

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Desiree Capuano 315 W. Valencia Rd #23014 Tucson, AZ TELEPHONE NO.: 520-288-8200 FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):			FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 200 West Compton Blvd MAILING ADDRESS: 200 West Compton Blvd CITY AND ZIP CODE: Compton, CA 90220 BRANCH NAME: South Central District			
PETITIONER/PLAINTIFF: Richard Riess RESPONDENT/DEFENDANT: Desiree Capuano OTHER PARTY:			
RESPONSIVE DECLARATION TO REQUEST FOR ORDER			
HEARING DATE: 01/25/2016	TIME: 8:30am	DEPARTMENT OR ROOM: 2011	CASE NUMBER: TD035397

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:
 Existing order filed on August 1st, 2014
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:
 Existing order filed on August 1st, 2014
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: Richard Riess	CASE NUMBER:
RESPONDENT/DEFENDANT: Desiree Capuano	TD035397
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:

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: 01/08/2016

Desiree Capuano

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

Desiree Capuano
11111 Valencia Rd #23014
Tucson, AZ 85706

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

Richard Riess,
Petitioner,

v.

Desiree Capuano,
Respondent

Case No: TD035397

**RESPONSIVE DECLARATION
TO REQUEST TO MODIFY
CUSTODY AND VISITATION**

SUPPORTING INFORMATION:

The last time the parties met in this court room, the petitioner stated that he wished to relinquish all rights pertaining to the minor child to me, the respondent. It was so ordered that I would be granted sole physical and legal custody of G [REDACTED] Riess with the following conditions; a. reasonable visitation would be allowed between the minor child and the petitioner (as determined by the respondent) b. the respondent would not prohibit or interfere with communication between the petitioner and the minor child. I will show with the information below that I have done my best to adhere to all stipulations in spite of the attacks I have suffered from the petitioner.

On July 30th, 2014 the petitioner ceased using the identity of Richard Riess and instead insisted that he be referred to as Patrick [REDACTED], going so far as to attest to the fact that he was never

Richard Riess, that is was his understanding that Richard Riess died in 1993, and that he had always been Patrick [REDACTED]. As well, he refused any forms of communication (legal or otherwise) addressed to Richard Riess. Regardless of my misgivings, G [REDACTED] spent the entire week of fall break (October 4th through October 11th 2014) with the petitioner.

November 11th, 2014 was the first email I received from the petitioner stating that he had purchased a firearm. He stated this gun was for G [REDACTED] Riess as a birthday present and would be kept it at his home in Canada. (**Exhibit A**)

On November 29th, 2014 all plans were made and approved for G [REDACTED] to spend the entire winter break (December 20th, 2014 through January 3rd, 2014) in the form of an email sent to me from Patrick [REDACTED] titled "Travel Itinerary". However, on December 9th 2014, I was informed from the petitioner that he no longer had any identification in the name Richard Riess. This was of concern to me as the custody agreement, birth certificate, and passport of the minor child all listed Richard Riess as the father and G [REDACTED] had no documentation connecting him with a Patrick [REDACTED]. When I stated that I did not feel comfortable sending G [REDACTED] to him without this identification, the petitioner sent me a scanned copy of his deportation paperwork under the name Richard Riess. He then sent me a secondary communication with scanned documentation showing his Canadian ID under Patrick [REDACTED], a paycheck stub made out to Patrick [REDACTED], as well his Canadian firearms license in the name of Patrick [REDACTED]. He felt it necessary to explain to me

that the Canadian government had given him the legal right to purchase, own, and possess guns under the name Patrick [REDACTED] and that he often went to the shooting range. **(Exhibit B)**

Since I had verification that the petitioner had at least the deportation paperwork under the name Richard Riess, I agreed to the approved visitation and G [REDACTED] went to Canada for the full winter break.

On Sunday, January 11th, 2015 I received communication from Patrick [REDACTED]. This was a lengthy email that contained the following information; a. that his intent is to cause me so much distress that I commit suicide b. that G [REDACTED] asked him whether he would ever shoot me, to which he responded that he absolutely would have no problems killing me if the consequences of that were not life in prison and c. that he discusses all of his plans to attack me with G [REDACTED] and that G [REDACTED] is, "aware he is being used as a pawn in my plan to ruin your life". **(Exhibit C)**

I received the request from Patrick [REDACTED] on January 27th, 2015 for G [REDACTED] to visit him in Canada over the spring break (March 9th through March 13th 2015). I informed the petitioner that plans had already been made and that I would be keeping G [REDACTED] for this break. G [REDACTED] was very much aware of these plans and had been involved.

Later on that same day, January 27th, 2015 (at 10pm) I received an email from the petitioner (including the minor child as a recipient) in which Patrick [REDACTED] informs me that it is his desire to hire someone to have sex with me in order to obtain "intimate" photographs of me for his website 'desireecapitano.com' (**Exhibit D**)

During the week of spring break, the petitioner called and spoke with G [REDACTED] and found out that we had gone to visit my father, G [REDACTED]'s grandfather and his great-grandparents who he had never met before. Instead of being supportive of this visitation, the petitioner sent an email on March 9th insulting myself and my family (**Exhibit E**). The petitioner was informed before the end of March that he would have the entire summer break with G [REDACTED] as that was the next time off.

Communication began on April 20th, 2015 regarding summer visitation. I sent an email to Richard that the dates for the summer break were from Sunday, May 24th to July 12th, 2015. These were the dates that both G [REDACTED] and I determined together. The petitioner initially agreed to these dates. This changed however and I was asked to transport G [REDACTED] to the airport on the following Wednesday. I was not told why this change was being requested but I was told that the petitioner did not care if it interfered with my work schedule. I denied the date requested and told the petitioner that G [REDACTED] could travel on either Saturday or Sunday. The petitioner got very angry about this, added the minor child to the email thread and stated that I did not care that it would cost the petitioner more money to fly out on the weekend and that he did not have the

available funds as proof to G [REDACTED] of how bad I was. This email correspondence is 64 individual emails long and lasted from April 20th to May 11th 2015. The petitioner was very confused by the term "travel itinerary" and took until May 6th to get the travel plans, one way, from Phoenix to Vancouver. 5 days of arguing about getting a return ticket later, I finally gave up and was told that the petitioner would provide G [REDACTED]'s return information "sometime in June".

Additionally, in this correspondence the petitioner states that when the minor child turns 16 years old, he plans to take him to Ontario Canada where the age of an adult is 16. At this point, G [REDACTED] would no longer be required to return to me and there would be nothing that I or this court could do about it. He stated that this has been his plan all along. **(Exhibit F)**

The day before G [REDACTED] left for his visitation, I received an email from Patrick [REDACTED] telling me that his horrific website full of defamation, insults, and lies was the first thing that showed when anyone researched my name online. He indicated that he would make changes to the website so that it was the first search result if anyone researched my maiden name as well.

(Exhibit G)

I was aware before G [REDACTED] left that he had, what looked to be a rash forming behind his right ear. We administered Neosporin but this was identified only days before his scheduled departure.

G [REDACTED] left on May 24th 2015 and traveled to Los Angeles where he stayed with Liz M [REDACTED] until the following Thursday before flying to Vancouver for the remainder of the summer.

As this court is aware, over the summer of 2015, we moved from Phoenix to Tucson Arizona. This was not a spur of the moment decision; it was discussed with both of my children extensively before the decision was made. As required, a copy of the change of address form filed with this court was served via mail to Richard Riess.

From May 24th until June 30th 2015 Mr Riess/[REDACTED] felt it necessary to send me 59 emails. One of these emails was Patrick/Richard telling me how he had a conversation with G [REDACTED] and explained to him that I loved S [REDACTED] (my other son) more than him. (**Exhibit H**) Most of the other emails sent to me where to inform me that G [REDACTED] does not love me, has no respect for me, speaks ill of me and my home, and has no desire to live with me. None of which has been expressed to me by G [REDACTED], nor has the petitioner provided anything but his opinion to support these claims.

An email from May 15th was a series of pictures of a park in Burnaby that is close to where the petitioner lives which borders the United States. In this communication the petitioner

informs me that it is all too easy for him to cross the border, into the United States without the knowledge of immigration, border patrol, or authority of any kind. I can only assume this was meant as some form of threat. **(Exhibit I)**

Another email, from June 27th was a request from the petitioner to confirm if I had taken a new position at a college in Tucson. This email was sent to taunt and insult me and indicate that I had to take a “lesser” job due to the website he maintains. At this time I was still employed by Apollo. **(Exhibit J)**

By June 28th I was not provided any return flight information for G [REDACTED]. I initiated an email correspondence with the petitioner. I informed him that there were 2 days remaining for the information to be provided otherwise, I would take action. The response I received was that he was not “Richard Riess”, he was not bound to any “agreement”, he did not need to provide me with anything by June 30th, and that as long as G [REDACTED] was returned by July 12th there was nothing I could do about it.

On June 30th, still having no information for the return of my son nor having heard from G [REDACTED] the entire time he was in Canada, I called the Royal Canadian Mounted Police and asked them to perform a “wellness check”. The RCMP went to the petitioners’ home and spoke with G [REDACTED] as Mr Riess/[REDACTED] was at work. They said everything seemed to be in order but to call

them back if G [REDACTED] was not returned as scheduled. The following day (July 1st 2015) the petitioner sent me the details of G [REDACTED]'s return flight to Tucson Arizona.

Between July 2nd and July 7th, I received another 14 emails from the petitioner including one where he lists out 51 reasons he and G [REDACTED] make fun "at my expense" (**Exhibit K**)

On July 6th 2015 the issue of the address that was provided to the petitioner was brought up. While I understand that it is required to provide the physical address to the other involved parent I instead provide a mailing address. I was afraid of Richard having my physical address, I was afraid of him putting it on his website, and Richard is not allowed to be in the United States so all he would actually need was a mailing address. I had every intention of bringing this to the attention of the court and asking for guidance on how to proceed with this in the next hearing.

Once Richard/Patrick realized what he had was a mailing address and not a physical address, he refused to return G [REDACTED]. I was told that he would be taking the matter to the Vancouver family court and would get an order to override the custody agreement from this court. I argued that this was not the process and that he was more than welcome to request an emergency hearing in front of this judiciary body and demand the physical address but that he needed to return G [REDACTED] in the meantime. He disagreed with this and continued to state that he would not be returning G [REDACTED] to my care. Even on the day of G [REDACTED]'s return, July 12th, I

received an email from Richard/Patrick stating that he was not going to transport him to the airport. **(Exhibit L)** Up until the plane actually landed in Tucson, AZ and G [REDACTED] called me, I had no idea if he would be on the plane.

The day after G [REDACTED] returned, July 13th the petitioner informed me that he had acquired my physical address and had added it to the 'desireecapitano.com' website as I feared he would. I informed him that by having my home address on a public website that had many racial slurs, 'white power', and 'white pride' insignias that it could be dangerous for his own child. The response I received was that if a "Mexican" showed up at my home with the intention of hurting me because of the racial comments on his website, that they would probably not hurt G [REDACTED], so he was willing to take that chance. Furthermore, if something did happen, no court in the country would find him at fault for causing it. **(Exhibit M)**

Along with the physical address of my new residence, Richard/Patrick also added a picture of the home and information on the landlord and owner of the home. This information included his picture, his resume, a listing of all his previous employment, Richards' version of a biography of the landlord, as well as a threat to contact the Department of Defense in an attempt to have the landlords top secret government clearance revoked for "cohabitating" with me.

In another email, also sent on July 13th, the petitioner explained to me that he was able to get the physical address of my residence by tracking the location of G [REDACTED]'s phone during weekends that were spent in Tucson before we moved. He used the mobile phones' GPS to get the physical address of where we were, used the address to find out who owned the house. Researched the owner of the house through various social media sites, discovered that the owner had taken a contract at the same company I worked at and "figured it all out"...Then put it all on the website. **(Exhibit N)** It was then that I took the mobile phone supplied by the petitioner as it was being used to gather information on unrelated people and track my location. I felt violated, like I was being stalked.

The petitioner was provided the home phone number and began communicating regularly and freely with G [REDACTED] through this phone, which is not being monitored in any way.

Richard stated that while G [REDACTED] was in Canada, he took him to the doctor and got medicine for the infection. After speaking with G [REDACTED], I learned that the medicine did start to clear up the infection, but as soon as it started to clear up, he stopped taking it and did not finish the medicine as instructed. By the time G [REDACTED] returned, the rash had spread to his entire neck and both ears. He returned with the medicine from Canada and I told G [REDACTED] that if the infection was not cleared up by the time the medicine was gone, we would go back to the doctor. On July 18th, the petitioner sent me a very aggressive and threatening email about the rash. **(Exhibit O)**

After the nasty email, personal information being put up on the website and the overwhelming volume of venomous emails, I got fed up and called the Royal Canadian Mounted Police. I explained everything that was going on and sent them documentation. The RCMP felt that there was more than enough evidence to support the charge of criminal harassment and opened a case.

I received notification that on July 20th, Mr Riess/ [REDACTED] was arrested for criminal harassment and held in cells. After an interview with the RCMP, he was released from custody on the grounds that he not initiate any further contact with me that was not strictly regarding visitation of G [REDACTED]. (**Exhibit P**) At this point, the petitioner stopped sending me emails.

Between July 12th and August 3rd, I was able to get G [REDACTED] enrolled in school, his schedule built, and his shots updated for high school. He started freshmen year on August 3rd

In a very mature and responsible act, on July 22nd, G [REDACTED] requested a conversation between himself, me, and the petitioner. I sat at the dining room table as requested while G [REDACTED] called the petitioner and put him on speaker phone. G [REDACTED] let us both know that neither Richard/Patrick nor I were to talk, but that it was he that had things to say. His demands were very simple; he demanded that his father take down the offensive website and stop all harassing

attacks on both myself and Mr. Pendleton. In exchange, once the website was down, I was to return the mobile phone supplied by the petitioner. While I had misgivings about the things the petitioner could do with the mobile phone remotely, I did agree that we could come to some arrangement. The petitioner however, stated that he did not agree to the terms and that he would never stop the attacks nor would he ever take down the website. He told G [REDACTED] that I 'deserved' the abuse because I was a "bad, bad, bad person".

I did get G [REDACTED] a new mobile phone on an account that I pay for. I felt bad that the petitioners' actions had affected G [REDACTED]. I honestly feel that for my own protection and security though, that the petitioner cannot have access to the new phone. I don't know what he is capable of doing with the number or account information. This is why the home phone communication is not monitored or interfered with in any way.

On July 23rd, Mr. Pendleton and I went to the local courthouse with the same documentation provided to the RCMP and requested an Order of Protection for myself and an Injunction Against Harassment for Mr. Pendleton. Both were granted based on testimony. Neither order included the minor child in any way. We then requested the local police department to assist in sending the documentation to the RCMP to have them served on the petitioner.

In August I discovered that the petitioner had taken out a 'google ad' in my name for the area surrounding where I live. This 'ad' appears whenever anyone within a 20 mile radius of my home address accesses the internet and directs them to the website. This 'ad' contains key words such as "meth head", "smoking pot", "narcissist" which all appear on the desireecapitano.com website and are bolded key words if my name is searched at all.

Understanding that this information needed to be presented before this court, I drafted a motion to request a hearing in the Compton Courthouse. My hope was to be able to appear before this court before the next school break so that these matters and how they affect the minor child could be addressed in the presiding court.

On September 3rd, the petitioner requested G [REDACTED] visit him for Fall break (October 3rd through October 11th). I did not feel comfortable agreeing to this visit given the issues with the previous visitations and was hoping to have a court date before sending G [REDACTED] to Canada again. As well, I was informed by the RCMP that the petitioner would be appearing in court on the harassment charges sometime in October and I did not know when exactly that hearing was or what the outcome of it would be. Due to my inexperience in requesting a hearing and representing myself with no legal aid, I did not complete the request for a motion correctly and my motion was denied. The petitioner and I were not able to appear before court prior to the fall visitation and G [REDACTED] did not go to Canada for this visitation.

September 30th 2015 I was laid off from Apollo during their 3rd round of 'Reduction in Force'. I was one of many employees included in this layoff. I received a full severance package, remain completely re-hirable by Apollo, and was eligible for unemployment. Thankfully, because of the move to Tucson, the layoff in no way affected my children.

In September, G [REDACTED] attended a concert with an old friend from Phoenix as well as 2 new friends from Tucson and attended the Homecoming Bon Fire at the high school. He has been able to make friends very soon after starting school and has attended school functions with them as well as out of school events such as going to the movies.

The last week of October, G [REDACTED]'s high school put together a haunted house which G [REDACTED] actually acted in. He enjoyed the experience immensely and indicated his desire to take a drama class next year. He has a good friend that is also in drama and they are participating in school plays together. G [REDACTED] has also expressed interest in taking the photography class offered at the high school next year.

October 11th, 2014 the petitioner sent the first request for G [REDACTED] to spend the entire Winter break in Canada with him. I did not respond. He sent a second request on October 22nd. I spoke with G [REDACTED] after the second request and asked him to let me know whether he wanted to

go to Canada for the entire winter break or just a portion of it. He told me he would let me know. On November 13th, the petitioner sent a third request for Winter break. I asked G [REDACTED] again what he wanted to do. He told me that he did want to visit his father, but he would like to split the break and spend half of it in Canada and half with me. He selected which half he wanted to spend with each parent and we agreed on the dates together.

I informed the petitioner on November 14th that G [REDACTED] could travel to Canada for winter break contingent on some guidelines. Those guidelines were; that the visitation would be for one of the two weeks (dates were included), that I would have both departure and returning tickets ahead of time, and essentially that Richard would not to speak negatively about me to G [REDACTED] nor use G [REDACTED] to get information about me or my home. The petitioner responded that he did not have to abide by any demands that I made because I didn't have a job, and that I would never have a job as long as the website was up, and the website would be up as long as I was alive. He also informed me that he would be taking me back to court to get custody of G [REDACTED] taken away. **(Exhibit Q)**. I never received a ticket for G [REDACTED] to travel to Canada for winter break.

Regardless of the petitioners' insistence that the Order of Protection and Injunction against Harassment were not properly served or were dismissed, they were not. On December 3rd, Mr. Riess/[REDACTED] contested both orders and a hearing was scheduled for December 16th. On December 16th, in the local court all evidence and testimony was heard. Not only were both orders upheld, but the petitioner was ordered to relinquish his firearms and added to a registry of

individuals prohibited from owning, or operating firearms and/or ammunition. (**Exhibit R**). The petitioner told the judge in court that he would not be relinquishing any of his firearms since the court had no jurisdiction over him being in another country, nor would he stop any of the behaviors considered 'harassing' by the court.

The petitioner has again contested the Order of Protection as well as the Injunction against Harassment this time in the Superior Court. The Superior court will have the ability to include the minor child in any of the protection orders; however, I would like to try to keep matters pertaining to the minor child to remain in the control of this court.

Since the hearing on December 16th, the petitioner has continued to post defaming information to the website (in clear violation of the protection order). This includes information that he has gotten from speaking with G [REDACTED], such as my mother joining us for Christmas which Richard has somehow made into a negative thing.

The documentation that the petitioner has filed with this court for the hearing scheduled for January 25th was not served to me until 6:30pm on Thursday, January 8th giving me 1 day to draft a response in order to have it to the commissioner within the 9 court days required. I believe this was done intentionally to prevent me from having time to draft a response to the petitioners' erroneous allegations. I apologize for the late arrival of this responsive declaration.

I swear under penalty of perjury that the above information is true and correct to the best of my knowledge.

01/08/2016

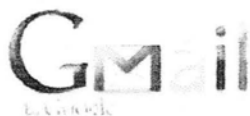
(Date)

Desiree Capuano

(Name)

(Signature)

Exhibit A



Desiree Capuano <desiree.capuano@gmail.com>

G [REDACTED]'s gift and next visit

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sat, Nov 8, 2014 at 3:53 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

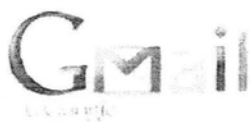
Desiree:

I got G [REDACTED] an authentic 1942 Mauser K98 rifle, from World War II. I don't suppose that's something you'll allow in your home, huh?

Also, he just told me he would like to visit over his winter break. This is my request, on his behalf, to permit him to visit at that time.

Patrick

Exhibit B



Desiree Capuano <desiree.capuano@gmail.com>

The ugly proof

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>
To: Desiree Capuano <desiree.capuano@gmail.com>
Cc: G [REDACTED] Riess <g[REDACTED]@gmail.com>

Wed, Dec 17, 2014 at 11:37 PM

Desiree:

Since you always insist that I lie about EVERYTHING and you can't trust anything I say - I've attached a few supporting documents. A copy of my BC ID, birth certificate, PAL, and just for good measure, a copy of my most recent paycheck. Of course, I work corp-to-corp because being an employee is for losers who feel the need to "belong" and have a company take care of them like some paternal figure. But you can easily verify on the California Secretary of State web site (<http://kepler.sos.ca.gov/>) for the California corporation; and on the BC Registry Services web site (<http://www.bcregistryservices.gov.bc.ca>) for the BC corporation; that I am the principal.

As you can see, believe whatever you want - but I've got documentary proof of MY claims and you have...well, nothing to support your claims. Just a lot of empty accusations.

I've been waiting for you to get off your ass and transfer the custody case to Arizona but clearly the marijuana has made you lethargic so I'm going to go ahead and file that too. Oh, what's that, you say? The judge in California said he won't allow the case to be transferred? If you believe that you're more gullible than I already thought. He doesn't have the authority to do that. And you and I both know the Arizona court is going to let G [REDACTED] decide for himself where he wants to live.

Let me know what your basis for refusing to believe the authenticity of the attached documents is. Why don't you check with Vital Statistics in Florida? I'm sure there is some way to verify it - unless, again, you just don't want to confirm that you're so incredibly wrong. And regardless of what you believe - that birth certificate together with my BC ID has been sufficient every time I've crossed the border. You only require the passport when flying, not driving.

I don't expect a response to this. Typically, when you realize you're beat and you have once again made an ass of yourself, you usually slink away quietly.

Oh, one more thing, I almost forgot, that other Richard Riess was arrested in Toronto in 1991 and never showed up for court. A warrant was issued and he just disappeared. That warrant is still there. If I were him I would not have been able to get a PAL. Also, you cannot legally change your name in Canada if you have an outstanding warrant. If I were him I would not be able to change my name to Patrick [REDACTED]. Come on, dude! Get over it. You got nothing! If you don't believe me about the PAL, go ahead, read up on the requirements. If you think I'm lying and don't really have a PAL you can check with G [REDACTED]. You need a PAL to get a membership at a shooting range which he can tell you I have (or I can scan the membership card for you). I can also send you pictures of my pistols and his rifle - which I wouldn't be able to get without the PAL. Face it, man: my name is Patrick [REDACTED] and I have a squeaky clean background and I'm an upstanding member of society who makes pretty decent money, and G [REDACTED] likes me more than he likes you (you have to hold him there by force or court order, he comes to me of his own free will). You've been played...you're a sucker...for years I was paying a salary in your name, through my corporations (you do remember Vertical Inversion Systems, right?) and not withholding taxes, you've got thousands in back taxes which, eventually, the IRS is going to go looking for. And if they don't, they're just a phone call away. I'm methodical and think things through. I look at the long term. Sometimes my plans take years to complete, but I always see them through.

Cheers,
Patrick

P.S. I emphasize the PAL because it is hard to get, involves an extensive background check, and requires a clean record and proof of good moral standing and psychological stability. If there was ANY truth to your claims I would never be able to get it. Do not take any statements or references to firearms, above, as being in any way threatening. I would never use a firearms offensively or to threaten someone. They are for sport and target practice only.

4 attachments

bcid.pdf
54K



birth certificate.pdf
329K



pal.pdf
46K



paycheck.pdf
68K

**FIREARMS LICENCE / PERMIS D'ARMES À FEU
POSSESSION · ACQUISITION**

Name / Nom

PATRICK [REDACTED] FOX



Date of Birth / Date de naissance

1973/11/24

Y/A M DJ

Expires / Expiration

2019/11/24

Y/A M DJ

Height / Taille

165 CM

Gender / Sexe

MALE

Eyes / Yeux

BROWN

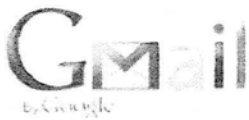
Standard
conditions are attached
to this licence

Ce permis est assorti
de conditions standard

Number / Numéro

12804668.0001

Exhibit C



Desiree Capuano <desiree.capuano@gmail.com>

Your loving home and parental teaching and guidance

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sun, Jan 11, 2015 at 8:34 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Cc: G [REDACTED] Riess <g[REDACTED]@gmail.com>

As always, I shall address each of your statements and point out, as plainly as possible, why/how it is wrong.

On 01/11/2015 12:54 PM, Desiree Capuano wrote:

| Ricky / Richard / Morgan / Parick / Patricia / Susan / whatever your chosen alias is today,

I don't get your intended implication here. How is my first name, whether assumed or legal, relevant to anything in my previous message and, in particular, whether I am on schedule with my plan against you? An insult is much more effective when the intended recipient is able to infer the reference. Please clarify.

| Are you bored or something?

Bored: no. Or something: vague and ambiguous. Please be more specific.

| Your stalker-like obsession with me is truly impressive. The amount of time and energy spent thinking of me is flattering, but honestly a little pathetic.

If there is any sincerity in your statements then you have grossly misinterpreted my intentions. I was pretty direct when I told Detective Tuchfarber that my intention was to do everything in my power and capabilities to make your life as miserable as possible, and, if possible, to the point that you ultimately commit suicide. That would be my ultimate desire. But before you reach that point it is imperative that you experience as much misery, disappointment, and suffering as possible first. At this point in your life you have very little to lose so there is not much incentive for me to actively publish your information. I shall wait, patiently, until you rise up a bit, THEN proceed with the billboard campaign around Phoenix; I'll wait until you actually have some financial significance, THEN publish your complete credit and financial history - including your social security number and birth certificate (not illegal as long as it's done outside the US).

I don't see how you could interpret such intentions as being misguided affection.

| For someone who so strongly espouses logic and intelligence, I would think that you could have grasped that I am not interested in you. Especially since I have directly told you that I am not interested in you.

Whether or not you are interested in me is not relevant to my objectives.

| I realize that I am really amazing, but please expend some of that energy towards finding a man / woman / inanimate object that is capable of coping with your delusional nature, and providing some small measure of happiness.

I see no evidence to suggest there is any merit to your implication that I am delusional. If you know of any then please cite them. Otherwise you're just talking gibberish again.

| Everyone has a right to the pursuit of happiness. Though that is a founding principal of

America, so I understand it being foreign to a Canadian citizen like yourself.

Almost every country in the world includes in their respective constitutions and/or bill of rights the right to the pursuit of happiness. I wish I could say it is because you are an ignorant American that you do not realize that, but that fact that you were born on US soil has nothing to do with the fact that you are clearly ignorant.

You again bring up the question of citizenship. Why? You are the only one pretending to still cling to that claim. When I show up at border crossings with my US birth certificate and BC photo ID US customs and ICE don't even give me a second thought.

But, I'll play along, for the sake of argument: Let's assume your claim that I am a Canadian citizen is true. So? What's your point? Are you trying to suggest that a person born on US soil is inherently superior to someone who wasn't? By that logic then Lauchner and Michael Capuano are automatically superior to me. Charles Manson, Ted Bundy and Richard Ramirez are superior to every single person ever born in Canada? That's some pretty sketchy reasoning. And let's pretend for a moment that I AM a Canadian citizen: that hasn't, and still doesn't prevent me from living in the US. I own a business in the US. So, again, what are you trying to imply?

Your obsessive pursuit of my attention seems to only pale in comparison to your capacity for delusional transference, and cruelty towards G [REDACTED]

Again, you're making claims about my psychological state without citing a single case of me ever exhibiting delusional behavior. At least when I call you delusional I refer you to a specific thing you did which supports my claim.

It is unfortunate that you chose to rob G [REDACTED] of his right and opportunity to choose for himself which parent to live with.

Come again? I was the one initially requested G [REDACTED] be interviewed by the court so he can tell the court where he wants to live. You then attempted to circumvent that by having me deported. I then ordered my attorney to request the court put the interview back on calendar. Then, when G [REDACTED] was given the chance, he clearly, explicitly, and very unequivocally told the court he wants to return to me...to live with me.

See that? That is a case of you exhibiting delusional behavior. You're accusing ME of doing exactly what you have, and continue to do. THAT's delusional.

You relinquished all rights a mere 2 months from his 14th birthday where he would have been able to declare his choice in front of everyone in open court.

I relinquished my rights so that I can remove the court from the equation. So that I can proceed with my plans respecting you. It's hard to do that when I have to maintain appearances for the court.

You are unsurprisingly misinformed about the significance of G [REDACTED] turning 14. There is no statutory age, in either California or Arizona, at which the court is required to grant the child the living arrangement the child desires. It is completely at the discretion of the court. "Generally" after the age of 14 the court will "listen" to what the child wants - but that's the extent of the law on the matter.

I also point out, waiving one's rights does not mean refusing one's responsibilities. Though you seem to think they are one and the same. I did not refuse to allow G [REDACTED] to return to live with me - I created a situation where he can see, firsthand, what you would be like in the absense of the court compelling you to act. And so far you've played right into it.

It doesn't surprise me given your repeated underestimation of his intelligence and potential; simply seeing him as a pawn and tool to use in your obsessive quest to win me back. ("destroy

me" ... Whatever you want to call it.)

As I have explained to him: sometimes, to get the desired outcome, we have to go through a period of challenges. That is what he is going through right now. I believe the exact idiom I used was "Sometimes, to make an omlette you have to break a few eggs".

I explained what that meant and how it applied to the current situation. He acknowledged understanding.

I love G [REDACTED] regardless of what decision he should ultimately make.

If that is the case then why do you insist on not allowing him to make that decision? He already has: he said he wants to come and live with me. He has expressed that if he never heard from you again he's fine with that.

It's already been more than 2 years...what do you believe is going to happen? Do you think one day he's going to wake up and realize that he was wrong all this time and suddenly love you unconditionally? Again, I say, THAT is delusional! Dude, the fact that since the July hearing, since you've gotten full custody and authority over him he has steadily withdrawn from you and that other kid of yours should tell you something. Before that he could hold on to the hope that at the next hearing the court would order you to return him. That hope is gone. I really don't know what you are hoping for, but your relationship with G [REDACTED] has reached it's peak and the only place it's going from here is down. There's less than two years until he can legally move out and I'm willing to bet that within 24 hours of turning 16 you'll never hear from him again.

As for "love": unless you can provide a clear definition of what the word means then you should refrain from using it.

I know he is capable of so much, and will support him down whatever path he should ultimately choose in whatever capacity I am able. I may be hard on G [REDACTED] sometimes, but being a real parent means looking out for the physical, mental, and emotional well being of your child even when it isn't easy or popular.

You are completely oblivious to anything going on with G [REDACTED]. I just spoke to him on the phone - you still haven't even noticed the anomaly in his eye. You live in the same house with him and he's been back for 8 days and you haven't noticed. You also didn't notice it before he came up here. How can you not notice a bright discoloration in his eye? Do you not speak with him? Do you not look him in the eye when you do (assuming you do speak with him)?

You add him to your insurance but you don't bother taking him to the doctor or the dentist (you only do it when you think I'm going to bring it up in court). Dental cleaning and checkups are supposed to be every 6 months, not every 12. He wasn't in the habit of using deodorant - I had to point out to him one day that he smelled of BO. He still often "forgets" to brush his teeth. He doesn't know how to get from your place to the Target, which is only a few blocks away. When given the choice of doing the research to figure out how to get to the outdoor shooting range, or not go, he chose not to do the research. Is that the result of your "real parenting"?

I can only hope that one day you decide to strive to be a better person, and better parent.

I strive, on a daily basis, to improve myself. I strive to be objective and fair, and to be reasonable and rational. I consider myself to be fair and decent. The people I come in contact with, exclusive of you, of course, also consider me such.

You're still making the same unfounded arguments that you've been making since 2011. You're the one that has to use underhanded tactics and false claims to get what you want. I'm referring to you resorting to calling ICE in order to gain custody by default. See, when G [REDACTED] is with me he's with me because he **wants** to be. I've never once had to force him or tell him he has to visit because the court ordered it. You, on the other hand, have done

exactly that. You claim to want what's best for G [REDACTED], yet you teach him nothing. You think hugs and kisses will make everything okay (again, that's delusional).

It is my opinion that if anyone needs to work on being a better person it is you.

| If not for yourself, for G [REDACTED]'s sake.

Both I, and G [REDACTED], are happy with who I am, with how I behave, with my values and beliefs. If I identify a character or personality flaw in myself then I will commit to improving it.

You act the same now as you did in 2000. You still try to use people's guilt and pity to manipulate them. You tell people half truths and versions of events which are heavily skewed in your favor, to gain their support. That's deceptive. That's completely contrary to how I try to live and how I try to guide G [REDACTED]. You can deny that you do that until you're blue in the face but I've got over 400 emails from you and/or about you where you've done that countless times.

You rush into relationships with losers like Lauchner and Capuano, you move in with them, you hastily have children with them. You expose your children to people like Lauchner and tell them he's a good, wonderful person. You allow him to take on a paternal role in their lives. You defend his behavior and get angry when people state facts about him. Yet you want to pretend you're a good, honorable person? And that you give a shit about your children?

| He is the one being hurt by your actions, scheming, and manipulation.

G [REDACTED] is not being hurt at all by what I am doing. He knew before I started executing the plan exactly what the plan was/is. I always confer with him beforehand so that he's not taken by surprise. If he told me he was uneasy with anything I would not proceed with that course. I told him in May I would be waiving all of my parental rights in July. I told him why. If he had concerns about me wouldn't he bring them to you? You're his primary custodial parent, aren't you? When he's with me we talk about you. Are you saying that he has such a lack of respect for you that he can't even speak openly with you about me? If that's that case then it really sucks to be you.

He once asked me if I would shoot you. I told him that murder is illegal and immoral and can result in spending the rest of one's life in prison. And that the rest of my life in prison is not a risk I'm willing to take. But otherwise, no, I would have no qualms about it; that that is how much I despise you for the things you've done and continue to do. He did not flinch; he didn't look anything other than indifferent; as best I could tell, he didn't care. The topic never came up again. That was during his visit last summer. To be clear, I told Tuchfarber the same thing. There is nothing illegal or threatening about *wanting* to harm someone - as long as you don't act on it. I am reasonable and rational enough to know the difference, and to refrain from engaging in such activity.

And let me be absolutely clear on this point: I would never deliberately cause you physical harm, other than in self defense or defense of another. Though that is nothing special toward you - I have that rule for ALL people. Also, I emphasize that G [REDACTED] brought up the question and I only responded to it truthfully.

| ~ Desiree (Not meant as a term of endearment, please do not mistakenly take it that way.)

I don't understand your meaning.

On Sunday, January 11, 2015, Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com> wrote:

Desiree:

Allow me to also point out: Having previously waived, in court, **all** of my parental rights, you now have the full legal right and authority to:

- refuse to allow G [REDACTED] to visit me;
- take away the phone and every other thing I have provided him, including the debit and credit cards

(although you do not have the legal right to withhold them - you must return them to me);
- cut off all contact and communication between G [REDACTED] and me.

Doing so would definitely prevent me from being able to have any influence on his perceptions, values, beliefs, et cetera and, thereby prevent me from being able to have any influence on your home environment and the relationship between you and him. However, doing so would also make him hate you that much more and ensure that he leaves your home at the first opportunity and never has anything to do with you for the rest of your life.

So, you see, again, we've created a situation where you have two mutually exclusive options but neither of them do ends favorably for you. That is strategy, and the benefit of long term planning, and the benefit of foresight. Remember also, that all of this was initiated by, and is the result of your own actions. I am where I am because of your direct and explicit actions; G [REDACTED] now has Canadian citizenship and cannot be deported from Canada and receives all of the benefits and protections of being a Canadian citizen the moment his foot touches Canadian soil - all because of your actions calling ICE. And you can say that I've been manipulating G [REDACTED] but that's exactly what you have done countless times with almost everybody you've ever met (that's why people always take your side when they hear your side of the story but then abandon you when they discover the full story).

I'd also like to point out that, as always, I've been very careful to make sure everything I do is within the law.

I've discussed all of this with G [REDACTED] and I've explained to him what my plan is with respect to you. I've told him if he's uncomfortable with any of it then I won't proceed. He is fully aware that he is being used as a pawn in my plan to ruin your life and he seems to be okay with it.

All the best,
Patrick

On 2015-01-11 9:04 AM, Patrick [REDACTED] wrote:

Good morning, Desiree.

I'd like to inquire how things have been going with all the wonderful stuff that you are able to teach and expose G [REDACTED] to which I, according to you, could not do. In particular, how has that emphasis on "family" been working out? Have you been able to instill in him the importance of "family" and how good it is to have "family"? Would you say he's "bonded" with your family? And knowing your family - is it your belief that that has improved him in some way? These are loaded and/or sarcastic questions. I already know the answers to them (otherwise I wouldn't be asking), and I wouldn't expect you to answer them, not honestly anyway - given your aversion to reality and honesty.

From what's been reported to me and from my own observations, so far all you've taught G [REDACTED] is poor table manners and how to mimic the people around you rather than having your own opinion. An important skill, I suppose, if you live in an environment where people get angry with you for being different. Say, for example, your home.

Are you still trying to convince yourself that you have the perfect little family? Are you beginning to realize, yet, that G [REDACTED]'s presence there is slowly eroding the happy, fair tale home that you're trying to hold on to?

I know that by saying this you will react to spite me - it's what you people do. Am I saying it deliberately, for that purpose? Is it that I know that you're getting fed up with how he's ruining your fair tale and you've been having thoughts of sending him away before he starts to taint Sage as well - and by stating these truths to you I will provoke you to hang in there a little longer, so you can show me how wrong I am? Probably. The longer G [REDACTED] is there, with his "bad attitude", his indifference toward you and Sage and your family, and his subtle demeanor of disgust and condescension toward you and Sage and your mother, and your trashy ways, the more it will instill into Sage's subconscious that he is inferior and inadequate.

The more it will slowly eat away at your perfect family.

Sucks! Now, on the one hand, you are pulled by your upbringing and years of conditioning, to react in the only way you know: with anger and spite, to want to keep G [REDACTED] there because you believe that will adversely affect me; while on the other hand, you know I'm right and that I've been manipulating the situation for two years, and that as long as G [REDACTED] is in your home you will never be happy because you will never have your fairy tale.

So, you'll show this email to your mother and ask her what you should do. She's going to say I'm just trying to get under your skin and the best thing is to not respond at all. She'll say that if you don't respond then I'll think you're unaffected and that will piss me off. She'll say this because she's just like you - after all, where did you learn your behavior from, right? And just like you she has the same emotional, irrational beliefs that a child inherently and unconditionally loves his mother.

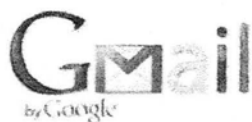
But!!! I am relying on your mother providing you such advice. And on you pretending you don't care and that you're unaffected. I require you to insist on keeping G [REDACTED] with you longer - the longer he's with you the more of an effect he'll have on Sage and the more subconscious hostility will seep into your home.

In the end you'll take your mother's advice and not respond to this, you'll convince yourself (with your mother's help) that everything is fine in your home and that I'm the one trying to cause problems for you. Or am I saying that because I believe you'll do the opposite of what I state you'll do - just to spite me?

Let me ask you this in closing: Has the amount of "love" in your home increased or decreased over the past year? It's rhetorical - I know the answer.

Patrick

Exhibit D



Desiree Capuano <desiree.capuano@gmail.com>

Your talk with G [REDACTED]

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Tue, Jan 27, 2015 at 10:04 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Cc: G [REDACTED] Riess <g[REDACTED]@gmail.com>

Desiree:

As a show of good faith, I'll fill you in on one of the plans that I'm working on for you. What I'd like, very much, is to be able to add some "intimate" pictures of you to your web site. To do that, of course, I'd have to hire someone to get close to you, pretend to be interested in you. Eventually, gain your trust, then eventually sleep with you. That should take...what? About 3, 4 days? Difficult to find people that unscrupulous. But for the right price there's always someone willing to do what you want. Hooray America!

There's nothing criminally illegal about it. You may be able to pursue a claim in civil court, but I'm not going to worry about that.

Okay, good evening.

Patrick

On 01/27/2015 05:45 PM, Desiree Capuano wrote:

[Quoted text hidden]

Exhibit E



Desiree Capuano <desiree.capuano@gmail.com>

Spring break plans

1 message

Patrick <patrick[REDACTED]@s[REDACTED].com>

Mon, Mar 9, 2015 at 7:45 AM

To: Desiree Capuano <desiree.capuano@gmail.com>

So that's the big secret that you refused to disclose: you wanted to take him to Alabama and Florida to meet more of your redneck, white trash family? It really is always all about you, huh? You make plans for all of you for the spring break so that he must do what YOU want without any consideration for whether he has any interest in meeting your extended family rather than visiting with me - which is clearly what he wanted to do. But why would you think that a 14 year old, that was never part of your family, and that was raised to understand that biological family is meaningless, would have the slightest interest in meeting a bunch of people that have never had anything to do with him? Or do you even consider such things? I don't believe you do. He's just a prize for you to parade around, isn't he?

Oh well, I suppose these experiences will also benefit him - it's important to be able to identify the people to avoid and to have a point of reference to be able to say "See those people? We're better than that." Enjoy your trip - maybe you can take him to a barbeque, or a monster truck show?

Cheers,
Patrick

Exhibit F



Desiree Capuano <desiree.capuano@gmail.com>

G [REDACTED] summer visitation 2015

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>
To: Desiree Capuano <desiree.capuano@gmail.com>

Wed, May 6, 2015 at 10:05 PM

So no comment on the turning 16 thing? Didn't think so. You didn't realize that when you set this course of action in motion, did you? You didn't even stop to consider what the consequences of your actions would be, did you?

You had no idea that the legal age to be independent of your parents, in Ontario, was 16. And that by G [REDACTED] receiving Canadian citizenship that it meant that on his 16th birthday he could walk out your door and never, ever have to see or speak to you ever again, huh? And the best part is that if, before he turns 18, he steps outside of Ontario THEN at that moment you have the legal authority to have him brought back to you by force. But as long as he's in Ontario there's not a damn thing you, or any US law enforcement agency, or any US court can do about it.

Now, if he was a US citizen and NOT also a Canadian citizen, THEN the Canadian authorities would have to send him back to the US. But as long as he has Canadian citizenship (which he now has for the rest of his life (thanks to you for setting things in motion), and he's over the age of 16, he can live on his own, have his own apartment, get his own firearms license, his own driver's license. And he won't need anyone's permission to do so.

And, by the time he turns 16, next year, what he will remember is things like you refusing to allow him to visit and refusing to provide a decent reason why. You taking away his property (like video game consoles) because you say "it's not fair to Sage". You taking him, by force, from Liz and forcing him to live in Arizona. You refusing to let him have things he, as a child with parents with a combined income over \$200,000, should have. You refusing to take him to the doctor for regular check ups. You refusing to have the anomaly in his eye checked. You calling ICE on his father and having him deported for no justifiable reason, other than to get custody of him by default. You never bothering to teach him things about life.

I was really hoping to surprise you with this on September 28, 2016, but I guess the cat's out of the bag now.

Do you ever get tired of being the perpetual loser? You ever think to yourself "what's the point"? Ever seem to you that maybe life is just to fucking hard and there's no point because we're all gonna die in the end anyway? If not, well, that's too bad - the world is going to be a better place when you are no longer in it.

Good evening,
Desiree

On 05/06/2015 07:34 PM, Desiree Capuano wrote:

Please provide me with your hotel information. I will make sure I am available for the "pick up" schedule.

On Wednesday, May 6, 2015, Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com> wrote:
Desiree:

Either your English skills are horrendous or you really do think of your offspring as possessions?

I am planning to accompany G [REDACTED] to the Vancouver International Airport on or before July 12, 2015, and being present with him until he passes through the security checkpoint. I cannot force him to do anything past that point. I also have no intention of, as you say, "returning him".

G [REDACTED] is a human being, not a possession. Neither you, nor I have the power to force him to do something against his will. All I can, and will, do is make every reasonable effort to ensure he is at the airport in time to board his return flight.

Why would you even ask such a stupid question? I mean, if I was intending to do something like abscond with G [REDACTED] do you think I would admit it beforehand? And if that was my intention, why would I bother going through all this stupid shit with you? Why wouldn't I just go to Phoenix and pick him up? What? Do you think it's impossible for me to walk right into the US? Do you think they scrutinize me every time I cross the border? My god, there is no end to your stupidity, is there?

And besides, what do you really care? You only have, at most, another 16 months until you have absolutely no legal authority over him, anyway. Yeah, that's right, the day he turns 16 and his foot touches the ground in the Province of Ontario he is a legal adult and cannot be forced to return to his parents - because he now has Canadian citizenship - because of **YOUR** actions. I don't even need to be in Canada myself.

Patrick

On 05/06/2015 06:46 PM, Desiree Capuano wrote:

Are you planning on returning G [REDACTED]?

On Wednesday, May 6, 2015, Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com> wrote:
Desiree:

I cannot imagine why you would hear that because I never said that.

I will tell you this, unequivocally: Since you did not require I provide the return flight information in order to allow G [REDACTED] to travel from Phoenix to Los Angeles on May 24, 2015, then from Los Angeles to Vancouver on May 28, 2015, and you only brought that up AFTER I purchased the tickets, then NO! I absolutely will not purchase his return ticket until I know he is actually going to be present in Vancouver.

I have no history of backing out of commitments, or saying completely false stuff to get what I want. You do! You are the one that cannot be trusted, not me.

Now, our dealings here are done. I have fulfilled the requirements you stated in writing. You are now attempting to change those requirements by adding new requirements. It is not going to happen! I don't believe there is anything further for us to discuss between now and when G [REDACTED] arrives here on May 28, 2015.

I have posted all of our emails from today onto your wonderful website so there is a public record of all of your words.

Good day,
Patrick

On 05/06/2015 06:35 PM, Desiree Capuano wrote:

So, what I hear is that you will send me the details of his return itinerary before he travels on the 24th of May?

On Wednesday, May 6, 2015, Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com> wrote:
Desiree:

I'd like to point out that that was NOT one of your stated requirements. I told G [REDACTED] that this is what you would do: you'll make up a bunch of requirements then, if I meet those requirements, you'll add more requirements, and if I meet those you'll just keep adding more. Same shit my mother used to do to my father.

Well, it ain't gonna happen. I met your requirements and I'm just dying for you to fuck up enough that the court will consider your behavior egregious. So far you've:

- refused to allow G [REDACTED] to visit during one extended school break;
- taken away his phone, cutting off all communication between him and I for an extended duration of time, without providing me any notice;
- taken away his debit card so I cannot provide him financial support;
- refused to provide him even the minimal level of medical care that the California legislature mandates;
- continued to keep drugs in the home.

So, go ahead, refuse to let him visit over the summer. Give me a reason that the court will consider justifiable to take away not only your custody but also visitation. And keep giving G [REDACTED] reasons to resent you. Regardless of what the court does, the important thing is that G [REDACTED] grows to hate you and you are doing an excellent job of pushing him in that direction.

Patrick

On 05/06/2015 05:58 PM, Desiree Capuano wrote:

If I do not have a travel itinerary for G [REDACTED]'s return flight to Phoenix on July 12th, 2015 then he will not board a plane to travel anywhere. Are you still unclear as to my meaning?

On Wed, May 6, 2015 at 5:51 PM, Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com> wrote:
I cannot possibly answer that question. I suspect what you mean to ask is not actually what you asked.

On 05/06/2015 05:44 PM, Desiree Capuano wrote:

Thank you for the itineraries. When can I expect one for his return trip?

On Wednesday, May 6, 2015, Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com> wrote:
Desiree:

At least my insults to you are based in reality. Surely, you're not trying to suggest that you're intellectually superior to me. I believe our many debates via email show that not to be true.

Patrick

On 05/06/2015 04:46 PM, Desiree Capuano wrote:

Funny but "stupid fucking cunt" looks nothing like a travel itinerary...maybe you're confused again. Do you need me to copy and paste an example for you??

On Wednesday, May 6, 2015, Patrick <patrick@.com> wrote:
Sorry, I meant to say "stupid fucking cunt".

On 05/06/2015 04:38 PM, Desiree Capuano wrote:

Sure...as soon as you send me a travel itinerary.

On Wednesday, May 6, 2015, Patrick <patrick@.com> wrote:
Desiree:

Can you stop being a stupid fucking for even just a minute?

Patrick

On 05/06/2015 04:31 PM, Desiree Capuano wrote:

You're right, I didn't call every single airline to check their age limitations for you. Did you need me to do all of the research for you? Do you need me to hold your hand through this whole process??

On Wednesday, May 6, 2015, Patrick <patrick@.com> wrote:
Desiree:

Sure, and if he can be at PHX by 4:30am then there's a 6:37am flight on Air Canada for \$395, with a 2:15 layover in San Fran, for a total travel time of 6:50; or there's a couple of 6:11am Air Canadas for \$463 with 2 stops for a travel time of 10:17 and 11:47, respectively; or a 1:43 with one layover in Denver for \$559, travel time: 7:26.

Do you do everything half-assed? Can you just go away and shut up? I don't believe that there is ANY way that your involvement in something would ever make it better so why don't you just go to your room and smoke some weed or something?

Patrick

On 05/06/2015 04:15 PM, Desiree Capuano wrote:

Air Canada allows it at 12 - I already called them.

On Wednesday, May 6, 2015, Patrick <patrick@.com> wrote:
Desiree:

Do you realize that many airlines now do not let a person under 15 travel alone? Do you realize how that limits the number of flights available to choose from? Do you ever look into things before you speak?

I am calling airlines right now. If I am able to secure a ticket I will let you know.

Patrick

On 05/06/2015 04:09 PM, Desiree Capuano wrote:

I would assume with all that free time on your hands you would be able to secure G a plane ticket, yet I don't have a travel itinerary.

On Wednesday, May 6, 2015, Patrick <patrick@.com> wrote:
Desiree:

Last night I sent you an email requesting what you will permit with respect to layover duration, et cetera. Why, when I request clarification of anything from you, do you always refuse to provide it? You refuse to be clear - even when the other party explicitly requests clarification - and then later you try to accuse the other party of "misinterpreting" what you meant. Maybe if you used the English language correctly clarification would not be necessary.

Patrick

On 05/06/2015 02:23 PM, Desiree Capuano wrote:

Once again - I don't see a travel itinerary. Do you want to keep talking or do you want to see your son? Are you seriously suggesting you would book G on a 15 hour flight?

On Wednesday, May 6, 2015, Patrick <patrick@.com> wrote:
Desiree:

That's wonderful. You have never indicated that you would allow a flight which has connectors and based on your demonstrated refusal to allow your children any independence, one must assume that you would not be amenable to such flights. I have, repeatedly, asked you whether such travel arrangements would be permissible and you have refused to respond.

Are you saying that you're okay with a 15 hour flight, including a 10 hour layover in a distant city? You may notice, the lowest priced direct flight is \$965US, which is about \$1200CDN. You realize I would be paying in Canadian dollars, right?

Why do you insist on blaming your fuck-ups and shortcomings on me?

Patrick

On 05/06/2015 02:10 PM, Desiree Capuano wrote:

In case you have trouble navigating the link, I took the liberty of taking screenshots for you (there are 11 pages of flights to choose from);

KAYAK Search Results

www.kayak.com/flights/PHX-YVR/2015-05-24

PHX → YVR May 24 Sunday Economy 1 traveler

Stops

- ✓ nonstop \$965
- ✓ 1 stop \$284
- ✓ 2+ stops \$315

Sort by: price (low to high) 156 of 221 flights

Vancouver \$199 RoundTrip

www.cheapcar.com/flights-to-vancouver

Low Fares to Vancouver Available. Book Discounted Fares Today & Save!

Times

Take-off Phoenix (PHX) Sun 5:00a - 10:00p

Show landing times

Airlines

Carrier	Alliance
✓ Air Canada	\$346
✓ Alaska Airlines	\$339
✓ American Airlines	\$307
✓ Delta	\$284
✓ United	\$288
✓ US Airways	\$351
✓ WestJet	\$301

More filters

Phoenix (PHX)

Qnetravel

Call Toll Free: 1-800-427-2167

Phoenix (PHX)

\$284 Delta 5:32p PHX → 9:19a YVR 15h 47m 1 stop (LAX)

\$288 United 11:05a PHX → 4:20p YVR 5h 15m 1 stop (SFO)

\$301 WestJet 1:35p PHX → 9:48p YVR 8h 13m 1 stop (YEG)

\$307 American Airlines

On Wed, May 6, 2015 at 1:56 PM, Desiree Capuano <desiree.capuano@gmail.com> wrote:
I would appreciate it if you would keep your emotions in check as we attempt to discuss and resolve this.

Did I ever once say I needed to know where G was going to be every single minute of every single day? No, I haven't. I told you specifically what information I needed, which was regarding the plane/flight information ONLY but you wanted to argue about the meaning of "including but not limited to".

You never once asked me to work with you on the date of his departure, you demanded it and only AFTER I said 'No' did you bring up that it was about the cost.

With all your threats to "destroy me", the emails you've sent to my work, and that horrendous website still up and being hosted from your home computer - what makes you think that I should do ANYTHING to help you out? Tell me exactly why I am responsible for taking time off of work to accommodate you? Where exactly does it say that I am required to in the court decree? Please show me.

See - you still don't get it. If you had come to me and said "hey, flights are cheaper on Wednesday and I would really appreciate it if you would work with me on G's travel" I would have done it. Even after everything you have done (especially beginning in March). The fight here is one sided, always has been.

Now to wrap this up, I do NOT need (from you or Liz);

1. a detailed plan for a journey, especially a list of places to visit; plan of travel.

2. a line of travel; route.

3. an account of a journey; record of travel.

4. a book describing a route or routes of travel with information helpful to travelers; guidebook for travelers.

What I need is the same thing you have sent me for every other visitation G has had to see you - the confirmation from the airline that includes the flight information (generally referred to as a "travel itinerary" - I can copy and paste a picture of one of you still need it for reference).

I just did a search on Google and found the following;

<http://www.kayak.com/flights/PHX-YVR/2015-05-24>

I gave you the travel dates on April 20th. You could have purchase a ticket at any point in the last 2 weeks. Instead you want to quibble over dictionary definitions and cite case law and now there are no reasonable flights left that are non-stop. So I guess I have no choice but to allow a layover, unless you want to explain to Liz that you were incorrect in your interpretation of what I said. Regardless of where he's traveling to, send me the flight confirmation. Or don't and we can most certainly take this back to court and you can plead your case.

Cheerio

On Tuesday, May 5, 2015, Patrick <patrick@.com> wrote:
Desiree:

How am I the one making it complicated when you're the one changing your demands?
Please see my further comments below.

On 05/05/2015 08:55 PM, Desiree Capuano wrote:

Ricky,

This is just unnecessarily complicated. Even for you. Let me make this VERY simple so that you can follow.

1. As stated on the email 05/04/2015 which you cited, Gariel's permissible time period for visitation with you is between May 24th, 2015 and July 12th, 2015. This means that the EARLIEST he may leave Arizona is May 24th, and the LATEST that G may be returned to my custody is July 12th, 2015.

2. As stated previously as well, G is to depart Arizona on a weekend, and be returned on a weekend within the above stated time period of visitation. NOT a week day. G and I have both looked up the prices for tickets, and there is not a significant price difference between equivalent weekend and week day flights as you (falsely) stated previously. This is not a significant financial hardship.

In your email dated 2015-05-04 you stated, and I'm quoting, "G [REDACTED] may travel for the purposes of visitation **between the dates of May 24th and July 12th, 2015**" (emphasis added). You stated, in your own words, in writing, that G [REDACTED] may travel between the two stated dates and you did not further qualify it.

You still have not provided a reason as to WHY you will not permit G [REDACTED] to travel on a weekday. Contrary to your grossly misinformed belief, you ARE required to provide a reason under these circumstances. You need to find yourself a better legal advisor.

You are full of shit about the cost of the flights. A flight on May 27, 28 is \$150 - \$180; on May 24 it's \$1300, on May 30, 31 it \$550 and up. How is that not a significant difference? If you're going to make such claims then provide proof. Where did you find such ticket prices?

3. You and I have already discussed a situation where by you have an option for G [REDACTED] to fly to LA to visit with Liz on a weekend, then fly to visit you in Canada during a week day.

You have imposed unreasonable requirements on allowing G [REDACTED] to fly to LA. You insist that you require a complete itinerary but then you refuse to clarify exactly what information you are demanding. That is the same stupid single mother bullshit my mother did when I was a kid and I'm not going to waste my time on it.

4. The above visitation as previously stated ALSO is contingent upon a full travel itinerary including all flight and travel plans. You've done this before, so it shouldn't be difficult or a surprise.

Go look up the word "itinerary", you fucking moron! What fucking language do you speak? Is it some made up version of English? Is it because your American that you're such an idiot? Let me help you (from dictionary.reference.com):

itinerary

noun, plural itineraries.

1. a detailed plan for a journey, especially a list of places to visit; plan of travel.
2. a line of travel; route.
3. an account of a journey; record of travel.
4. a book describing a route or routes of travel with information helpful to travelers; guidebook for travelers.

So what the fuck are you asking for? Just the flight information? Do you want to know exactly where he is going to be each day? Be more fucking specific you fucking idiot!

Fuck you, and fuck your stupid, white trash, single mother bullshit games. I'm going to get him a ticket for the 27th or 28th and if you don't allow him to leave then I get to show the court that not once, but twice now you've refused to allow him to visit during his extended school breaks.

Good day, I'm not reading any further because your stupidity hurts my head.

Patrick

Recap:

- Travel between 05/24/2015-07/12/2015.
- Travel FROM Arizona on Weekends within the above listed dates (05/24 /2015-07/12/2015) only.
- Travel TO Arizona on Weekends within the above listed dates (05/24/2015-07 /12/2015) only.
- Visitation with Liz is permissible, and up front visitation which has also been discussed is also permissible as long as I am apprised of G [REDACTED]'s location and the plans.
- The above plans as previously stated are contingent upon you providing me a full travel itinerary including all flight details and arrangements for G [REDACTED] while on travel.

On Tue, May 5, 2015 at 1:38 PM, Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com> wrote:

You're the one going "round and round". I HAVE reviewed the previous emails, which is why I require clarification - first you stated one set of requirements, then you stated a different set of requirements.

You are grossly mistaken about the meaning and legal definition of "including but not limited to". You might want to review, for example, some current case law on the matter. Specifically, the "but not limited to" means the previously stated list of requirements is NOT exhaustive and MAY include additional, not explicitly stated, requirements. Stop pretending to be smarter than you are!

If what you wish to express is that you require specific information then you should have phrased it as, for example:

"I will require x, y, z. Additional information may be provided, at your discretion, but is not required by me."

Based on your most recent email THAT is what you meant to say. But that is 100% contrary to what you ACTUALLY said.

Since, literally, what you have said in your email dated 2015-05-04 is that G [REDACTED] is permitted to travel "between" the dates of "May 24th and July 12th", with no additional exclusions or qualifications, I am going to obtain G [REDACTED] a flight from Phoenix to Vancouver for a date which will be reasonable and cost effective. I don't care if that is conducive with your work schedule because there is no requirement that you MUST personally transport him to the airport or be present at the time of his departure.

In the event you are actually interested in better educating yourself (since, clearly UoP hasn't done much for you in that respect), here are a couple links regarding "including but not limited to":

<http://www.adamsdrafting.com/including-without-limitation/>

<http://www.weagree.com/book/96-The+issue+of+%E2%80%98include%E2%80%99+and+%E2%80%98without+limitation%E2%80%99.html>

<http://www.jdsupra.com/legalnews/including-vs-including-without-limit-48967/>

<http://www.americancriminallawreview.com/acfr-online/overplaying-their-hand-overly-broad-interpretive-canons-applied-including-not-limited-clauses/>

Patrick

On 05/05/2015 12:59 PM, Desiree Capuano wrote:

Ricky,

I really don't have the time or patience for this. You

Exhibit G



Desiree Capuano <desiree.capuano@gmail.com>

Search engine results

1 message

Patrick <patrick@.com>

Sat, May 23, 2015 at 2:15 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Hello, Desiree.

Thought you might like to know that when I google "desiree capuano" the your website is the second entry in the list. Not bad for people that might want to google you.

When I google "desiree tomlin", the site is 18th in the search results. Need to improve this so people who don't know you changed your name can find it easier. People you went to grade school with, and such.

In Bing, the search term "desiree capuano" brings up the site as the first search result returned; and for "desiree tomlin" it's the 6th entry.

On yahoo, desireecapuano.com is also the first entry to come up.

When I google "kristopher lauchner" your site is the 4th entry.

The searches were performed without the quotes because that's how most people would type their searches.

I was going to attach a copy of the Apache access log - in case you were curious about the activity on the site, but then decided against it.

Cheers,
Patrick

Exhibit H



Desiree Capuano <desiree.capuano@gmail.com>

Your favorite child?

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sun, Jun 28, 2015 at 8:15 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

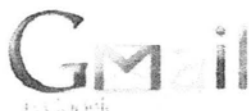
Desiree:

I was speaking with G [REDACTED] earlier, about that thing of you refusing to allow him to get decent clothes when he's with you. And I pointed out to him that you obviously like Sage more than him. He asked me why I believe that. I told him you don't allow him to have anything better, or more, than what Sage has. I pointed out the many times you've forbidden him from having things - for no reason other than that Sage doesn't also have them. Then I asked him if you've ever made Sage go without something because it wouldn't be "fair" to G [REDACTED]. He couldn't think of a single instant. I pointed out that you wouldn't allow G [REDACTED] to have multiple video game consoles because Sage only had the one, but now Sage has a PS4 as well as his 360, yet you still won't allow G [REDACTED] to have a PS4.

You can disagree, if that will make you feel better, but you're actions make your preference clear.

Later,
Patrick

Exhibit I



Desiree Capuano <desiree.capuano@gmail.com>

The most difficult border in the world to cross!

Patrick <patrick@.com>

Fri, May 15, 2015 at 5:03 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Desiree:

You will find, attached, numerous pictures of the Peace Arch border crossing and the surrounding area. The pictures are, obviously, from Google Maps. The Peace Arch border crossing is 27.5 miles from my apartment. It is where I usually cross the border.

If you look at the picture named border_crossing_looking_north.jpg you see that I circled an obelisk. That obelisk marks the actual, physical border between the two countries. Do you see any security? Any fences or walls? Anything at all to obstruct movement between the two countries?

Now, turn your attention to the image named border_crossing_looking_south.jpg. That is taken from exactly right next to the same obelisk, but facing south, into the US. Over to the left is the park that is in the other pictures. Any signs of Border Patrol? Anyone attempting to inspect people moving between the two countries?

Now, have a look at in_us_park_facing_canada.jpg. That is about 100 feet to the east of the same obelisk. you see that road beyond the bench where the guy and his dog are sitting? That's the intersection of Peace Park Drive and 0 Ave. That intersection is in Canada; the park the picture is taken from is in the US. Do you see anything suggesting that people are not allowed to move freely?

In fact, let's go to the picture named peace_park_drive_and_zero_ave.jpg. This picture is just about 15 feet north of the previous one. In fact, you can see part of the same bench right there, behind the hedges (I've circled it for you). Do you see that opening in the two hedges? With the paved path/walkway? That is, in fact, a paved path for people to walk and/or ride their bicycles on. And it crosses right over the border. Not only is there nothing suggesting that people SHOULDNT move freely between the two points, they've even created a walkway to make such movement easier!

Now have a look at zero_ave_facing_south.jpg. That is standing on 0 Ave, which runs along the border, on the Canadian side. See what's right next to it? Completely open, unobstructed access to that nice, inviting park in Washington State. There is a ditch that runs along the road, for drainage, and every 100 feet, or so, there is a covering so that you can step across easily (circled, on the far left).

Have a look at in_us_park_facing_canada-01.jpg. You see that road? That's in Canada. Everything on this side is the US. The houses - they're in Canada. You see that spot I've circled on the far right? That's one of the points where the ditch is covered over to facilitate movement.

Do you see ANYTHING, ANYWHERE that would make it in any way difficult to simply walk from any one point to any other point?

So why the fuck do you think that if I wanted to be in the US I would not be? People obviously hang out in that park and nobody bothers them. There are no ICE agents or border patrol running around demanding to see peoples' proof of lawful presence. Do you not think an ordinary looking, English speaking person could just come and go as they pleased?

Do you not think those people that live in those houses along 0 Avenue do just walk across the border to take their children to that park?

God damn, you're such a fucking moron.

Exhibit J



Desiree Capuano <desiree.capuano@gmail.com>

Carrington College

4 messages

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sat, Jun 27, 2015 at 9:45 AM

To: Desiree Capuano <desiree.capuano@gmail.com>

Hello, Desiree.

May you confirm that you have taken a position with Carrington College in Tucson? If so, then I should update your website. Do you have any interesting quotes or pseudo facts that I can put on the site? But, I can't imagine there'd be much of a need for a "Systems Analyst" at an individual campus of a demi-college. Wouldn't that be a bit of a step down from what you were purportedly doing at Apollo? But since the campus is substantially smaller then you'd be less anonymous - and word of your website and your back-story should spread quickly.

Cheers,
Patrick

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sat, Jun 27, 2015 at 10:13 AM

To: Desiree Capuano <desiree.capuano@gmail.com>

Oh, I see now. So Apollo was/is having serious financial problems and doing yet more layoffs. Is that what happened? Were you let go? Since almost every company in Arizona does drug testing, I guess your options were very limited. I'm guessing Carrington doesn't do drug testing. Based on their reputation I guess they'd have to be willing to accept whoever would be willing to work for them (see <http://www.glassdoor.ca/Reviews/Carrington-College-Reviews-E341378.htm>). Not a lot of satisfied employees - low morale; low pay.

But it doesn't seem they actually have any Systems Analyst positions at their Tucson campus. Did you make a career change?

If it makes you feel any better, I too have just started a new position. With VTech. As a Senior Software Engineer, doing embedded C/C++ (you know, that "outdated" language, as you once referred to it) on their VoIP telephone systems. It only pays \$100K a year, though. Oh well, that's life, I guess.

Patrick
[Quoted text hidden]

Desiree Capuano <desiree.capuano@gmail.com>

Sun, Jun 28, 2015 at 8:17 PM

To: Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

My job is none of your business.
[Quoted text hidden]

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

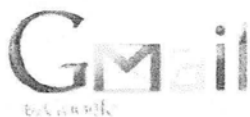
Sun, Jun 28, 2015 at 8:21 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Is that because you're embarrassed about having to take such a step down? Do you think that if you don't tell me that I won't be able to confirm it anyway? Can I not just call HR and ask them? And as long as you use your social security number then couldn't I just run a credit check on you?

[Quoted text hidden]

Exhibit K



Desiree Capuano <desiree.capuano@gmail.com>

Fun at your expense

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sun, Jul 5, 2015 at 12:17 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Hello, Desiree!

In the event you're curious how, exactly, we're having fun at your expense, allow me to enlighten you.

1. The way you dress. There is general agreement your wardrobe and taste in clothes is hideous. You're a veritable advertisement for K-Mart from 10 years ago.
2. Your insistence that the University of Phoenix is a reputable school and a degree from there is anything to be proud of.
3. Your pride in your degree from the University of Phoenix.
4. The ridiculous claims you make which are completely contrary, not only to all of the physical evidence, but at times just completely illogical and contrary to your own prior statements and/or actions.
5. Your belief that you can force someone (namely your children) to love and/or respect you.
6. Your terrible grammar.
7. Your lack of basic vocabulary.
8. Your frequent misuse of words.
9. Your inability to sufficiently articulate your thoughts.
10. Your tendency to be overly emotional and to blow irrelevant things out of proportion.
11. Your inability to have your own opinions and personality (it is G [REDACTED] who pointed out that when you were with Kristopher you were all into UFC and shooting pool but since he'd left you you've completely lost interest in those things).
12. Your transparency when claiming that you're doing something in G [REDACTED]'s interest when it's really for your own benefit (like "letting" him visit over the summer, when really you just wanted him out of the way while you selected and moved into your new home).
13. Your thinning hair.
14. Your keeping of a ridiculous surname even after you've divorced the person you adopted the name from.
15. Your irrational attachment to family - particularly those family members who have done nothing to improve your life.
16. Your taste in music (I mean, come on, country music?).
17. Your claiming that you had a pair of shoes just like the Doc Martens he got. Just because the style of the shoes you had looked similar to his Docs, doesn't make them Docs.
18. Your inability to realize that your \$35 shoes are NOT Doc Martens.
19. Your table manners.
20. Your clearly poor taste in men. Yes, I realize that I would be included in that, however, I point out that you, yourself, stated you were young, didn't know any better and consider your time with me to be a mistake. So you consider being with me, perhaps the one relationship that WAS intelligent, a mistake.
21. Your inability to learn from your own mistakes.
22. Your long history of making poor choices.
23. Your messy apartment.
24. Your pot use.
25. Your inability to obtain a decent job in Phoenix even though you have a degree from a "real university" and years of experience.
26. Your belief that Hamburger Helper is not trailer park food.
27. Your belief that heating up food or making toast is actually "cooking".
28. Your intolerance toward religions and a belief in any kind of deity.
29. Your racism toward Hispanics.
30. Your belief that you're somehow better than someone else just because you happen to be white.
31. Your belief that you're somehow better than someone else just because you happen to have been born on US

soil.

32. Your claims that you're blonde (your hair is actually, naturally light brown).
33. Your ridiculous tattoos (particularly the one on your finger).
34. Your inability to realize how incredibly trashy you really are (see point 33 for clarification).
35. Your insistence that you are "an excellent mother".
36. Your taking G [REDACTED] from Liz's care in 2011, by force, then inviting Liz to go to Phoenix and stay with your mother so she can be present for G [REDACTED]'s birthday.
37. Your copying of very personal, intimate photos of yourself onto G [REDACTED]'s iPod so they can be put on the Internet.
38. Your refusal to take issue with the fact that you're blatantly supporting a white supremacist organization on your website.
39. Your insistence on calling me Richard even though you've already admitted that you know my legal name is Patrick and that I don't go by Richard anymore.
40. Your inability to do anything to rise above your lowly, trashy station in life.
41. Having to move to Tucson to find a job.
42. Having to take a job which is so clearly below your supposed skill and experience level.
43. Your struggle to not gain weight and plump up like your mother (face it, it's inevitable, there's no point in fighting it).
44. Your claims that \$50 is a lot for a pair of shoes.
45. Your feelings being hurt because G [REDACTED] likes the studded wrist bands more than the wrist band you got him (I don't take credit for that - he picked out and paid for them himself - they weren't gifts from me).
46. The way you cry over stupid, irrelevant things.
47. The way you express your "emotional hurt" by getting angry and lashing out at people (like your children) rather than addressing the actual issue that's "hurting" you.
48. The way you blame everybody else for everything that's wrong with your life.
49. Your inability to be financially responsible and to improve your financial situation. I mean, a 401k? Really? Do you not realize 401k's are just a sham to get investment money from the masses of ignorant middle class people who actually think it helps them in some way?
50. Your bad credit.
51. Your crappy car.

The list goes on, but you get the gist. You just make it so easy for people to have fun at your expense.

And there's the things we have fun at Sage's expense, as well (starting with his ridiculous name), but we'll save that for another email.

Cheers,
Patrick

Exhibit L



Desiree Capuano <desiree.capuano@gmail.com>

Contact Information

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

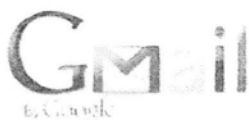
Sun, Jul 12, 2015 at 3:29 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Since I've not heard back from you with the current address at which g[REDACTED] will be residing, I will not be transporting him to the airport.

[Quoted text hidden]

Exhibit M



Desiree Capuano <desiree.capuano@gmail.com>

Contact Information

Desiree Capuano <desiree.capuano@gmail.com>

Sat, Jul 18, 2015 at 10:23 PM

To: Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Richard,

Have you stopped to consider that if what you have were the real address, and not just an intentional misdirection, that you would be endangering G[REDACTED]'s safety and privacy with your amateur website? Publishing an address your son would potentially be residing at?! Good job. Classy... real classy.

- Desiree

[Quoted text hidden]



Desiree Capuano <desiree.capuano@gmail.com>

Contact Information

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sat, Jul 18, 2015 at 10:51 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Yes, of course I had considered that. But the address is, in fact, the address you are physically at - in fact, you are there right at this moment.

I have considered whether publishing the address of an openly racist, anti-Latino, who happens to be physically present at the same house which my son is also physically present at and, after careful consideration, have concluded if such an event as angry Mexicans showing up to express their discontent with you and your white supremest beliefs were to occur, the focus of their attention would be you - not G [REDACTED]. The Latino people are, generally, honorable and would not harm an innocent child if they had issues with the child's misguided mother. So, no, I don't believe G [REDACTED] would be put in any danger by publishing your address.

The point of the website is not to be aesthetically appealing. It is to make known, publicly, the facts and the realities about you...the type of person you REALLY are. It has been up for over a year and a half and you have not indicated that anything on it is inaccurate. And, if the information is true then you have no legal or ethical grievance. If you do not want your true ugliness published on the Internet then perhaps you should be a better person - less ugly.

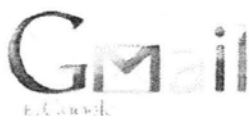
"Classy"? I am thinking you don't know what the word means. I don't see how it would apply in this context. Perhaps the word you meant to use was "dignified". But even then, I don't see anything undignified about what I've done.

Good evening. Go scream at your children, then cry yourself to sleep like you usually do.

Cheers,

Patrick

[Quoted text hidden]



Desiree Capuano <desiree.capuano@gmail.com>

Contact Information

Patrick [REDACTED] <patrick[REDACTED]@s[REDACTED].com>

Sat, Jul 18, 2015 at 11:07 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

I also considered the legal implications if something were to happen, like for example, a pissed off Mexican showed up at your house and attempt to cause you "harass" you in retaliation for your racist views. Some might say I was criminally negligent by publishing your address along with your racist comments. They might try to argue that had I not done so then you would not have been harmed. However, both your racist views and related comments, and your current address are all points of fact - the publishing of facts simply cannot be considered negligent - criminal or otherwise. I'm pretty sure not a court in America would hold me responsible for anything that might occur to you as a result of you openly expressing racist, anti-Latino sentiments, while living in an area with a very high Mexican population.

Another thing you can't prevent me from publishing is your social security number. There is no law in Canada which prohibits a person from publishing the non-Canadian identifying information of another person who is not in Canada; and even if it were illegal under US law - I'm not in the US and therefore, not subject to US law.

Patrick

On 07/18/2015 10:23 PM, Desiree Capuano wrote:

[Quoted text hidden]

Exhibit N



Desiree Capuano <desiree.capuano@gmail.com>

Updates to your site

2 messages

Patrick [redacted] <patrick[redacted]@s[redacted].com>

Mon, Jul 13, 2015 at 8:11 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Desiree:

I've updated some of the information on your site. Let me know if anything is inaccurate. Namely on the home page and on the News page. I was sure to include your new address, a picture of your presumed boyfriend, and a picture of your new home.

I still need to confirm your employment - once I do then I'll update that information too.

It's good that you're living in such a small community now. Much less anonymity. You're reputation will undoubtedly spread quickly.

Cheers,
Patrick

P.S. I believe you are expecting me to say nasty things about James Pendleton, but I don't know him so I have no opinion of him.

Patrick [redacted] <patrick[redacted]@s[redacted].com>

Mon, Jul 13, 2015 at 8:30 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Desiree:

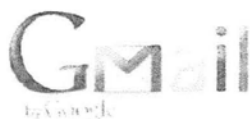
Oh, I should mention, before you freak out at G [redacted] and ground him for telling me where you live: I already had the address from the times you've previously spent the weekend at the house. Given the address, finding the name of the person who owns the property is a simple public records check. Given the name of the property owner, a simple google search provides his LinkedIn and Facebook profiles. From the LinkedIn profile I see that he also worked at Apollo Group at the same time you did. Using basic deduction, and given how well I know you, I was able to conclude that you were intimately involved with Mr. Pendleton - why else would you take your kids and spend numerous weekends at his house which is hours drive from where you lived.

So, you see, G [redacted] told me nothing - any fool with partial intelligence and a bit of background on you could figure it out.

Patrick

[Quoted text hidden]

Exhibit O



Desiree Capuano <desiree.capuano@gmail.com>

G's infection

Patrick <patrick@s.com>

Sat, Jul 18, 2015 at 5:56 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Cc: G Riess <g@gmail.com>

Desiree:

What the fuck is wrong you? You still have not taken G to the doctor about the infection on his ear and neck?!?!? Dude! The doctor here said that if it hasn't cleared up in 2 weeks to bring him back. It's been more than 4 weeks now! Obviously the antibiotic that he's been using hasn't been working! Are you fucking retarded?!?!? Do you know what the infection is? Do you know if the rash is just a symptom of a much more serious problem happening under the skin? Do you know if it's a bacteria or a virus? Is it quietly causing permanent harm to the tissue under the skin? You don't know ANY of those!!! And you tell him that you'll take him to see the doctor when his current medication runs out? He was only supposed to use that medication for 2 weeks! What the fuck are you waiting for - permanent damage?

What the god damn fuck is wrong with you???? Get the fuck off your lazy, fucking ass and take your fucking son to a fucking doctor you stupid piece of shit! How the fuck do you get off calling yourself an "excellent mother"? God damn, you're a FUCKING waste of fucking space!!!

Rather than going around boo-hooing to everybody about how I'm such an asshole and about how you care about your kids so much why don't you tell everybody you know the truth about yourself and your parenting? Why don't you tell your friends about how you'd rather sit around the house, pretending to be "working from home", rather than providing your children with even the minimum of medical care - medical care that doesn't even have to cost you anything! Let's see how much people feel sorry for you and think you're such a wonderful person then! FUCK you're disgusting.

Better yet, why don't I just forward this email, with pictures of the rash on G's neck, to all of the people in your contacts list for you?

Patrick

Exhibit P

Exhibit Q



Desiree Capuano <desiree.capuano@gmail.com>

G's visit for winter break 2015

2 messages

Desiree Capuano <desiree.capuano@gmail.com>

Sat, Nov 14, 2015 at 10:51 AM

To: Patrick <patrick@.com>

Richard Riess,

I will allow G to travel to Canada for visitation under the following conditions;

1. His visit will not be for the entire duration of winter break. You may have him for the first week. These dates have been discussed and agreed to by G and are as follows:

Travel to Canada may occur on either Friday, December 18th, 2015 or Saturday, December 19th, 2015

Return travel to Arizona will occur no later than Sunday, December 27th, 2015

2. The plane ticket from Arizona to Canada and from Canada back to Arizona must be purchased and provided to me prior to G's departure.

3. While G is in your care you are not to speak about me at all. This includes my home, my lifestyle, the other people in our home, your opinions, or your thoughts. These are unnecessary topics of conversation. I know if this has happened based on his behavior when he returns.

4. While G is in your care you are not to use him to gather information about me, my home, my lifestyle, or the people in my home. Using your child to gather information to hurt the other parent is bad and G does not deserve to be used in this manner. I will know if this has happened.

5. While G is in your care you are not to use G to plot or attempt to plot against me, my home or the people in my home. This includes any actions, direct or indirect, which would or could potentially adversely affect me, my home, my lifestyle, or the people in my home. Again, using or attempting to use your child in such a way is bad and G deserves better.

If you agree to these terms then provide the travel plans for both flights and I will make sure G sees you for the first week of winter break.

Desiree

Patrick <patrick@.com>

Sat, Nov 14, 2015 at 4:21 PM

To: Desiree Capuano <desiree.capuano@gmail.com>

Desiree:

This was not an invitation to negotiate and you are not in a position to be making demands of any sort. You have stated that you will be monitoring G's communication with me so I assume you heard our conversation the other day. Therefore, you know that I am well aware of your entire situation.

G has told me he wants to spend his entire break with me - just as he wanted to spend his entire Fall Break with me, his entire Summer Break with me, and his entire Spring Break with me. So that is what I am requesting.

There will be know negotiating and I will not agree to any terms you try to impose. You will soon be homeless; you have no money; nobody believes anything you say anymore; nobody is coming to your aid or defense; you

will not be able to secure another job as long as that website exists - and it's not going anywhere as long as you're alive; your boyfriend has reached the point of being fed up and only his sense of decency toward Sage keeps him from kicking you guys out (he knows G [REDACTED] will be fine because of me).

Moreover, I've already submitted a request to the family court for an expedited hearing for an order for G [REDACTED] to visit for the entire winter break (amongst other things). So, why would I agree to your "terms"?

Patrick

[Quoted text hidden]

Exhibit R

ORDER OF PROTECTION

[] Amended Order

Case No. M-1046-CV-201500024

Court ORI No. AZ010051J

County PIMA

State AZ

Former Case No.

PLAINTIFF

DESIREE CAPUANO

PLAINTIFF IDENTIFIERS

10/1/1980

First Middle Last

Date of Birth of Plaintiff

And/or on behalf of minor family member(s) and other Protected Person(s): (List name and DOB.)

V.

DEFENDANT

PATRICK

First Middle Last

Defendant/Plaintiff Relationship MARRIED NOW OR IN THE PAST

Defendant's Address : SUNSET ST

BURNABY, BC V5G1T3 BURNABY, UN

DEFENDANT IDENTIFIERS

SEX	RACE	DOB	HT	WT
M	W		5' 4"	130
EYES	HAIR	Arizona Prohibits Release of Social Security Numbers		
BRO	BRO			
DRIVER'S LICENSE #		STATE	EXP DATE	

CAUTION: [X] Weapon Alleged in Petition

[] Estimated Date of Birth

WARNINGS TO Defendant: This Order shall be enforced, even without registration, by the courts of any state, the District of Columbia, any U.S. Territory, and may be enforced by Tribal Lands (18 U.S.C. § 2265). Crossing state, territorial, or tribal boundaries to violate this Order may result in federal imprisonment (18 U.S.C. § 2262). As a result of this order, it may be unlawful for you to possess or purchase a firearm or ammunition pursuant to federal law under 18 U.S.C. § 922(g)(8) and/or state, tribal, territorial, or local law. If you have any questions whether these laws make it illegal for you to possess or purchase a firearm, you should consult an attorney. **Only the Court, in writing, can change this Order.**

This Order is effective for one year from date of service. VERIFY VALIDITY (call Holder of Record):

PIMA COUNTY SHERIFF'S DEPARTMENT - (520)351-4625

THE COURT HEREBY FINDS:

That it has jurisdiction over the parties and subject matter.

[] Defendant received actual notice of this Hearing and had an opportunity to participate.

Additional findings of this Order and warnings are set forth on the next page(s).

THE COURT, finding reasonable cause to believe that Defendant may commit an act of domestic violence or has committed an act of domestic violence within the past year (or good cause exists to consider a longer period), **HEREBY ORDERS:**

NO CRIMES. Defendant shall not commit any crimes, including but not limited to harassment, stalking, or conduct involving the use, attempted use, or threatened use of physical force that would reasonably be expected to cause bodily injury, against Plaintiff or Protected Persons.

[X] **NO CONTACT.** Defendant shall have no contact with **Plaintiff** except through attorneys, legal process, court hearings, and as checked: [] Phone [] Email/Fax [] Mail [] Other:

[] **NO CONTACT.** Defendant shall have no contact with **Protected Person(s)** except through attorneys, legal process, court hearings and as checked: [] Phone [] Email/Fax [] Mail [] Other:

THE COURT FURTHER ORDERS:

☐ RESIDENCE. Plaintiff is granted exclusive use and possession of the residence listed below.

☐ LAW ENFORCEMENT STANDBY. Defendant may return once with a law enforcement officer to obtain necessary personal belongings. Neither law enforcement nor this protective order can resolve conflicts over property, title, furniture, finances, real estate, or other ownership issues.

PROTECTED LOCATIONS. Defendant shall not go to or near the Plaintiff's or other Protected Person's:

☒ Residence (leave blank if confidential):

250 E PLACITA LAGO DEL MAGO, SAHUARITA, AZ, 85629;

☐ Workplace (leave blank if confidential):

☐ School / Other:

☒ **FIREARMS.** Pursuant to A.R.S. § 13-3602(G)(4), the Court finds that Defendant poses a credible threat to the physical safety of the Plaintiff or Protected Persons. Therefore, Defendant shall not possess, receive, or purchase firearms and shall surrender same within 24 hours of service to: law enforcement

OTHER ORDERS.

07/23/2015

Date

Judicial Officer

MARIA M. AVILEZ

Printed Name

Warning

This is an official Court Order. If you disobey this Order, you will be subject to arrest and prosecution for the crime of interfering with judicial proceedings and any other crime you may have committed in disobeying this Order.

ADDITIONAL WARNINGS TO Defendant: Violations of this Order should be reported to a law enforcement agency, not the Court. Both parties must notify this Court if an action for dissolution (divorce), separation, annulment or paternity/maternity is filed. This is NOT a parenting time (visitation) or custody order. You must file those requests separately in Superior Court. If you disagree with this Order, you have the right to request a hearing, which will be held within 5 to 10 business days after your written request has been filed in the Court that issued this Order. Nothing the Plaintiff does can stop, change, or undo this Order without the Court's written approval. You must appear in Court to ask a judge to modify (change) or quash (dismiss) this Order. **Even if the Plaintiff initiates contact, you could be arrested and prosecuted for violating this protective order. If you do not want the Plaintiff to contact you, you have the right to request a protective order against the Plaintiff. However, orders are not automatically granted upon request. Legal requirements must be met.**

PCO Codes: 1,4,5,7,8.

Sahuarita Municipal Court- 360 W. Sahuarita Center Way, Sahuarita, Az. 85629 520-344-7150

<u>Desiree Capuano</u> Plaintiff / Plaintiff Employer (Work Injunction ONLY) Birth Date: <u>10/01/80</u> Agent's Name (Work Injunction ONLY)	<u>Patrick [REDACTED]</u> Defendant <u>[REDACTED] Sunset St [REDACTED]</u> Address <u>Burnaby, BC V5G 1T3</u> City, State, Zip Code, Phone	Case No. <u>CV 2015-00024</u> <div style="background-color: black; color: white; padding: 5px; text-align: center; font-weight: bold;"> This is <u>not</u> a court order. </div> PETITION for <input checked="" type="checkbox"/> Order of Protection <input checked="" type="checkbox"/> Injunction Against Harassment <input type="checkbox"/> Workplace Injunction
--	--	--

DIRECTIONS: Please read the Plaintiff's Guide Sheet before filling out this form.

- Defendant/Plaintiff Relationship: ☒ Married now or in the past ☐ Live together now or lived together in the past
☒ Child in common ☐ One of us pregnant by the other ☐ Related (parent, in-law, brother, sister or grandparent)
☐ Romantic or sexual relationship (current or previous) ☐ Dating but not a romantic or sexual relationship
☐ Other: _____
- ☒ If checked, there is a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time or support in Maricopa (annulment) Superior Court,
 Case #: FC 2011-093719 (annulment) ^(COUNTY) Los Angeles (custody)
TD 035397 (custody)
- Have you or the Defendant been charged or arrested for domestic violence OR requested a protective order?
☐ Yes ☒ No ☐ Not sure
 If yes or not sure, explain: _____
- I need a court order because: (PRINT both the dates and a brief description of what happened.)

Tell the judge what happened and why you need this order. A copy of this petition is provided to the defendant when the order is served. (Do not write on back or in the margin. Attach additional paper if necessary.)

Dates

7/18/15	My physical address, email address, employment info, etc was added to a website he hosts
7/20/15	He was arrested and charged with criminal harassment against me
7/21/15	additional pictures and information was added to the website <u>www.desireecapuano.com</u>
7/18/15	a very aggressive email was sent to me using profanity and insults
7/18/15	Received 9 emails from about information that
7/20/15	would be made public by him

June 27th 2015 - He states he will contact my supposed employer and direct them to the website

January 11th, 2015 - He tells me that he discussed shooting me with our son and said that he would if there was no risk of going to jail

January 27th, 2015 - He tells me that he intends to hire someone to have sex with me so he can get "intimate" pictures for his website

January 28th, 2015 - He tells me that his primary goal in life is for me to experience as much misery as possible

July 18th, 2015 - He threatens to put my social security number on the website. I don't know how he would have it.

December 17th, 2014 - He states that he has a gun license and owns multiple firearms

May 15th, 2015 - He shows me the border in Canada that he uses to cross into the United States

SAHUARITA MUNICIPAL COURT-360 W. SAHUARITA CENTER WAY, SAHUARITA, AZ. 85629 520-344-7150

<u>Desiree Capuano</u> Plaintiff v. <u>Patrick [REDACTED]</u> Defendant		Case No. <u>CU 2015-00024</u>	REQUEST: <input checked="" type="checkbox"/> HEARING <input type="checkbox"/> DISMISS ORDER <input type="checkbox"/> CANCEL HEARING AND ORDER OPI/IAH/IAWH Issue Date: <u> / / </u> (mm/dd/ccyy)
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☒ Defendant requests: ☒ a hearing.
☐ that the Court cancel the hearing requested by the defendant in this case.
☐ that the Court continue the scheduled hearing on / / (Date).

- If the Plaintiff is:
- a current or former spouse, or
 - someone with whom you live or lived intimately, or
 - the child of an intimate partner, or
 - a parent of your child

AND the Order remains in effect or is changed after the hearing.

It may be unlawful for you to possess or purchase a firearm or ammunition until the order expires (one year after the service of the original order). By making this request, even if you fail to appear for the hearing, the prohibition against you possessing or purchasing firearms or ammunition may apply. If you have any questions about whether federal law under 18 U.S.C. § 922(g)(8) makes it illegal for you to possess or purchase a firearm, you should consult an attorney

- ☐ Plaintiff requests:
- ☐ the protective order listed above be dismissed.
 - ☐ that the Court cancel the hearing set prior to the issuance of the protective order in this case.
 - ☐ that the Court continue the scheduled hearing on / / (Date).

List the reasons for your request:

I REQUEST THE ORDER BE DISMISSED ON THE GROUNDS
THAT HER STATEMENTS RELATING TO A FEAR FOR HER
SAFETY ARE FALSE AND UNFOUNDED.

2015-12-03
 Date

Please inform court staff if interpreter services are needed for this hearing. ☐ Yes, I need interpreter services for

Requesting Person's Signature

[REDACTED] SCHEFF ST, BURNING, BC
156 IT3 604-[REDACTED]
 Address and telephone number if Defendant is the requesting party.

CERTIFICATE OF TRANSMITTAL

Copy ☐ mailed ☐ provided personally to Plaintiff on / / by
 Copy ☐ mailed ☐ provided personally to Defendant on / / by

SAHUARITA MUNI. COURT
360 W. SAHUARITA CENTER WAY SAHUARITA ,AZ 85629

(520) 344-7150

DESIREE CAPUANO	M-1046-CV-201500024	HEARING ORDER <input checked="" type="checkbox"/> Order of Protection <input type="checkbox"/> Injunction Against Harassment <input type="checkbox"/> Injunction Against Workplace Harassment Issued Date: 7/23/2015 (mm/dd/ccyy)
Plaintiff	Case No.	
Birth Date: 10/1/1980		
V.		
PATRICK [REDACTED]	AZ010051J	
Defendant		

- ☐ The request for:
- ☐ A protective order is ☐ granted ☐ denied ☐ withdrawn.
 - ☐ A hearing is denied.
 - ☐ A motion to continue is denied.
 - ☐ A motion to modify is denied.
- ☐ The Court continues the hearing set for ____/____/____ (Date). See Notice of Hearing.
- ☐ The Court cancels the hearing set for ____/____/____ (Date).
- ☐ On Plaintiff's motion, the Court dismisses the protective order listed above.

At time of hearing:

Plaintiff: ☒ Appeared ☐ Failed to Appear but did not have Notice ☐ Failed to Appear but had Notice
Defendant: ☒ Appeared ☐ Failed to Appear but did not have Notice ☐ Failed to Appear but had Notice

Telephonic

- ☐ The Court dismisses the protective order listed above.
- ☐ A protective order is ☐ denied ☐ granted ☐ Brady applies.
- ☒ The protective order listed above remains in effect. ☒ Brady applies.
- ☐ As attached, the Court modifies the protective order listed above. ☐ Brady applies.

Defendant has to appeal

12/16/15
Date

[Signature]
Judicial Officer

CERTIFICATE OF TRANSMITTAL

Copy ☐ mailed ☒ provided personally to Plaintiff on 12/16/15 by [Signature]
Copy ☒ mailed ☐ provided personally to Defendant on 12/16/15 by [Signature]
Copy ☒ mailed ☐ delivered ☒ faxed to Sheriff on 12/16/15 by [Signature]

SAHUARITA MUNICIPAL COURT
360 W SAHUARITA CENTER WAY, SAHUARITA, AZ 85629 PH - 520-344-7150

DESIREE CAPUANO Plaintiff Birth Date: 10/01/1980 vs PATRICK [REDACTED] Defendant	CASE NO: M1046CV201500024 Court ORI #: AZ010051J	NOTICE TO SHERIFF OF BRADY INDICATOR OP/IAH Issue Date: 07/23/2015
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Notice is hereby given to the Sheriff of this County that the protective order issued in the above-referenced case appears to meet the criteria established in the Violent Crime Control and Law Enforcement Act of 1994 (18 U.S.C. § 922). If the Sheriff determines the criteria established in the VCCLEA are met, the protective order should be assigned a positive Brady Record Indicator in the Protective Order File of the National Crime Information Center database.

The defendant may be disqualified from purchasing or possessing a firearm or ammunition based upon the following:

- ☐ The plaintiff and the defendant are intimate partners. As defined in 18 U.S.C. § 921(a)(32), "intimate partner" means with respect to a person, the spouse of a person, a former spouse of the person, an individual who is a parent of a child of the person, and an individual who lives or has lived in an intimate relationship with the person.
- ☐ The protective order was issued or affirmed after a hearing of which the defendant received actual notice and at which the defendant had an opportunity to participate.
- ☒ The defendant is subject to a protective order that restrains him or her from harassing, stalking, or threatening an intimate partner or child of an intimate partner, or engaging in other conduct that would place an intimate partner in reasonable fear of bodily injury to himself or herself or a child in common.
- ☒ The protective order:
 - includes a finding that the defendant represents a credible threat to the physical safety of such intimate partner or child; OR
 - explicitly prohibits the use, attempted use, or threatened use of physical force against such intimate partner or child that would reasonably be expected to cause bodily injury.

DATE: 12/16/2015

Judicial officer Signature: 

CERTIFICATE OF TRANSMITTAL

Copy ☐ mailed ☐ delivered ☐ faxed to Sheriff on 12/16/15 by me

Copy ☐ mailed ☐ provided personally to Plaintiff on 12/16/15 by me

Copy ☐ mailed ☐ provided personally to Defendant on 12/16/15 by me

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Desiree Capuano 315 W. Valencia Rd #23014 Tucson, AZ 85734 TELEPHONE NO.: 520-288-8200 FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 200 West Compton Blvd MAILING ADDRESS: 200 West Compton Blvd CITY AND ZIP CODE: Compton, CA 90220 BRANCH NAME: South Central District	
PETITIONER/PLAINTIFF: Richard Riess RESPONDENT/DEFENDANT: Desiree Capuano OTHER PARENT/PARTY:	CASE NUMBER: TD035397 (If applicable, provide): HEARING DATE: 01/25/2016 HEARING TIME: 8:30am DEPT.: M
PROOF OF SERVICE BY MAIL	

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

- 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.
- My residence or business address is:
 3341 E. Cochise Dr
 Phoenix, AZ 85028
- I served a copy of the following documents (specify):
 FL-320 Responsive Declaration to Request for Order
 Supportive Documentation for Responsive Declaration to Request for Order
 FL-335 Proof of Service by Mail

 by enclosing them in an envelope AND
 - ☒ **depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid.
 - ☐ **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.
- The envelope was addressed and mailed as follows:
 - Name of person served: **Richard Riess**
 - Address: **█ Sunset St █, Burnaby, BC V5G 1T3**
 - Date mailed: **01/09/2016**
 - Place of mailing (city and state): **Tucson, AZ**
- ☐ 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.)
- I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: **01/08/2016**

Teresa Hoffman

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON COMPLETING THIS FORM)