

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <i>Rich and Riess, 15-0019, 3410</i> <i>c/o Santa Ana Jail</i> <i>PO Box 22003</i> <i>Santa Ana, CA 92702</i> TELEPHONE NO: _____ FAX NO. (Optional): _____ E-MAIL ADDRESS (Optional): _____ ATTORNEY FOR (Name): Self-Represented	FOR COURT USE ONLY <div style="font-size: 1.2em; font-weight: bold; margin: 10px 0;">ORIGINAL FILED</div> <div style="margin: 5px 0;">JAN 30 2013</div> <div style="margin: 5px 0;">LOS ANGELES</div> <div style="margin: 5px 0;">SUPERIOR COURT</div>	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: <i>200 W. Compton Pl</i> MAILING ADDRESS: <i>200 W. Compton Pl</i> CITY AND ZIP CODE: <i>Compton, CA 90220</i> BRANCH NAME: <i>South Central</i>	CASE NUMBER: <div style="font-size: 1.2em; margin-top: 10px;"><i>TD 035387</i></div>	
PETITIONER/PLAINTIFF: <i>Richard Riess</i> RESPONDENT/DEFENDANT: <i>Desiree Capuano</i> OTHER PARTY: _____		
RESPONSIVE DECLARATION TO REQUEST FOR ORDER		
HEARING DATE: <i>2/6/13</i>	TIME: <i>8:30 am</i>	DEPARTMENT OR ROOM: <i>M</i>

1. ☒ **CHILD CUSTODY**
 - a. ☐ I consent to the order requested.
 - b. ☒ I do not consent to the order requested, but I consent to the following order:
 _____ as attached on FL-311
Respondent to have emergency, temporary custody of child until it can be released from detention, at which time child will be returned to my custody.
2. ☐ **CHILD VISITATION (PARENTING TIME)**
 - a. ☐ I consent to the order requested.
 - b. ☐ I do not consent to the order requested, but I consent to the following order:
 _____ as attached on FL-311
3. ☐ **CHILD SUPPORT**
 - a. ☐ I consent to the order requested.
 - b. ☐ I consent to guideline support.
 - c. ☐ I do not consent to the order requested, but I consent to the following order:
 - (1) ☐ Guideline
 - (2) ☐ Other (specify): _____
4. ☐ **SPOUSAL OR PARTNER SUPPORT**
 - a. ☐ I consent to the order requested.
 - b. ☐ I do not consent to the order requested.
 - c. ☐ I consent to the following order: _____

PETITIONER/PLAINTIFF:

CASE NUMBER

RESPONDENT/DEFENDANT:

OTHER PARTY:

5. ☐ ATTORNEY'S FEES AND COSTS

- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested.
- c. ☐ I consent to the following order:

6. ☐ PROPERTY RESTRAINT

- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested.
- c. ☐ I consent to the following order:

7. ☐ PROPERTY CONTROL

- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested.
- c. ☐ I consent to the following order:

8. ☒ OTHER RELIEF

- a. ☐ I consent to the order requested.
- b. ☒ I do not consent to the order requested.
- c. ☐ I consent to the following order:

___ as attached on FL-316 Request for Orders Regarding Noncompliance with Disclosure Requirements

9. ☒ SUPPORTING INFORMATION

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

NOTE: To respond to domestic violence restraining orders requested in the *Request for Order (Domestic Violence Prevention)* (form DV-100), you must use the *Answer to Temporary Restraining Order (Domestic Violence Prevention)* (form DV-120).

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

Date: 1-25-2013

Richard Riess

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <i>Richard Riera, 13-0019, 3A10</i> <i>46 Santa Ana Jail</i> <i>PO Box 22005</i> <i>Santa Ana, CA 92702</i>		FOR COURT USE ONLY
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): <i>Self-Represented</i>		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: <i>200 W. Compton Bl</i> MAILING ADDRESS: <i>200 W. Compton Bl</i> CITY AND ZIP CODE: <i>Compton, CA 90220</i> BRANCH NAME: <i>South Central</i>		
PETITIONER/PLAINTIFF: <i>Richard Riera</i> RESPONDENT/DEFENDANT: <i>Desiree Capricano</i> OTHER PARENT/PARTY:		CASE NUMBER: <i>TD 035347</i>
PROOF OF SERVICE BY MAIL		(If applicable, provide): HEARING DATE: <i>2/6/13</i> HEARING TIME: <i>8:30am</i> DEPT.: <i>M</i>

NOTICE: To serve temporary restraining orders you must use personal service (see form FL-330).

1. I am at least 18 years of age, not a party to this action, and I am a resident of or employed in the county where the mailing took place.

2. My residence or business address is:
 [REDACTED] *Lincoln St, Carson, CA 90745*

3. I served a copy of the following documents (specify):
Responsive Declaration to Request for Order

by enclosing them in an envelope AND

- a. ☒ depositing the sealed envelope with the United States Postal Service with the postage fully prepaid.
 b. ☐ placing the envelope for collection and mailing on the date and at the place shown in item 4 following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

4. The envelope was addressed and mailed as follows:

- a. Name of person served: *Desiree Capricano*
 b. Address: *9153 W. 84th Dr, Peoria, AZ 85345*
 c. Date mailed: *1-25-2013*
 d. Place of mailing (city and state): *Santa Ana, CA*

5. ☐ I served a request to modify a child custody, visitation, or child support judgment or permanent order which included an address verification declaration. (Declaration Regarding Address Verification—Postjudgment Request to Modify a Child Custody, Visitation, or Child Support Order (form FL-334) may be used for this purpose.)

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

Date: *1-25-13*

Richard Riera

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON COMPLETING THIS FORM)

Richard Riess
13-019, 3A10
c/o Santa Ana Jail
P.O. Box 22003
Santa Ana, CA 92702
Pro Per

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

Richard Riess,
Petitioner,

v.

Desiree Capuano,
Respondent.

Case No: TD 035397

**Responsive Declaration of Richard Riess to
Respondent's Ex Parte Request to Modify
Child Custody**

I, Richard Riess, hereby declare under penalty of perjury that the statements provided herein are true and correct to the best of my knowledge and are based on first hand knowledge.

SUMMARY

1. I believe Desiree deliberately and in bad faith filed false reports and allegations about me, with ICE, in order to cause me to be detained and deported so that she could obtain sole legal and physical custody of G [REDACTED], in my absence.
2. I believe Desiree's current actions and intentions are identical to her actions and intentions in August 2011 when she took G [REDACTED] to Arizona without my knowledge, without notice, and without consideration for his or anyone else's interests or wishes, then immediately attempted to

obtain custody of him based on her false claims against me, and on my temporary detention by ICE and her unfounded belief that I would be deported to Canada.

3. My current detention is not related to, or the result of, any action on my part, and has only occurred as a direct result of Desiree's filing false and/or misleading reports about me with ICE.
4. No criminal charges, prosecution, or new or further legal action, whether criminal, civil, or immigration related, have resulted from my arrest by ICE on January 2, 2013 or my current administrative detention. All charges and allegations have been completely dropped.
5. I believe Desiree's interest in obtaining custody of G [REDACTED] and keeping him with her in Arizona is motivated by her own selfish desire to win some kind of perceived battle between her and I, and not in any way related to G [REDACTED]'s best interests or a sincere desire to provide for and raise G [REDACTED]. I believe this is supported by her willingness to let G [REDACTED] suffer and go without basic necessities; her demonstrated lack of interest in G [REDACTED]'s well-being, when he's not in her presence, meanwhile putting significant time and effort into fighting with me, arguing with me, and trying to make circumstances difficult me; and her voluntary, complete absence from G [REDACTED]'s life up to the Spring of 2011 when I located and contacted her.

BACKGROUND

6. I am the Petitioner in the captioned matter.
7. I am the natural father of G [REDACTED] Riess and he has been in my care since his birth in 2000.
8. Desiree Capuano is the biological mother of G [REDACTED] and has been completely absent from G [REDACTED]'s life from early 2002 until I located her and put her and G [REDACTED] in contact in the Spring of 2011.

9. G [REDACTED] and I have known Liz M [REDACTED] since the Spring of 2002. Since that time Liz has frequently assisted me in taking care of G [REDACTED] by baby sitting and looking after him while I was occupied or out of town on business. During the four years that I was detained (from July 2007 through August 2011) Liz acted as G [REDACTED]'s guardian (Desiree was absent and I had no knowledge of her whereabouts since 2002) and provided for all of his needs. Since 2002 G [REDACTED] has developed a significant familial bond with Liz and her extended family, and typically participates in their family functions as a member of their family.
10. In August 2011, while I was being temporarily detained by the Bureau of Immigration and Customs Enforcement (ICE) and G [REDACTED] was in Liz's care, Desiree came to Los Angeles and took G [REDACTED] to Arizona where she immediately attempted to gain physical and legal custody of G [REDACTED].
- a. In support of her request for emergency custody Desiree falsely claimed, in her sworn declarations before the Court, that I had hid G [REDACTED] from her for the nine years that she was absent; that I was in prison; that I was going to be deported to Canada; and that if I was permitted to maintain custody of G [REDACTED] I was likely to disappear to Canada with him. None of those claims turned out to be true.
 - b. Upon my release from detention, two weeks after Desiree took G [REDACTED] to Arizona, she attempted to obtain a Court order prohibiting me from having any contact with G [REDACTED]. That request was denied.
 - c. At the time of taking G [REDACTED] to Arizona, Desiree had only had two weekend visits with G [REDACTED] and was, essentially, a stranger to him.
11. On August 30, 2011 I was released from ICE custody. I was not deported as had been stated by Desiree.

12. On November 9, 2011 the Superior Court of California ordered Desiree to immediately return G [REDACTED] to the only home he has ever known, until August 2011.
13. Since November 2011, G [REDACTED] has been in my physical custody and has spent his school breaks and occasional long weekends with Desiree. Desiree has declined to exercise her visitations on multiple occasions.
14. Since G [REDACTED]'s return from his summer break visitation with Desiree he has expressed an increasing lack of desire to maintain contact with Desiree. G [REDACTED] cited, in particular, her repeated lies to him; her repeated failure to follow through on her promises; her ongoing drug use; and her often unpredictable, erratic and sudden mood changes. G [REDACTED] also stated
- a. he is often uncomfortable in Desiree's presence and speaking with her about many personal topics;
 - b. he doesn't think of S [REDACTED] (Desiree's other child) as a brother, but merely as an acquaintance, and he is not interested in developing a relationship with S [REDACTED] due to social and behavioral differences between them;
 - c. he has difficulty thinking of Desiree as a maternal figure because she has not been present until recently, and he has difficulty relating to her due to behavioral differences;
 - d. he has difficulty believing much of what Desiree tells him because she often says things that he later finds out are false.
15. Over the period of time from September 2011 through December 2012 Desiree had made repeated threats to me about reporting me to ICE and having me deported; she had consistently insisted that I am an illegal alien, and had been deported; and that she was going to call "the Feds" on me and have me sent back to prison and deported again. I generally disregarded those threats because I am not an illegal alien, have not been deported, and do not believe I would be

- of interest to any law enforcement agency (ICE or otherwise). I have received and retained many emails from Desiree and her fiancé, Kristopher Lauchner, making such threats and claims.
16. On December 16, 2012 Desiree came to Los Angeles to pick up G [REDACTED] for her winter break visitation. Desiree made travel arrangements for G [REDACTED] to be returned on January 5, 2013.

CURRENT ARREST, INVESTIGATION AND DETENTION

17. On January 2, 2013 two ICE Agents came to my residence, claiming to have received a report of a "dangerous fugitive" alien who had been using that address. I did not have any reason to believe that ICE was looking for, or was interested in, me. I allowed the agents into my home and cooperated with them.
18. The ICE Agents informed me they had received a report that I was a convicted felon, had been deported, had re-entered the U.S. illegally, and was a danger to society. I did not resist and agreed to accompany the Agents to the ICE facility in downtown Los Angeles for further investigation.
19. Upon arrival at the ICE office, and before being interrogated, I spoke informally and at length with one of the Agents about numerous topics relating to my life in general, career, plans, parenting, et cetera. There was no animosity between the Agent and myself, that I could detect. During the course of our discussion, the Agent stated "We're not worried about you. If you had a shaved head and gang tattoos on your face then I'd be worried about you, but you don't really have a criminal record, you haven't been in any trouble since you've been released, your home is clean, and you've been taking care of your son."
20. I asked the Agent how it was that ICE had come to be investigating me, and he responded that ICE had received a number of reports of a previously deported fugitive, who had illegally re-

- entered the US, living at my address. Upon further inquiry, the Agent admitted that the reports were from a party who identified herself as my ex-wife. During the later interrogation by the other Agent, he admitted that the reports were received by Desiree Capuano. The Agents also stated that Desiree claimed to be my "ex-wife" and did not inform them that we are still married.
21. Over the course of multiple interrogations I responded to all of the ICE Agents' questions. Yet, they were unable to establish that I had committed **ANY** criminal offense or violated any law (immigration or otherwise) of the US. During the course of their investigation they verified the information I had provided them regarding my citizenship and right to be in the US.
22. Following their interrogation and investigation the ICE Agents forwarded my file, and the results of their investigation, to ICE counsel for further review. It was ultimately determined that there was no basis for arrest or any further legal action.
23. In 2009 the Immigration Court in Eloy, Arizona entered an order of removal against me, to Mexico or, in the alternative to Canada. That order of removal authorizes ICE to detain me for a brief period while they attempt to obtain a travel document to effect my removal. That is the only basis upon which I am currently being detained.
24. The ICE Agents repeatedly stated that my detention is not expected to exceed 3 to 4 weeks, and is only due to the prior removal order.
25. The ICE Agent stated that, upon verifying my US birth, a note was entered into my file to ensure I would not be arrested or detained by ICE again.
26. Based on conversations with ICE I believe my current period of detention will not last beyond early February 2013.

27. On January 18, 2013 an ICE Agent approached me, seeking my assistance in identifying and correcting potential security holes along the U.S./Canada border. I told the Agent that I would be willing to cooperate with them in any way I could.
28. While in custody at the Santa Ana Jail I have worked with, and cooperated with ICE to identify constitutional rights violations, civil rights violations, and violations of the ICE Detention Standards being committed against the detainees by the facility and it's staff.

CURRENT CONDITIONS OF CONFINEMENT AFFECTING ABILITY TO LITIGATE

29. I received the Temporary Emergency Court Order (filed 01/16/2013) and related documents, at the Santa Ana Jail, on Wednesday, January 23, 2013.
30. Outgoing detainee mail at the Santa Ana Jail facility is picked up from Monday morning through Thursday morning, and must be deposited in the housing unit mail box no later than 10:30pm the night before, in order to go out with the next day's mail. For that reason, I was not able to mail this (and related) documents until Monday, January 28, 2013.
31. My current custodial agents, ICE and the Santa Ana Police Department, refuse to provide me access to the Superior Court of California forms. For that reason, I am currently unable to comply with the Court's order to utilize those forms.
32. Under my current detention I may, potentially, be released from ICE custody at any moment and may, potentially, be transported by ICE to an undetermined location within the U.S. or Canada upon my release. Such action, without prior notice, may affect my ability to respond timely or to appear as directed by the Court. However, every effort will be made on my part to comply with the Court's orders and requirements.

DESIREE'S ACTIONS DURING MY DETENTION

33. Since my arrest on January 2, 2013 I have not been able to contact G [REDACTED] by telephone, on the mobile phone I have provided him because I believe Desiree is not allowing G [REDACTED] to use that telephone.
34. I have not been able to contact G [REDACTED] by telephone at Desiree's home number because every time I call that number no one answers and it goes to voice, which has not been set up. I have typically been calling 2 – 3 times per day.
35. I have written and mailed at least three letters to G [REDACTED], at Desiree's home, however I have not received a single response. With one of the letters I included a self-addressed, stamped envelope and a blank sheet of paper for G [REDACTED] to respond with.
36. I believe Desiree is deliberately interfering with my ability to communicate with G [REDACTED] by withholding my mail to him, not allowing him to use the mobile phone I provided him, and not allowing him to answer her home telephone when I call.

RESPONSE TO DESIREE'S DECLARATION DATED 1-14-13

37. In the Temporary Emergency Court Orders (FL-305) entered by the Court on January 16, 2013, section 4 states additional orders are listed on Attachment 4, however, no document entitled or labeled "Attachment 4" was provided to me.
38. In her declaration, dated 1-14-13, Desiree attached a copy of a letter I had sent to G [REDACTED] from the Santa Ana Jail on 1-5-2013. I believe that proves that Desiree is intercepting and interfering my mail and communication with G [REDACTED].
39. In her declaration Desiree states she has had no contact with Kristopher Lauchner since his arrest on October 2, 2012 and that he has since been removed from her medical insurance (paragraphs

7 and 8). I believe those statements are insignificant because Desiree also cohabited with, supported, and defended Lauchner's actions and behavior and drug use right up to the day of his arrest and incarceration. Moreover, to that very day Desiree allowed Lauchner to supervise and care for her children in her daily absence.

40. By her own admissions, Desiree's attitude toward Lauchner literally changed, 180 degrees, on the day of his arrest. Moreover, Desiree has stated in her emails that she holds Lauchner, myself, and her other ex-husband (Michael Capuano) responsible for most of the problems in her life, yet **SHE** chose to be in long term, committed relationships with them and during those relationships openly praised them. I believe that type of behavior demonstrates emotional instability, co-dependency, and sets a bad example for her children.
41. In paragraphs 9 and 10 of her declaration Desiree states that she has successfully completed her drug diversion program and passed a drug test for CPS. However, by her own admissions she was not required to, and did not discontinue her marijuana use during her participation in the drug diversion program, and CPS was not permitted to test for marijuana use due to her having a medical marijuana card. I believe that negates the accomplishment of successfully completing the drug diversion program or passing a drug test.
42. In paragraph 11 of her declaration Desiree states that all charges against her have been dropped. The dismissal of the charges was based on her completion of the drug diversion program and by her own admission she was not required to, and did not discontinue her marijuana use during the program. Also, the charges were for possession of marijuana, prior to her obtaining the medical marijuana card. I believe the primary issue of concern is Desiree's marijuana **USE** and it's adverse affects on G [REDACTED], not whether her possession or use is legal.

43. In paragraph 12 of her declaration Desiree states she does not now, nor has she ever, had a drug problem. However, she was encountered by police on more than two occasions, prior to obtaining a medical marijuana card, illegally possessing marijuana. One of those encounters lead to criminal prosecution, and her participation in a drug diversion program – a requirement of which is the admission of having a drug problem. In addition, she was convicted in Santa Monica, CA for being under the influence in a public place before even reaching the age of 21.
44. In paragraph 13 of her declaration Desiree states she is still gainfully employed and that she has recently received numerous achievement awards at her place of employment. At the same time, however, Desiree has consistently refused to provide for G [REDACTED]'s financial needs over the past 2 years, when he is not in her physical presence. I believe this proves that Desiree sees G [REDACTED] as nothing more than a prize or trophy in some kind of battle she perceives herself as being in with me, and that she is very willing to make her children suffer for the sake of her own selfish goals.
45. In paragraph 14 of her declaration Desiree states that I am giving G [REDACTED] the false impression that I was never guilty of anything and that G [REDACTED] will be returned to my care. I disagree with that statement. Nowhere in my letter did I stated that I was never guilty of anything. I only stated that I am not guilty of illegal re-entry or falsely claiming to be a US citizen (the allegations which lead to my current detention). And, in fact, if I was guilty of those charges I am confident ICE would have pursued prosecution. Further, I have complete confidence in the California Court system and it is my sincere belief that G [REDACTED] will be returned to my care and, therefore, that is not a false impression.
46. In paragraph 14 of her declaration Desiree further states I put all blame on her and continue to attempt to poison her son against her. I deny that claim. In my letters to G [REDACTED] I have only stated that my current detention is the result of the false reports filed by Desiree, with ICE, and

not related to any action or wrongdoing on my part. I have not attempted to adversely affect G[REDACTED]'s perception of Desiree. G[REDACTED]'s lack of interest in maintaining a relationship with Desiree has been based on his own first hand knowledge and experiences with Desiree over the past year. In particular, G[REDACTED] has indicated he has been adversely affected by Desiree's:

- a. retaliatory cancelling of the mobile phone she had provided him;
- b. refusal to assist him when he is not in her physical presence;
- c. disregard for his well-being and interests when she took him to Arizona in August 2011;
- d. disregard for his desires and interests when she filed false claims with ICE causing my current detention;
- e. lack of interest in maintaining contact with him between his visitations;
- f. ongoing use of marijuana; and
- g. irrational, erratic, and unpredictable behavior and mood changes.

47. I believe, by deliberately bringing about the current circumstances, which have resulted in my temporary detention and G[REDACTED]'s prolonged presence in Arizona apart from me, Desiree has and continues to severely and permanently damage her relationship with G[REDACTED]. I believe Desiree's actions will have the ultimate effect of pushing G[REDACTED] away from her, just as they did in August 2011.

48. In paragraph 15 of her declaration Desiree cites her "documented stability" as a basis for why the Court should grant her temporary custody of G[REDACTED]. However, the facts belie any claim of "documented stability". In particular:

- a. she cohabited with, was engaged to, and habitually kept her children in the presence and care of a man that was actively engaging in criminal activity, using crystal methamphetamine, hiding stolen assault rifles in the house, and promoting Nazi

propaganda in front of her Jewish son (only following Lauchner's arrest and incarceration did she finally create the appearance of terminating the relationship);

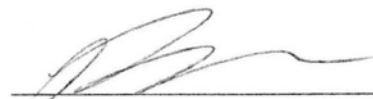
- b. since relocating to Phoenix, AZ in 2009 Desiree has resided at more than 5 different addresses, each in a different school area, resulting in her children changing schools frequently and not being able to develop long term friendships;
- c. while in Los Angeles recently Desiree stated that she intends to relocate again this coming summer in order to be closer to her place of employment;
- d. on at least one occasion within the last 18 months Desiree has had to relocate as a direct result of police activity and her arrest at her residence;
- e. on more than one occasion police have searched Desiree's home and found illegal drugs, including marijuana and crystal methamphetamine in the home, where they could have been accessed by her children.

49. In paragraph 16 of her declaration Desiree requests the Court grant an order prohibiting communication between myself and G [REDACTED] to "avoid confusing and adding more stress on the child while he tries to adjust to the new situation". I believe, however, that not allowing communication between myself and G [REDACTED] during the period of adjustment will actually make it much more stressful for G [REDACTED] as it will increase the uncertainty and sense of abandonment. Moreover, when G [REDACTED] eventually learns that I have been frequently attempting to contact him by telephone and sending him multiple letters each week, and that it was through Desiree's deliberate actions that he has not heard from me, I believe that will completely destroy any trust he may still have in her and any chances of him developing any kind of relationship with her.
50. G [REDACTED] has stated to me on many occasions over the past 3 months that he did not wish to go to Arizona any more and that he just wanted to remain with me. I believe his current period of

remaining in Arizona with Desiree, as a result of my detention, is very traumatic and is causing him permanent emotional harm.

51. On January 15, 2013 Miss M [REDACTED] told me that Desiree had told her, earlier that day, that G [REDACTED] had not yet started school in Arizona. By February 6, 2013 G [REDACTED] will have only been in school in Arizona for less than three weeks and I believe if I work with him we would be able to make up the lost time at his school here in Los Angeles.
52. Prior to, and at the time of my arrest on January 2, 2013 I had been working on a volunteer basis with Temple Menorah (a Jewish temple and synagogue), in Redondo Beach, providing software development and web development services to them. My current arrest and detention has significantly adversely affected the Temple and the projects that I was involved with. On January 23, 2013 I received a letter from Rabbi Silver at the Temple, requesting my attorney's information and offering to assist in any way with the ordeal I am currently going through.
53. In his letter, Rabbi Silver indicated that he knows Congressman Henry Waxman and suggested Mr. Waxman may also be able to help me with my current complications.
54. I am very thankful for mine and G [REDACTED]'s connection to the Jewish community in the South Bay and to have their support.

Dated this 24th day of January 2013.


Richard Riess