in
24 a declaration containing competent testimony based on personal knowledge of irreparable
25 harm, immediate danger, or any other statutory basis for granting relief ex parte. *California*
26 *Rules of Court*, Rules 3.1202(c) and 5.151; LASC Local Rule 5.3.

27 Here, exigent circumstances exist to grant ex parte relief because
28 Respondent/mother intentionally and with premeditation picked up Hunter from his father's

1 friend's house while Petitioner was at work on the representation that she wanted to take
2 the parties' 3-year old son, Hunter, to the park (please see attached Declarations of James
3 J. Campbell, and Elaine Dotts). Respondent never returned Hunter! Instead, she abducted
4 Hunter and fled to Canada in spite of having been served with the Summons on May 21,
5 2015 and with full knowledge of the meaning of the Standard Family Law Restraining
6 Orders. Petitioner has already been, and will continue to be, irreparably harmed due to
7 Respondent's abduction of Hunter to Vancouver, B.C. Thus, Petitioner needs ex parte
8 relief.

9 **B. Immediate Risk of Move-Away Exists.**

10 *Family Code* Section 3064(a) states:

11 The court shall refrain from making an order granting or modifying a custody
12 order on an ex parte basis **unless there has been a showing of** immediate
13 harm to the child or **immediate risk that the child will be removed from the**
State of California. (Emphasis added)

14 Here, Respondent/mother has already abducted the parties' 3-year old son, Hunter,
15 from the state of California. The supporting declarations and Exhibits show that
16 Respondent/mother violated the Standard Family Law Restraining Orders willfully and with
17 full knowledge of the prohibition against either party from taking the minor child out of the
18 state of California absent written permission or Court order. Respondent's own texts
19 demonstrate her intention to remain in Vancouver, B.C. with the minor child unless this
20 Court issues an order.

21 Respondent has no intention of returning Hunter to Los Angeles voluntarily, which is
22 evidenced in her attached text messages (please see EXHIBITS "A" and "B"). The
23 following are excerpts from these EXHIBITS:

- 24 1. "You want to force me you [sic] move back to la you will need a court order."
25 2. "Reed I'm not a flight risk -/ coming home to vancouver doesn't mean you can't force
26 me to move back to LA!"
27 3. "You can get a court order // but you would have to show the judge your plan and
28 explain how that plan is in hunters best interest."

1 4. "We are getting a divorce -/ I will have to comply with whatever the court orders in
2 the end... If the court says I have to move back I will... But you can't force me to
3 leave my home with no notice!!!"

4 5. "I'm not even allowed to move? I didn't need a travel letter!!"

5 6. "You don't have the right to force me to do anything. You need a court order."

6 Respondent seems to take pleasure in rubbing her abduction in Petitioner's face
7 with comments like "I'm not even allowed to move? I didn't need a travel letter!!"
8 Respondent obviously knew she was doing something wrong and illegal – she gloats about
9 not needing a travel letter! This type of conduct is not in Hunter's best interest, and
10 denying Petitioner's ex parte relief will surely empower Respondent to continue with her
11 offensive and illegal conduct.

12 **C. It Is In Hunter's Best Interest for Respondent/Mother to Have Monitored or**
13 **Supervised Visitation.**

14 *Family Code* Sections 3020 and 3100 state in pertinent part:

15 3020. (a) The Legislature finds and declares that it is the public policy of this
16 state to assure that the health, safety, and welfare of children shall be the
17 court's primary concern in determining the best interest of children when
18 making any orders regarding the physical or legal custody or visitation of
19 children. The Legislature further finds and declares that the perpetration of child
abuse or domestic violence in a household where a child resides is detrimental
to the child. (Emphasis added.)

20 (b) The Legislature finds and declares that it is the public policy of this
21 state to assure that children have frequent and continuing contact with both
22 parents after the parents have separated or dissolved their marriage, or ended
23 their relationship, and to encourage parents to share the rights and
24 responsibilities of child rearing in order to effect this policy, except where the
contact would not be in the best interest of the child, as provided in Section
3011. (Emphasis added.)

25 (c) Where the policies set forth in subdivisions (a) and (b) of this section
26 are in conflict, any court's order regarding physical or legal custody or visitation
27 shall be made in a manner that ensures the health, safety, and welfare of the
child and the safety of all family members.

28 3100. (a) In making an order pursuant to Chapter 4 (commencing with Section
3080), the court shall grant reasonable visitation rights to a parent **unless it is**

1 shown that the visitation would be detrimental to the best interest of the
2 child. In the discretion of the court, reasonable visitation rights may be granted
3 to any other person having an interest in the welfare of the child. (Emphasis
4 added.)

5 Respondent has already demonstrated that she does not intend on nor want to
6 ensure frequent and continuing contact between Hunter and his father/Petitioner.
7 Respondent defied Hunter's best interest by unilaterally fleeing California and moving
8 Hunter to Vancouver while explicitly taunting Petitioner that she has no intention of moving
9 back UNLESS this Court makes such an order.

10 What is telling about Respondent's conduct is that nowhere in her text messages
11 does she explain how her actions are in Hunter's best interest. Respondent is thinking
12 about what is best for her, not Hunter, and certainly not Petitioner. Once served with the
13 Summons Respondent was prohibited from taking Hunter out of California absent written
14 permission or Court order; Respondent lacked both.

15 *Family Code* Section 3048 authorizes this Court to make specific orders when
16 evidence exists of a risk of abduction. Section 3048 states in pertinent part:

17 (b) (1) In cases in which the court becomes aware of facts which may indicate
18 that there is a risk of abduction of a child, the court shall, either on its own
19 motion or at the request of a party, determine whether measures are needed to
20 prevent the abduction of the child by one parent. To make that determination,
21 the court shall consider the risk of abduction of the child, obstacles to location,
22 recovery, and return if the child is abducted, and potential harm to the child if he
23 or she is abducted. To determine whether there is a risk of abduction, the court
24 shall consider the following factors:

25 (A) Whether a party has previously taken, enticed away, kept, withheld, or
26 concealed a child in violation of the right of custody or of visitation of a person.

27 (B) Whether a party has previously threatened to take, entice away, keep,
28 withhold, or conceal a child in violation of the right of custody or of visitation of a
person.

(C) Whether a party lacks strong ties to this state.

(D) Whether a party has strong familial, emotional, or cultural ties to another
state or country, including foreign citizenship. This factor shall be considered
only if evidence exists in support of another factor specified in this section.

(E) Whether a party has no financial reason to stay in this state, including
whether the party is unemployed, is able to work anywhere, or is financially
independent.

(F) Whether a party has engaged in planning activities that would facilitate the removal of a child from the state, including quitting a job, selling his or her primary residence, terminating a lease, closing a bank account, liquidating other assets, hiding or destroying documents, applying for a passport, applying to obtain a birth certificate or school or medical records, or purchasing airplane or other travel tickets, with consideration given to whether a party is carrying out a safety plan to flee from domestic violence.

(G) Whether a party has a history of a lack of parental cooperation or child abuse, or there is substantiated evidence that a party has perpetrated domestic violence.

(H) Whether a party has a criminal record.

(2) If the court makes a finding that there is a need for preventative measures after considering the factors listed in paragraph (1), the court shall consider taking one or more of the following measures to prevent the abduction of the child:

(A) Ordering supervised visitation.

(B) Requiring a parent to post a bond in an amount sufficient to serve as a financial deterrent to abduction, the proceeds of which may be used to offset the cost of recovery of the child in the event there is an abduction.

(C) Restricting the right of the custodial or noncustodial parent to remove the child from the county, the state, or the country.

(D) Restricting the right of the custodial parent to relocate with the child, unless the custodial parent provides advance notice to, and obtains the written agreement of, the noncustodial parent, or obtains the approval of the court, before relocating with the child.

(E) Requiring the surrender of passports and other travel documents.

(F) Prohibiting a parent from applying for a new or replacement passport for the child.

(G) Requiring a parent to notify a relevant foreign consulate or embassy of passport restrictions and to provide the court with proof of that notification.

(H) Requiring a party to register a California order in another state as a prerequisite to allowing a child to travel to that state for visits, or to obtain an order from another country containing terms identical to the custody and visitation order issued in the United States (recognizing that these orders may be modified or enforced pursuant to the laws of the other country), as a prerequisite to allowing a child to travel to that country for visits.

(I) Obtaining assurances that a party will return from foreign visits by requiring the traveling parent to provide the court or the other parent or guardian with any of the following:

(i) The travel itinerary of the child.

(ii) Copies of round trip airline tickets.

(iii) A list of addresses and telephone numbers where the child can be reached at all times.

(iv) An open airline ticket for the left-behind parent in case the child is not returned.

(J) Including provisions in the custody order to facilitate use of the Uniform Child Custody Jurisdiction and Enforcement Act (Part 3 (commencing with Section 3400)) and the Hague Convention on the Civil Aspects of International Child Abduction (implemented pursuant to 42 U.S.C. Sec. 11601 et seq.), such as identifying California as the home state of the child or otherwise defining the basis for the California court's exercise of jurisdiction under Part 3 (commencing with Section 3400), identifying the United States as the country of habitual residence of the child pursuant to the Hague Convention, defining custody rights pursuant to the Hague Convention, obtaining the express agreement of the parents that the United States is the country of habitual residence of the child, or that California or the United States is the most appropriate forum for addressing custody and visitation orders.

(K) Authorizing the assistance of law enforcement.

(3) If the court imposes any or all of the conditions listed in paragraph (2), those conditions shall be specifically noted on the minute order of the court proceedings.

(4) If the court determines there is a risk of abduction that is sufficient to warrant the application of one or more of the prevention measures authorized by this section, the court shall inform the parties of the telephone number and address of the Child Abduction Unit in the office of the district attorney in the county where the custody or visitation order is being entered.

(c) The Judicial Council shall make the changes to its child custody order forms that are necessary for the implementation of subdivision (b). This subdivision shall become operative on July 1, 2003.

(d) Nothing in this section affects the applicability of Section 278.7 of the Penal Code.

There are too many portions of *Family Code* Section 3048 to underline/emphasize because in this case Respondent's conduct hits almost every factor under (b)(1) above. To wit:

1. Respondent has already taken Hunter to Canada and threatens to keep him there. Respondent has THREE passports – U.S., Canada, and Belgium – which increases her chances of fleeing the continent with Hunter.
2. **Respondent is in possession of Hunter's U.S. and Canada passports so Respondent could travel anywhere with him absent the granting of Petitioner's ex parte relief.**
3. Respondent lacks strong ties to California as evidenced by the attached EXHIBITS "A" and "B" in which she represents that Vancouver is her home, not California.

Respondent schemed to take Hunter out of California as evidenced in the Declarations of James J. Campbell and Elaine Dotts attached hereto.

Petitioner respectfully requests and urges this Court to make preventative orders prohibiting Respondent from taking Hunter out of California again, including but not limited to:

1. An order for supervised visitation for Respondent.
2. An order for the immediate turnover of all of Hunter's travel documents such as passports and identification cards.
3. An order prohibiting Respondent from applying for a new or replacement passport for Hunter.
4. An order requiring Respondent to post bond.
5. An order requiring Respondent to notify the relevant embassies and consulates of any restrictions.

Monitored/Supervised visitation is the only way to ensure that Respondent does not pull this stunt again. Respondent must be held accountable for her actions.

Petitioner is the parent who is more likely to ensure frequent and continuing contact of Hunter with Respondent. Respondent seems to lack any concern about how her conduct affects their impressionable 3-year old son.

III.

CONCLUSION

Based on these Points and Authorities and the attached Declaration, Petitioner requests that this Court grant the requested ex parte relief.

Respectfully submitted.

DATED: June 5, 2015

SALICK FAMILY LAW GROUP, APLC

By:



NICHOLAS A. SALICK, ESQ.,
Attorney for Petitioner,
REED RANDOY

Nicholas Salick

From: Marieke Randoy <mariekevrandoy@icloud.com>
Sent: Tuesday, May 26, 2015 3:46 AM
To: Nicholas Salick; Reed Randoy
Subject: Fwd: Child protective services

Hi Nick,

Please advise my soon to be ex husband so that he does not destroy his family.

Reed this will unfortunately cost you money because it takes time to read this.. But I think it's important that your attorney give you some good advice right now. And he needs a little more information from my side to help you. You need to be honest about the things you have been threatening me with the last 5 days. I do not want to call on my friends and borrow money to pay for a fancy attorney who will then petition the court to have you pay for my legal bills as part of a divorce settlement.

Please see someone about your anger before you continue. You will only destroy our family if you don't figure out some better tools to communicate and manage your anger.

We need to divorce amicably. That cannot happen if you do nothing but threaten, intimidate, harass, and try to coerce me into submission by putting me out on the street and taking our son.

Just like you cannot make any new crazy purchases, close accounts, hide money, withdraw large sums of money, you cannot STOP supporting us the way you have for the past 4 years.

You can take up your complaints with a judge but you cannot prevent me from being able to pay my rent and bills.

It says so right in the restraining order that you served me -- we both have the same obligations.

What you are doing is the equivalent of closing bank accounts and freezing assets and putting a lock on our front door, and wiping out our accounts.

Make no mistake Reed, what you are doing is against the law. I think you need to sit down with your attorney and have him advise you about how you are to conduct yourself so that this divorce doesn't get nasty and our son doesn't end up hurt.

Hunter and I live in Vancouver and you do not have my permission to take him from our home, and keep him outside of BC Canada.

Hunter is a dual citizen and we both agreed about moving to Canada. You have paid the rent for a year up there directly to our landlord. You have given me 5k a month for all my expenses up there including rent. Our standard of living is exactly the same as it was in LA.

You chose to buy a new boat and car and to spend 20k in 4 months just on boats and cars (3 of each now) and not visit your son last summer.

I have all the bank records I know where every penny went in the last 3 years. I know that you are fudging the paperwork to get away with not paying the right amount of taxes.



Your LLC won't protect you and it won't enable you to get away with not paying child support etc.

I don't need to subpoena your bank records. I have them. I can show a judge exactly where your money actually went.

I'm not asking for anything more than what you have been providing so that I can stay home and take care of our son. Paying a sitter 16-24 dollars an hour while I go to work somewhere makes no logical sense when you earn 750 a day, take home -- \$11250 a month and only from working 15 days a month!

In addition to the 100 percent responsibility for our son 24/7/365 since he was born and for the next 18 years, I am following through with the plan we both agreed to do so that I can build by acting career and become completely financially self supporting. Vancouver is the place for me to do that. There are only 10 casting directors up there and tons of series and TV shows. I need to book a bunch of small roles to bolster my resume and so I can return to California and put myself in tape for auditions in Vancouver once the casting directors know who I am and I've booked with them. I already booked a job in January.

I am obligated as your soon to be ex wife to do everything I can to ensure that I can support myself as soon as possible. I cannot raise Hunter and work a regular job while paying a sitter 16-24 an hour. The only work that makes sense is the work I am trained for which is acting. That is the work that will also pay me the kind of money that you are currently making per day you work.. And that's just for starters. My profession has a union and a health plan and once I've earned a certain amount per year I will be able to get health benefits for myself and Hunter -- much like the ones you have as a Teamster.

This past year in Vancouver has been extremely stressful with all the arguments and threats that always lead to you threatening to take away Hunter and put me out on the street. The stress has taken a huge toll on me emotionally and had affected my health.

The never ending threats and controlling me by not allowing me access to our finances so I can pay our bills on time has made it nearly impossible to focus on my career. Being broke constantly -- having you close our joint account and destroy my credit by allowing all my medical bills to go to collections.. By you controlling my cash flow and literally making me beg for every dollar you transfer into my account.. I've come to my wits end.

I don't want to have to bounce one more check, pay One more late fee and INSUFFICIENT Funds fee.. And have my card declined at the grocery store --

A family of 3 that has a household income of 135k cash take home, should not have these financial problems. We should not be living from pay check to pay check and be three years behind paying taxes.. and have every bill go to collections..

I have tried everything to set you straight financially but you refuse to change anything about the way you manage the finances.

In the next few days I will be writing up agreements that I would like you to sign and look over with your attorney if you wish.. Once they have received their retainer since they won't do anything without the assurance that they will get paid.

One of the agreements has to do with visiting Hunter once a month and scheduling your work around that time with him..

Another will be about rules for hunters safety, like no drinking alcohol when you are caring for him.. EVER. Doesn't matter is your buddy Jim is driving. You do not drink. Nor do you smoke while you are caring for him.. At all. And no pocket knives, and no junk in the truck that would kill our son if you should have to slam on the brakes for any reason..

He must be bathed daily and you must wash his and your hands throughout the day and use sanitizer and obviously you must wash and sanitize your hands after diaper changes to avoid the ROTAVIRUS infections our son has been plagued with while in your care.

~~If you decide to go forward with these attorneys I will be calling one myself and this will get hella expensive. Cost you far more in the end than what you are fighting me over right now.~~

Let me know how you wish to proceed. I want this to be as inexpensive and amicable as possible and for us to have a relationship where we can remain cooperative and respectful so we can raise Hunter without him having to endure any more stress and unhappiness.

Marieke

Sent from my iPhone

Begin forwarded message:

From: Marieke Randoy <mariekevrandoy@icloud.com>
Date: May 26, 2015 at 2:15:59 AM PDT
To: Reed Randoy <reedrandoy@me.com>, Reed Randoy <reedrandoy@yahoo.com>
Subject: Child protective services

Sent from my iPhone

Begin forwarded message:

From: Marieke Randoy <mariekevrandoy@icloud.com>
Date: May 26, 2015 at 2:08:39 AM PDT
To: "reed@cowboypictures.biz" <reed@cowboypictures.biz>
Subject: Re: 30 day Notice

So you have an attorney cc'd on this letter?

You have an attorney.
Good to know. You didn't want to involve attorneys.

Hmmm.

Is this your way of telling me I need to lawyer up?

You are using an attorney to intimidate me and our landlord. You are trying to put me out on the street.

I will bring this to the attention of a judge if necessary. Don't make it necessary.

Who works for this law firm? Who is your attorney?

If this person is a friend of yours and not an actual attorney you are paying, I will be sure to include them in my complaint against you for harassment and child abduction if necessary.

If anyone is involved with your attempts to take my son from his home, and allows you to use their name or if they do anything else to assist you in any attempt to take Hunter away from me, and harass me I will be sure to include them as accessories in the police report and should I be put in a position where I must press charges.

If you try to enlist the help of anyone in your plan and you at any time fail to disclose where Hunter is, I will go to the police and that person or people will be charged.

I'm giving you fair warning Reed. Show this email to whoever is trying to help you take Hunter away from me and take him from his home.

Right now you have broken so many laws. I could have you arrested, however, since you are completely irrational and you don't have the tools necessary to communicate properly, I'm trying to tread carefully and approach you and this whole situation with empathy.

I know that the only emotion you have when faced with something that doesn't go your way, is RAGE.

And you cannot think clearly when you are enraged. You make bad choices and bad decisions that will only make an already bad situation so much worse.

Reed. If we do not start communicating properly we risk creating a situation where you will fly into a rage and things will escalate to the point where authorities get involved.

If that were to happen you would create a situation where the police would decide that things are too volatile and unsafe for Hunter and they would bring in child protective services and put our son in foster care.

The person you are getting advice from doesn't know anything about your temper and what you are capable of saying and doing when you are in a blind rage.

Any attempts to discredit me to the authorities in order to "win".. Will put Hunter in foster care. Immediately.

You are unstable - the things you say are inflammatory and since Hunter is just a tiny child they won't take any chances.

We will have to go to court to get him back.

Reed. Right now I am afraid of you. I'm afraid of what you are trying to do to me and Hunter. I'm afraid for my safety. I do not feel safe alone with you. I haven't for a while now, but now that you have lied about not having an attorney, and spent the last 5 days intimidating me, threatening me, and now with this letter to Daniel, I cannot trust your word.

Only your actions can inform me whether or not we can work this out amicably.

I'm trying to remain focused on the big picture and on the positive end result I know we both want.

Please take some time today to think about this.

Go to a psychiatrist who deals with rage. Please. Before things get completely out of control and Hunter lands in foster care.

I would never forgive you if you made that happen.

Sent from my iPhone

On May 25, 2015, at 8:33 AM, Reed Randoy <reedrandoy@yahoo.com> wrote:

Daniel,

I'm sure you are aware that I am the one paying the lease and I am the one on the lease. Marie lived there with me and I traveled back and forth to LA to work. So she can't resign a lease for I she signed my name! You have legal notice required, however, and will be able to show the proof of time.

If Marieke chooses to stay in Canada and not move back to LA with her son, she'll be paying. That's something you are welcome to take up with her.

Thank you.

Reed

From: Chan, Daniel <DChan@wm.com>;
To: Reed Randoy <reedrandoy@yahoo.com>;
Cc: Nicholas "Nick" Salick <nas@gillespiesalick.com>;
Subject: RE: 30 day Notice
Sent: Mon, May 25, 2015 3:23:59 PM

Reed,

I just spoken with Marika a few weeks ago and she signed another year lease so I am confused by the need to speak with her either way because if she is moving out end of June, then I need to arrange with show potential tenants the condo to rent out.



< Messages (5) Marieke

Details

Monday 3:41 PM

Please pay the rent today. Until you have a suitable living situation you can't expect me and Hunter to be in limbo. Our car is here, our apartment, our nice warm beds, our clothes and hunters toys.. You can't expect me to stay in a women's shelter and wait until a court date.. What about our belongings? What about our apartment ?

Reed the fact you tried to put me out on the street so I would have to stay in a shelter to be with my son...

What were you thinking? Were you thinking about hunters best interest? A homeless shelter with his



< Messages (5) Marieke**Details**

C'mon. There is no court in the world that would agree with your logic.

You want to force me you
move back to la you will need
a court order.

And in Order to get one you will need to figure out those numbers -- 50/50 custody with the round the clock nannies taking 65 percent of your income on the weeks you have him? Just so you see him two weekends a month - 5 days total?

Plus alimony and child support for me.

Two apartments a three bedroom and a two bedroom // you need a bedroom for a night nanny.

●●●○ T-Mobile LTE

10:19 AM

100% 

Personal Hotspot: 1 Connection

◀ Messages (5) Marieke

Details

Reed run those numbers for me..

Give me your plan for 50/50 custody in LA.

I assumed you had friends

You need to have this plan for the judge..

And ideally our lawyers will help us come up with a solution we agree upon before we go to court.

You will need to come up with this plan.

I have a plan, but it's the opposite of yours. So somehow we have to take your plan and mine and figure out a compromise.

And there's these things called

◀ Messages (5) Marieke Details

You expect me to couch surf
or live in hotels?

Reed I'm not a flight risk -/
coming home to vancouver
doesn't mean you can't force
me to move back to LA!!

Well if you were to agree I
could have gotten you an
apartment too

You can get a court order //
but you would have to show
the judge your plan and
explain how that plan is in
hunters best interest.

Reed explain your numbers
and the La apartment //
explain your plan-/
This move wouldn't have to
happen overnight.

< Messages (5) Marieke Details

And you forged a travel letter

We are getting a divorce -/ I
will have to comply with
whatever the court orders in
the end.

If the court says I have to
move back I will.

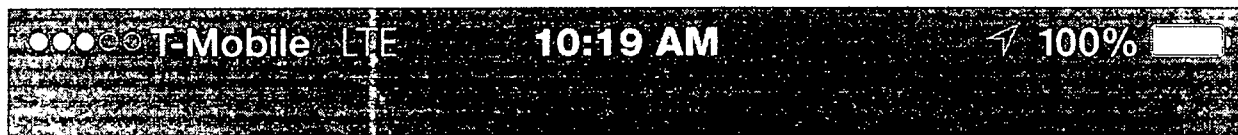
But you can't force me to leave
my home with no notice!!!

But you can't force me to leave
my home with no notice!!!

I'm not even allowed to move?

I didn't need a travel letter!!

The canadian government
knows that hunter and I reside
in Canada and that we are dual
citizens.



◀ Messages (5) Marieke Details

I was in LA for 5 weeks couch surfing.. You think my friends should let me stay for months? My friends aren't responsible for a Hunter and I . And asking them to put us up would only be enabling you to take the law into your own hands.

You don't have the right to force me to do anything.

You need a court order. And in order to get a court order you will need to present a very good argument and show the court your new home, hunters new room, bring in the three nannies you have hired.

You are trying to turn Hunters life completely upside down-/ so you better be able to show the court that you have it all

●●●○○ T-Mobile LTE

10:19 AM

100% 

Personal Hotspot: 1 Connection

◀ Messages (5) **Marieke**

Details

~~the completely, open, and~~
so you better be able to show
the court that you have it all
figured out and that it's in
Hunters best interest.

Today 9:56 AM

So how am I supposed to fly to
California with hunter when
you have closed our joint
account?

How am I supposed to show
up with 24 hours notice with
no money?

Again. Abusive. Extreme. You
have no home for hunter. You
have never cared for him. You
are just doing this to intimidate
and harass me.

I could have helped you in LA.
Now you broke the law and are