

This form is attached to DV-105, *Request for Child Custody and Visitation Orders*.

- 1 Your name: Reed Randoy ☐ Mom ☒ Dad ☐ Other*
- 2 Other parent's name: Marieke Randoy ☒ Mom ☐ Dad ☐ Other*
- *If "Other," specify relationship with children: _____

- 3 Do you think the other parent may take the children without your permission to:
- a. ☐ Another county in California? ☐ Yes ☐ No If "yes," what county? _____
- b. ☐ Another state? ☐ Yes ☐ No If "yes," what state? _____
- c. ☒ A foreign country? ☒ Yes ☐ No If "yes," what country? Canada
- If "Yes," is the other parent a citizen of that country? ☒ Yes ☐ No
- If "Yes," does the other parent have family or emotional ties to that country? ☒ Yes ☐ No
- Explain: _____

Respondent has removed Hunter from California after being served with the Summons and has been ordered twice that Hunter not be removed from California. She keeps threatening to do it again.

- 4 Why do you think the other parent may take the children without your permission?
- The other parent: (Check all that apply)
- a. ☒ Has violated - or threatened to violate - a custody or visitation order in the past.
- b. ☒ Does not have strong ties to California.
- c. ☐ Has done things recently that make it easy for him or her to take the children away without permission.
He or she has: (Check all that apply)
- ☐ Quit his or her job ☐ Sold his or her home
- ☐ Closed a bank account ☐ Ended a lease
- ☐ Sold or gotten rid of assets ☐ Hidden or destroyed documents
- ☐ Applied for a passport, birth certificate, or school or medical records
- d. ☒ Has a history of: (Check all that apply)
- ☒ Domestic violence
- ☐ Child abuse
- ☒ Not cooperating with me in parenting
- ☒ Child abduction
- e. ☐ Has a criminal record
- f. Please explain your answers to a-e:

Please see attached Declarations of Petitioner, Jim Campbell.

This is not a Court Order.

What orders do you want? Check the boxes that apply to your case.



5 ☒ Post a Bond

I ask the court to order the other parent to post a bond for \$ 10000. If the other parent takes the children without my permission, I can use this money to bring the children back.

6 ☒ Do Not Move Without My Permission or Court Order

I ask the court to order the other parent *not* to move with the children without my written permission or a court order.

7 ☒ No Travel Without My Permission

I ask the court to order the other parent *not* to travel with the children outside: *(Check all that apply)*

☐ This county ☒ California ☐ The United States ☐ Other *(specify)*: _____

8 ☒ Notify Other State of Travel Restrictions

I ask the court to order the other parent to register this order in the state of Vancouver, BC before the children can travel to that state for visits.

9 ☒ Turn In and Do Not Apply for Passports or Other Vital Documents

I ask the court to order the other parent to turn in and *not* apply for passports or other documents (such as visas or birth certificates) that can be used for travel.

10 ☒ Provide Itinerary and Other Travel Documents

If the other parent is allowed to travel with the children, I ask the court to order the other parent to give me before leaving:

- ☒ The children's travel itinerary
- ☒ Copies of round-trip airline tickets
- ☒ Addresses and telephone numbers where the children can be reached
- ☒ An open airline ticket for me in case the children are not returned
- ☐ Other *(specify)*: _____

11 ☒ Notify Foreign Embassy or Consulate of Passport Restrictions

I ask the court to order the other parent to notify the embassy or consulate of BC/Canada of this order and to provide the court with proof of that notification within 14 calendar days.

12 ☐ Foreign Custody and Visitation Order

I ask the court to order the other parent to get a custody and visitation order equal to the most recent U.S. order before the child can travel to that country for visits. I understand that foreign orders may be changed or enforced depending on the laws of the country.

13 I declare under penalty of perjury under the laws of the State of California that the information on this form is true and correct.

Date: 07/16/2015

Reed Randy
Type or print your name

▶ Please see DV-100
Sign your name

This is not a Court Order.

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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* Application for a Domestic Violence Restraining Order against Respondent and related orders, and an order deeming her a vexatious litigant.

BASIS FOR EX PARTE RELIEF

3. Since July 1, 2015, Respondent, MARIEKE RANDOY (hereinafter referred to as "Respondent") has attempted to abduct our three (3) year old son, Hunter, and take him back to Canada in spite of this Court's July 1, 2015 order that Hunter shall remain in California pending the July 31, 2015 hearing.

4. Respondent has threatened to have me arrested for domestic violence, threatened to report my attorney (Mr. Salick) to the California State Bar, threatened my nanny (Heidi Halvardsson) threatened my friend who is renting me his guest house (Jim Campbell), threatened to report us for child abduction and violation of court orders.

5. Respondent has threatened to contact my employers and co-workers and try to get me fired. She has prevented me from accepting jobs due to her *Ex Parte* notice she

1 gave for July 14, 2015, and I had to cancel a job to appear in Court on Thursday, July 16,
2 2015.

3 6. Respondent has harassed and threatened us all. I think she has literally gone
4 insane. She is acting irrational. She keeps filing motions with this Court asking for the same
5 relief over and over again.
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7 **FACTS SINCE OUR LAST HEARING ON JULY 1, 2015 IN SUPPORT OF MY**
8 **REQUESTED RELIEF**

9 7. Immediately after the hearing on July 1, 2015, and right after this Court ruled
10 that Hunter shall not leave California pending our July 31, 2015 hearing, Respondent, Mr.
11 Salick and I walked together down to the 2nd floor of the courthouse to pick up Hunter from
12 childcare. As we were walking, Respondent said (I am paraphrasing): "Well, you're certainly
13 going to learn the hard way what it's like to be a father since you're going to have him for the
14 next month! Because I'm going back home to Vancouver!" After we picked Hunter up from
15 childcare we all proceeded to walk towards the exit, at which time Respondent said
16 something like: "Well, you're going to need his clothes, right? And you'll need his passport,
17 right?" After conferring with my attorney, I proposed that Respondent and I walk to her hotel
18 (she was staying blocks from the courthouse) so I could retrieve Hunter's clothing, toys and
19 U.S. Passport. Respondent flipped off my attorney off and continued to slander him and
20 myself as we walked with Hunter to her hotel where she and Hunter had stayed the night
21 before. When we got to the hotel, Respondent was already checked out, packed and ready
22 to take off for the airport.
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26 8. She handed over Hunter's passport and a few belongings that she had brought
27 for the day. They had only flown in to go to the court hearing and were planning on flying out
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again after it was over. When I asked for Hunter's Canadian Passport, *she first said she couldn't find it and then later said that she didn't have one.* I do not have Hunter's Canadian passport but I know he has one. It is deceit like this that makes me scared that Respondent will abduct Hunter and take him to Vancouver. Hunter is not a toy – he's a child. **I strongly believe that Respondent sees this entire case and this custody fight as a joke.** I am merely trying to provide a stable environment for Hunter and work, but Respondent is doing everything she can, legal and illegal, to punish me and steal Hunter away from me. I believe Respondent has mentally lost it because her actions are inexplicable.

9. After I left Respondent's hotel, I took Hunter to my rented 1-bedroom guesthouse located at 4207 Chase Avenue, Mar Vista, CA 90066. Like I represented to the Court at the July 1st hearing, I hired a babysitter/helper (Heidi XXXXXX) to care for Hunter while I worked. Occasionally my friends helped care for Hunter, but between me, Heidi and my friends, Hunter was always supervised by responsible adults who made sure to feed him, cloth him, watch him, play with him, etc.

10. Once I was at work, Respondent started texting me and my friends incessantly. She threatened to call the police on us for abduction. She threatened to take Hunter and go back to Vancouver. She called us all names and threatened to turn my babysitter into Department of Child and Family Services ("DCFS"). She threatened to turn me into the IRS. She threatened to report my attorney to the State Bar. **She threatened to take me to court twice a month for the next 16-years.** She will not stop texting me threats even after I repeatedly asked her to stop.

11. Soon after I returned to work after July 1st I learned that Respondent did not actually go back to Vancouver like she said she would on the record in Court on July 1st. If

1 this Court recalls Respondent stated that she had no place to stay in L.A. She apparently is
2 staying at her friend's apartment, Lucianna Carro, who accompanied Respondent to Court at
3 the June 26, 2015 hearing (she was in the audience during the hearing). Respondent
4 proceeded to harass, bully and threaten me and my friends for the next 2-weeks.

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6 12. Since one of her threats has been that I am withholding Hunter from her, which
7 is false because I thought she had gone back to Vancouver like she told this Court and told
8 me in front of my attorney immediately after the July 1st hearing, I agreed to meet her at the
9 park for a couple of hours so she could see Hunter.

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11 13. If this Court will recall, in my Ex Parte RFO filed on June 6, 2015, Respondent
12 picked up Hunter from my friend Jim's house and said she just wanted to take Hunter to the
13 park... instead she drove directly to the airport and flew to Vancouver (this was the reason I
14 filed my June 6th Ex Parte RFO – because she violated the ATROs and removed Hunter from
15 California). Then she did not let me even talk to Hunter until I saw him again on July 1st.
16 Thus, I did not want feel it was safe to leave Hunter and Respondent alone.

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18 14. I agreed to meet her when I was off of work and I could be there to supervise. I
19 agreed to meet at the park near where I live and she showed up with her friend Lucianno
20 Carro. They were videotaping me with their cell phones and accusing me on camera of
21 'being on my best behavior because the camera was on.' I let them play for 2-hours as I had
22 agreed. While Respondent had Hunter in the swings she was kneeling down in front of him
23 telling him things, not swinging him. Respondent was whispering to Hunter so I could not
24 hear what they were saying. Later that night Hunter was acting up and telling me things like
25 we could not stay where we were staying and my sitter could not come inside. When I asked
26 him who told him that, he said, "Mommy."
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1 15. After we were done at the park, they brought Hunter back to me – while filming
2 me – and Respondent leaned in close to my face and accused me of drinking alcohol. I said
3 on camera that I had not been drinking and that their little video game they were playing was
4 over and I was leaving with my son. They waited for me to put him in my truck and then they
5 followed me. I drove around the neighborhood to see if they were really trying to follow me –
6 they continued to follow me. Respondent texted me and accused me of being drunk (again, I
7 was not), and she claimed that she wanted to make sure I got Hunter home safe. If she truly
8 thought I was drinking then why would she let me get behind the wheel with Hunter in the
9 car? They were harassing me, pure and simple. I drove back to my residence and they
10 finally left.
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12 16. It is pertinent for this Court to know that as a Union member I have a Class A
13 commercial driver's license. Not only was I NOT drinking that afternoon/evening, I never
14 drink and drive. My job and career depends on it, not to mention I had my 3-year old son
15 with me and would never drink and drive. Her ability to try to trick me into saying something
16 or do something that she can use against me further justifies why this woman cannot be
17 trusted and is unfit to have custody of Hunter. Respondent is obviously trying to slander me
18 and my sitter and friends to Hunter. I decided it was not in Hunter's best interest for her to
19 see him until the July 31st hearing because she was manipulating our 3-year old son and
20 putting thoughts into his head. Again, I think Respondent has literally lost it.
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22 17. Respondent continued with more threats and texts to take Hunter from me and
23 take him back to Vancouver, that she was going to call the police and report us to the
24 authorities, that she was going to take all my money, get me fired from my job, turn me into
25 the IRS for a reward and put the car that I purchased for her on the street to be impounded.
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1 These threats demonstrate that Respondent does not care about this Court's orders or
2 Hunter's best interest. She is dead-set on getting her way regardless of the consequences.

3 18. Her actions are not consistent with a person of a sound mind. I have personal
4 knowledge that she suffers from depression and bi-polar disorder, and that she takes (or
5 should be taking) medication for it. Respondent's manic behavior and hatred toward me is
6 non-stop.
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8 19. I believe, along with my friends and family, that my happy and healthy son
9 cannot be allowed to be alone in her custody until she seeks treatment and stabilizes. As
10 illustrated in her barrages of text messages since July 1st that she has some serious anger
11 issues, and I do not want our son around that. Hunter is only 3-years old.
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13 20. As explained to the Court in my June 2015 Ex Parte RFO, Respondent has a
14 family history of mental illness. Her mother was in a mental institution for over 30-years in
15 Belgium before she died there. Respondent harbors an angry, negative behavior towards
16 her family and I fear if it goes untreated, Respondent could end up in the same state.
17 Respondent does not have a job, nor seems to want to get one, and has absolutely no way
18 to support herself, let alone Hunter, in Vancouver. She has claimed multiple times that all
19 she plans on doing is to fight me in Court for the next 16-years.
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21 21. It was explicitly agreed between Respondent and I that she was going to move
22 to Vancouver with Hunter for a "trial period" of 1-year, which was precisely the duration of our
23 apartment lease. This 1-year trial period was so that Respondent could try to obtain acting
24 credits as a local performer in order to build a résumé and be able to come back to Los
25 Angeles to work in the film industry. During that 1-year period from April 2014 through April
26 2015 Respondent failed to book anything credit worthy and was only able to go on 7-
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auditions in a year's time. Once I asked her to return with Hunter to Los Angeles she demanded a divorce and said I could not tell her what to do. Respondent's taunts and request for me to file for divorce in Los Angeles were detailed in my June 2015 Ex Parte RFO.

22. I assure the court I just want to do what is in Hunter's best interest. After the July 1st hearing I was (and still am) ecstatic to be able to spend a month with Hunter and wait to see how this Court ruled on July 31st. Respondent reported to me, my attorney and this Court that she was going to return to Vancouver. As evidenced in this declaration and supporting pleadings and text messages between us since July 1st she instead stayed here and has been wreaking havoc on Hunter, me, my friends, my ability to work, this Court, and my attorney.

23. I need to emphasize that Respondent's actions since July 1st have impeded my ability to earn a living. All these Ex Parte hearings and court dates have caused me to lose work and resulted in fees and costs that exceed what I earn. Respondent does not have a job or an attorney so it costs her practically nothing to keep coming back to Court. She is creating unnecessary mental stress for me due to the thought of possibly having to battle my son's mother rather than just get a phone call about when she can pick up Hunter or when I am working or not.

24. I desperately need these DVPA restraining orders to make Respondent stop texting, harassing, manipulating, calling and threatening me and my family and friends and putting Hunter's well-being in jeopardy. Respondent needs medical attention.

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1 I declare under penalty of perjury under the laws of the state of California that the
2 foregoing is true and correct. Executed on July 16th, 2015 at Los Angeles, California.
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4 Please see signature on DV-100
5 REED RANDOY, Petitioner
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DECLARATION OF JAMES "JIM" CAMPBELL

I, JAMES "JIM" CAMPBELL, declare as follows:

1. I am 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 Petitioner, REED RANDOY'S *Ex Parte* Application for a Domestic Violence Restraining Order against Respondent and related orders, and an order deeming her a vexatious litigant.

3. Petitioner and I have been friends for years, and prior to this divorce case both my wife and I were on friendly terms with Hunter's mother, Respondent.

FACTS CONCERNING EVENTS THAT OCCURRED ON JULY 7, 2015

4. Collectively attached hereto as **EXHIBIT "A"** and incorporated herein by this reference are text message exchanges between myself and Respondent. These text messages corroborate the facts set forth in this Declaration.

5. On Tuesday 7/7/15 Respondent sent me and my wife, Anne Huarte (a licensed California attorney, SBN 158555), sent close to seventy (70) texts to me and my wife. Her texts were harassing, annoying, threatening, and disturbed the peace of me, my wife, and Respondent, as well as an LAPD officer. I asked Respondent no less than seven (7) times to

1 contact Petitioner and/or to stop texting me but she continued to send texts. I ultimately had
2 to block her phone number to make it stop.

3 6. In her texts she stated repeatedly that she was coming over to my house to see
4 the parties' son, Hunter, who is staying with Petitioner in our rented 1-bedroom guesthouse
5 located on our property. My family lives in our main house. The address for the main house
6 and guesthouse are the same.
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8 7. I informed Respondent that Petitioner was at work and that due to the last
9 incident in June 2015 (when she said she 'just wanted to take Hunter to the park' while Reed
10 was at work but instead took Hunter straight to the airport and left the country), I told her she
11 wasn't welcome at our home and would have to wait for Petitioner to return home from work
12 to see Hunter (please see EXHIBIT "A-1; A-3; A-4; A-5; A-6"). Respondent then repeatedly
13 demanded proof of who was watching Hunter, demanded her contact information as well as
14 my and my wife's driver's licenses, and threatened to call the police on us if we didn't give up
15 this information (please see EXHIBIT "A-2; A-3; A-4; A-6; A-7; A-8; A-9"). Respondent kept
16 saying that she was coming over to pick up Hunter and that we couldn't do anything about it.
17 Respondent accused Petitioner of violating Court orders and accused us of 'wrongfully
18 detaining' Hunter (please see EXHIBIT "A-2; A-3; A-4; A-6; A-8; A-9; A-11").
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21 8. I relayed Respondent's texts to Petitioner, who then contacted an LAPD officer,
22 Officer Jacobus, about a potential domestic altercation. Petitioner then gave me the
23 numbers for his attorney and Officer Jacobus should Respondent follow through on her
24 threat to show up at my house uninvited and start causing a scene. I then informed
25 Respondent of this, and she responded that *she* was going to call the police that she should
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1 save the time and just call Officer Jacobus since he apparently already knew about her.
2 Fortunately, Respondent never showed up.

3 9. A few days later on 7/12/15 Respondent texted that she was going to press
4 charges against me and my wife. All the aforementioned text message exchanges are
5 collectively attached.

6
7 10. I request this Court grant Petitioner's Ex Parte relief. Since Respondent was
8 served with divorce papers she has grown increasingly harassing and menacing. She is
9 disturbing my peace and the peace of my wife, Anne Huarte, not to mention Hunter,
10 Petitioner and the nanny/helper whom Petitioner arranged to travel from overseas to care for
11 Hunter while Petitioner was/is at work and when I and/or my wife are unable to take care of
12 Hunter.
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14 I declare under penalty of perjury under the laws of the state of California that the
15 foregoing is true and correct. Executed on July 16th, 2015 at Los Angeles, California.

16 SEE ATTACHED
17 FACSIMILE SIGNATURE

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JAMES "JIM" CAMPBELL, Declarant

save the time and just call Officer Jacobus since he apparently already knew about her. Fortunately, Respondent never showed up.

9. A few days later on 7/12/15 Respondent texted that she was going to press charges against me and my wife. All the aforementioned text message exchanges are collectively attached.

10. I request this Court grant Petitioner's Ex Parte relief. Since Respondent was served with divorce papers she has grown increasingly harassing and menacing. She is disturbing my peace and the peace of my wife, Anne Huarte, not to mention Hunter, Petitioner and the nanny/helper whom Petitioner arranged to travel from overseas to care for Hunter while Petitioner was/is at work and when I and/or my wife are unable to take care of Hunter.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on July 16th, 2015 at Los Angeles, California.



JAMES "JIM" CAMPBELL, Declarant

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): — Nicholas A. Salick, Esq. (SBN 236583) Salick Family Law Group, APLC 9595 WILSHIRE BLVD., SUITE 900 BEVERLY HILLS, CA 90212 TELEPHONE NO.: 310-492-4324 FAX NO. (Optional): E-MAIL 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	
PLAINTIFF/PETITIONER: Reed Randoy	
DEFENDANT/RESPONDENT: Marieke Randoy	
DECLARATION	CASE NUMBER: BD621137

See following declaration dated 7/15/15.

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

Date: 07/16/2015

Ann M. Huarte
 (TYPE OR PRINT NAME)

Ann M. Huarte
 (SIGNATURE OF DECLARANT)

☐ Attorney for
☐ Plaintiff
☐ Petitioner
☐ Defendant
☐ Respondent
☐ Other (Specify):

To whom it may concern:

On Tuesday 7/7/15 Marika texted me and my wife, Anne Huarte, saying she was coming over to my house to see her son Hunter, who is staying in my guest house with his father and my friend, Reed Randoy. I informed her that Reed was at work and that due to the last incident June, where she said she just wanted to take Hunter to the park while Reed was at work and ended up taking him to the airport and leaving the country, I told her she wasn't welcome at our home and would have to wait for Reed to return to see her son.

She wanted proof of who was watching Hunter and threatened to call the police on us if we didn't tell her and give up the information.

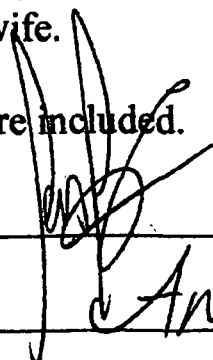
She said she was coming over to pick up Hunter and that we couldn't do anything about it. Reed had informed a local Los Angeles police officer, Officer Jacobus, about the potential for a domestic altercation and gave me the number of the officer and his attorney, should Marika show up and start causing a scene.

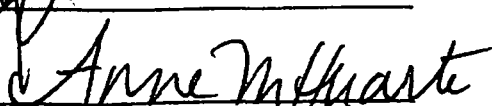
I informed her after she said she was going to call the police that she should save the time and just call Officer Jacobus, since he already knew about her. She never showed up.

A few days later, 7/12/15, she texted that she was going to press charges on me and my wife.

All the text exchanges are included.

James J Campbell-
&
Anne Huarte-



 7/15/15.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Nicholas A. Salick, Esq. (SBN 236583) Salick Family Law Group, APLC 9595 WILSHIRE BLVD., SUITE 900 BEVERLY HILLS, CA 90212 TELEPHONE NO: 310-492-4324 FAX NO. (Optional): E-MAIL 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	
PLAINTIFF/PETITIONER: Reed Randoy DEFENDANT/RESPONDENT: Marieke Randoy	
DECLARATION	CASE NUMBER: BD621137

See attached declaration dated 7/15/15

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

Date: 07/16/2015

HEIDI HALVARDSSON
 (TYPE OR PRINT NAME)

Heidi Halvardsson
 (SIGNATURE OF DECLARANT)

☐ Attorney for
☐ Respondent
 ☐ Plaintiff
☐ Other (Specify):
 ☐ Petitioner
☐ Defendant

To whom it may concern:

On Wednesday 7/8/15 Marika called me (she probably found my number on Google) ,saying she wanted to Skype with her son Hunter, at this point I thought Reed Randoy had given her my number and approved that she could Skype with Hunter, so I let her do it.

In the evening she wanted to Skype with him again and started to ask me questions about my arrangement with Reed and Hunter, I did not respond to any of her texts, I just let her Skype Hunter from my phone.

The next day she texted and wanted to Skype with Hunter again two times, and asked me more questions and telling me about rules and laws for babysitters, or if I was a new girlfriend who is trying to take her place. I still did not respond.

The following night when she asked (texted) me to Skype with Hunter she started to tell me that what I was doing was against the law, I did not respond or comment, just let her Skype with Hunter.

Saturday 7/11/15 she texted me saying that she wanted to speak to Hunter at 6pm, and told me to make sure he was available at that time. I did not see this text and did not respond, nor did I answer when she called. She texted that I was breaking the law by not allowing her to see her son and that she will pursue legal actions against me and that she is pressing charges against me.

She texted again that she was pressing charges against me the next day and called me the day after that, I did not respond.

All the text exchanges are included.

Mixed Sources



EXHIBIT “A”

Jul 7, 2015, 1:09 PM from Marieke Petra Elise Vekemans Taylor Randoy

Hi guys heading over now

Jul 7, 2015, 1:09 PM from Marieke Petra Elise Vekemans Taylor Randoy

If you want to meet in the park from yesterday that's fine..

Jul 7, 2015, 1:15 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Marieke you can see him when reed is there

Jul 7, 2015, 1:15 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

You are not welcome at my house

Jul 7, 2015, 1:16 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

He's out with the nanny shopping

Jul 7, 2015, 1:17 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

You can wait till he gets home

Jul 7, 2015, 1:30 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Reed will wrap later today

EXHIBIT

A-1

Jul 7, 2015

8 PM from Marieke Petra Elise Vekemans

or Randoy

Please bring Heidi's drivers license phone number us working papers all that so I know who is caring for my child.

And if either of you are every going to care for hunter I need your drivers licenses also. Just a photo of it is fine.

I will give you all my information so you all have it too in case of any emergency.

I will also give you hunters health insurance card so you have it.

I'm sorry if Reed is making this seem awkward. I just want to see my son.

The courts will sort out the rest.

I'm not at all angry about the statement you made to the court - it was all thrown out.

I've ordered the court transcripts and will forward them to you if you want.

It is my understanding that Reed is violating court orders by staying with you guys. And bringing hunter on your boats.

But that's on him not on you.

I just want to be able to see my son whenever I want. And call him via Skype three times a day. So he knows I love him and I haven't disappeared. He doesn't understand what's going on.

Jul 7, 2015, 1:19 PM from Marieke Petra Elise Vekemans Taylor Randoy

I need to see him with the nanny then

Jul 7, 2015, 2:20 PM from Marieke Petra Elise Vekemans Taylor Randoy

I need her information her phone number etc as I explained in the previous text

A-2

Jul 7, 2015,

0 PM from Marieke Petra Elise Vekemans

or Randoy

That's scary. He's not at your address and with a random person who I have never met?
No way.

Jul 7, 2015, 1:21 PM from Marieke Petra Elise Vekemans Taylor Randoy

Tell her to return immediately and meet me at the park in half an hour

Jul 7, 2015, 1:21 PM from Marieke Petra Elise Vekemans Taylor Randoy

I'm heading over now

Jul 7, 2015, 1:23 PM from Marieke Petra Elise Vekemans Taylor Randoy

If you don't tell me where my child is or let me see my son you are wrongfully retaining him

Jul 7, 2015, 1:24 PM from Marieke Petra Elise Vekemans Taylor Randoy

I just want to see him guys it's no big deal

Jul 7, 2015, 1:25 PM from Marieke Petra Elise Vekemans Taylor Randoy

And I want to know who is taking care of my child right now I want all of her information is very simple request

Jul 7, 2015, 1:37 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Talk to reed

Jul 7, 2015, 1:30 PM from Marieke Petra Elise Vekemans Taylor Randoy

I'm not visiting read

Jul 7, 2015, 1:30 PM from Marieke Petra Elise Vekemans Taylor Randoy

I honestly don't care what he does

A-3

Jul 7, 2015, 1:30 PM from Marieke Petra Elise Vekemans Taylor Randoy

I need to meet the new nanny and see her working papers her drivers license and get her telephone number

Jul 7, 2015, 1:31 PM from Marieke Petra Elise Vekemans Taylor Randoy

Anyone that's going to take my son off of your property I need to know that person's information now

Jul 7, 2015, 1:34 PM from Marieke Petra Elise Vekemans Taylor Randoy

You do not have custody over my son but you allowed as perfect stranger to leave your property with my son and you do not want to give out her information that's not gonna work for me

Jul 7, 2015, 1:35 PM from Marieke Petra Elise Vekemans Taylor Randoy

It's very complicated Jim I have full physical custody over Hunter read is violating court orders by letting Hunter stay with you guys because I am not welcome on your property see how this is just not working out

Jul 7, 2015, 1:35 PM from Marieke Petra Elise Vekemans Taylor Randoy

I can see my son anytime I want I don't have to ask for an appointment

Jul 7, 2015, 1:37 PM from Marieke Petra Elise Vekemans Taylor Randoy

Unfortunately Reed has involved you guys but normally I would just be speaking to read and read would be giving me the information off the babysitter and I'd be able to see three while Reed is at work no big deal

Jul 7, 2015, 1:47 PM from Marieke Petra Elise Vekemans Taylor Randoy

That's funny he blocked me

Jul 7, 2015, 1:53 PM from Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Sorry talk to Reed

A-4

Jul 7, 2015, 1:08 PM from Marieke Petra Elise Vekemans Taylor Randoy for Randoy

Trust me I don't want to have to deal with you guys it's not fair to you
it's not fair to me but Reed is putting me in a very awkward situation
and you guys in a very awkward and uncomfortable situation

Jul 7, 2015, 1:39 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

No Reed is not he's my friend he's got a apt he's moving into so talk
to him... Thx bye

Jul 7, 2015, 1:59 PM from Marieke Petra Elise Vekemans Taylor Randoy

He is making things that should be very uncomplicated and turning
them into something that involves you guys and makes it incredibly
complicated and stupid

Jul 7, 2015, 1:46 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

On another note Oscar and hunter are having a great time

Jul 7, 2015, 1:39 PM from Marieke Petra Elise Vekemans Taylor Randoy

Well actually you share about together and your children your child
and my child take baths together and watch television together

Jul 7, 2015, 1:39 PM from Marieke Petra Elise Vekemans Taylor Randoy

A boat

Jul 7, 2015, 1:40 PM from Marieke Petra Elise Vekemans Taylor Randoy

And you swore under oath made a statement in court so unfortunately
you've involved yourself

Jul 7, 2015, 1:40 PM from Marieke Petra Elise Vekemans Taylor Randoy

If you want to call the police I will please believe me I don't want to.

A-5

Jul 7, 2015, 1:41 PM from Marieke Petra Elise Vekemans Taylor Randoy

I just want to know where my son is who is caring for him know all of her contact information and her legal status in the United States

Jul 7, 2015, 1:42 PM from Marieke Petra Elise Vekemans Taylor Randoy

Right now you are helping read hide my son and not allowing me to know his whereabouts or who is caring for him and you have allowed my son off at your property

Jul 7, 2015, 1:44 PM from Marieke Petra Elise Vekemans Taylor Randoy

With a complete stranger and you refuse to tell me this person's information.

Jul 7, 2015, 1:51 PM from Marieke Petra Elise Vekemans Taylor Randoy

Yeah and he's been ripped away from his mother the person who has cared for him since birth.

Jul 7, 2015, 1:54 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Jesus marike

He's with a nanny because Reed is working...

If you need all this info call Reed

Anne and I both have jobs and have to work so talk to Reed

Jul 7, 2015, 1:54 PM from Marieke Petra Elise Vekemans Taylor Randoy

I'm getting him back. Through court orders. Not to worry. Everything is getting done by the book. But the state department and the canadian embassy will intervene if necessary.

Jul 7, 2015, 1:54 PM from Marieke Petra Elise Vekemans Taylor Randoy

Just tell me who she is and where she is

A-6

Jul 7, 2015, 1:44 PM from Marieke Petra Elise Vekemans Taylor Randoy or Randoy

And her contact info

Jul 7, 2015, 1:56 PM from Marieke Petra Elise Vekemans Taylor Randoy

It's so simple. It's a very normal request. You would ask for the same information if you were in my shoes.

Jul 7, 2015, 2:16 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

I don't have that that's a reed question she's a professional nanny very nice.... Norwegian.

Jul 7, 2015, 2:15 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Please do not talk to me anymore thank you

Jul 7, 2015, 1:57 PM from Marieke Petra Elise Vekemans Taylor Randoy

I already texted him about this all morning

Jul 7, 2015, 1:58 PM from Marieke Petra Elise Vekemans Taylor Randoy

Jim and Ann I do not want to be contacting you.
But Reed is a child and putting me in a position where I have no alternative.

Jul 7, 2015, 1:58 PM from Marieke Petra Elise Vekemans Taylor Randoy

Not knowing where my son is and who is caring for him is not an option .

Jul 7, 2015, 1:58 PM from Marieke Petra Elise Vekemans Taylor Randoy

Sorry guys. That's not how I operate

Jul 7, 2015, 1:58 PM from Marieke Petra Elise Vekemans Taylor Randoy

Elaine tried this with me when she had him for two days.

A-7

Jul 7, 2015, 2:00 PM from Marieke Petra Elise Vekemans Taylor Randoy

Wouldn't let he see him or tell me where he was.
That's violating my parental custodial rights and authority. It's only common sense.

Jul 7, 2015, 2:03 PM from Marieke Petra Elise Vekemans Taylor Randoy

And the actual term for the offense is called wrongful retention. And harassment. Seriously put yourself in my shoes. Let me see my kid and let me know where he is and who he's with and give me all their information.

Jul 7, 2015, 2:21 PM from Marieke Petra Elise Vekemans Taylor Randoy

I will have the police at the door

Jul 7, 2015, 2:23 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anna Huarte My Wife

We called em already

Jul 7, 2015, 2:22 PM from Marieke Petra Elise Vekemans Taylor Randoy

Just want to meet the nanny. Have her information.

Give her my number have her call me

Jul 7, 2015, 2:22 PM from Marieke Petra Elise Vekemans Taylor Randoy

She's a professional right?

Jul 7, 2015, 2:22 PM from Marieke Petra Elise Vekemans Taylor Randoy

Have her call me :)

Jul 7, 2015, 2:23 PM from Marieke Petra Elise Vekemans Taylor Randoy

I'm the mother and she should contact me so she has my information

Jul 7, 2015, 2:23 PM from Marieke Petra Elise Vekemans Taylor Randoy

It's so easy guys.

A-8

Jul 7, 2015, 2:13 PM from Marieke Petra Elise Vekemans Taylor Randoy

We don't need to cross any wires

Jul 7, 2015, 2:20 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

This is all reed stuff I didn't hire her

Jul 7, 2015, 2:25 PM from Marieke Petra Elise Vekemans Taylor Randoy

Accuse each other of international child abduction!!

If she is the new nanny sge needs to be aware that right now she is unwittingly getting embroiled in a custody dispute simply because the man who hired her won't give out her contact information

Jul 7, 2015, 2:25 PM from Marieke Petra Elise Vekemans Taylor Randoy

I have her name. I will report her to the police of she doesn't contact me.

Jul 7, 2015, 2:25 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Ok

Jul 7, 2015, 2:25 PM from Marieke Petra Elise Vekemans Taylor Randoy

Well you might want to let him know

Jul 7, 2015, 2:26 PM from Marieke Petra Elise Vekemans Taylor Randoy

I'm sorry guys

Jul 7, 2015, 2:27 PM from Marieke Petra Elise Vekemans Taylor Randoy

I have to know where my child is and who has him at all times

Jul 7, 2015, 2:27 PM from Marieke Petra Elise Vekemans Taylor Randoy

As parents I would think you could understand that.

A-9

Jul 7, 2015, 2:07 PM from Marieke Petra Elise Vekemans Taylor Randoy or Randoy

Reed would have to get a court order to take these rights from me

Jul 7, 2015, 2:28 PM from Marieke Petra Elise Vekemans Taylor Randoy

He has no such order

Jul 7, 2015, 2:31 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Call reeds attorney about this I don't have these answers

Jul 7, 2015, 2:30 PM from Marieke Petra Elise Vekemans Taylor Randoy

And we will be at your door. I'm sorry.

Jul 7, 2015, 2:31 PM from Marieke Petra Elise Vekemans Taylor Randoy

All Reed has to do is give me her info and let her know I want to see my son and to let me meet them at a park

Jul 7, 2015, 2:32 PM from Marieke Petra Elise Vekemans Taylor Randoy

Lol you trying to be funny?

Jul 7, 2015, 2:32 PM from Marieke Petra Elise Vekemans Taylor Randoy

I'm my own attorney

Jul 7, 2015, 2:32 PM from Marieke Petra Elise Vekemans Taylor Randoy

I don't need to contact reeds attorney

Jul 7, 2015, 2:36 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Great our police officer said that's fine call em officer Jacobus is his name

A-10

Jul 7, 2015, 2:38 PM from Marieke Petra Elise Vekemans (or Randoy

Nick is terrified that I will beat him in court and wants to get as much of our community property he can before Reed fires him:) Nick is a liar, taking us to the cleaners for as long as he can and completely useless.

Jul 7, 2015, 2:38 PM from Marieke Petra Elise Vekemans Taylor Randoy

No I will just call the appropriate authorities.

Jul 7, 2015, 2:39 PM from Marieke Petra Elise Vekemans Taylor Randoy

But thank you for the chuckle.

Jul 7, 2015, 2:40 PM from Marieke Petra Elise Vekemans Taylor Randoy

Perfect thank you.. What police department? I will just go over there and speak with them

Jul 7, 2015, 2:41 PM from Marieke Petra Elise Vekemans Taylor Randoy

?

Jul 7, 2015, 2:45 PM from Marieke Petra Elise Vekemans Taylor Randoy

Culver city PD?

Jul 7, 2015, 2:47 PM to Marieke Petra Elise Vekemans Taylor Randoy, Anne Huarte My Wife

Blocked

Jul 7, 2015, 2:47 PM from Marieke Petra Elise Vekemans Taylor Randoy

See you soon

Jul 7, 2015, 1:53 AM from Marieke Petra Elise Vekemans Taylor Randoy

I'm pressing charges against you.

A-11