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ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 25 2018

Sherril R. Gallego, LAGUARDIA, Officer/Clerk
By: M. Solo, Deputy
Moses Solo

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

14 ISAIAH JAMES SILVA,

15 Plaintiff,

16 vs.

17 COURTNEY LOVE, OSAMA LUTFI,
18 ROSS BUTLER, YAN YUKHTMAN, BLUE
19 VELVET LLC, JOHN NAZARIAN,
20 NAZARIAN AND ASSOCIATES, ESQUIRE
21 INTERNATIONALE THE AGENCY,
22 MICHAEL EVAN SCHENK, MARC GANS,
23 LAW OFFICES OF MARC GANS,
24 and DOES 1-50 inclusive

25 Defendant(s).

Case No.: BC 707927

UNLIMITED CIVIL CASE AMOUNT IN
EXCESS OF \$25,000 COMPLAINT FOR CIVIL
AND PUNITIVE DAMAGES &
DEMAND FOR JURY TRIAL FOR:

1. PER SE VIOLATION OF STATUTE;
 - CRIMINAL CONSPIRACY
 - BURGLARY
 - ROBBERY
 - SEXUAL BATTERY
 - KIDNAPPING
 - ATTEMPTED MURDER
 - CRIMINAL THREATS
 - FALSE IMPRISONMENT
 - EXTORTION
 - DISSUADING A WITNESS
2. ASSAULT & BATTERY;
3. FALSE IMPRISONMENT
4. EXTORTION
5. STALKING
6. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS;
7. TRESPASS

1 Plaintiff Isaiah SILVA believes and alleges against all Defendants and each of them, as follows:

2
3 **PARTIES, JURISDICTION, & VENUE**

- 4 1. Plaintiff Isaiah James Silva (hereinafter referred to as SILVA) is a musician and front man for
5 the rock band The Eeries. SILVA is the ex-husband of Frances Bean Cobain (hereinafter
6 referred to as COBAIN). COBAIN is the only child of musicians, Kurt Cobain, deceased, and
7 Defendant Courtney Love. At all times relevant to this litigation SILVA was a resident of Los
8 Angeles County, California.
9
- 10 2. Defendant Courtney Michelle Love, also known as "Courtney Love Cobain" and "Courtney
11 Michelle Harrison" (hereinafter referred to as LOVE) is a former musician and was the mother-
12 in-law of SILVA. LOVE has a documented history of criminal drug use and violence including
13 arrests for assault with a deadly weapon and battery. Upon information and belief, LOVE is a
14 resident of Los Angeles County, California and was at all times relevant to this litigation.
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16
- 17 3. Defendant Osama Nicolas Lutfi, also known as "Sam Lutfi" and "Sam Lufti" (hereinafter
18 referred to as LUTFI) is LOVE's business manager, infamous self-proclaimed Hollywood
19 "fixer," and illicit drug supplier to LOVE and COBAIN. LUTFI has a documented history
20 insinuating himself into the personal and business affairs of female entertainers such as Britney
21 Spears, Amanda Bynes, and Lindsay Lohan. LUTFI also has a long documented history of drug
22 involvement, threats, violence, stalking, and harassment which has resulted in at least six
23 restraining orders in Los Angeles and Orange Counties. Upon information and belief, LUTFI is
24 a resident of Los Angeles County, California and was at all times relevant to this litigation.
25
26
- 27 4. Defendant Ross Fleming Butler (hereinafter referred to as BUTLER) is an actor, close
28

1 associate, and agent of LUTFI who acted as a courier for illicit drugs supplied to LOVE and
2 COBAIN. In June 2016 BUTLER was LUTFI's roommate. According to the Los Angeles
3 District Attorney's Office, BUTLER could not be questioned by police in the SILVA matter
4 because he fled to Canada immediately afterward. Upon information and belief, BUTLER is a
5 resident of Los Angeles County, California and was at all times relevant to this litigation.
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7 5. Defendant Yan Yukhtman (hereinafter referred to as YUKHTMAN) is a professional chauffer
8 doing business as BLUE VELVET LLC. YUKHTMAN is a close associate and agent of
9 LUTFI. YUKHTMAN has a long and disturbing history of criminal conduct and arrests
10 including, but not limited to, arrests for crimes of violence, drugs, illegal possession of
11 ammunition, solicitation of criminal conduct, and possession of poisonous or harmful
12 substances. Upon information and belief, YUKHTMAN is a resident of Los Angeles County,
13 California and was at all times relevant to this litigation.
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16 6. Defendant John James Nazarian (hereinafter referred to as NAZARIAN) is a private
17 investigator doing business as ESQUIRE INTERNATIONALE THE AGENCY and
18 NAZARIAN AND ASSOCIATES. NAZARIAN bills himself as "the scum of Hollywood" and
19 boasts a celebrity clientele. NAZARIAN has produced and posted instructional videos which
20 encourage women to stage fake crime scenes and make false reports to the police in order to
21 have their spouses falsely arrested and removed from the house, "How to Throw Your Husband
22 Out - Divorce Advice." In another video, NAZARIAN characterizes his work on behalf of the
23 wealthy, "The rich and powerful always want their pound of flesh and we kind of go out and
24 collect it for them;" and "You pick your worst lawyer that you know, we're 10 floors below
25 him. That's what we get paid to do." NAZARIAN is an associate of LOVE and she has
26 employed his services in the past. Upon information and belief, NAZARIAN is a resident of
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1 Los Angeles County, California and was at all times relevant to this litigation.

2
3 7. Defendant Marc S. Gans (hereinafter referred to as GANS) is LOVE's attorney and has
4 previously represented LUTFI. Upon information and belief, GANS is a resident of Los
5 Angeles County, California and was at all times relevant to this litigation.

6
7 8. Defendant Michael Evan Schenk, also known as "Michael Vega" and "Vega Schenk"
8 (hereinafter referred to as SCHENK) is a musician who, at all times relevant to this complaint,
9 was employed by COBAIN as a personal assistant. Upon information and belief, SCHENK is a
10 resident of Los Angeles County, California and was at all times relevant to this litigation.

11
12 9. The true names and capacities of the Defendants, DOES 1 through 50, inclusive, whether
13 individual, corporate, associate or otherwise, are unknown to Plaintiff at the time of filing this
14 Complaint and Plaintiff, therefore, sue said Defendants by such fictitious names and will ask
15 leave of Court to amend this Complaint to show their true names or capacities when the same
16 have been ascertained. Plaintiffs are informed and believe, and thereon allege, that each of the
17 DOE Defendants is, in some manner, responsible for the events and happenings herein set forth
18 and directly and proximately caused injury and damages to the Plaintiff as herein alleged.

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20
21 10. Jurisdiction and venue for this action in the County of Los Angeles are proper pursuant to,
22 without limitation, California Code of Civil Procedure §393 and §395.5 in that, among other
23 things, the conduct occurred and the claims and causes of action alleged herein arose in the
24 State of California, County of Los Angeles.

25
26 **SYNOPSIS**

27
28 11. In this case Defendants LOVE, LUTFI, BUTLER, and YUKHTMAN entered into a criminal

1 conspiracy to commit trespass, burglary, home invasion robbery, assault, battery, kidnapping,
2 and murder against Frances COBAIN's estranged husband, Isaiah SILVA. The primary
3 objective of their conspiracy was to locate and take possession of a guitar believed to be worth
4 millions of dollars, which was gifted to SILVA, by COBAIN, on January 8, 2014, six months
5 prior to their June 29, 2014 marriage. The conspirators' secondary objective was to remove
6 SILVA from the home on Curson Avenue and end any potential legal claims SILVA may have
7 to the Curson property, the Willoughby Trust, and spousal support.
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10 12. In the early morning hours of June 3, 2016, in furtherance of their conspiracy, Defendants
11 LUTFI, BUTLER, and YUKHTMAN did burglarize, rob, assault, batter, sexually batter,
12 kidnap, and attempt to murder SILVA at his North Curson Avenue residence in West
13 Hollywood, California.
14

15 13. When LOVE, LUTFI, BUTLER, and YUKHTMAN's plan to murder SILVA was frustrated by
16 unforeseen complications, LOVE's attorney, GANS, joined their criminal conspiracy in an
17 effort to fulfill the objectives of the conspiracy by means other than murder. Beginning in the
18 pre-dawn hours of June 3, 2016 and continuing through June 4, 2016, LOVE, LUTFI,
19 BUTLER, YUKHTMAN, and GANS acted in concert to falsely imprison and extort SILVA.
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21
22 14. After June 4, 2016, coconspirators LOVE, LUTFI, BUTLER, and YUKHTMAN engaged in a
23 pattern of conduct that included criminal threats, bribes, stalking, intimidation, defamation,
24 extortion, and dissuasion against SILVA, his family members, friends, and witnesses favorable
25 to SILVA as part of an ongoing campaign of intimidation aimed at evading criminal prosecution
26 and achieving the unsatisfied objectives of their original conspiracy.
27

28 15. On June 24, 2016 LOVE and LUTFI conspired with NAZARIAN and SCHENK to unlawfully

1 wrest control of the Curson Avenue house from SILVA, thereby realizing one of the original
2 objectives of the June 3, 2016 criminal conspiracy between LOVE, LUTFI, BUTLER,
3 YUKHTMAN, and GANS. In furtherance of the June 24, 2016 conspiracy, NAZARIAN and
4 SCHENK did assault and cause physical injury to SILVA's mother while in SILVA's presence
5 and with the intent of terrorizing and intimidating SILVA.
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7 **GENERAL ALLEGATIONS AS TO ALL CAUSES OF ACTION**
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- 9 16. At all times herein mentioned, each of the Defendants and DOES 1-50, were the coconspirator,
10 agent, servant, and/or employee of each of the other Defendants and were at all times herein
11 mentioned acting within the scope of said conspiracy/ agency and/or employment.
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- 13 17. SILVA met COBAIN on January 8, 2010, after which a dating relationship began. At the time
14 the two met, SILVA was working with special needs children at an elementary school in Orange
15 County. He held this position for approximately eight years, while concurrently working in the
16 music industry and developing his music career.
17
- 18 18. COBAIN is the only child of two musicians, Kurt Cobain, deceased, and Defendant LOVE. In
19 2011, COBAIN and SILVA began residing together full-time.
20
- 21 19. Commencing in 2012, according to emails provided to SILVA by COBAIN, LOVE's business
22 manager, Defendant LUTFI, began surreptitiously providing services for COBAIN and LOVE
23 in trade for favors and loyalty.
24
- 25 20. During the time outlined herein, LUTFI surreptitiously provided narcotics and illicit
26 benzodiazepines to COBAIN and LOVE. Defendant LUTFI and COBAIN referred to the drugs
27 as "cookies." For example, when the two discussed the need for more narcotics and illicit
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1 benzodiazepines they would communicate in code and say, "the cookie jar is empty," or
2 something to that effect. ATTACHED HERETO, MARKED EXHIBIT 1 COLLECTIVELY,
3 AND INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE COPIES OF SEVEN
4 EMAIL CONVERSATIONS BETWEEN LUTFI AND COBAIN REGARDING THEIR
5 ILLICIT DRUG TRANSACTIONS.
6

7 21. LUTFI routinely used Defendant BUTLER to deliver the narcotics and illicit benzodiazepines
8 to COBAIN. One routine was for, BUTLER to leave the drugs in a hiding place in the bushes
9 outside of SILVA and COBAIN's Curson Avenue residence. This hiding place was
10 predetermined by LUTFI and COBAIN through email. The narcotics and illicit benzodiazepines
11 were hidden to ensure SILVA was unaware of the secret drug-related business relationship
12 between LUTFI and COBAIN. COBAIN, in an attempt to further conceal her requests for
13 narcotics and illicit benzodiazepines, developed a code of emojis to disguise each of the illicit
14 drugs that she would solicit from LUTFI. ATTACHED HERETO, MARKED EXHIBIT 2,
15 AND INCORPORATED HEREIN AS IF SET OUT AT LENGTH, IS THE LEGEND FOR
16 THE EMOJI CODE USED IN HER ILLICIT DRUG TRANSACTION COMMUNICATIONS
17 WITH LUTFI.
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21 22. Background pertinent to the issues to be alleged herein is, COBAIN lived primarily with LOVE,
22 in New York, until approximately 2009 when COBAIN's grandmother, Wendy O'Connor,
23 formerly Wendy Cobain, (hereinafter referred to as O'CONNOR) and COBAIN's aunt, Kimmy
24 Cobain (hereinafter referred to as KIMMY), obtained legal guardianship of COBAIN.
25 Thereafter COBAIN moved to Los Angeles. At the same time, O'CONNOR and KIMMY
26 moved from the family home in Washington State, and into a home just doors down the street
27 from COBAIN on West Knoll, in West Hollywood.
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23. After dating for a year, COBAIN proposed to SILVA on July 4, 2011 and, in celebration of their engagement, the young couple searched for a home near West Hollywood selecting and moving into a Curson Avenue residence in West Hollywood. Subsequently, COBAIN's estranged mother, LOVE, rented a home directly across from Wattles Park, a small park within walking distance of SILVA and COBAIN's Curson Avenue residence. LUTFI would later claim that he and BUTLER facilitated LOVE's move to this location.
24. LOVE seemingly moved into her new residence with the intent of smoothing things over with COBAIN. Soon after her move, LOVE began texting and soliciting SILVA for his help in mending the damaged relationship with her daughter. At about that time, LOVE sent a text message to SILVA imploring him to allow her to introduce him to LUTFI, LOVE's confidant and business manager. Despite SILVA's apprehension, due to the infamous reputation that preceded both LUTFI and LOVE, SILVA felt obligated to appease the request of his future mother-in-law furthering LOVE's hopes that SILVA would broker peace between her and COBAIN. Subsequently, LUTFI initiated numerous attempts to ingratiate himself with both COBAIN and SILVA.
25. On May 31, 2012, LUTFI, stating he was a confidant of LOVE's, solicited COBAIN by email requesting that COBAIN get to know him and telling her that a relationship would be mutually beneficial. Evidence of LUTFI's idea of a mutually beneficial relationship is illustrated in subsequent emails between COBAIN and LUTFI. In one email, COBAIN thanked LUTFI for traveling to Mexico, obtaining illicit drugs, and transporting them back to the United States for her and LOVE's use. In exchange, COBAIN insisted on paying LUTFI for any expense incurred during the process of refilling the "cookie jar." ATTACHED HERETO, MARKED

1 EXHIBIT 3 COLLECTIVELY, AND INCORPORATED HEREIN AS IF SET OUT AT
2 LENGTH, ARE THE ABOVE REFERENCED EMAIL COMMUNICATIONS.

- 3
4 26. COBAIN and SILVA engaged now for some time, and with SILVA still none the wiser that
5 LUTFI had been surreptitiously providing narcotics and illicit benzodiazepines to COBAIN, set
6 October 30, 2013 as their wedding date. However, before the date arrived, SILVA became
7 increasingly concerned after witnessing COBAIN, on a number of occasions, meet a car outside
8 of their Curson Avenue residence, return inside in a suspicious manner, and immediately retreat
9 into the bathroom. When COBAIN emerged from the bathroom, she exhibited bizarre, agitated,
10 and abusive behavior. On several occasions, COBAIN did not return from the bathroom for
11 long periods of time. On one such occasion, SILVA became alarmed and entered the bathroom.
12 SILVA found COBAIN passed out on the bathroom floor from apparent drug use. This was not
13 an isolated incident and as time went by, SILVA found COBAIN in this condition with greater
14 frequency. Despite SILVA's observations, COBAIN continued to emphatically deny that her
15 behavior and physical condition were drug-related. SILVA spent countless sleepless nights
16 monitoring COBAIN's breathing and behavior fearful that she would pass away in her drug-
17 induced deep sleep. On occasion, SILVA documented COBAIN's behavior with the hope that
18 sharing a video of her conduct with her would convince COBAIN that her drug use was a
19 serious and potentially life-threatening problem. SILVA hoped that it would motivate COBAIN
20 to seek treatment. Unfortunately, COBAIN's drug use only escalated and came to the point
21 where SILVA was finding COBAIN passed out on the bathroom floor just feet from the bed
22 where his five-year-old daughter, Arlo Silva (hereinafter referred to as ARLO), was sleeping.
23
24 27. Over time, and after heart-to-heart discussions, COBAIN not only admitted to SILVA that she
25 was receiving narcotics and illicit benzodiazepines from LUTFI, she also provided SILVA with
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1 the email exchanges, marked as exhibits herein, between herself and LUTFI detailing their
2 surreptitious drug-based business relationship. This confirmed to SILVA that LUTFI, LOVES
3 business manager and confidant, was, in fact, conspiring with and furnishing drugs to COBAIN
4 behind SILVA's back.

- 5
- 6 28. In one particular email exchange between LUTFI and COBAIN on October 12, 2013 at
7 approximately 5:00 p.m., LUTFI discussed the delivery of "cookies" to COBAIN. In the email
8 LUTFI proposed that COBAIN introduce BUTLER to SILVA stating, "I'm telling ya, you
9 should have Ross bring over GTA5 say your Mom's sending it as a gift and Ross can meet you
10 two ... and never mention me or COOKIES plus I bet you Isaiah will think he's cool. Ross is
11 playing guitar for the Rolling Stones in San Fran this December BTW plus if they click, then
12 great, you'll have a friend of his that's incredibly loyal to you." COBAIN responded,
13 "Amazing" and said "My in-laws are still here so maybe he should put them on the left side in
14 the bushes like he did the first time just lemme know when he's on his way so I can distract."
15 ATTACHED HERETO, MARKED AS EXHIBIT 4, AND INCORPORATED HEREIN AS IF
16 SET OUT AT LENGTH, IS THE ABOVE REFERENCED EMAIL COMMUNICATION.
- 17
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- 19
- 20 29. Upon confirmation of LUTFI's clandestine drug supply arrangement with COBAIN, SILVA
21 became extremely worried for COBAIN and himself. SILVA's underlying suspicion of LUTFI
22 was further validated by Blackbox Security professionals hired following a break-in at the
23 couple's Curson Avenue residence in October 2012. The employees of Blackbox Security
24 recommended that SILVA and COBAIN not give any personal information to LUTFI, stating
25 that LUTFI is notorious for using such information to go after people. This understanding
26 coupled with SILVA's knowledge of the content of the email exchanges between COBAIN and
27 LUTFI, caused SILVA to personalize the home's "Smile You're on Camera" surveillance sign
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1 with the message "That means you Sam Lutfi and Ross Butler." A celebrity gossip website
2 picked up on his handwritten note on the security sign and published an article which got back
3 to LOVE and LUTFI angering them. Foreshadowing what was to come for SILVA years later,
4 LOVE and LUTFI flooded COBAIN and SILVA with calls and texts demanding that SILVA
5 take the sign down immediately and issue a public apology to LUTFI and BUTLER. SILVA did
6 not apologize, but appeased LOVE and LUTFI by eventually taking the sign down.

7
8 ATTACHED HERETO, MARKED AS EXHIBIT 5, AND INCORPORATED HEREIN AS IF
9 SET OUT AT LENGTH, IS A PHOTOGRAPH OF THE ABOVE REFERENCED SIGN.
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11 30. LUTFI's intrusion into SILVA and COBAIN's life and relationship was not limited to
12 supplying drugs to COBAIN. LUTFI found ways to insinuate himself into nearly anything that
13 involved COBAIN and her mother, LOVE. LOVE referred to LUTFI as her "Rottweiler" and
14 described him in text messages to SILVA, "...he's a rott weiler (sic) when it comes to
15 protecting me and my assets and a good friend." In February 2015, LOVE, LUTFI, COBAIN,
16 and SILVA were scheduled to attend a premiere of the Kurt Cobain documentary "Montage of
17 Heck" in Berlin. Prior to the premiere, SILVA became ill and could not travel for the event. He
18 encouraged COBAIN to go without him, but she chose to stay with SILVA. This angered
19 LUTFI and he lashed out at SILVA, accused him of lying about his illness, and threatened him.
20 Knowing that LUTFI lives on the end of LOVE's leash, COBAIN informed her mother about
21 LUTFI's conduct and LOVE apologized to SILVA by text message. In the messages LOVE
22 once again confirmed LUTFI's status as her Rottweiler and her position as his handler, "Fbc
23 just told me about Sam. I had no idea I have a Rottweiler whose out of control. Just fucking
24 ignore him. Im so sorry. Terribly so. I told him to knock it the fuck off. If he continues please
25 tell me. Ignore him. I should not have shared nr concern with him. Im sorry you are being
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1 growled at and threatened. He's probably drunk. Just ignore it." ATTACHED HERETO,
2 MARKED AS EXHIBIT 6 COLLECTIVELY, AND INCORPORATED HEREIN AS IF SET
3 OUT AT LENGTH, ARE THE ABOVE REFERENCED TEXT MESSAGE
4 COMMUNICATIONS.

- 5
- 6 31. As part of LOVE and LUTFI's joint effort to cajole their way into COBAIN and SILVA's lives,
7 LOVE, with a full knowledge of LUTFI's sordid public reputation, nonetheless told SILVA to
8 trust LUTFI. She asserted that LUTFI would be useful and worth having on their side.
- 9
- 10 32. The extent of LUTFI's utility to LOVE was later illustrated by a 2013 email exchange between
11 LUTFI and COBAIN. Having lost control of Kurt Cobain's estate to her daughter in 2010,
12 LOVE was replaced as the estate's manager by Attorney David Byrnes. In addition, LOVE's
13 decision authority for the estate, End of Music, LLC (hereinafter referred to as EOM), was
14 transferred to COBAIN. In the October 11, 2013 email exchange with COBAIN, LUTFI
15 endeavors to enlist COBAIN's influence with EOM to expedite a large royalty payment LUTFI
16 claims is due to LOVE. In an emotional play to obtain COBAIN's support and financial aid,
17 LUTFI told COBAIN that LOVE was in debt by at least one hundred thirty thousand dollars
18 (\$130,000) and would not be able to pay her sixteen thousand-dollar (\$16,000) rent, among
19 other obligations. In a cynical effort to play COBAIN against EOM, LUTFI implied that EOM
20 blamed COBAIN for their decision to not make the payment to LOVE earlier. LUTFI wrote,
21 "They basically rubbed it in our face already that you don't care that (the check) is coming in
22 Dec rather than next week." In an email back to LUTFI, COBAIN initially says that she will
23 intercede on LOVE's behalf if she can get drugs delivered, "Tell u what I'll do that if I can get a
24 package delivered tonight or tomorrow. Fair trade off?" LUTFI responds by telling COBAIN
25 that LOVE has been living "frugally" and reiterates the gravity of LOVE's financial position.
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1 LUTFI ends his email with a reference to the drugs COBAIN requested and an implied quid pro
2 quo as to future drug deliveries, "I know you're thinking Fuck this guy and where's Ross lol,
3 don't worry, that's being taken care of... but I'll be dry after that, so trying desperately to work
4 on refilling the cookie jar." In the end, LOVE's Rottweiler filled the cookie jar and successfully
5 exploited the addiction he encouraged and fueled with COBAIN to manipulate her into
6 interceding with EOM on LOVE's behalf. COBAIN later claimed that she also gave LOVE
7 money to pay her rent. ATTACHED HERETO, MARKED AS EXHIBIT 7 COLLECTIVELY,
8 AND INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE THE ABOVE
9 REFERENCED EMAIL COMMUNICATIONS.
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- 12 33. Deeply hurt by COBAIN's deception surrounding her secret drug-related business relationship
13 with LUTFI, and following a drug-fueled episode of domestic violence wherein COBAIN
14 struck SILVA, SILVA called off the couple's engagement and October 30, 2013 wedding date.
15 Soon thereafter COBAIN decided it was in her best interest and the best interest of her
16 relationship with SILVA to discontinue her illicit relationship with LUTFI. Toward this end,
17 COBAIN provided SILVA with copies of her email communications with LUTFI regarding
18 their illicit drug-related business relationship.
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20
- 21 34. The relationship between SILVA and COBAIN improved and the couple reestablished their
22 trust. SILVA and COBAIN began looking to their future and possible marriage. Ultimately
23 COBAIN and LUTFI rekindled their drug-related business relationship behind SILVA's back.
24
- 25 35. Unaware of this development, SILVA surprised COBAIN with a marriage proposal and ring to
26 celebrate their re-engagement. The couple set a new wedding date for June 2014. In anticipation
27 of the couples annual January 8 celebration of their dating anniversary, which would have
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1 special significance due to the re-engagement and new wedding date, SILVA spent the month
2 of December 2013 meticulously constructing a highly personalized art studio/reading room for
3 COBAIN at their Curson Avenue residence.

- 4
- 5 36. Eager to surprise his fiancée, SILVA began the process of converting the spare bedroom. No
6 detail was spared in SILVA's quest to surprise COBAIN with an extravagant and sentimental
7 dating anniversary gift. He purchased much of the room furnishings and decor from COBAIN's
8 favorite high-end antique shop, TINL. Silva purchased other vintage furnishings and decor at the
9 weekly Fairfax Flea Market in West Hollywood. Additional items were acquired from
10 miscellaneous vendors, private sellers, or created by hand by SILVA. These items include a
11 vintage 1950's desk that SILVA restored and converted into a drawing table with a light-box, a
12 unique vintage storage unit that SILVA repurposed fully stocking it with COBAIN's favorite art
13 supplies from BLICK, a vintage French sconce that SILVA restored, a pair of vintage French
14 floor lamps, a pair of 1950's vintage French drapes that SILVA modified, a wrought-iron day
15 bed with trundle, vintage wrought-iron baskets that SILVA repurposed and mounted as shelves,
16 which he stocked with COBAIN's favorite books including a 1930's first edition copy of Henry
17 Miller's Tropic of Cancer, framed artwork, and other limited edition art pieces signed and
18 numbered by some of COBAIN's favorite artists including Frank Kozik, music memorabilia
19 from COBAIN's favorite musicians including a one of a kind drawing by the late GG Allin, a
20 record player along with a vintage milk crate that SILVA repurposed and stocked with
21 COBAIN's favorite albums, an LED flat screen TV, a decorative gold Gretsch Double Jet guitar
22 that SILVA mounted on the wall, as well as many more sentimental knick-knacks, collectables,
23 and art pieces.
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- 28 37. COBAIN, aware that SILVA had been laboring for weeks in preparation for their annual

1 January 8 dating anniversary celebration, and in light of the couple's re-engagement and new
2 wedding date, obtained consent and acknowledgment from LOVE to retrieve one of her late
3 father's guitars from storage. COBAIN selected the 1959 Martin guitar she observed SILVA
4 playing during a prior visit to the storage facility. Notably, items could not be removed from the
5 storage facility by COBAIN or LOVE without their mutual consent, which proved to be
6 difficult to achieve at times. One often holding out on the other for a favor in exchange for
7 consent. On January 8, 2014, before the couple left their Curson Avenue residence to celebrate
8 their dating anniversary and other recent relationship milestones at the Chateau Marmont, the
9 couple exchanged gifts. First, SILVA revealed the art studio/reading room to COBAIN and all
10 of its sentimental contents. Elated by SILVA's gift, COBAIN said it was the most amazing
11 thing anyone had ever done for her. COBAIN, in celebration of the couple's dating anniversary
12 and re-engagement, gifted Kurt Cobain's 1959 Martin guitar to SILVA. COBAIN also told
13 SILVA the guitar was a means for SILVA to form a bond with his late father-in-law and
14 welcome SILVA into the family. The guitar immediately became symbolic and sentimental to
15 SILVA, and he kept it in the master bedroom of the couple's Curson Avenue home. SILVA and
16 COBAIN were married as planned on June 29, 2014 and continued to live together at the
17 Curson Avenue house. ATTACHED HERETO, MARKED AS EXHIBIT 8, IS A COPY OF
18 THE PHOTOGRAPH TAKEN ON JANUARY 8, 2014 OF SILVA WITH THE 1959 MARTIN
19 GUITAR GIFTED TO HIM BY COBAIN.
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- 24 38. SILVA was overjoyed with the gift and immediately texted several of his friends and bandmates
25 to share the news with them. SILVA included photographs of the 1959 Martin guitar in his text
26 message exchange with Ian Volker. ATTACHED HERETO, MARKED AS EXHIBIT 9
27 COLLECTIVELY, AND INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE
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1 THE ABOVE REFERENCED TEXT COMMUNICATIONS WITH PHOTO
2 ATTACHMENTS,
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- 4 39. SILVA has an informal shared custody arrangement with his daughter ARLO's mother, Jessica
5 Sullivan (hereinafter referred to as SULLIVAN). During SILVA and COBAIN's dating
6 relationship SULLIVAN resided in Orange County near SILVA's family residence, the school
7 SILVA worked at, and SILVA's music studio. COBAIN would accompany SILVA during the
8 routine custodial exchanges of ARLO which required the couple to commute weekly from their
9 residence in West Hollywood to SILVA's family residence in Orange County to pick up ARLO.
10 Due to the length of the commute, COBAIN and SILVA would sometimes stay overnight at
11 SILVA's family residence in Orange County. SILVA would also organize a practice with his
12 band and spend time working in his music studio to maximize the couple's weekly commute to
13 Orange County. After a period of time, the weekly routine did not sit well with COBAIN who
14 confided in SILVA's mother, Mary Silva (hereinafter referred to as MARY), that she was weary
15 of the weekly custodial exchanges. She told MARY it made her feel like SILVA wasn't fully
16 committed to the life and home the couple had built together in West Hollywood. COBAIN
17 asked MARY to stand with her as she tried to motivate SILVA to relocate his Orange County-
18 based obligations closer to the couple's Curson Avenue home. This resulted in COBAIN and
19 SILVA purchasing a house on Willoughby Avenue in West Hollywood for ARLO and
20 SULLIVAN and enrolling ARLO at The Willows, COBAIN's former private school. The
21 Willoughby Avenue house was placed in a trust with SILVA's father, Walter Silva, (hereinafter
22 referred to as WALTER), as the Trustee. ARLO had been an integral part of COBAIN's life
23 since the age of two and was treated and referred to by COBAIN as her daughter.
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27
28 40. Now married, SILVA and COBAIN lived together at their Curson Avenue home for the next

1 eighteenth months. During that time, COBAIN's drug use intensified and by the Fall of 2014
2 COBAIN was again in the grasp of a life-threatening addiction. In November 2014, COBAIN,
3 SILVA, and ARLO were watching television as a family on the bed when COBAIN
4 experienced a grand mal seizure. COBAIN fell out of the bed and onto the floor. SILVA, with
5 formal CPR training and eight years of experience working with epileptics, dropped to his knees
6 and began to assist COBAIN. Utterly terrified, ARLO watched COBAIN violently thrashing on
7 the floor and in a display of courage dialed 9-1-1 from SILVA's phone then brought the phone
8 to SILVA. SILVA remained on the phone with the 9-1-1 operator for eight minutes while
9 anxiously waiting for the paramedics to arrive. SILVA held his seizing fiancée with his left
10 hand and his distraught daughter with his right hand. Just moments before the paramedics
11 arrived COBAIN stopped convulsing, seemingly stopped breathing, and began to turn blue.
12 Fearing the worst, SILVA frantically repositioned COBAIN onto her back for CPR
13 compressions when COBAIN sat up astonished, wide-eyed, and gasping for air. Moments later,
14 the paramedics arrived at the family's Curson Avenue residence and after a thorough
15 assessment concluded that COBAIN was going to be fine. Within hours of being revived by
16 SILVA, COBAIN sent text messages to her loved ones that read in part, "So I almost died
17 tonight. I had a grand mal seizure. Isaiah thought I had died in his arms. Pretty intense. I
18 shouldn't be alive but I am which is a good thing so I'm texting everyone I love and telling
19 them I LOVE YOU!!!" At this point, fearing for COBAIN's well-being, SILVA spoke to
20 O'CONNOR, who COBAIN regarded as more of a mother-figure than she did LOVE. SILVA
21 told O'CONNOR about COBAIN's drug use, her grand mal seizure, and the nature of LOVE
22 and LUTFI's involvement in COBAIN's life. ATTACHED HERETO, MARKED AS EXHIBIT
23 10 COLLECTIVELY, AND INCORPORATED HEREIN AS IF SET OUT AT LENGTH,
24
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1 ARE THE ABOVE REFERENCED TEXT COMMUNICATIONS.

- 2
- 3 41. By February of 2016, COBAIN's increasingly heavy drug use put tremendous strain on her
- 4 marriage to SILVA, but SILVA stood by COBAIN and made numerous attempts to monitor her
- 5 and intervene when possible.
- 6
- 7 42. On February 12, 2016 COBAIN disappeared from the Curson Avenue house without
- 8 explanation. SILVA became immensely concerned and immediately tried reaching out to
- 9 COBAIN without success. Sometime later, SILVA discovered a note written by COBAIN
- 10 which said in part, "Isaiah, I love you. Please don't think of this as abandoning you or as cruel
- 11 or crude. That's not my intention in the slightest." The note went on to suggest that COBAIN
- 12 had left to "evaluate (her) priorities." SILVA interpreted COBAIN's note to mean that she was
- 13 seeking help with her drug addiction, which COBAIN appeared to describe in the note, "I feel I
- 14 have been stuck in the same cycle of misery and the chaos & almost physical pain of wondering
- 15 when, where, how & the gnawing need that eats away at the pit of my stomach forces me to
- 16 focus most of my energy on that & know in my heart of hearts, within my truth that it's not
- 17 healthy, it's essentially a deathwish for me." COBAIN's note left SILVA with the impression
- 18 that she intended to return to their marriage when she got well. ATTACHED HERETO,
- 19 MARKED AS EXHIBIT 11, AND INCORPORATED HEREIN AS IF SET OUT AT
- 20 LENGTH, IS THE ABOVE REFERENCED HANDWRITTEN NOTE FROM COBAIN.
- 21
- 22
- 23
- 24 43. SILVA knew that COBAIN was extremely close with her personal assistant, John Hamilton
- 25 (hereinafter referred to as HAMILTON) and was aware of how much she relied upon him for
- 26 her day to day needs. When HAMILTON arrived at the couples Curson Avenue residence for
- 27 work on the following Monday, SILVA asked him if he had been in communication with
- 28

1 COBAIN or had any knowledge of her whereabouts. HAMILTON, complying with COBAIN's
2 instructions, feigned ignorance. After days of SILVA's persistence, HAMILTON finally
3 relented and informed SILVA that he had personal knowledge that COBAIN was safe.

4 However, HAMILTON would not provide SILVA with any additional information regarding
5 COBAIN. Unbeknownst to SILVA, HAMILTON had been with COBAIN on a nearly daily
6 basis since she disappeared from the Curson Avenue residence, continuing on as her personal
7 assistant. While aware of COBAIN's intention to divorce SILVA, HAMILTON never disclosed
8 this fact to SILVA, nor did he disclose to SILVA that COBAIN had no intention of returning to
9 the couple's Curson Avenue residence to reunite.
10
11

12 44. From the day that COBAIN disappeared, February 12, 2016, and continuing on an almost daily
13 basis, HAMILTON came to the Curson Avenue residence to retrieve specific items that
14 COBAIN requested. During this period, HAMILTON had unfettered access to the Curson
15 Avenue property and was often there unsupervised by SILVA. Not once during this period did
16 COBAIN personally, or through HAMILTON, attempt to pick up the 1959 Martin guitar, nor
17 did COBAIN or HAMILTON ask SILVA to give back the 1959 Martin guitar COBAIN had
18 given him.
19
20

21 45. Following COBAIN's February 12, 2016 departure, SILVA remained at the Curson Avenue
22 home. Despite the fact that COBAIN filed for divorce on March 14, 2016, the couple hung out
23 casually on a handful of occasions in March and April 2016. Between March and mid-May
24 2016 COBAIN and SILVA began peacefully discussing an amicable resolution regarding
25 COBAIN's desire for a divorce. Each expressed to the other they preferred not to involve
26 attorneys. During these discussions, including an April 2016 hours-long discussion at the
27 couple's Curson Avenue residence, COBAIN walked through the residence thoroughly
28

1 combing through her belongings and ultimately removing various items. COBAIN removed so
2 many items that she needed SILVA's help carrying them to his car and placing them in the
3 trunk. Thereafter SILVA and COBAIN drove to COBAIN's new residence and unloaded the
4 items placing them in the entryway of her new home. While picking up and removing items
5 from the Curson Avenue residence COBAIN never attempted to repossess the 1959 Martin
6 guitar, nor did she ask SILVA to give it back to her.
7

8
9 46. Following COBAIN's April 2016 walkthrough of the Curson Avenue house, she and SILVA
10 spent the night together in a suite at the Sunset Marquis Hotel. Sometime the next the morning,
11 COBAIN, while sitting with SILVA, called her dissolution attorney, and in a speakerphone
12 conversation personally instructed her attorney to indefinitely hold off on serving SILVA with
13 divorce papers because they were in the process of reaching an amicable resolution without
14 attorneys. Yet, for reasons unknown to SILVA, the attorney had a process server attempt to
15 serve him on May 30, 2016. The process server mistakenly delivered the papers to SILVA's
16 guest, Robin Diaz (hereinafter referred to as DIAZ).
17

18
19 47. After COBAIN left SILVA, the decision to gift him the valuable 1959 Martin guitar became a
20 point of contention with LOVE and her Rottweiler LUTFI who came to regard it as a terrible
21 mistake. Both LUTFI and LOVE were enraged by COBAIN's gifting of the 1959 Martin guitar
22 to SILVA and became obsessed with finding a way to retrieve the guitar from SILVA. LUTFI
23 and LOVE were determined to clean up what they perceived as COBAIN's mess and take back
24 the 1959 Martin guitar from SILVA, which they believed to be in SILVA's possession at the
25 Curson Avenue residence. Weeks after the June 3, 2016 incident, in the presence of Phillip M.
26 Munsey II (hereinafter referred to as MUNSEY), LUTFI and LOVE discussed the guitar's
27 monetary value which they believed to be in the millions. They talked about LOVE's financial
28

1 woes and they talked about how foolish they believed it was for COBAIN to have given SILVA
2 the guitar.

3
4 48. Absent Court order to the contrary, California law provides that a party pending litigation in a
5 dissolution proceeding may remain in the marital home. After COBAIN inexplicably
6 disappeared from the Curson Avenue residence on February 12, 2016, SILVA remained at the
7 residence by himself, with the exception of his young daughter ARLO, who stayed with SILVA
8 several days each week. In contravention of the law, LOVE conspired with LUTFI, BUTLER,
9 and YUKHTMAN, to kidnap SILVA and unlawfully remove him from the Curson Avenue
10 residence by force on June 3, 2016.

11
12 49. LOVE, LUTFI, BUTLER, and YUKHTMAN also conspired to illegally take possession of the
13 1959 Martin guitar COBAIN had given to SILVA as a gift. Despite the passage of nearly four
14 months between her February 12, 2016 departure and the June 3, 2016 attack, COBAIN did not
15 communicate or express her desire and/or intent to repossess the 1959 Martin guitar in any
16 petition, dissolution action, informal settlement conference, text message, or email
17 communication. It was not until after LOVE, LUTFI, BUTLER, and YUKHTMAN failed to
18 unlawfully and forcibly take possession of the 1959 Martin guitar on June 3, 2016 that it first
19 arose as a point of contention in the dissolution case.

20
21 50. Another act in furtherance of the conspiracy to murder SILVA and thereby gain possession of
22 the 1959 Martin guitar and end any claims SILVA had to the Curson Avenue house, the
23 Willoughby Trust, and spousal support occurred when LOVE, LUTFI, BUTLER, and
24 YUKHTMAN hacked SILVA's iMessage account and sent out messages making it appear that
25 SILVA was despondent and on a mental precipice contemplating suicide. This was part of the
26
27
28

1 plan to thereafter commit a home invasion, kidnap SILVA, murder him, make it appear to be a
2 suicide, and recover the 1959 Martin guitar. Such a suicide narrative was not without precedent,
3 nor was it newly employed against SILVA. Foundation for what would become a central
4 component of the conspirators' plan had been laid as early as nine months prior to June 3, 2016.
5 In a September 2015 text conversation with Lindsey (hereinafter referred to as LINDSEY)
6 COBAIN wrote, "Isaiah doesn't count he's just a black cloud but he sure as hell knows how to
7 scare the shit out of me he's selling everything he owns and asked John three times now
8 where/how to get a gun... if he kills himself I'm bringing him back from the dead so I can kill
9 him tho I wouldn't have to get a postnuptial or deal with lawyers... KIDDING I'm just
10 KIDDING...." SILVA was not, in fact, suicidal and COBAIN's messages were contrivances
11 aimed at making SILVA appear unhinged. In expressing concern over SILVA inquiring about a
12 firearm, COBAIN cynically wove a deception around a three year old event that she stripped of
13 context, mischaracterized, and portrayed as contemporaneous. The conspirators ultimately built
14 upon this foundation to make SILVA's "suicide" seem plausible. ATTACHED HERETO,
15 MARKED AS EXHIBIT 12 COLLECTIVELY, AND INCORPORATED HEREIN AS IF SET
16 OUT AT LENGTH, ARE THE ABOVE REFERENCED TEXT COMMUNICATIONS.
17
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- 21 51. In truth, SILVA's inquiries about firearms occurred three years earlier and had nothing
22 whatsoever to do with suicide. In reality, it was just the opposite. On October 13, 2012, a
23 mentally unstable Nirvana fan, Matthew Galen Rudd also known as "Marc James Franco"
24 (hereinafter referred to as RUDD), broke into COBAIN and SILVA's Curson Avenue house.
25 RUDD laid in wait at the couple's house with the intent of killing SILVA. The LAPD
26 responded and arrested RUDD. It was later discovered that RUDD was in possession of a coded
27 death threat against SILVA. In an effort to strengthen their personal security, COBAIN and
28

1 SILVA updated the house's alarm system, bought a dog, and explored the idea of obtaining a
2 defensive weapon. COBAIN and SILVA talked about and considered both lethal and non-lethal
3 weapons before ultimately concluding that a non-lethal option was best suited for their needs.
4 However, prior to settling on a non-lethal alternative, SILVA and COBAIN briefly considered
5 obtaining a firearm. COBAIN's new assistant, HAMILTON, mentioned the fact that his brother
6 was a police officer and was looking to sell a few of his guns. On a handful of occasions,
7 SILVA and HAMILTON discussed the idea of SILVA and COBAIN purchasing one of
8 HAMILTON's brother's firearms. After dismissing the idea of a lethal weapon, the notion of
9 obtaining a firearm was dropped and SILVA never revisited the issue.
10
11

- 12 52. In late May 2016 SILVA received several frantic text messages from his friend, Simon S.
13 Bennett (hereinafter referred to as BENNETT), imploring SILVA not to commit suicide.
14 Unknown to SILVA at the time, BENNETT had received iMessages, seemingly from SILVA,
15 indicating that he was contemplating suicide. The text messages allegedly sent by SILVA to
16 BENNETT stated "I'm feeling suicidal. Can't take this much longer. I feel awful for the things
17 I've done." BENNETT replied to SILVA and stated "I'll call you in a minute. Don't do
18 anything. Hello? Isaiah. Pick up." This was a shock to SILVA because he had not sent any
19 iMessages to BENNETT from his iPhone or from any other device at the time that BENNETT
20 had received the suicidal iMessages. Even more confounding, SILVA was asleep at the time
21 that the suicidal iMessages were sent to BENNETT. Furthermore, and most importantly,
22 SILVA was not suicidal. BENNETT was able to make contact with SILVA and directly
23 confirmed with him that he had not drafted the suicidal iMessages that BENNETT received,
24 thus confirming SILVA's iMessage had been hacked. Immediately upon confirming SILVA's
25 iMessage had been hacked, BENNETT assisted SILVA in taking security measures to help
26
27
28

1 ensure SILVA's iPhone and other devices were sufficiently protected. ATTACHED HERETO,
2 MARKED AS EXHIBIT 13 COLLECTIVELY, AND INCORPORATED HEREIN AS IF SET
3 OUT AT LENGTH, ARE THE ABOVE REFERENCED TEXT COMMUNICATIONS.
4

5 53. Following the hacked iMessage incident in late May 2016, SILVA became genuinely concerned
6 for his own safety. Based upon his prior conversations with O'CONNOR and what he
7 subsequently came to know about the circumstances surrounding Kurt Cobain's death, SILVA
8 recognized the possible significance of the counterfeit suicide messages. Acting upon this
9 concern, SILVA called the non-emergency line for the LAPD where he was connected with
10 dispatch officer Watson. Upon confirming with dispatch officer Watson that non-emergency
11 calls were recorded, SILVA explained that somebody had attempted to make him appear
12 despondent and suicidal and he informed dispatch officer Watson that if anything happened to
13 him to look into LUTFI and LOVE. This conduct follows a disturbingly similar pattern and
14 course of conduct to the modus operandi of LUTFI in the harassment cases of Samuel Barth v.
15 Osama Lutfi BS 128349 LASC, Deborah Barth v. Osama Lutfi BS128351 LASC, Daniel
16 Haines v. Osama Lutfi 07NL02915 OCSC, and Daniel Haines v. Osama Lutfi 07NL02063
17 OCSC. ATTACHED HERETO, MARKED AS EXHIBIT 14 COLLECTIVELY, AND
18 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE COPIES OF THE ABOVE
19 REFERENCED RESTRAINING ORDERS AND DECLARATIONS.
20
21
22

23 54. Beginning on or about May 31, 2016, and continuing for several days, LUTFI and LOVE
24 directed a barrage of menacing text messages, telephone calls and tweets to SILVA's friend and
25 bandmate DIAZ. DIAZ, a studio and touring musician with a twenty-year career in the music
26 industry, had been previously hired by LOVE to play drums and tour in LOVE's band. DIAZ
27 had also been hired to play drums for LOVE's friend, former writing partner, and ex-boyfriend,
28

1 Billy Corgan (hereinafter referred to as CORGAN) of the Smashing Pumpkins. Turning DIAZ
2 against SILVA was critical to the Defendants' plan, because LOVE and LUTFI knew that
3 DIAZ had been recording with SILVA and was very recently at the Curson Avenue house with
4 SILVA. LOVE and LUTFI believed that DIAZ could provide them with the alarm and gate
5 codes as well as information about when SILVA was alone at the Curson Avenue house. In
6 addition, DIAZ was one of the few people, not already aligned with LOVE and LUTFI, who
7 had socialized with SILVA in-person over the days immediately preceding June 3, 2016. As a
8 result, DIAZ had contemporaneous first-hand knowledge of SILVA's true state of mind, which
9 conflicted with the suicide narrative LOVE and LUTFI had gone to great lengths to cultivate.
10

11
12 55. LUTFI relentlessly threatened and harassed DIAZ stating: "Robin be smart... you've got your
13 own family to protect and future and career and he (SILVA) isn't going to provide that for you.
14 Robin, listen to me. You're playing games and I will target you... I'm pulling you into this...
15 You have no clue what hell you're facing... sacrifice your entire future for Isaiah. smart choice
16 buddy, very smart that's right, hang up like a pussy. Make the right choice or live in hell, you
17 decide... You're making the worst choice of your life right now... both CL (LOVE) and Billy
18 (CORGAN) are contacting everyone in this town... going to dedicate this entire day to making
19 sure we've spoken to everyone. Is that what you want???... Do not relay anything to anyone.
20 Give me the cell number Isaiah is currently using I'm not asking again." LOVE likewise
21 threatened DIAZ stating: "I'm going to spend every dime I have and all the energy in the world
22 to put you behind bars along with your best friend. Calls are being made. You will never work
23 again in this town I promise you this." "You're about to set forth on a journey of serious pain."
24 "You chose the wrong side... you just walked straight into hell and you'll pay eternally."
25
26
27

28 ATTACHED HERETO, MARKED AS EXHIBIT 15 COLLECTIVELY, AND

1 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE THE ABOVE
2 REFERENCED TEXT COMMUNICATIONS.

- 3
4 56. In a telephone conversation during the last week of May 2016, LUTFI attempted to manipulate
5 DIAZ by claiming that SILVA was under investigation by the Federal Bureau of Investigation
6 (FBI) and that DIAZ, as a consequence of his friendship with SILVA, was likewise under FBI
7 investigation. LUTFI then offered to broker a meeting between DIAZ and the FBI in exchange
8 for DIAZ pledging his allegiance to COBAIN in regard to the Cobain v. Silva divorce case.
9 Thereafter, on June 3, 2016, during the home invasion and kidnapping at the Curson Avenue
10 residence, LUTFI, BUTLER and YUKHTMAN aggressively insisted to SILVA that he was
11 under investigation by the FBI and that DIAZ had already cooperated with the FBI as a display
12 of his loyalty and support of COBAIN.
13
14
- 15 57. DIAZ, distressed by the barrage of threats LUTFI and LOVE directed at him, his wife Lisa
16 (hereinafter referred to as LISA), and his career, reluctantly called LUTFI and, on the evening
17 of June 2, 2016, DIAZ and LISA drove to LUTFI's Caswell Avenue residence in Mar Vista
18 hoping to reason with LUTFI and LOVE and resolve whatever it was that incited their hostility.
19
- 20 58. DIAZ and LISA met with LUTFI at his Caswell Avenue residence in Mar Vista. LUTFI asked
21 DIAZ to give him the security code for the alarm system at the Curson Avenue residence where
22 SILVA lived. DIAZ informed LUTFI that he was unaware of the security code for the alarm
23 system to the Curson Avenue residence where SILVA lived. LUTFI then attempted to secure
24 DIAZ's cooperation in conspiring against SILVA by offering him a monetary bribe. When
25 DIAZ did not respond favorably to the bribe, LUTFI asked, "Don't you need money?" and then
26 attempted to bribe DIAZ with professional favors from COBAIN and LOVE that would
27
28

1 advance DIAZ's music career by way of their connections in the music industry. This was the
2 same tactic that LUTFI would use after the June 3, 2016, home invasion and kidnapping at
3 SILVA's Curson Avenue residence, in order to temporarily manipulate and silence MUNSEY.
4

5 59. After the June 3, 2016, home invasion and kidnapping at the Curson Avenue residence, DIAZ
6 called the SILVA family home and spoke to SILVA's sister, Summer Silva (hereinafter referred
7 to as SUMMER). DIAZ told SUMMER that "they" had threatened to kill LISA, and that was
8 the reason he had "given up" SILVA - a claim that DIAZ has since repeated. Due to LUTFI and
9 LOVE's threats, DIAZ has become extremely concerned about his career.
10

11 60. On, or about June 2, 2016, with the objective of stealing the 1959 Martin guitar from SILVA,
12 forcing him from the Curson Avenue home, and ending SILVA's potential legal claims to the
13 Curson Avenue property, Willoughby Trust, and spousal support, Defendants LOVE, LUTFI,
14 BUTLER, and YUKHTMAN set in motion the final act of their conspiracy to burglarize,
15 kidnap, rob, and murder SILVA.
16

17
18 61. Just after midnight on June 3, 2016 YUKHTMAN drove LUTFI and BUTLER to the Curson
19 Avenue house in a black Cadillac Escalade. Dressed in dark clothing, LUTFI, YUKHTMAN,
20 and BUTLER entered onto the property. The property surrounding the Curson Avenue
21 residence, including the backyard, was protected by several tall gates, each of which required an
22 access code to enter. It is unknown how LUTFI, BUTLER, and YUKHTMAN were able to gain
23 access through the locked gates, but after getting past the gates, they approached a set of glass-
24 paned double doors located on first floor to the rear of the property. LUTFI, YUKHTMAN, and
25 BUTLER used a rock to break the glass adjacent to the locking mechanism in one of the doors
26 and made entry into the residence. YUKHTMAN and BUTLER rushed with LUTFI up the
27
28

1 interior stairway to the second floor where LUTFI approached the master bedroom door.
2 ATTACHED HERETO, MARKED AS EXHIBIT 16 COLLECTIVELY, AND
3 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE PHOTOGRAPHS OF THE
4 BROKEN GLASS DOOR AS REFERENCED ABOVE.
5

6 62. At this time, SILVA and his bandmate, MUNSEY, were watching the movie "The Brothers
7 Grimsby" in the upstairs master-bedroom at the Curson Avenue residence when they heard
8 noises emanating from the first floor. SILVA initially thought the noise was made by his cats
9 and paused the movie so he and MUNSEY could listen more intently. The noises were closely
10 followed by a crashing sound and the home's alarm system activated and began blaring
11 throughout the residence. SILVA and MUNSEY were distressed by the sound of footsteps
12 racing up the stairway. ATTACHED HERETO, MARKED AS EXHIBIT 17, AND
13 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, IS THE DETAILED (ALARM)
14 ACTIVITY REPORT.
15
16

17 63. LUTFI pounded loudly on the locked master bedroom door while he, BUTLER, and
18 YUKHTMAN yelled that they were police officers with the Los Angeles Police Department
19 (hereinafter referred to as LAPD), they repeatedly yelled, "Police open up!" "LAPD, open the
20 fucking door!". Impersonating police officers, LUTFI, YUKHTMAN, and BUTLER ordered
21 SILVA to open the locked door.
22
23

24 64. SILVA and MUNSEY watched in astonishment as someone began violently shaking the door
25 handle and incessantly pounding on the locked master-bedroom door. Confused and in shock,
26 SILVA and MUNSEY hesitated and did not immediately open the locked master-bedroom
27 door. The delay seemed to enrage the "police officers" and they screamed at SILVA that he had
28

1 just seconds to open the door and that the longer he waited the worse it would be for him. In
2 compliance with what he thought to be an order from law enforcement officers, SILVA began
3 to slowly open the locked master-bedroom door. As he did so, the door was flung open
4 revealing three imposter policemen, LUTFI, BUTLER, and YUKHTMAN. Before SILVA
5 could react, LUTFI seized him and violently dragged him from the bedroom. With obvious
6 surprise, LUTFI saw that SILVA was not alone. It was apparent from his reaction that LUTFI
7 expected SILVA to be alone at the Curson Avenue residence. LUTFI screamed at MUNSEY
8 ordering him to leave the house.
9

- 10
11 65. The Curson Avenue house Detailed (Alarm) Activity Report for the early morning hours of
12 June 3, 2016, confirms that the home invasion began at approximately 12:20 a.m. The alarm
13 report further indicates that the point of entry was the "rear door." The fact that LUTFI later
14 claimed to the LAPD investigating officers that he had been given the key to the front door of
15 the Curson Avenue house by COBAIN prior to the home invasion, suggests that breaking and
16 entering through the rear glass door was a ruse intended as a forensic counter-measure to make
17 it appear as though the kidnapping was committed by random individuals unfamiliar to SILVA
18 or COBAIN. COBAIN has consistently maintained that she never gave LUTFI a key to the
19 Curson Avenue residence.
20
21
22 66. As LUTFI forced a stunned SILVA onto the stairwell, he continued screaming at MUNSEY and
23 threatened him with bodily harm if he did not leave the house. MUNSEY complied with
24 LUTFI's orders and YUKHTMAN and BUTLER returned to the first floor in order to escort
25 MUNSEY to the front door. Once at the door, YUKHTMAN and BUTLER pushed MUNSEY
26 out and closed the door behind him. As MUNSEY was exiting, he looked back and saw LUTFI
27 violently assaulting SILVA on the landing of the stairs near the bathroom. As SILVA struggled
28

1 with LUTFI, he repeatedly screamed for MUNSEY to call the police.

2
3 67. Once the front door to the residence was closed, LUTFI, who was engaged in a one-on-one
4 physical altercation with SILVA on the stairway landing, summoned BUTLER and
5 YUKHTMAN to help him subdue SILVA. YUKHTMAN and BUTLER rushed to the stairway
6 landing near the bathroom where they joined LUTFI in assaulting SILVA. Ultimately, the three
7 intruders were able to overpower SILVA. As BUTLER held one arm and YUKHTMAN the
8 other arm, they pinned SILVA against a wall. While SILVA continued his efforts to free
9 himself from BUTLER and YUKHTMAN's grip, LUTFI told BUTLER to take the telephone
10 from SILVA's hand, "Grab his phone! Grab his phone!" BUTLER seized the iPhone as well as
11 SILVA's wallet and identification card, all of which SILVA had been clutching in his left hand.
12 As BUTLER took SILVA's wallet and iPhone, LUTFI crudely searched SILVA by patting his
13 pants down. LUTFI then moved his face to within inches of SILVA's face, grabbed SILVA's
14 genitals through his pants, and whispered to SILVA, "Listen faggot, calm the fuck down or
15 we'll drag you upstairs and take turns fucking you." In fear for his life, SILVA, tried to appear
16 calm and cooperative. However, LUTFI, BUTLER and YUKHTMAN, continued to threaten
17 him and physically removed SILVA from his Curson Avenue residence against his will.
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21 68. The three intruders, LUTFI, BUTLER, and YUKHTMAN placed their hands under SILVA's
22 arms and dragged him out of his home. Once SILVA was outside LUTFI, BUTLER and
23 YUKHTMAN physically forced SILVA into the back seat of a strategically parked black
24 Cadillac Escalade waiting directly outside of the Curson Avenue residence's front gate.
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26 69. As MUNSEY was being forced from the Curson Avenue residence by BUTLER and
27 YUKHTMAN, he heard SILVA's desperate pleas for help and called 9-1-1. MUNSEY reported
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1 the home invasion and kidnapping in progress to a 9-1-1 operator at 12:24 a.m. While on the
2 phone with the 9-1-1 operator, MUNSEY watched as LUTFI, BUTLER, and YUKHTMAN
3 kidnapped SILVA, physically forcing him into the black Cadillac Escalade. MUNSEY managed
4 to get into his own vehicle and drove a short distance down Curson Avenue ahead of the
5 Cadillac Escalade while still speaking to the 9-1-1 operator. MUNSEY used his car to block the
6 narrow canyon road in an attempt to prevent the Cadillac Escalade from reaching Hollywood
7 Boulevard and escaping with SILVA. MUNSEY's 9-1-1 emergency call was recorded and has
8 subsequently been authenticated. ATTACHED HERETO, MARKED AS EXHIBIT 18, AND
9 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, IS THE TRANSCRIPT OF
10 MUNSEY'S CALL TO 9-1-1.
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13 70. The Curson Avenue residence is located near the top of a dimly lit narrow dead-end canyon
14 road with only one way in and one way out. As the black Cadillac Escalade, with
15 YUKHTMAN behind the wheel and SILVA restrained by LUTFI in the back seat, made its
16 escape down Curson Avenue, it encountered MUNSEY's vehicle parked across the road
17 blocking their escape. The black Cadillac Escalade came to a stop and the three kidnapers
18 shouted from the Escalade and initiated a conversation with MUNSEY as he spoke to the 9-1-1
19 operator. From inside the Escalade, LUTFI spoke with MUNSEY and learned that the LAPD
20 was responding to their location. Within minutes, an LAPD helicopter was overhead and police
21 cars rushed into the area. At this point, MUNSEY moved his car which cleared the way for the
22 black Cadillac Escalade to proceed toward the police cars. Approximately ninety minutes after
23 leaving the scene, MUNSEY texted SILVA's parents and alerted them of the home invasion
24 and kidnapping of their son. ATTACHED HERETO, MARKED AS EXHIBIT 19, AND
25 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, IS THE ABOVE REFERENCED
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TEXT COMMUNICATION.

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71. The scene on Curson Avenue was chaotic as the black Cadillac Escalade reached the lower section of Curson Avenue near Wattles Park. Bright lights lit up the cabin of the black Cadillac Escalade, police cars barricaded the narrow canyon road sealing off the exit, and a police helicopter circled loudly overhead. An LAPD officer spoke over a loudspeaker and ordered YUKHTMAN to stop the vehicle. Thereafter, the occupants of the parked black Cadillac Escalade were ordered to roll all of the vehicle's windows down, place their hands outside of the windows, and the three kidnapers, LUTFI, BUTLER, and YUKHTMAN, and their victim, SILVA, were ordered to exit the vehicle one by one and walk down Curson Avenue toward the police officers stationed near Wattles Park.
72. While LUTFI, BUTLER, YUKHTMAN, and SILVA still occupied the black Cadillac Escalade, LUTFI hurriedly concocted a false story intended to prevent LAPD from arresting them. In order to ensure that SILVA went along with the false narrative, LUTFI threatened the lives of SILVA's family and seven-year-old daughter ARLO. LUTFI threatened SILVA stating SILVA and his family would suffer dire consequences and he would be sacrificing his life and his family members' lives if he failed to convincingly relay the fake story to the police officers at the scene, and if he ever revealed the truth about the home invasion, assault, and kidnapping in the future. LUTFI menaced SILVA telling him to think long and hard about his family, specifically his young daughter ARLO. LUTFI went on to tell SILVA that he had surreptitiously gathered information about ARLO and knew where ARLO lived, where she went to school, her teacher's name, her school schedule, and which days ARLO spent with SILVA during the week. LUTFI also warned SILVA that he, LOVE, and COBAIN owned the judicial system, the LAPD, and the media, so no one would believe SILVA. LUTFI's threats

1 regarding ARLO achieved their intended result and overrode SILVA's sense of self
2 preservation. In shock and fearing for his life and the lives of his family and daughter, SILVA
3 agreed to go along with LUTFI's false narrative and told the responding officers what LUTFI
4 told him to say. SILVA told the officers that LUTFI, YUKHTMAN, and BUTLER were old
5 college friends of his from out of town and the kidnapping had been a prank intended to surprise
6 SILVA. The prank was misconstrued by MUNSEY who was not familiar with LUTFI,
7 YUKHTMAN, and BUTLER, which led him to place the 9-1-1 emergency telephone call.

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10 73. Were it not for the intervention of MUNSEY and the LAPD, it is believed, based upon facts and
11 evidence, that SILVA would have been taken to a secondary crime scene and murdered on June
12 3, 2016. As previously described in this complaint, LUTFI, LOVE, and their coconspirators
13 went to great lengths to create the impression that COBAIN's soon to be ex-husband (SILVA)
14 was depressed, drug addicted, on the brink of committing suicide, and had recently inquired
15 about where to obtain a firearm. An eerily familiar scenario when taken in the light of persistent
16 suspicions of LOVE's involvement in the alleged suicide of her own soon to be ex-husband
17 Kurt Cobain, who had also been characterized (by LOVE) as depressed, drug addicted, suicidal,
18 and recently in possession of a firearm.

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21 74. Having spoken candidly with Kurt Cobain's mother, O'CONNOR, on several prior occasions,
22 SILVA was keenly aware of the disturbing correlations between his circumstances and those of
23 O'CONNOR's late son. Over the course of several conversations between O'CONNOR,
24 SILVA, and SILVA's family members in 2015, O'CONNOR confided that she believed LOVE
25 to be involved in the alleged suicide of her son, Kurt Cobain. O'CONNOR, provided a detailed
26 account of what led her to this conclusion which included information about how LOVE
27 behaved leading up to and after Kurt Cobain's death. During one of their 2015 conversations,
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1 O'CONNOR told SILVA and MARY that, shortly after Kurt Cobain's death, she and LOVE
2 were talking in the kitchen of the Washington home where Kurt Cobain had died. When
3 O'CONNOR began to question the facts surrounding her son's alleged suicide. O'CONNOR
4 said that LOVE became angry and threatened O'CONNOR's daughter, Brianne O'Connor,
5 saying, "Shut up, or she's next." O'CONNOR told SILVA and SILVA's mother, MARY, that
6 Kurt Cobain had filed for divorce from LOVE shortly before his death and had initiated the
7 process of cutting LOVE out of his last will and testament. On the same day that she threatened
8 O'CONNOR, LOVE threw Kurt Cobain's divorce papers into the fire and declared to
9 O'CONNOR, "Everything's mine." O'CONNOR also told SILVA and SILVA's family
10 members that she was dissatisfied with the recent documentary "Montage of Heck," about her
11 late son, and said that she felt manipulated by the film's director, LOVE, and COBAIN for
12 forcing her to participate in the film, which O'CONNOR claimed was a vindication project for
13 LOVE. Consequently, O'CONNOR asked to have her scenes taken out of the film prior to its
14 release, but her request was denied by the film's director, LOVE, and COBAIN. O'CONNOR
15 told the Silvas that she favored a contemporaneously released documentary, "Soaked in
16 Bleach," which advanced the theory that Kurt Cobain's death was murder, not suicide, and that
17 LOVE was a coconspirator in his murder. O'CONNOR implored SILVA and his family to
18 watch "Soaked in Bleach."
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- 23 75. The memory of his conversations with O'CONNOR regarding her belief that LOVE was
24 directly involved in the staged suicide of her late son, Kurt Cobain, and the detailed account
25 O'CONNOR gave thereof, in conjunction with what had occurred at the Curson Avenue house
26 on June 3, 2016 put SILVA in even greater fear for his life and the lives of his family. The
27 crimes committed against SILVA by conspirators LOVE, LUTFL, BUTLER, and
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1 YUKHTMAN, caused SILVA great anxiety and emotional distress.

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3 76. Prior to June 3, 2016, SILVA also became aware of LUTFI's notorious reputation through
4 employees of Black Box Security, who described LUTFI as a shady fixer orbiting around the
5 fringe of celebrity culture where it is alleged that LUTFI harassed multiple celebrities, most
6 notably, Brittany Spears and the Spears family.
- 7
8 77. Once the LAPD left the scene where LUTFI, YUKHTMAN, BUTLER, and SILVA had been
9 contacted on Curson Avenue, SILVA, still acting under the threats made to him and against his
10 family, got back into the black Cadillac Escalade as ordered by LUTFI. YUKHTMAN then
11 drove them all back to the Curson Avenue residence where the three men held SILVA hostage
12 for several hours.
- 13
14 78. Concentrating on forcing SILVA to disclose the location of the 1959 Martin guitar, LUTFI
15 incessantly threatened and demeaned SILVA declaring SILVA deserved a bullet to the head and
16 to be put in the ground. LUTFI also told SILVA that he was going to make him the most hated
17 person in Hollywood and that he, LOVE, and COBAIN were working to destroy his decade-
18 long career in music. LUTFI informed SILVA that they had already started the process by
19 contacting various DJs at KROQ and ALT 98.7 in Los Angeles that SILVA had a working
20 relationship with. LUTFI said that the DJs were told by LOVE and COBAIN to boycott
21 SILVA's band. Taking aim again at SILVA's daughter, LUTFI claimed he was going to go
22 straight from SILVA's Curson Avenue residence that morning to ARLO's residence and make
23 sure that SILVA never saw her again implying he was going to kidnap and/or kill her. LUTFI
24 told SILVA that they, the conspirators, had "bugged" SILVA's home and had been recording
25 him at home for the past nine months. LUTFI told SILVA that he should just give in to them
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1 now because they, LUTFI and his coconspirators, had the means and influence to carry out his
2 threats without being held legally accountable.

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4 79. Eventually, LUTFI ordered BUTLER and YUKHTMAN to exit the home and directed them to
5 stand guard outside. Once alone with SILVA inside the Curson Avenue house, LUTFI's
6 behavior became erratic. One minute LUTFI was offering SILVA bribes in order to obtain the
7 1959 Martin guitar, and the next minute he would return to threatening violence against SILVA
8 and SILVA's family if SILVA did not give him the guitar. As before, LUTFI predominantly
9 focused his threats on SILVA's young daughter ARLO. In an effort to end his captivity and stop
10 LUTFI's threats, SILVA told LUTFI that he had been recording with his band, The Eeries, at
11 the Village Recorder in Santa Monica from May 30, 2016 to June 1, 2016. SILVA explained
12 that, because they had been in recording sessions, many of his guitars were displaced from
13 where they were generally stored. SILVA told LUTFI that this included the 1959 Martin guitar
14 that was given to him by COBAIN years earlier.

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17 80. Over the next few hours, LUTFI came to realize that he would not be able to take possession of
18 the 1959 Martin guitar at that time. This angered LUTFI and his behavior became even more
19 threatening. LUTFI then rummaged through SILVA's personal mail, opened several items, and
20 ultimately stole SILVA's mail from the Curson Avenue residence.

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23 81. While holding SILVA captive, LUTFI recognized that being identified by MUNSEY and
24 contacted by the LAPD made arrest and prosecution near certainties should SILVA be found
25 dead. LOVE, LUTFI, BUTLER, and YUKHTMAN abandoned their original plan to murder
26 SILVA and set about extorting him into signing a settlement agreement crafted to accomplish
27 the original objectives of their conspiracy without necessitating SILVA's murder. In order to
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1 accomplish this, LOVE's attorney, Marc GANS, joined the conspiracy and LOVE, LUTFI,
2 BUTLER, YUKHTMAN, and GANS conspired and acted in concert to falsely imprison SILVA
3 and extort him into signing the aforementioned settlement agreement.
4

5 82. Toward this end, LUTFI continued to threaten SILVA and told him he was in communication
6 with COBAIN's attorneys and Attorney GANS. LUTFI walked between SILVA and the
7 adjacent room speaking on his phone and texting obsessively. Several minutes later, LUTFI
8 held out his phone and briefly showed SILVA written communications that he claimed were
9 from the attorneys. LUTFI told SILVA that the attorneys provided him with a divorce
10 settlement agreement which required that SILVA agree to seven terms. Chief among them were
11 that SILVA agree to surrender ownership of the 1959 Martin guitar and any claim he may have
12 to the Curson Avenue home, Willoughby Trust, and spousal support from COBAIN. In
13 addition, LUTFI said that the agreement required that SILVA surrender, to him, all photographs
14 and recordings of COBAIN that SILVA accumulated during their dating relationship and
15 marriage. LUTFI asserted that the agreement was drafted by COBAIN's lawyers and said he
16 was under orders to have SILVA sign the document "a.s.a.p." with LUTFI acting as the witness.
17 Notwithstanding the fact that the value of the 1959 Martin guitar and SILVA's other potential
18 marital claims amounted to millions of dollars, LUTFI told SILVA that he had convinced
19 LOVE and COBAIN to allow SILVA one hundred and twenty thousand dollars (\$120,000).
20 LUTFI told SILVA that if he signed an agreement with these terms, he, YUKHTMAN, and
21 BUTLER would leave him in peace and no harm would come to SILVA's family.
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26 83. From that point forward, LUTFI's threats and intimidation shifted focus entirely from the 1959
27 Martin guitar to extorting SILVA into agreeing to the aforementioned terms and coercing
28 SILVA into signing a settlement agreement replicating those terms. LUTFI relentlessly

1 threatened and menaced SILVA for hours, focusing his threats, as before, on SILVA's family,
2 specifically ARLO, as leverage to bend SILVA to his will. LUTFI reiterated that SILVA's
3 entire family would suffer dire consequences if he failed to sign the agreement.
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5 84. After hours of unremitting threats and abuse, LUTFI told SILVA that he was tired and needed
6 to sleep. However, before leaving the Curson Avenue house, LUTFI demanded that SILVA
7 give him his computer. LUTFI told SILVA that he needed to smash the computer hard drive so
8 that he could present it to LOVE and COBAIN to show them that he had at least destroyed all
9 of SILVA's photographs and recordings of COBAIN.
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11 85. Just before dawn on June 3, 2016, LUTFI, BUTLER, and YUKHTMAN left the Curson
12 Avenue residence. As LUTFI left he got in SILVA's face and told him that he needed to
13 cooperate and sign the settlement agreement or they would make good on their threats and come
14 after SILVA and his family even harder than they had that night, referring to the home invasion,
15 assault, robbery, and kidnapping. Capitalizing on the atmosphere of threats, fear, and
16 intimidation he had created, LUTFI ordered SILVA to remain at his Curson Avenue residence
17 until the agreement was delivered to him and he signed it. LUTFI further directed SILVA to
18 respond immediately to any subsequent communications regarding the agreement. LUTFI told
19 SILVA that he would post one of his men outside of the Curson Avenue house to be sure
20 SILVA did not leave. Terrified, SILVA did as he was ordered and remained imprisoned at the
21 Curson Avenue house fearing that, if he were to leave or fail to sign the agreement, LUTFI
22 would make good on the threats he made against him, ARLO, and SILVA's family.
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26 86. At approximately 8:00 a.m. on June 3, 2016, SILVA's mother, MARY, read the text message
27 that MUNSEY had sent to her earlier that morning. The text informed MARY that LUTFI had
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1 broken into SILVA's Curson Avenue residence with two other men. MARY, and SILVA's
2 sister, SUMMER, frantically drove from Orange County to Los Angeles to pick up SILVA and
3 take him to safety. Upon arriving at SILVA's Curson Avenue residence in West Hollywood,
4 MARY found her son in shock, hardly able to speak, and immobilized by fear. SILVA, heeding
5 the orders given to him by LUTFI and paralyzed by the fear that LUTFI would make good on
6 his threats, refused to leave his Curson Avenue residence. At some length, MARY succeeded in
7 convincing SILVA to take refuge with his family in Orange County. SILVA was so shaken and
8 spent that he was unable to drive. Consequently, MARY drove SILVA in his own car to Orange
9 County while SUMMER raced to pick up ARLO, who was at her Willoughby Avenue house,
10 and take her to Orange County.
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13 87. Later that evening LUTFI, in the belief that SILVA was still imprisoned at the Curson Avenue
14 house awaiting the agreement, sent SILVA a screenshot of a text exchange between himself and
15 GANS that occurred minutes earlier, between 9:36 and 9:45 p.m. In the text message exchange,
16 LUTFI asks GANS if he can release SILVA. GANS responds telling LUTFI that he should wait
17 until the agreement was completed and SILVA signed it, "...so everything can be finalized
18 first." It is evident from the text messages that GANS was not only aware that SILVA was
19 being held against his will at the Curson Avenue house, but that he (GANS) was directing
20 LUTFI's actions and making the decision as to whether SILVA would remain a prisoner or be
21 permitted to leave. As evidenced by the text exchange, GANS intended for SILVA to remain a
22 prisoner until he conceded to their extortion demands and signed away, among other things, the
23 1959 Martin guitar and any rights he may have had to the Curson and Willoughby Avenue
24 properties. ATTACHED HERETO, MARKED AS EXHIBIT 20 COLLECTIVELY, AND
25 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE THE ABOVE
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REFERENCED TEXT COMMUNICATIONS.

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3 88. Over the course of the next twenty-four hours LUTFI continuously badgered SILVA with text
4 messages, which pressed him to sign the agreement and reinforced his earlier threats against
5 SILVA's life, "this agreement is your one and only choice, consider it your lifeline." Later
6 during this period, LUTFI shifted from direct threats of physical violence to threats of civil law
7 suits, baseless felony criminal charges, and vague references to SILVA and his family being the
8 targets of a Federal investigation over which LOVE and COBAIN exercised control. LUTFI
9 repeatedly and falsely asserted that SILVA had engaged in criminal conduct and that LUTFI,
10 LOVE, and GANS would criminally prosecute SILVA if he did not sign their "MOU"
11 settlement agreement. LUTFI described the settlement agreement as SILVA's "get out of jail
12 card." SILVA, still in a state of shock and anxious fear after the home invasion, assault,
13 kidnapping, and threats against him and his family, believed LUTFI capable of carrying out his
14 threats, to include filing false criminal charges against him. SILVA felt the safest move for him
15 was to foster LUTFI's mistaken belief that he was still a prisoner at the Curson Avenue house
16 and adopt an exceedingly agreeable and cooperative tone with LUTFI. SILVA hoped that by
17 appearing acquiescent and friendly to LUTFI it would keep him from harming SILVA or
18 SILVA's family. Perceiving that he had broken SILVA, LUTFI took on the absurd facade of
19 someone who was actually protecting and advocating for SILVA against LOVE, COBAIN's
20 attorneys, and GANS. In his new guise LUTFI sent dozens of text messages to SILVA claiming
21 that he had calmed LOVE down and that he was negotiating for SILVA to be allowed to sign
22 the agreement versus having LUTFI's threats carried out against him. LUTFI made several
23 attempts to coerce SILVA into meeting with him to sign the agreement. When SILVA failed to
24 respond as he wanted, LUTFI's texts became more threatening and manipulative. ATTACHED
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1 HERETO, MARKED AS EXHIBIT 21 COLLECTIVELY, AND INCORPORATED HEREIN
2 AS IF SET OUT AT LENGTH, ARE THE ABOVE REFERENCED TEXT
3 COMMUNICATIONS.
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5 89. With LUTFI having no success extorting SILVA into signing the agreement, GANS took action
6 and at 11:28 p.m. on Saturday, June 4, 2016, GANS emailed a copy of an agreement to
7 SILVA's family law attorney. The agreement was identical in content to that described by
8 LUTFI as he held SILVA captive at the Curson Avenue house in the early morning hours of
9 June 3, 2016. The agreement was attached to an email that read, "Douglas: I represent Frances
10 Cobain's mother, Courtney Love Cobain. Neil Freedman was unavailable tonight due to a prior
11 commitment, so I assisted in finalizing the attached memorandum of understanding that he
12 prepared. Please return a fully executed copy as soon as possible. Thank you. Best, Marc."
13 While GANS euphemistically referred to the agreement as a "Memorandum of Understanding,"
14 the irregularity of the document, communications, and events leading up to its presentation belie
15 the truth, that GANS' request for the return of a fully executed copy was, in fact, an extortive
16 demand backed up by LUTFI's threats. The Memorandum of Understanding was simply
17 another link in the chain of illegal acts intended to dispossess SILVA of the 1959 Martin guitar
18 and any lawful claims he had to the Curson Avenue residence, Willoughby Trust, and spousal
19 support. The circumstances and timing of the "Memorandum of Understanding" presented to
20 SILVA and his family law attorney at nearly midnight on a Saturday, further contradict any
21 argument that it is a legitimate settlement agreement as commonly used in family law matters.
22 In addition, the form, structure, and content of the Memorandum of Understanding do not even
23 approximate the recognized legal custom and practice regarding settlement agreements.
24

25 ATTACHED HERETO, MARKED AS EXHIBIT 22 COLLECTIVELY, AND
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1 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE THE ABOVE
2 REFERENCED EMAIL COMMUNICATION AND ATTACHMENT.

3
4 90. Working to tie up loose ends and aware that MUNSEY had witnessed the home invasion,
5 assault, and kidnapping of SILVA at the Curson Avenue residence on June 3, 2016, LUTFI
6 bribed MUNSEY to keep him quiet and secure his loyalty. On June 7, 2016, just four days after
7 MUNSEY witnessed the home invasion, assault, and kidnapping of his friend and bandmate,
8 SILVA, LUTFI moved MUNSEY into his Mar Vista apartment and began paying MUNSEY
9 three thousand dollars (\$3,000) unreported income every month to act as a personal assistant for
10 him, LOVE, and COBAIN. During this period, MUNSEY alternately received his salary
11 payments from LUTFI and LOVE mostly via PayPal. LUTFI further incentivized MUNSEY by
12 arranging for him to receive approximately twenty thousand dollars (\$20,000) in cosmetic
13 dental care, including but not limited to dental implants and veneers. In addition, LUTFI and
14 LOVE used their influence, on at least three occasions, in an effort to help MUNSEY secure
15 employment. MUNSEY had never met LUTFI or LOVE prior to the June 3, 2016 home
16 invasion, assault, and kidnapping of SILVA at the Curson Avenue residence. According to
17 MUNSEY's statement, as part of his personal assistant duties, MUNSEY delivered narcotics
18 and illicit benzodiazepines to COBAIN and LOVE on a daily basis. MUNSEY estimated that he
19 delivered in excess of 1000 Xanax bars per week which were obtained by LUTFI. Xanax bars
20 are 2mg alprazolam pills that are available by prescription only and are classified as a Schedule
21 IV Controlled Substance. This supply model is consistent with the 2013 email exchanges
22 between LUTFI and COBAIN wherein they discuss the delivery of "cookies." It is after the
23 relationship between LUTFI and MUNSEY soured, that MUNSEY confirms he received money
24 and other valuable considerations in exchange for his support of LUTFI and LOVE's
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1 conspiracy against SILVA.

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3 91. Once MUNSEY revealed he no longer wished to be associated with LUTFI, LOVE, and
4 COBAIN, LUTFI contacted MUNSEY and his parents and claimed that MUNSEY was going
5 to jail for credit card fraud and for abusing LUTFI's dogs. LUTFI also threatened to destroy the
6 career of MUNSEY's father, also named Phillip MUNSEY, who is a well-known pastor
7 affiliated with Joel Osteen.
8
- 9 92. In the wake of the conspiracy's failure on June 3 and 4, 2016, and in furtherance of its primary
10 objectives, LUTFI and LOVE embarked on a relentless campaign of threats, intimidation,
11 harassment, and defamation against SILVA, his family, and friends. Members of SILVA's
12 family were surveilled, stalked, menaced, and directly threatened by LUTFI and his agents in
13 both Los Angeles and Orange Counties. In addition, LUTFI sought out witnesses to the
14 criminal acts committed by the conspirators as well as the handful of witnesses with firsthand
15 knowledge that COBAIN had given the 1959 Martin guitar to SILVA as a gift. LUTFI and
16 LOVE attempted to bribe these witnesses with money and professional favors in exchange for
17 false statements in support of COBAIN's claim that the 1959 Martin guitar was not given to
18 SILVA and to support further falsified claims about SILVA in the divorce case. SILVA's
19 family, friends, and those who rejected the bribes offered by LUTFI were harassed, menaced,
20 and threatened with false criminal charges, damage to their careers or employment, and/or
21 bodily harm. LUTFI and LOVE's threats were intended to isolate SILVA, dissuade potential
22 witnesses, and solicit false statements from witnesses with direct knowledge of either the
23 conspiracy, or the fact that COBAIN had given the 1959 Martin guitar to SILVA as a gift. In
24 addition, LOVE, LUTFI and their agents saturated social media and celebrity gossip media
25 organizations with false and defamatory information crafted to cast SILVA in the worst possible
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1 light and discredit any allegations of misconduct on their part.

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3 93. LUTFI and his coconspirators placed SILVA's family home in Orange County under
4 surveillance. Strange vehicles occupied by persons wearing wigs and clown glasses began to
5 appear in the SILVA's quiet neighborhood. The surveillance vehicles would change their
6 license plates before entering the neighborhood and would sometimes be left unoccupied within
7 sight of the SILVA house. Prior to her separation from SILVA, COBAIN once told MARY that
8 when her mother, LOVE, wanted to harass someone she would send people dressed in crazy
9 wigs and large clown glasses because, if the party being harassed called the police, they would
10 be discredited by the outlandish description of the harasser. Members of SILVA's family were
11 often followed when they left the house. In one such occurrence on the evening of June 11,
12 2016, MARY drove from her home to a car dealership nearby. As she drove, two late model
13 Ford sedans without license plates boxed her in from the front and behind. The sedans slowed
14 and began to force MARY to a stop. MARY was able to turn quickly into the dealership and the
15 sedans raced away. MARY was so shaken by the encounter that she filed a report with the
16 Orange County Sheriff's Department (hereinafter referred to as OCSD) – report number 16-
17 140939.
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21 94. LUTFI terrorized SILVA's sister SUMMER through text messages and telephone calls sent
22 from SILVA's iPhone which had been stolen by LUTFI, BUTLER, and YUKHTMAN during
23 the June 3, 2016 home invasion, assault, and kidnapping. In one particularly vicious exchange
24 on June 17, 2016, LUTFI threatened SUMMER's family with criminal prosecution, disparaged
25 SUMMER's "whore mother" and "piece of shit father," and ominously called at 1:15 a.m. to
26 tell SUMMER that he was outside of the SILVA family home and was coming to get her.
27 SUMMER immediately called 9-1-1 and the OCSD responded, secured the area, and took a
28

1 report for criminal threats. ATTACHED HERETO, MARKED AS EXHIBIT 23, AND
2 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, IS THE ABOVE REFERENCED
3 OCSD CRIMINAL THREATS REPORT: 16-147935.
4

5 95. LUTFI sent messages to SILVA's friends in an effort to erode SILVA's credibility regarding
6 the June 3, 2016 kidnapping. LUTFI and LOVE also sent menacing texts to SILVA's family,
7 and SILVA's friends telling them that they, LUTFI, LOVE, and COBAIN had the ability to
8 bring falsified criminal charges against SILVA, SILVA's family, and SILVA's friends.
9

10 96. On June 5, 2016, and June 6, 2016, SULLIVAN was barraged with phone calls and text
11 messages from LUTFI and LOVE. During his June 5, 2016 attempt to bribe witness
12 SULLIVAN, LUTFI stated, "Do you have any idea what type of people you're dealing against?
13 Are you stupid? Be her friend right now. Sign with her. You want a future? She's got money to
14 fucking take care of you and your wife, and your child 'til the day you die." When SULLIVAN
15 rejected the bribe LUTFI switched tactics and attempted to extort SULLIVAN's cooperation.
16 LUTFI became belligerent during his June 6, 2016 call to SULLIVAN and spewed vile hate
17 speech, calling SULLIVAN, a "cunt," a "dyke," a "whore," and a "skinhead." LUTFI bullied
18 SULLIVAN with threats asserting that COBAIN gave him control over her assets and that he
19 would utilize that control to put SULLIVAN in the street and "Your kid will be in an
20 orphanage" and "Do you know who you are dealing with?" ATTACHED HERETO, MARKED
21 AS EXHIBIT 24, AND INCORPORATED HEREIN AS IF SET OUT AT LENGTH, IS THE
22 TRANSCRIPT OF THE ABOVE REFERENCED JUNE 6, 2016 TELEPHONE THREATS.
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26 97. One event in particular illustrates the nature and severity of the intimidation and harassment
27 LUTFI and LOVE subjected SILVA, his family, and friends to following the June 3, 2016
28

1 kidnapping. On June 6, 2016, one of SILVA's closest friends, BENNETT, texted SILVA's
2 mobile phone, which had been forcefully taken from SILVA by LUTFI three days earlier. When
3 BENNETT did not get a response, he drove to the Curson Avenue house and unsuccessfully
4 tried to contact SILVA there. BENNETT returned to his home. Sometime later that day,
5 BENNETT exited his house headed for the Gelson's Market a short distance from his home. As
6 BENNETT exited the house, he was grabbed by the arms and confronted by two large men who
7 physically restrained BENNETT and warned him to stay away from SILVA and COBAIN and
8 to stay out of their dispute. The men ordered BENNETT, "Do not contact Isaiah or Frances ever
9 again, or you'll be sorry." The men then threatened BENNETT, telling him that if he did not
10 heed their warning they would contact his employer at the Chateau Marmont, André Balazs
11 (hereinafter referred to as BALAZS), and have him fired. BENNETT knew that LOVE and
12 COBAIN frequented the Chateau Marmont and that LOVE had great influence over BALAZS
13 with whom she once had a dating relationship. Not realizing that LUTFI had stolen SILVA's
14 phone and was impersonating SILVA in their text exchanges, BENNETT continued to text
15 SILVA's phone. Impersonating SILVA, LUTFI attempted to deceive BENNETT into sending
16 him all of his prior text message traffic with SILVA. LUTFI, in the guise of SILVA, also tried
17 to discredit the notion that he had kidnapped SILVA. BENNETT asked, "Did Lufti (sic) try to
18 remove you from the house?" and LUTFI responded, "Dont listen to Phil." When it became
19 evident to LUTFI that BENNETT no longer believed he was speaking with SILVA, LUTFI
20 threatened BENNETT in the same way the men had earlier at his house, "Simon, you need to
21 back off you hear me? I'm going to have a talk with Mr Balasz (sic) about all this." Weeks later,
22 BENNETT was, in fact, terminated from his job at the Chateau Marmont. ATTACHED
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HERE TO, MARKED AS EXHIBIT 25 COLLECTIVELY, AND INCORPORATED HEREIN

1 AS IF SET OUT AT LENGTH, ARE THE ABOVE REFERENCED TEXT
2 COMMUNICATIONS.

- 3
4 98. In another example of harassment, LUTFI used SULLIVAN's phone number to create an
5 advertisement in the free section on Craig's List and posted a picture of ARLO's puppy.
6 Subsequently, SULLIVAN's phone blew up with random inquiries about a free puppy.
7
- 8 99. In addition, LUTFI illegally re-routed SILVA's mail delivery to his own Caswell Avenue
9 apartment in Los Angeles where he opened it and used the contents to advance his campaign of
10 intimidation against SILVA. On June 26, 2016, SILVA changed his mailing address with the
11 United States Post Office. When SILVA did not receive a single piece of mail, he contacted the
12 United States Postal Inspection Service. After investigating SILVA's complaint, United States
13 Postal Inspection Service case number: CA131638802, the Postal Inspectors informed SILVA
14 that COBAIN had submitted a change of address in SILVA's name on July 3, 2016,
15 superseding SILVA's June 26, 2016 change of address request. The July 3, 2016 change of
16 address, erroneously attributed to COBAIN, forwarded all of SILVA's mail to LUTFI's Caswell
17 Avenue residence in Mar Vista. LUTFI's fraudulent mail forwarding scheme was confirmed by
18 both the United States Postal Inspection Service and eyewitness MUNSEY, who lived with
19 LUTFI at his Caswell Avenue residence in Mar Vista at the time. MUNSEY later revealed that
20 LUTFI bragged that he was the one who submitted the fraudulent change of address request for
21 SILVA's mail. MUNSEY also personally observed LUTFI receive SILVA's mail and watched
22 as LUTFI opened mail clearly addressed to SILVA. MUNSEY also stated that he frequently
23 found SILVA's opened mail laying around LUTFI's Caswell Avenue apartment.
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28 100. While LUTFI's campaign of stalking, intimidation, and harassment continued unabated for

1 months, the period of June 3, 2016 through June 17, 2016 was particularly intense for the Silva
2 family. During this period, LUTFI launched a furious and unremitting barrage of sinister
3 threats, intimidation, and harassment against SILVA, SILVA's mother, SILVA's father,
4 SILVA's sister, SILVA's friends, SULLIVAN, and ARLO. LUTFI was so relentless and
5 menacing that SILVA and his family members were unable to sleep for days on end. Sleep
6 deprived and deeply shaken, the SILVA family hired a licensed armed security guard on June
7 10, 2016 hoping this would give them some peace of mind and help them sleep for the first time
8 since the June 3, 2016 home invasion, assault, and kidnapping of SILVA.
9

- 10
11 101. The barrage of threats and intimidation put SILVA, in a near constant state of shock leaving
12 him hesitant to trust anyone, including the LAPD. During the hours that LUTFI held SILVA
13 captive on June 3, 2016, he repeatedly warned SILVA against contacting the police, or in any
14 other way reporting the crimes that occurred at his Curson Avenue residence. LUTFI put great
15 effort into convincing SILVA that reporting LUTFI's crimes would be of no avail, because he,
16 LOVE, and COBAIN controlled the LAPD, judicial system, and media. Taken in combination
17 with LUTFI's explicit threats against SILVA's daughter and family, SILVA was paralyzed into
18 inaction for several days. However, after rallying support from his family and friends, SILVA,
19 mustered the courage to travel from Orange County to the LAPD's Hollywood Station where he
20 reported the June 3, 2016 home invasion, assault, robbery, kidnapping, and extortion at his
21 Curson Avenue residence. An Investigative Report was written on June 8, 2016 - Incident
22 #16060800. ATTACHED HERETO, MARKED AS EXHIBIT 26, AND INCORPORATED
23 HEREIN AS IF SET OUT AT LENGTH, IS THE ABOVE REFERENCED POLICE REPORT.
24
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27 102. During the perfunctory and truncated investigation that resulted from SILVA's June 8, 2016
28 Hollywood Station crime report, LUTFI admitted to the investigating police officers that he had

1 entered SILVA's residence without the permission or knowledge of SILVA. LUTFI asserted
2 that he had been able to enter SILVA's Curson Avenue residence on June 3, 2016, with a key
3 given to him by COBAIN. LUTFI outrageously claimed to the investigating police officers that
4 his purpose for entering SILVA's Curson Avenue residence during the early morning hours of
5 June 3, 2016, was to take SILVA out to a restaurant and discuss his alleged drug use. LUTFI
6 went on to tell the investigating police officers that it got late after they were stopped by the
7 responding police officers at the scene, so they returned to SILVA's residence instead of
8 continuing on to the restaurant.
9

10
11 103. On June 27, 2016, SILVA obtained a Temporary Restraining Order issued by the Los Angeles
12 Superior Court. The court ordered LUTFI to stay at least one-hundred yards away from SILVA
13 and to cease any harassment, intimidation, abuse, stalking, attacking, threatening, assault, or
14 disturbance of the peace of SILVA and his family. The Temporary Restraining Order was
15 based on the unlawful violence and credible threat of violence or stalking as outlined herein.
16 ATTACHED HERETO, MARKED AS EXHIBIT 27, AND INCORPORATED HEREIN AS
17 IF SET OUT AT LENGTH, IS THE ABOVE REFERENCED RESTRAINING ORDER.
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19

20 104. The nature of the acts committed, the relationships between the parties, the common interests of
21 the coconspirators, and the overt acts performed by each conspirator advancing the common
22 objective of their unlawful scheme all establish a conspiracy between LOVE, LUTFI,
23 YUKHTMAN, BUTLER, and GANS and each of them. Still further facts supporting the
24 conspiracy are:
25

26 105. On June 24, 2016, SILVA was at the marital premises on CURSON Avenue sitting on a chair in
27 the backyard while waiting for COBAIN to arrive and remove some personal items per an
28

1 agreement brokered by their respective family law attorneys. SILVA was accompanied by his
2 mother MARY, sister SUMMER, and Private Investigator Raymond Banuelos (hereinafter
3 BANUELOS). In violation of the agreement, COBAIN arrived at the Curson Avenue house in
4 the company of Defendant NAZARIAN, Defendant SCHENK, and five or six large men. The
5 men, led by Defendant NAZARIAN and SCHENK, rushed up the driveway and confronted
6 MARY, who was standing at the gate. Several of NAZARIAN's men held their cell phones in
7 hand as if they were filming. NAZARIAN was intentionally confrontational with MARY in an
8 apparent effort to provoke SILVA and capture his reaction on camera. SILVA looked on as
9 NAZARIAN, accompanied by SCHENK, screamed at MARY and acted in an aggressive and
10 threatening manner. NAZARIAN jabbed his finger in MARY's face and shouted at her. Then,
11 without warning or provocation, NAZARIAN assaulted MARY by violently shoving the gate
12 into her. The force of NAZARIAN's assault knocked MARY backward where her arm was
13 lacerated by jagged shards of glass that remained in the window that LUTFI broke during his
14 June 3, 2016 home invasion and attack on SILVA. MARY, SUMMER, and SILVA, in fear for
15 their personal safety, rushed back into the house as NAZARIAN, SCHENK, and their men
16 charged through the gate. Upon witnessing this act of aggression, BANUELOS, a retired police
17 officer, called the LAPD for help. Not long afterward, LAPD officers arrived at the Curson
18 Avenue house. NAZARIAN approached the officers and presented them with a paper believed
19 to be a copy of the deed for the Curson Avenue house. NAZARIAN asked the officers to
20 remove SILVA from the property. The officers informed NAZARIAN that he did not have any
21 right to force SILVA out of his own home. ATTACHED HERETO, MARKED AS EXHIBIT
22 28 COLLECTIVELY, AND INCORPORATED HEREIN AS IF SET OUT AT LENGTH,
23 ARE PHOTOGRAPHS OF THE ABOVE REFERENCED INCIDENT, THE INJURY TO
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1 MARY SILVA, TRANSCRIPT OF RETIRED POLICE OFFICER RAYMOND BANUELOS'
2 RECORDED INTERVIEW, AND EVIDENCE OF LOVE AND LUTFI'S CLOSE
3 ASSOCIATION WITH NAZARIAN.
4

5 106. NAZARIAN of Nazarian and Associates and Esquire Internationale The Agency, is well
6 known for his illegal and unethical practices particularly to the Los Angeles family law courts
7 and attorneys representing wives in those courtrooms. NAZARIAN is the self-proclaimed
8 "Scum of Hollywood." Among other things, NAZARIAN teaches women how to make false
9 allegations of abuse to the police, the criminal courts, and the family law courts. Notably,
10 NAZARIAN teaches women how to get their husbands out of the family residence and teaches
11 them how to gain the upper hand in court proceedings by staging fake crime scenes and filing
12 false police reports with intent of having their husbands falsely arrested. NAZARIAN has
13 promoted his unlawful scheme and services through You-Tube Videos such as "How to Throw
14 Your Husband Out – Divorce Advice." In another video, NAZARIAN characterizes his work
15 on behalf of the wealthy stating, "The rich and powerful always want their pound of flesh and
16 we kind of go out and collect it for them," and "You pick your worst lawyer that you know,
17 we're 10 floors below him. That's what we get paid to do." NAZARIAN is an associate of
18 LOVE and she has employed his services since at least 2009. In the instant case, NAZARIAN
19 was employed for his services by one or more of the conspirators and became part of the
20 conspiracy. ATTACHED HERETO, MARKED AS EXHIBIT 29 COLLECTIVELY, AND
21 INCORPORATED HEREIN AS IF SET OUT AT LENGTH, ARE TRANSCRIPTS OF
22 NAZARIAN'S ABOVE REFERENCED VIDEOS.
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27 107. Plaintiff, Isaiah James SILVA, was harmed by the unlawful actions of each of the Defendants as
28 from now on alleged as each Defendant was aware of the other individual Defendants and their

1 plan and conspired to commit the acts herein alleged and agreed with and intended that the
2 wrongful act be committed.

3
4 108. Plaintiff, Isaiah James SILVA, was harmed by the unlawful actions of each of the Defendants
5 herein from now on alleged. Plaintiff alleges each Defendant was aware of the other individual
6 Defendants and their plan, and each of them conspired to commit the acts herein alleged and
7 gave substantial assistance and or encouragement to the other Defendants. This conduct was a
8 substantial factor in causing harm to the Plaintiff.

9
10 109. Each of the acts alleged herein were done with a wanton, reckless disregard for the rights of
11 Silva and with the full knowledge that he would suffer personal injury as a result of said acts.

12
13 110. As a direct and proximate result of the aforementioned intentional and unlawful conduct of
14 Defendants and each of them, SILVA sustained severe and serious injury and damage to his
15 person in an amount to be shown according to proof.

16
17 111. As a further direct and proximate result of the intentional and unlawful conduct of Defendants
18 and each of them, and the resulting injuries and damages to SILVA, he incurred expenses for
19 professional medical services as well as other special damage. The exact total amount of said
20 expenses has not been ascertained at this time and, when known, he will ask leave of the court
21 to amend this Complaint accordingly.

22
23
24 112. As a further direct and proximate result of the intentional and unlawful conduct of coconspirator
25 Defendants and each of them, SILVA a musician with a budding career after working for years
26 in the music business has been unable to work since June 3, 2016 due to the severe emotional
27 distress he suffered as a result of the home invasion, assault, and battery, kidnapping, attempted
28

1 murder, and infliction of emotional distress and remains unable to work for an indefinite period
2 in the future, all to SILVA's further damage in an amount to be shown according to proof.

3
4 113. Defendants and each of them owed Plaintiff Isaiah James SILVA a duty to exercise reasonable
5 care. "Everyone is responsible, not only for the result of his or her willful acts, but also for an
6 injury occasioned to another by his or her want of ordinary care or skill in the management of
7 his or her property or person, except so far as the latter has, willfully or by want of ordinary
8 care, brought the injury upon himself or herself." Civil Code §1714(a).

9
10 114. Defendants and each of them were negligent and breached that duty as stated in Civil Code
11 §1417(a) thereby harming Plaintiff Isaiah James SILVA.

12
13 115. The negligence of Defendants and each of them was a substantial factor in causing harm to
14 Plaintiff, Isaiah James SILVA.

15
16 116. Defendants and each of them acted maliciously intending to cause injury to Plaintiff Isaiah
17 SILVA in addition the conduct was despicable and was done with a willful and knowing
18 disregard of the rights or safety of Plaintiff SILVA. Defendants and each of them were aware of
19 the probable dangerous consequences of their actions and their conduct and deliberately failed
20 to avoid those consequences. All of this is factually supported as plead herein and in the
21 exhibits attached hereto.
22

23
24 117. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to
25 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as
26 plead herein and in the exhibits attached hereto.
27

28 118. The conduct of Defendants is vile, base and so contemptible as to be looked down on and

1 despised by reasonable people. All of this is factually supported as plead herein and in the
2 exhibits attached hereto.

3
4 119. Defendants and each of them intentionally fraudulently misrepresented and or concealed
5 material facts and did so intending to harm Plaintiff SILVA. All of this is factually supported as
6 plead herein and in the exhibits attached hereto.

7
8 120. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
9 them for the harm done and to discourage similar conduct in the future.

10
11 **FIRST CAUSE OF ACTION - NEGLIGENCE**

12
13 **(AGAINST LOVE, LUTFI, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,**
14 **NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,**
15 **GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**

16
17 121. Plaintiff, ISAAH JAMES SILVA, alleges and incorporates with full force and effect
18 Paragraphs 1 through 120 of the General Allegations as if fully set forth herein.

19
20 122. In doing the things stated above, Defendants, and each of them, negligently, carelessly,
21 recklessly, and unlawfully failed to use reasonable care to prevent harm to SILVA.

22
23 123. Each of the acts alleged herein were done with a wanton, reckless disregard for the rights of
24 SILVA and with the full knowledge that he would suffer personal injury as a result of said acts.

25
26 124. The conduct of Defendants, and each of them, as described above, evidence a lack of any care
27 and an extreme departure from what a reasonably careful person would do in the same situation
28 to prevent harm to oneself or others and constitutes gross negligence thereby causing harm to

1 Plaintiff.

2 125. The wrongful conduct stated herein is a violation of the standard of care established by the
3 following laws:
4

- 5 a. California Penal Code §31 - "All persons concerned in the commission of a crime,
6 whether it be a felony or misdemeanor, and whether they directly commit the act
7 constituting the offense, or aid and abet in its commission, or, not being present, have
8 advised and encouraged its commission ... compel another to commit any crime, are
9 principals in any crime so committed."
10
- 11 b. California Penal Code §21a & §664 - §21a "An attempt to commit a crime consists of
12 two elements: a specific intent to commit the crime, and a direct but ineffectual act done
13 toward its commission." - §664 "Every person who attempts to commit any crime, but
14 fails, or is prevented or intercepted in its perpetration, shall be punished where no
15 provision is made by law for the punishment of those attempts, as follows: (a) If the
16 crime attempted is punishable by imprisonment in the state prison, or by imprisonment
17 pursuant to subdivision (h) of Section 1170, the person guilty of the attempt shall be
18 punished by imprisonment in the state prison or in a county jail, respectively, for one-
19 half the term of imprisonment prescribed upon a conviction of the offense attempted.
20 However, if the crime attempted is willful, deliberate, and premeditated murder, as
21 defined in Section 189, the person guilty of that attempt shall be punished by
22 imprisonment in the state prison for life with the possibility of parole. If the crime
23 attempted is any other one in which the maximum sentence is life imprisonment or
24 death, the person guilty of the attempt shall be punished by imprisonment in the state
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1 prison for five, seven, or nine years. The additional term provided in this section for
2 attempted willful, deliberate, and premeditated murder shall not be imposed unless the
3 fact that the attempted murder was willful, deliberate, and premeditated is charged in the
4 accusatory pleading and admitted or found to be true by the trier of fact. (b) If the crime
5 attempted is punishable by imprisonment in a county jail, the person guilty of the
6 attempt shall be punished by imprisonment in a county jail for a term not exceeding one-
7 half the term of imprisonment prescribed upon a conviction of the offense attempted. (c)
8 If the offense so attempted is punishable by a fine, the offender convicted of that attempt
9 shall be punished by a fine not exceeding one-half the largest fine which may be
10 imposed upon a conviction of the offense attempted. (d) If a crime is divided into
11 degrees, an attempt to commit the crime may be of any of those degrees, and the
12 punishment for the attempt shall be determined as provided by this section.

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16 c. California Penal Code §32 - "Every person who, after a felony has been committed,
17 harbors, conceals or aids a principal in such felony, with the intent that such principal
18 may avoid or escape from arrest, trial, conviction or punishment, having knowledge that
19 said principal has committed such felony or has been charged with such felony or
20 convicted thereof, is an accessory of such felony,"
- 21
22 d. California Penal Code §136.1 - "(a) Except as provided in subdivision (c), any person
23 who does any of the following is guilty of a public offense and shall be punished by
24 imprisonment in a county jail for not more than one year or in the state prison: 1.
25 Knowingly and maliciously prevents or dissuades any witness or victim from attending
26 or giving testimony at any trial, proceeding, or inquiry authorized by law. 2. Knowingly
27 and maliciously attempts to prevent or dissuade any witness or victim from attending or
28

1 giving testimony at any trial, proceeding, or inquiry authorized by law. 3. For purposes
2 of this section, evidence that the Defendant was a family member who interceded in an
3 effort to protect the witness or victim shall create a presumption that the act was without
4 malice. (b) Except as provided in subdivision (c), every person who attempts to prevent
5 or dissuade another person who has been the victim of a crime or who is witness to a
6 crime from doing any of the following is guilty of a public offense and shall be punished
7 by imprisonment in a county jail for not more than one year or in the state prison: (1)
8 Making any report of that victimization to any peace officer or state or local law
9 enforcement officer or probation or parole or correctional officer or prosecuting agency
10 or to any judge. (2) Causing a complaint, indictment, information, probation or parole
11 violation to be sought and prosecuted, and assisting in the prosecution thereof. (3)
12 Arresting or causing or seeking the arrest of any person in connection with that
13 victimization. (c) Every person doing any of the acts described in subdivision (a) or (b)
14 knowingly and maliciously under any one or more of the following circumstances, is
15 guilty of a felony punishable by imprisonment in the state prison for two, three, or four
16 years under any of the following circumstances: (1) Where the act is accompanied by
17 force or by an express or implied threat of force or violence, upon a witness or victim or
18 any third person or the property of any victim, witness, or any third person. (2) Where
19 the act is in furtherance of a conspiracy. (3) Where the act is committed by any person
20 who has been convicted of any violation of this section, any predecessor law hereto or
21 any federal statute or statute of any other state which, if the act prosecuted was
22 committed in this state, would be a violation of this section. (4) Where the act is
23 committed by any person for pecuniary gain or for any other consideration acting upon
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1 the request of any other person. All parties to such a transaction are guilty of a felony.
2 (d) Every person attempting the commission of any act described in subdivisions (a),
3 (b), and (c) is guilty of the offense attempted without regard to success or failure of the
4 attempt. The fact that no person was injured physically, or in fact intimidated, shall be
5 no defense against any prosecution under this section. (e) Nothing in this section
6 precludes the imposition of an enhancement for great bodily injury where the injury
7 inflicted is significant or substantial. (f) The use of force during the commission of any
8 offense described in subdivision (c) shall be considered a circumstance in aggravation of
9 the crime in imposing a term of imprisonment under subdivision (b) of Section 1170.”
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11

12 e. California Penal Code §137 - “(a) Every person who gives or offers, or promises to give,
13 to any witness, person about to be called as a witness, or person about to give material
14 information pertaining to a crime to a law enforcement official, any bribe, upon any
15 understanding or agreement that the testimony of such witness or information given by
16 such person shall be thereby influenced is guilty of a felony. (b) Every person who
17 attempts by force or threat of force or by the use of fraud to induce any person to give
18 false testimony or withhold true testimony or to give false material information
19 pertaining to a crime to, or withhold true material information pertaining to a crime
20 from, a law enforcement official is guilty of a felony, punishable by imprisonment
21 pursuant to subdivision (h) of Section 1170 for two, three, or four years. As used in this
22 subdivision, “threat of force” means a credible threat of unlawful injury to any person or
23 damage to the property of another which is communicated to a person for the purpose of
24 inducing him to give false testimony or withhold true testimony or to give false material
25 information pertaining to a crime to, or to withhold true material information pertaining
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1 to a crime from, a law enforcement official. . . .”

- 2
3 f. California Penal Code §140 - “Every person who willfully uses force or threatens to use
4 force or violence upon the person of a witness to, or a victim of, a crime or any other
5 person, or to take, damage, or destroy any property of any witness, victim, or any other
6 person, because the witness, victim, or other person has provided any assistance or
7 information to a law enforcement officer, or to a public prosecutor in a criminal
8 proceeding or juvenile court proceeding is guilty under this statute.”
- 9
10 g. California Penal Code §182 - If two or more persons conspire: (1) To commit any crime.
11 (2) Falsely and maliciously to indict another for any crime, or to procure another to be
12 charged or arrested for any crime. (3) Falsely to move or maintain any suit, action, or
13 proceeding. (4) To cheat and defraud any person of any property, by any means which
14 are in themselves criminal, or to obtain money or property by false pretenses or by false
15 promises with fraudulent intent not to perform those promises. (5) To commit any act
16 injurious to the public health, to public morals, or to pervert or obstruct justice, or the
17 due administration of the laws. . . .”
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19
20 h. California Penal Code §664/187 - “(a) Murder is the unlawful killing of a human being,
21 or a fetus, with malice aforethought. (b) This section shall not apply to any person who
22 commits an act that results in the death of a fetus if any of the following apply: (1) The
23 act complied with the Therapeutic Abortion Act, Article 2 (commencing with Section
24 123400) of Chapter 2 of Part 2 of Division 106 of the Health and Safety Code. (2) The
25 act was committed by a holder of a physician’s and surgeon’s certificate, as defined in
26 the Business and Professions Code, in a case where, to a medical certainty, the result of
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1 childbirth would be death of the mother of the fetus or where her death from childbirth,
2 although not medically certain, would be substantially certain or more likely than not.

3 (3) The act was solicited, aided, abetted, or consented to by the mother of the fetus. (c)
4 Subdivision (b) shall not be construed to prohibit the prosecution of any person under
5 any other provision of law." §664 "Every person who attempts to commit any crime, but
6 fails, or is prevented or intercepted in its perpetration, shall be punished where no
7 provision is made by law for the punishment of those attempts, as follows: (a)...if the
8 crime attempted is willful, deliberate, and premeditated murder, as defined in Section
9 189, the person guilty of that attempt shall be punished by imprisonment in the state
10 prison for life with the possibility of parole."
11

- 12
- 13 i. California Penal Code §209(a) - "Any person who seizes, confines, entices, decoys,
14 abducts, conceals, kidnaps or carries away another person by any means whatsoever
15 with intent to hold or detain, or who holds or detains, that person for ransom, reward or
16 to commit extortion or to exact from another person any money or valuable thing, or any
17 person who aids or abets any such act, is guilty of a felony. . . ."
18
- 19
- 20 j. California Penal Code §237(a) - False imprisonment is punishable by a fine not
21 exceeding one thousand dollars (\$1,000), or by imprisonment in the county jail for not
22 more than one year, or by both that fine and imprisonment. If the false imprisonment be
23 effected by violence, menace, fraud, or deceit, it shall be punishable by imprisonment
24 pursuant to subdivision (h) of Section 1170.
25
- 26 k. California Penal Codes §236 & 236.1 - "False imprisonment is the unlawful violation of
27 the personal liberty of another." 236.1(b) "A person who deprives or violates the
28

1 personal liberty of another with the intent to effect or maintain a violation of Section
2 266, 266h, 266i, 266j, 267, 311.1, 311.2, 311.3, 311.4, 311.5, 311.6, or 518 is guilty of
3 human trafficking and shall be punished by imprisonment in the state prison for 8, 14, or
4 20 years and a fine of not more than five hundred thousand dollars (\$500,000).

- 5
- 6 l. California Penal Code §211 - "Robbery is the felonious taking of personal property in
7 the possession of another, from his person or immediate presence, and against his will,
8 accomplished by means of force or fear."
- 9
- 10 m. California Penal Code §240 - "An assault is an unlawful attempt, coupled with a present
11 ability, to commit a violent injury on the person of another."
- 12
- 13 n. California Penal Code §242 - "A battery is any willful and unlawful use of force or
14 violence upon the person of another."
- 15
- 16 o. California Penal Code § 243.4(a) - "(a) Any person who touches an intimate part of
17 another person while that person is unlawfully restrained by the accused or an
18 accomplice, and if the touching is against the will of the person touched and is for the
19 purpose of sexual arousal, sexual gratification, or sexual abuse, is guilty of sexual
20 battery. A violation of this subdivision is punishable by imprisonment in a county jail
21 for not more than one year, and by a fine not exceeding two thousand dollars (\$2,000);
22 or by imprisonment in the state prison for two, three, or four years, and by a fine not
23 exceeding ten thousand dollars (\$10,000)...(2) As used in this subdivision, "touches"
24 means physical contact with another person, whether accomplished directly, through the
25 clothing of the person committing the offense, or through the clothing of the victim.
26
27
28

1 p. California Penal Code §422 - "(a) Any person who willfully threatens to commit a crime
2 which will result in death or great bodily injury to another person, with the specific
3 intent that the statement, made verbally, in writing, or by means of an electronic
4 communication device, is to be taken as a threat, even if there is no intent of actually
5 carrying it out, which, on its face and under the circumstances in which it is made, is so
6 unequivocal, unconditional, immediate, and specific as to convey to the person
7 threatened, a gravity of purpose and an immediate prospect of execution of the threat,
8 and thereby causes that person reasonably to be in sustained fear for his or her own
9 safety or for his or her immediate family's safety, shall be punished by imprisonment in
10 the county jail not to exceed one year, or by imprisonment in the state prison. (b) For
11 purposes of this section, "immediate family" means any spouse, whether by marriage or
12 not, parent, child, any person related by consanguinity or affinity within the second
13 degree, or any other person who regularly resides in the household, or who, within the
14 prior six months, regularly resided in the household. (c) "Electronic communication
15 device" includes, but is not limited to, telephones, cellular telephones, computers, video
16 recorders, fax machines, or pagers. "Electronic communication" has the same meaning
17 as the term defined in Subsection 12 of Section 2510 of Title 18 of the United States
18 Code."

19
20
21
22
23 q. California Penal Code §459 - "Every person who enters any house, room, apartment,
24 tenement, shop, warehouse, store, mill, barn, stable, outhouse or other building, tent,
25 vessel, as defined in Section 21 of the Harbors and Navigation Code, floating home, as
26 defined in subdivision (d) of Section 18075.55 of the Health and Safety Code, railroad
27 car, locked or sealed cargo container, whether or not mounted on a vehicle, trailer coach,
28

1 as defined in Section 635 of the Vehicle Code, any house car, as defined in Section 362
2 of the Vehicle Code, inhabited camper, as defined in Section 243 of the Vehicle Code,
3 vehicle as defined by the Vehicle Code, when the doors are locked, aircraft as defined by
4 Section 21012 of the Public Utilities Code, or mine or any underground portion thereof,
5 with intent to commit grand or petit larceny or any felony is guilty of burglary. As used
6 in this chapter, "inhabited" means currently being used for dwelling purposes, whether
7 occupied or not. A house, trailer, vessel designed for habitation, or portion of a building
8 is currently being used for dwelling purposes if, at the time of the burglary, it was not
9 occupied solely because a natural or other disaster caused the occupants to leave the
10 premises."
11
12

- 13 r. California Penal Code §487 - "Grand theft is theft committed in any of the following
14 cases: (a) When the money, labor, or real or personal property taken is of a value
15 exceeding nine hundred fifty dollars (\$950), except as provided in subdivision (b). (b)
16 Notwithstanding subdivision (a), grand theft is committed in any of the following cases:
17 (1) (A) When domestic fowls, avocados, olives, citrus or deciduous fruits, other fruits,
18 vegetables, nuts, artichokes, or other farm crops are taken of a value exceeding two
19 hundred fifty dollars (\$250). (B) For the purposes of establishing that the value of
20 domestic fowls, avocados, olives, citrus or deciduous fruits, other fruits, vegetables,
21 nuts, artichokes, or other farm crops under this paragraph exceeds two hundred fifty
22 dollars (\$250), that value may be shown by the presentation of credible evidence which
23 establishes that on the day of the theft domestic fowls, avocados, olives, citrus or
24 deciduous fruits, other fruits, vegetables, nuts, artichokes, or other farm crops of the
25 same variety and weight exceeded two hundred fifty dollars (\$250) in wholesale value,
26
27
28

1 (2) When fish, shellfish, mollusks, crustaceans, kelp, algae, or other aquacultural
2 products are taken from a commercial or research operation which is producing that
3 product, of a value exceeding two hundred fifty dollars (\$250). (3) Where the money,
4 labor, or real or personal property is taken by a servant, agent, or employee from his or
5 her principal or employer and aggregates nine hundred fifty dollars (\$950) or more in
6 any 12 consecutive month period. (c) When the property is taken from the person of
7 another. (d) When the property taken is any of the following: (1) An automobile. (2) A
8 firearm.”

9
10
11 s. California Penal Code §518(a) - “Extortion is the obtaining of property or other
12 consideration from another, with his or her consent, or the obtaining of an official act of
13 a public officer, induced by a wrongful use of force or fear, or under color of official
14 right.”

15
16 126. As a direct and proximate result of the conduct of Defendants and each of them Plaintiff SILVA
17 was directly and proximately caused harm.

18
19 127. As a direct and proximate result of the negligence, carelessness, recklessness, wantonness, and
20 unlawfulness of the Defendants and each of them, Plaintiff sustained severe and permanent
21 injuries to his person, all to Plaintiff's damage in a sum within the jurisdiction of this court and
22 to be shown according to proof.

23
24 128. As a further direct and proximate result of the negligence, carelessness, recklessness,
25 wantonness and unlawfulness of Defendants, and each of them, Plaintiff has been hurt and
26 injured in his health, strength and activity, all of which said injuries have caused general
27 damages and continue to cause him great mental, emotional and physical strain, pain and
28

1 suffering; said injuries include, but are not limited to, the need for caretaking and treatments.
2 Plaintiff is informed and believes, and thereon alleges, that the injuries described above, and
3 each of them, are permanent, all of which said injuries and damages are in an amount presently
4 unknown to Plaintiff but in excess of the jurisdictional limits of this court. Plaintiff will ask
5 leave to amend this Complaint at such time as the exact amount of these damages are
6 ascertained or proved at the time of trial.
7

8
9 129. By reason of the acts herein alleged, Plaintiff SILVA has suffered special damage loss including
10 by not limited to employing the services of caretakers and other professional medical services,
11 and Plaintiff has incurred expenses for medicines. Plaintiff is informed and believes, and
12 thereon alleges, that further services of said nature will be required in the future by Plaintiff in
13 an amount to be shown according to proof.
14

15
16 **SECOND CAUSE OF ACTION - BATTERY**

17 **(AGAINST LOVE, LUTFI, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,**
18 **NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,**
19 **GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**
20

21 130. Plaintiff, ISAIAH JAMES SILVA, alleges and incorporates with full force and effect
22 Paragraphs 1 through 120 of the General Allegations as if fully set forth herein.
23

24 131. Defendants and each of them touched or caused Plaintiff SILVA to be touched with the intent to
25 harm or offend him.
26

27 132. SILVA did not consent to the touching.
28

1 133. SILVA was harmed and offended by Defendants conduct.

2 134. A reasonable person in Plaintiff SILVA'S situation as stated herein would have been offended
3 by the touching.
4

5 135. As a direct and proximate result of the conduct of Defendants and each of them Plaintiff SILVA
6 was directly and proximately caused harm.
7

8 136. As a direct and proximate result of the intentional and unlawful conduct of Defendants and each
9 of them Plaintiff sustained severe and permanent injuries to his person, all to Plaintiff's damage
10 in a sum within the jurisdiction of this court and to be shown according to proof.
11

12 137. As a further direct and proximate result of the intentional and unlawful conduct of Defendants,
13 and each of them, Plaintiff has been hurt and injured in his health, strength and activity, all of
14 which said injuries have caused general damages and continue to cause him great mental,
15 emotional and physical strain, pain and suffering; said injuries include, but are not limited to,
16 the need for caretaking and treatments. Plaintiff is informed and believes, and thereon alleges,
17 that the injuries described above, and each of them, are permanent, all of which said injuries and
18 damages are in an amount presently unknown to Plaintiff but in excess of the jurisdictional
19 limits of this court. Plaintiff will ask leave to amend this Complaint at such time as the exact
20 amount of these damages are ascertained or proved at the time of trial.
21
22

23
24 138. As a further direct and proximate result of the intentional and unlawful conduct of coconspirator
25 Defendants and each of them, SILVA a musician with a budding career after working for years
26 in the music business, has been unable to work since June 3, 2016 due to the severe emotional
27 distress he suffered as a result of the home invasion, assault, battery, kidnapping, attempted
28

1 murder, and infliction of emotional distress and remains unable to work for an indefinite period
2 in the future, all to SILVA's further damage in an amount to be shown according to proof.

3
4 139. Defendants and each of them acted maliciously intending to cause injury to Plaintiff SILVA. In
5 addition, the conduct was despicable and was done with a willful and knowing disregard of the
6 rights or safety of SILVA. Defendants and each of them were aware of the probable dangerous
7 consequences of their actions and their conduct and deliberately failed to avoid those
8 consequences. All of this is factually supported as plead herein and in the exhibits attached
9 hereto.

10
11 140. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to
12 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as
13 plead herein and in the exhibits attached hereto.

14
15 141. The conduct of Defendants is vile, base, and so contemptible as to be looked down on and
16 despised by reasonable people. All of this is factually supported as plead herein and in the
17 exhibits attached hereto.

18
19 142. Defendants and each of them intentionally misrepresented and or concealed material facts and
20 did so intending to harm Plaintiff SILVA. All of this is factually supported as plead herein and
21 in the exhibits attached hereto.

22
23 143. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
24 them for the harm done and to discourage similar conduct in the future.
25
26
27
28

THIRD CAUSE OF ACTION - ASSAULT

**(AGAINST LOVE, LUTFI, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,
NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,
GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**

144. Plaintiff, ISAAH JAMES SILVA, alleges and incorporates with full force and effect Paragraphs 1 through 120 of the General Allegations, as if fully set forth herein.

145. Defendants and each of them did the things stated herein, intending to cause a harmful or offensive contact, with Plaintiff SILVA or intending to place him in fear of a harmful or offensive contact.

146. Plaintiff SILVA reasonably believed, that he was about to be touched in a harmful or an offensive matter.

147. Defendants and each of them threatened to touch Plaintiff SILVA in a harmful or offensive manner.

148. It reasonably appeared to Plaintiff SILVA that he was about to be touched in a harmful or offensive manner.

149. Plaintiff did not consent to the conduct by Defendants and each of them.

150. Plaintiff was harmed by the conduct of Defendants, and each of them.

151. The conduct of Defendants was a substantial factor in causing Plaintiff's harm.

152. As a direct and proximate result of the intentional and unlawful of the Defendants and each of them, Plaintiff sustained severe and permanent injuries to his person, all to Plaintiff's damage in

1 a sum within the jurisdiction of this court and to be shown according to proof.

2
3 153. As a further direct and proximate result of the intentional and unlawful conduct of Defendants,
4 and each of them, Plaintiff has been hurt and injured in his health, strength and activity, all of
5 which said injuries have caused general damages and continue to cause him great mental,
6 emotional and physical strain, pain and suffering; said injuries include, but are not limited to,
7 the need for caretaking and treatments. Plaintiff is informed and believes, and thereon alleges,
8 that the injuries described above, and each of them, are permanent, all of which said injuries and
9 damages are in an amount presently unknown to Plaintiff but in excess of the jurisdictional
10 limits of this court. Plaintiff will ask leave to amend this Complaint at such time as the exact
11 amount of these damages are ascertained or proved at the time of trial.
12

13
14 154. By reason of the foregoing conduct, Plaintiff has further been compelled to employ the services
15 of caretakers and other professional services, and Plaintiff has incurred expenses for medicines.
16 Plaintiff is informed and believes, and thereon alleges, that further services of said nature will
17 be required in the future by Plaintiff in an amount to be shown according to proof.
18

19 155. Defendants and each of them acted maliciously intending to cause injury to Plaintiff Isaiah
20 SILVA. In addition, the conduct was despicable and was done with a willful and knowing
21 disregard of the rights or safety of Plaintiff SILVA. Defendants and each of them were aware of
22 the probable dangerous consequences of their actions and their conduct and deliberately failed
23 to avoid those consequences. All of this is factually supported as plead herein and in the
24 exhibits attached hereto.
25

26
27 156. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to
28 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as

1 plead herein and in the exhibits attached hereto.

2
3 157. The conduct of Defendants is vile, base, and so contemptible as to be looked down on and
4 despised by reasonable people. All of this is factually supported as plead herein and in the
5 exhibits attached hereto.

6
7 158. Defendants and each of them intentionally misrepresented and or concealed material facts and
8 did so intending to harm Plaintiff SILVA. All of this is factually supported as plead herein and
9 in the exhibits attached hereto.

10
11 159. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
12 them for the harm done and to discourage similar conduct in the future.

13
14 **FOURTH CAUSE OF ACTION—INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
15 **(AGAINST LOVE, LUTFL, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,**
16 **NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,**
17 **GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**

18
19
20 160. Plaintiff, ISALAH JAMES SILVA, alleges and incorporates with full force and effect
21 Paragraphs 1 through 120 of the General Allegations as if fully set forth herein.

22
23 161. The conduct of Defendants, and each of them, was outrageous.

24
25 162. Defendants intended to cause Plaintiff emotional distress and/or acted with reckless disregard of
26 the probability that Plaintiff would suffer emotional distress knowing that Defendants' conduct
27 was directed toward Plaintiff.
28

- 1 163. Plaintiff suffered severe emotional distress as a direct and proximate result of the conduct of
2 Defendant, and each of them.
- 3
4 164. The conduct of Defendants, and each of them was a substantial factor in causing Plaintiff's
5 severe emotional distress.
- 6
7 165. As a direct and proximate result of the intentional and unlawful of the Defendants and each of
8 them, Plaintiff sustained severe and permanent injuries to his person, all to Plaintiff's damage in
9 a sum within the jurisdiction of this court and to be shown according to proof.
- 10
11 166. As a further direct and proximate result of the intentional and unlawful conduct of Defendants,
12 and each of them, Plaintiff has been hurt and injured in his health, strength and activity, all of
13 which said injuries have caused general damages and continue to cause him great mental,
14 emotional, and physical strain, pain, and suffering; said injuries include, but are not limited to,
15 the need for caretaking and treatments. Plaintiff is informed and believes, and thereon alleges,
16 that the injuries described above, and each of them, are permanent, all of which said injuries and
17 damages are in an amount presently unknown to Plaintiff but in excess of the jurisdictional
18 limits of this court. Plaintiff will ask leave to amend this Complaint at such time as the exact
19 amount of these damages are ascertained or proved at the time of trial.
- 20
21
22 167. By reason of the foregoing conduct, Plaintiff has further been compelled to employ the services
23 of caretakers and other professional services, and Plaintiff has incurred expenses for medicines.
24 Plaintiff is informed and believes, and thereon alleges, that further services of said nature will
25 be required in the future by Plaintiff in an amount to be shown according to proof.
- 26
27
28 168. Defendants and each of them acted maliciously intending to cause injury to Plaintiff Isaiah

1 SILVA. In addition, the conduct was despicable and was done with a willful and knowing
2 disregard of the rights or safety of Plaintiff SILVA. Defendants and each of them were aware of
3 the probable dangerous consequences of their actions and their conduct and deliberately failed
4 to avoid those consequences. All of this is factually supported as plead herein and in the
5 exhibits attached hereto.
6

7 169. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to
8 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as
9 plead herein and in the exhibits attached hereto.
10

11 170. The conduct of Defendants is vile, base, and so contemptible as to be looked down on and
12 despised by reasonable people. All of this is factually supported as plead herein and in the
13 exhibits attached hereto.
14

15 171. Defendants and each of them intentionally misrepresented and or concealed material facts and
16 did so intending to harm Plaintiff SILVA. All of this is factually supported as plead herein and
17 in the exhibits attached hereto.
18

19 172. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
20 them for the harm done and to discourage similar conduct in the future.
21

22
23 **FIFTH CAUSE OF ACTION - TRESPASS**

24 **(AGAINST LOVE, LUTFI, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,**
25 **NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,**
26 **GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**
27
28

1 173. Plaintiff SILVA, alleges and incorporates with full force and effect Paragraphs 1 through 120 of
2 the General Allegations as if fully set forth herein.

3
4 174. Plaintiff SILVA occupied and controlled the Curson Ave property the site of the home invasion
5 June 3, 2016.

6
7 175. Defendants and each of them intentionally entered the property.

8
9 176. Defendants and each of them entered the property without consent and with unlawful intent.

10
11 177. Defendants conduct was a substantial factor in causing harm to Plaintiff SILVA.

12
13 178. As a direct and proximate result of the intentional and unlawful of the Defendants and each of
14 them, Plaintiff sustained severe and permanent injuries to his person, all to Plaintiff's damage in
15 a sum within the jurisdiction of this court and to be shown according to proof.

16
17 179. As a further direct and proximate result of the intentional and unlawful conduct of Defendants,
18 and each of them, Plaintiff has been hurt and injured in his health, strength and activity, all of
19 which said injuries have caused general damages and continue to cause him great mental,
20 emotional and physical strain, pain and suffering; said injuries include, but are not limited to,
21 the need for caretaking and treatments. Plaintiff is informed and believes, and thereon alleges,
22 that the injuries described above, and each of them, are permanent, all of which said injuries and
23 damages are in an amount presently unknown to Plaintiff but in excess of the jurisdictional
24 limits of this court. Plaintiff will ask leave to amend this Complaint at such time as the exact
25 amount of these damages are ascertained or proved at the time of trial.

26
27 180. By reason of the foregoing conduct, Plaintiff has further been compelled to employ the services
28

1 of caretakers and other professional services, and Plaintiff has incurred expenses for medicines.
2 Plaintiff is informed and believes, and thereon alleges, that further services of said nature will
3 be required in the future by Plaintiff in an amount to be shown according to proof.
4

5 181. Defendants and each of them acted maliciously intending to cause injury to Plaintiff Isaiah
6 SILVA, In addition, the conduct was despicable and was done with a willful and knowing
7 disregard of the rights or safety of Plaintiff SILVA. Defendants and each of them were aware of
8 the probable dangerous consequences of their actions and their conduct and deliberately failed
9 to avoid those consequences. All of this is factually supported as plead herein and in the
10 exhibits attached hereto.
11

12 182. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to
13 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as
14 plead herein and in the exhibits attached hereto.
15

16 183. The conduct of Defendants is vile, base, and so contemptible as to be looked down on and
17 despised by reasonable people. All of this is factually supported as plead herein and in the
18 exhibits attached hereto.
19

20 184. Defendants and each of them intentionally misrepresented and or concealed material facts and
21 did so intending to harm Plaintiff SILVA. All of this is factually supported as plead herein and
22 in the exhibits attached hereto.
23

24 185. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
25 them for the harm done and to discourage similar conduct in the future.
26
27
28

SIXTH CAUSE OF ACTION - FALSE IMPRISONMENT / KIDNAPPING

**(AGAINST LOVE, LUTFI, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,
NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,
GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**

186. Plaintiff, ISAJAH JAMES SILVA, alleges and incorporates with full force and effect Paragraphs 1 through 120 of the General Allegations as if fully set forth herein.

187. Defendants and each of them intentionally deprived Plaintiff SILVA of his freedom of movement by use of physical force, barriers, threats of force, menace, fraud, deceit and unreasonable duress.

188. Plaintiff, SILVA did not consent.

189. The conduct of Defendants and each of them was a substantial factor in causing harm to Plaintiff SILVA.

190. As a direct and proximate result of the intentional and unlawful of the Defendants and each of them, Plaintiff sustained severe and permanent injuries to his person, all to Plaintiff's damage in a sum within the jurisdiction of this court and to be shown according to proof.

191. As a further direct and proximate result of the intentional and unlawful conduct of Defendants, and each of them, Plaintiff has been hurt and injured in his health, strength and activity, all of which said injuries have caused general damages and continue to cause him great mental, emotional and physical strain, pain, and suffering; said injuries include, but are not limited to, the need for caretaking and treatments. Plaintiff is informed and believes, and thereon alleges, that the injuries described above, and each of them, are permanent, all of which said injuries and

1 damages are in an amount presently unknown to Plaintiff but in excess of the jurisdictional
2 limits of this court. Plaintiff will ask leave to amend this Complaint at such time as the exact
3 amount of these damages are ascertained or proved at the time of trial.
4

5 192. By reason of the foregoing conduct, Plaintiff has further been compelled to employ the services
6 of caretakers and other professional services, and Plaintiff has incurred expenses for medicines.
7 Plaintiff is informed and believes, and thereon alleges, that further services of said nature will
8 be required in the future by Plaintiff in an amount to be shown according to proof.
9

10 193. Defendants and each of them acted maliciously intending to cause injury to Plaintiff Isaiah
11 SILVA. In addition, the conduct was despicable and was done with a willful and knowing
12 disregard of the rights or safety of Plaintiff SILVA. Defendants and each of them were aware of
13 the probable dangerous consequences of their actions and their conduct and deliberately failed
14 to avoid those consequences. All of this is factually supported as plead herein and in the
15 exhibits attached hereto.
16

17
18 194. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to
19 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as
20 plead herein and in the exhibits attached hereto.
21

22 195. The conduct of Defendants is vile, base, and so contemptible as to be looked down on and
23 despised by reasonable people. All of this is factually supported as plead herein and in the
24 exhibits attached hereto.
25

26 196. Defendants and each of them intentionally misrepresented and or concealed material facts and
27 did so intending to harm Plaintiff SILVA. All of this is factually supported as plead herein and
28

1 in the exhibits attached hereto.

2
3 197. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
4 them for the harm done and to discourage similar conduct in the future.

5
6 **SEVENTH CAUSE OF ACTION - EXTORTION**

7 **(AGAINST LOVE, LUTFI, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,**
8 **NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,**
9 **GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**

10
11 198. Plaintiff, ISAAH JAMES SILVA, alleges and incorporates with full force and effect
12 Paragraphs 1 through 120 of the General Allegations as if fully set forth herein.

13
14 199. Defendants and each of them intentionally and wrongfully induced Plaintiff SILVA to surrender
15 his occupancy and right to continue occupancy of the Curson Ave residence by use of force and
16 fear.

17
18 200. Defendants and each of them intentionally and wrongfully used threats of force and fear in their
19 efforts to unlawfully take the gifted guitar from Plaintiff SILVA.

20
21 201. As a direct and proximate result of the actions of Defendants and each of them Plaintiff SILVA
22 incurred extra ordinary living expenses as a result of being unable to reside at his Curson home.

23
24 202. The conduct of Defendants and each of them was a substantial factor in causing harm to
25 Plaintiff SILVA.

26
27 203. As a direct and proximate result of the intentional and unlawful of the Defendants and each of
28

1 them, Plaintiff sustained severe and permanent injuries to his person, all to Plaintiff's damage in
2 a sum within the jurisdiction of this court and to be shown according to proof.

3
4 204. As a further direct and proximate result of the intentional and unlawful conduct of Defendants,
5 and each of them, Plaintiff has been hurt and injured in his health, strength and activity, all of
6 which said injuries have caused general damages and continue to cause him great mental,
7 emotional and physical strain, pain and suffering; said injuries include, but are not limited to,
8 the need for caretaking and treatments. Plaintiff is informed and believes, and thereon alleges,
9 that the injuries described above, and each of them, are permanent, all of which said injuries and
10 damages are in an amount presently unknown to Plaintiff but in excess of the jurisdictional
11 limits of this court. Plaintiff will ask leave to amend this Complaint at such time as the exact
12 amount of these damages are ascertained or proved at the time of trial.

13
14
15 205. By reason of the foregoing conduct, Plaintiff has further been compelled to employ the services
16 of caretakers and other professional services, and Plaintiff has incurred expenses for medicines.
17 Plaintiff is informed and believes, and thereon alleges, that further services of said nature will
18 be required in the future by Plaintiff in an amount to be shown according to proof.

19
20 206. Defendants and each of them acted maliciously intending to cause injury to Plaintiff Isaiah
21 SILVA. In addition, the conduct was despicable and was done with a willful and knowing
22 disregard of the rights or safety of Plaintiff SILVA. Defendants and each of them were aware of
23 the probable dangerous consequences of their actions and their conduct and deliberately failed
24 to avoid those consequences. All of this is factually supported as plead herein and in the
25 exhibits attached hereto.

26
27
28 207. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to

1 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as
2 plead herein and in the exhibits attached hereto.

3
4 208. The conduct of Defendants is vile, base, and so contemptible as to be looked down on and
5 despised by reasonable people. All of this is factually supported as plead herein and in the
6 exhibits attached hereto.

7
8 209. Defendants and each of them intentionally misrepresented and or concealed material facts and
9 did so intending to harm Plaintiff SILVA. All of this is factually supported as plead herein and
10 in the exhibits attached hereto.

11
12 210. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
13 them for the harm done and to discourage similar conduct in the future.

14
15 **EIGHTH CAUSE OF ACTION - STALKING**

16
17 **(AGAINST LOVE, LUTFI, BUTLER, YUKHTMAN, BLUE VELVET LLC., NAZARIAN,**
18 **NAZARIAN AND ASSOCIATES, ESQUIRE INTERNATIONALE THE AGENCY, SCHENK,**
19 **GANS, LAW OFFICES OF MARC GANS, and DOES 1-50)**

20
21 211. Plaintiff, ISALIAH JAMES SILVA, alleges and incorporates with full force and effect
22 Paragraphs 1 through 120 of the General Allegations as if fully set forth herein.

23
24 212. Defendants and each of pursuant to the continuing conspiracy and more particularly Defendant
25 Osama LUTFI engaged in a pattern of conduct, the intent of which was to follow, alarm, place
26 under surveillance, and or harass the Plaintiff.

27
28 213. As a result of that pattern of conduct, SILVA reasonably feared for his safety and the safety of

1 his immediate family,

2 214. As a still further result of the pattern of conduct Plaintiff SILVA suffered substantial emotional
3 distress.

4
5 215. The defendants and each of them, as a part of the pattern of their conduct, made credible threats
6 with the intent to place the Plaintiff in reasonable fear for his safety the safety of an immediate
7 family member and in reckless disregard for the safety of Plaintiff SILVA and his immediate
8 family members.
9

10
11 216. Although there were threats where the exigent circumstances made a communication by SILVA
12 to cease and abate impractical and unsafe, Plaintiff SILVA repeatedly, clearly, and definitively
13 demanded that LUTFI cease and abate his pattern of conduct. Yet LUTFI persisted in his
14 pattern of conduct.
15

16 217. Plaintiff SILVA sought and received a restraining order prohibiting the actions. LUTFI violated
17 the restraining order and persisted in his pattern of conduct.
18

19 218. The conduct of Defendants and each of them was a substantial factor in causing harm to
20 Plaintiff SILVA.
21

22 219. As a direct and proximate result of the intentional and unlawful conduct of the Defendants and
23 each of them, Plaintiff sustained severe and permanent injuries to his person, all to Plaintiff's
24 damage in a sum within the jurisdiction of this court and to be shown according to proof.
25

26 220. As a further direct and proximate result of the intentional and unlawful conduct of Defendants,
27 and each of them, Plaintiff has been hurt and injured in his health, strength, and activity, all of
28

1 which said injuries have caused general damages and continue to cause him great mental,
2 emotional, physical strain, pain, and suffering; said injuries include, but are not limited to, the
3 need for caretaking and treatments. Plaintiff is informed and believes, and thereon alleges, that
4 the injuries described above, and each of them, are permanent, all of which said injuries and
5 damages are in an amount presently unknown to Plaintiff but in excess of the jurisdictional
6 limits of this court. Plaintiff will ask leave to amend this Complaint at such time as the exact
7 amount of these damages are ascertained or proved at the time of trial.
8

9
10 221. By reason of the foregoing conduct, Plaintiff has further been compelled to employ the services
11 of caretakers and other professional services, and Plaintiff has incurred expenses for medicines.
12 Plaintiff is informed and believes, and thereon alleges, that further services of said nature will
13 be required in the future by Plaintiff in an amount to be shown according to proof.
14

15 222. Defendants and each of them acted maliciously intending to cause injury to Plaintiff Isaiah
16 SILVA. In addition, the conduct was despicable and was done with a willful and knowing
17 disregard of the rights or safety of Plaintiff SILVA. Defendants and each of them were aware of
18 the probable dangerous consequences of their actions and their conduct and deliberately failed
19 to avoid those consequences. All of this is factually supported as plead herein and in the
20 exhibits attached hereto.
21

22
23 223. The conduct of Defendants and each of them was despicable and subjected Plaintiff SILVA to
24 cruel and unjust hardship in knowing disregard of his rights. All of this is factually supported as
25 plead herein and in the exhibits attached hereto.
26

27 224. The conduct of Defendants is vile, base, and so contemptible as to be looked down on and
28 despised by reasonable people. All of this is factually supported as plead herein and in the

1 exhibits attached hereto.

2 225. Defendants and each of them intentionally misrepresented and or concealed material facts and
3 did so intending to harm Plaintiff SILVA. All of this is factually supported as plead herein and
4 in the exhibits attached hereto.
5

6 226. Plaintiff SILVA is therefore entitled to Punitive Damages to punish the defendants and each of
7 them for the harm done and to discourage similar conduct in the future.
8

9 WHEREFORE, Plaintiff, ISAAH JAMES SILVA, prays for judgment against the Defendants, and
10 each of them, as follows:
11

12 **AS TO PLAINTIFF'S FIRST CAUSE OF ACTION:**
13

- 14 A. General damages in the sum according to proof;
15
16 B. Sums incurred for services of physicians, nurses and other medical supplies and services;
17
18 C. For the loss of income incurred and to be incurred according to proof;
19
20 D. For interest as provided by law including, but not limited to, California Civil Code §3291; and
21
22 E. Costs of suit and for such other and further relief as the court deems proper.
23
24 F. Punitive Damages
25
26 G. For trial by jury.

27 **AS TO PLAINTIFF'S SECOND CAUSE OF ACTION:**
28

- 29 A. General damages in the sum according to proof;

1 B. Sums incurred for services of physicians, nurses and other medical supplies and services;

2 C. For the loss of income incurred and to be incurred according to proof;

3
4 D. For interest as provided by law including, but not limited to, California Civil Code §3291; and

5
6 E. Costs of suit and for such other and further relief as the court deems proper.

7
8 F. Punitive Damages

9
10 G. For trial by jury.

11 **AS TO PLAINTIFF'S THIRD CAUSE OF ACTION:**

12
13 A. General damages in the sum according to proof;

14
15 B. Sums incurred for services of physicians, nurses and other medical supplies and services;

16
17 C. For the loss of income incurred and to be incurred according to proof;

18
19 D. For interest as provided by law including, but not limited to, California Civil Code §3291; and

20
21 E. Costs of suit and for such other and further relief as the court deems proper.

22
23 F. Punitive Damages

24
25 G. For trial by jury.

26 **AS TO PLAINTIFF'S FOURTH CAUSE OF ACTION:**

27
28 A. General damages in the sum according to proof;

B. Sums incurred for services of physicians, nurses and other medical supplies and services;

1 C. For the loss of income incurred and to be incurred according to proof;

2 D. For interest as provided by law including, but not limited to, California Civil Code §3291; and

3
4 E. Costs of suit and for such other and further relief as the court deems proper.

5
6 F. Punitive Damages

7
8 G. For trial by jury.

9
10 **AS TO PLAINTIFF'S FIFTH CAUSE OF ACTION:**

11 A. General damages in the sum according to proof;

12
13 B. Sums incurred for services of physicians, nurses and other medical supplies and services;

14
15 C. For the loss of income incurred and to be incurred according to proof;

16
17 D. For interest as provided by law including, but not limited to, California Civil Code §3291; and

18
19 E. Costs of suit and for such other and further relief as the court deems proper.

20
21 F. Punitive Damages

22
23 G. For trial by jury.

24 **AS TO PLAINTIFF'S SIXTH CAUSE OF ACTION:**

25 A. General damages in the sum according to proof;

26
27 B. Sums incurred for services of physicians, nurses and other medical supplies and services;

28
C. For the loss of income incurred and to be incurred according to proof;

1 D. For interest as provided by law including, but not limited to, California Civil Code §3291; and

2 E. Costs of suit and for such other and further relief as the court deems proper.

3
4 F. Punitive Damages

5
6 G. For trial by jury.

7
8 **AS TO PLAINTIFF'S SEVENTH CAUSE OF ACTION:**

9 A. General damages in the sum according to proof;

10
11 B. Sums incurred for services of physicians, nurses and other medical supplies and services;

12
13 C. For the loss of income incurred and to be incurred according to proof;

14
15 D. For interest as provided by law including, but not limited to, California Civil Code §3291; and

16
17 E. Costs of suit and for such other and further relief as the court deems proper.

18
19 F. Punitive Damages

20
21 G. For trial by jury.

22 **AS TO PLAINTIFF'S EIGHTH CAUSE OF ACTION:**

23 A. General damages in the sum according to proof;

24
25 B. Sums incurred for services of physicians, nurses and other medical supplies and services;

26
27 C. For the loss of income incurred and to be incurred according to proof;

28
D. For interest as provided by law including, but not limited to, California Civil Code §3291; and

1 E. Costs of suit and for such other and further relief as the court deems proper.

2 F. Punitive Damages

3
4 G. For trial by jury.
5
6
7
8

9 DATED: May 25, 2018.

10
11 By: 

12
13 Attorneys for Plaintiff, ISALAH JAMES SILVA

14
15 STANTON T. MATHEWS, ESQ.

16 MATHEWS | NISSEN, LLP

17 DOUGLAS S. UNGER, ESQ.

18
19 LAW OFFICES OF DOUGLAS S. UNGER
20
21
22
23
24
25
26
27
28

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 1

Me Oct 11 at 10:07 PM

To: Sam Lutfi

I got you re-trust & eom. I hope I'm good through Monday-Friday. I'll try to only use em when I have a panic attack (I wish I could say that happens rarely but it happens more often than not unfortunately) just do what you can this week before you go get supplies for the cookie jar and leave whenever it's most convenient for you.

On Oct 11, 2013, at 9:11 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi Oct 11 at 10:16 PM

To: Me

Does that end up putting strain on him? Or does that concern just create more anxiety? If he doesn't know about the cookies then we should think of something to tell your mom so that she doesn't accidentally say something to him. Yikey

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Me Oct 11 at 10:22 PM

To: Sam Lutfi

Ill talk to her about it he doesnt care but I doubt my in laws would be thrilled I just hope she doesnt say anything to him before I get the chance to talk to her. Please tell me he's gonna do this for me tonight. I've seriously been waiting all day and at some ease knowing they were coming tonight. I have 4 left and 1 ambian. this last minuet stuff fucking sucks I wish I would have know/been told sooner man. Fuck fuck fuck .

On Oct 11, 2013, at 10:16 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi Oct 11 at 10:26 PM

To: Me

Ok if you're gonna talk to her she's gonna start wondering whaaaaat cause she keeps thinking they're for him too. If u leave it up to me, I'll think of the best reason not to ever mention it.

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Me Oct 11 at 10:29 PM

To: Sam Lutfi

Kk. Say he's not comfortable having them unless their from a doctor & he gets 90 a month so he doesn't need a you or an R & it would freak him out knowing their coming from someone who doesn't have a license. That's what I was gonna say. If u can think of something better go with whatever u think will be most convincing to keep this business to herself.

On Oct 11, 2013, at 10:26 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi Oct 11 at 10:37 PM
To Me

Oh helll no. Then she will send him her fifteen hundred dollar a trip dr in la...I'll come up with something.

[Hide message history](#)

Me Oct 11 at 10:49 PM
Sent - 1397 emails

Haha okay. Lemme know when R has successfully dropped package off.

On Oct 11, 2013, at 10:35 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi Oct 11 at 11:05 PM
To Me

He already did

[Show message history](#)

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Me Oct 11 at 11:18 PM
To Sam Lutfi
by the Trash folder

Fantastic thanks.

On Oct 11, 2013, at 11:05 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi Oct 11 at 11:28 PM
To Me

Nighty poo

[Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Sam Lutfi
To Me

Today at 4:57 PM

Got the 90 thanks to R holy moly that was right under the wire

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me
To Sam Lutfi

Today at 5:12 PM

Amazing. My in laws are still here so maybe he should put them on the left side in the bushes like he did the first time. Just lemme know when he's on his way so I can distract. I only need 20-30 because I wan to be able to access the other 30 if i need to while ur gone filling up the cookie jar. just keep me updated as to what time hes heading over/dropping off.

On Oct 12, 2013, at 4:57 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

> [Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Sam Lutfi
To Me

Today at 5:17 PM

Lord OK but your mom thinks he's met Ross. I'm telling ya, you should have Ross bring over gta5 and say your mom's sending it as a gift and ross can meet you two etc hed never Mention me nor the cookies plus I'll bet you isaiah will think he's cool ross is playing guitar for rolling stones in San Fran this December BTW plus if they click, then great, you'll have a friend of his that's incredibly loyal to you.....

> [Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me
To Sam Lutfi

Today at 5:21 PM

Okay I wil do that today is not the day though he's in a pissy mood. My gmail account is: Kooklemunster666@gmail and my name is chande lier Please make a new one that doesn't have Sam lutfi on it do we can communicate & I don't have to delete all our convos.

On Oct 12, 2013, at 5:17 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

> [Show message history](#)

Sam Lutfi
To Me

Today at 5:33 PM

Get me on beachindays@gmail.com

▼ [Hide message history](#)

[No Subject]

Sam Lutfi

Oct 11 at 9:20 PM

To Me

Ok he has 20 with him. And after that there's only 11 left that you can have during the week if need be. I'm going to try to get 90 tomorrow, if that doesn't work I'll have a shot at it on Monday. If not then I'll have to fly out Tuesday and get back Thursday morning. That work? If that panics you, I'm holding an 8am flight for tomorrow... seriously I'm ok with going tomorrow if you feel I should

Reply, Reply All or Forward | More

Me

Oct 11 at 10:00 PM

To Sam Lutfi

Thursday works just try to get 90 tomorrow so incase I run out before next week I'll have a safety net & tell R to for sure hold onto those 11 for me for when I need before you go, but if u get 90 tomorrow I'll probably ask him for a 30 package late next week. Ur going to a different country for me & CL go whenever it's most convenient for you. But those 90 would really put my mind at ease. Just keep me updated with regards to that. I hate hospitals & I don't wanna be red flagged. But yea Thursday works. Just Please do what you can to tide me over for the next week. Even if its not 90, 15, 20, 30 whatever u can get ur hands on before u go so I can contact Ross when it's necessary before you leave/while ur gone. Email meoncepackage Ross has dropped them off in black box. Thanks man. Seriously. Thank you.

On Oct 11, 2013, at 9:20 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi

Oct 11 at 10:07 PM

To Me

Hey, better yet, then I'm gonna go try and get the 90 in the morning, if I do that, can I send you 40 tomorrow morning instead of the 20 tonight?

Reply, Reply All or Forward | More

Me

Oct 11 at 10:11 PM

To Sam Lutfi

Is there any way I could get 20 tonight and 20 tomorrow? There's just no gaurenteeurgonnagetanything tomorrow and the20 is a gaurentee.

On Oct 11, 2013, at 10:07 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi

Oct 11 at 10:13 PM

To Me

Bah ok. I just feel bad, can sense R is tired from running around all day. K I'll bribe him with fortune cookies or wontons

> Show message history

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Me Oct 11 at 10:14 PM
To: Sam Lutfi

Tell him I'll leave him \$100 in the black box tomorrow if he does this tonight.

On Oct 11, 2013, at 10:13 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Sam Lutfi Oct 11 at 10:18 PM
To: Me

Oh hell nooo. That'll just really look like a slimy cookie deal lol. Plus he's not hurting for dough. Ooh cookie dough see what I just did there. Ha

▼ Hide message history

Sam Lutfi

Oct 11 at 12:57 PM

To Me

Is he taking them to oc? Or did I misread that?

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me

Oct 11 at 3:52 PM

To John Hamilton

A guy might be dropping something off in black box next to front gate. once I know what time can you head over to get it and put it in lunchbox. Please. Xxxx Delete.

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me

Oct 11 at 3:54 PM

To Sam Lutfi

No he's gonna leave them in the black box I'm in oc my assistant will go get it from black box and put it inside so they can't be stolen or anything. He's a chill dude won't look inside won't ask questions he'll just do it. Unless R wants to drop them off around like 9 or 10 I'll become by then

On Oct 11, 2013, at 12:55 PM, Sam Lutfi <sam/lutfi@gmail.com> wrote:

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John Hamilton

Oct 11 at 3:59 PM

To Me

Of cociese hun. At Barney's Now

John Hamilton

> On Oct 11, 2013, at 3:52 PM, gffcoo@yahoo.com wrote:

>

> A guy might be dropping something off in black box next to front gate. once I know what time can you head over to get it and put it in lunchbox. Please. Xxxx Delete.

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

> On Oct 11, 2013, at 8:50 PM, gffcoo@yahoo.com wrote:

>

> guy should be there eith before or around 10 I know its late but hey u get tomorrow off. If we get home before 10 I'll email u so keep checking ur email. If we aren't in la/headed towards la before that time leave at 10 then leave in lunch box and u can take an 2 ambian. I didn't know it was gonna happen this late. Put a sound on for ur emails so U can check them when I send them to u to either go or not to bother. Ur the best regardless I love you xxxx again I had no idea it would be that late. So sorry.

>

John Hamilton

Oct 11 at 8:58 PM

To Me

Ok, sounds good. Let me know when he's dropping off and I'll take them inside for you. Xxxx

John Hamilton

> [Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

> On Oct 11, 2013, at 9:02 PM, gffcoo@yahoo.com wrote:

>

> Will do. Thank you times infinity.

>

Me

Oct 11 at 8:57 PM

To Sam Lutfi

I get script on 20th (i thought it was the 18th i was wrong) so sooner the better but I can make these 20 last me this week + a few days I hope so anytime before the 20th would be ideal just so I don't, you know, have a seizure or anything. But really since ur going to another country for the cookie jar go whenever u have the time. I don't think u get how appreciative me & CL are. Seriously, you rock. Imma email those fuckers in the morning as a big fucking fat thank you.

On Oct 11, 2013, at 8:13 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

On Oct 11, 2013, at 9:20 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

▼ Hide message history

Ok he has 20 with him. And after that there's only 11 left that you can have during the week if need be. I'm going to try to get 90 tomorrow, if that doesn't work I'll have a shot at it on Monday. If not then I'll have to fly out Tuesday and get back Thursday morning. That work? If that panics you, I'm holding an 8am flight for tomorrow... seriously I'm ok with going tomorrow if you feel I should

Re: Re: Re: All as Forged I Mean

Thursday works just try to get 90 tomorrow so incase I run out before next week I'll have a safety net & tell R for sure hold onto those 11 for me for when I need before you go, but if u get 90 tomorrow I'll probably ask him for a 30 package late next week. Ur going to a different country for me & CL go whenever it's most convenient for you. But those 90 would really put my mind at ease. Just keep me updated with regards to that. I hate hospitals & I don't wanna be red flagged. But yea Thursday works. Just Please do what you can to tide me over for the next week. Even if its not 90, 15, 20, 30 whatever u can get ur hands on before u go so I can contact Ross when it's necessary before you leave/while ur gone. Email meoncepackage Ross has dropped them off in black box. Thanks man. Seriously. Thank you.

On Oct 11, 2013, at 9:20 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

> Show message history

Me Oct 11 at 12:23 PM
To Sam Lutfi

20-30 cool? Lemme thanks yenta. Ur saving my ass. Let u know once email is sent.

On Oct 11, 2013, at 12:20 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

> [Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Sam Lutfi Oct 11 at 12:25 PM
To Me

K will be at least 20 and equal amount of amb

> [Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me

Today at 2:19 AM

To Sam Lutfi

Got em thanks. Tell R I say thanks too.

On Oct 11, 2013, at 11:28 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 2



Blues = Blue Heart
 Bars = Yellow Banana
 CK = White Rice
 ADD = Coffee (Black)
 Norcos = Yellow Corn
 X = Happy White Ghost
 SIZZ = Purple Grapes
 H = Black Spider

Do you need anything = Praying Hands

Yes = Thumbs up

NO = Thumbs down

CALL ME = RED phone

I'm Here = Yellow lightning Bolt

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 3

Sam Lutfi
To Me

May 31, 2012 at 5:07 PM

I know we don't know each other and albeit all incongruous, you've probably heard nothing but nefarious details about me etc, barring all that drivel for now, I would like to open up a line of confidential dialogue between us? Why? Good question... a cipher in the shroud of mendacity perhaps? goals are mutually salubrious, I can assure you of that.... If not, well, can't blame me for trying. Cheers, Sam

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Sam Lutfi

Oct 11 at 12:24 PM

To Me

Also yahoo is the most unsecured email network on the planet. Gmail is highly encrypted and virtually impossible to hack. Also you can install an app that will alert you via text if anyone ever logs into your email. Your mom has it set up that way. Only relaying this because I know what depths gw sinks to in order to amass full control. Read my court docs , those women had their eyes in everything, texts, emails, etc etc

Between you and bozo senior(mom) I may need to fly to Mexico and refill the cookie jar. Cause the jar is mostly crumbs at this point. Am looking up flights now. Joy joy

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me

Oct 11 at 2:38 PM

To Sam Lutfi

Hahaha well I can pay for ur flight ie u put it on ur card & I'll compensate whatever u spend w/ cash. I know you'd never ask me for \$ but please let me do this for being so Chill/accommodating about all this for cl & myself. Seriously, I insist. Also I'll set up a gmail account today. U should set up a new one without ur name on it as I plan to do so no one can tell its us communicating because GW is sneaky and evil. Not Cohen.GW

On Oct 11, 2013, at 12:24 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

> [Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me

Oct 11 at 2:49 PM

To Sam Lutfi

Hahah well I can pay for ur flight. I.e. you pay for the tickets on ur card and I'll compensate whatever u spend by giving you cash, I know you would never ask me for \$ but please let me do this, for being so chill/accommodating to me & CL. I Insist seriously. I'm doing it weather you agree to it or not. Also I will set up a gmail account today. You should set up a new one with a different name as I plan to do so no one can ever tell its us communicating. GW is evil and would stoop to that level. Not CW, GW, anyway let me know how much tickets both ways are and I'll pay you back in cash. If u don't tell me then I'm just gonna have to guess and it would be easier to have a precise #. Thanks for a) going to Mexico b) telling me about yahoo. I had no idea. Lemme know if cookie basket is gonna get dropped off tonight or tomorrow.

On Oct 11, 2013, at 12:24 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Sam Lutfi

Oct 11 at 2:56 PM

To Me

Bahh I appreciate the courtesy, don't even worry about that at all, but thank you for that though. If you really want to pay me back and own me as your personal bitch for life, then when you fire GW, just let me there, even in spirit!! Bah!!

> [Show message history](#)

Me

Oct 11 at 2:58 PM

[message history](#) | [All](#)

Hahha okay please let me pay for ur tickets ie you put it on your card and I'll compensate whatever you spend with cash. I know you'd never ask me for \$ but I want to do this for you being so chill/accommodating towards CL and me. I'm insisting. Im gonna do it weather you want me to or not so let me know the price tickets both way & I'll compensate you w/ cash. If you don't give me a precise # imma just have guess. Also I'm creating a gmail account today. You should creat a new one too using a different name as i plan to do so No one can ever tell its us communicating. GW is that sneaky/evil. Not CW, GW. Thanks dude. Seriously. Thank you. I'll email you from my new account at some point today. Also email me about if th cookie basket is gonns get delivers today or tomorrow. Much appreciated.

On Oct 11, 2013, at 12:24 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 4

Sam Lutfi Today at 4:57 PM
To Me

Got the 90 thanks to R holy moly that was right under the wire

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Me Today at 5:12 PM
To Sam Lutfi

Amazing. My in laws are still here so maybe he should put them on the left side in the bushes like he did the first time. Just lemme know when he's on his way so I can distract. I only need 20-30 because I want to be able to access the other 30 if I need to while ur gone filling up the cookie jar. just keep me updated as to what time hes heading over/dropping off.

On Oct 12, 2013, at 4:57 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

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[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Sam Lutfi Today at 5:17 PM
To Me

Lord OK but your mom thinks he's met Ross. I'm telling ya, you should have Ross bring over gta5 and say your mom's sending it as a gift and ross can meet you two etc hed never Mention me nor the cookies plus I'll bet you isaiah will think he's cool ross is playing guitar for rolling stones in San Fran this December BTW plus if they click, then great, you'll have a friend of his that's incredibly loyal to you.....

> [Show message history](#)

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Me Today at 5:21 PM
To Sam Lutfi

Okay I will do that today is not the day though he's in a pissy mood. My gmail account is: Kookiemunster666@gmail and my name is chande iler Please make a new one that doesn't hve Sam lutfi on it do we can communicate & I don't have to delete all our convos.

On Oct 12, 2013, at 5:17 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

> [Show message history](#)

Sam Lutfi Today at 5:33 PM
To Me

Get me on beachindays@gmail.com

> [Hide message history](#)

Silva v. Love, et al

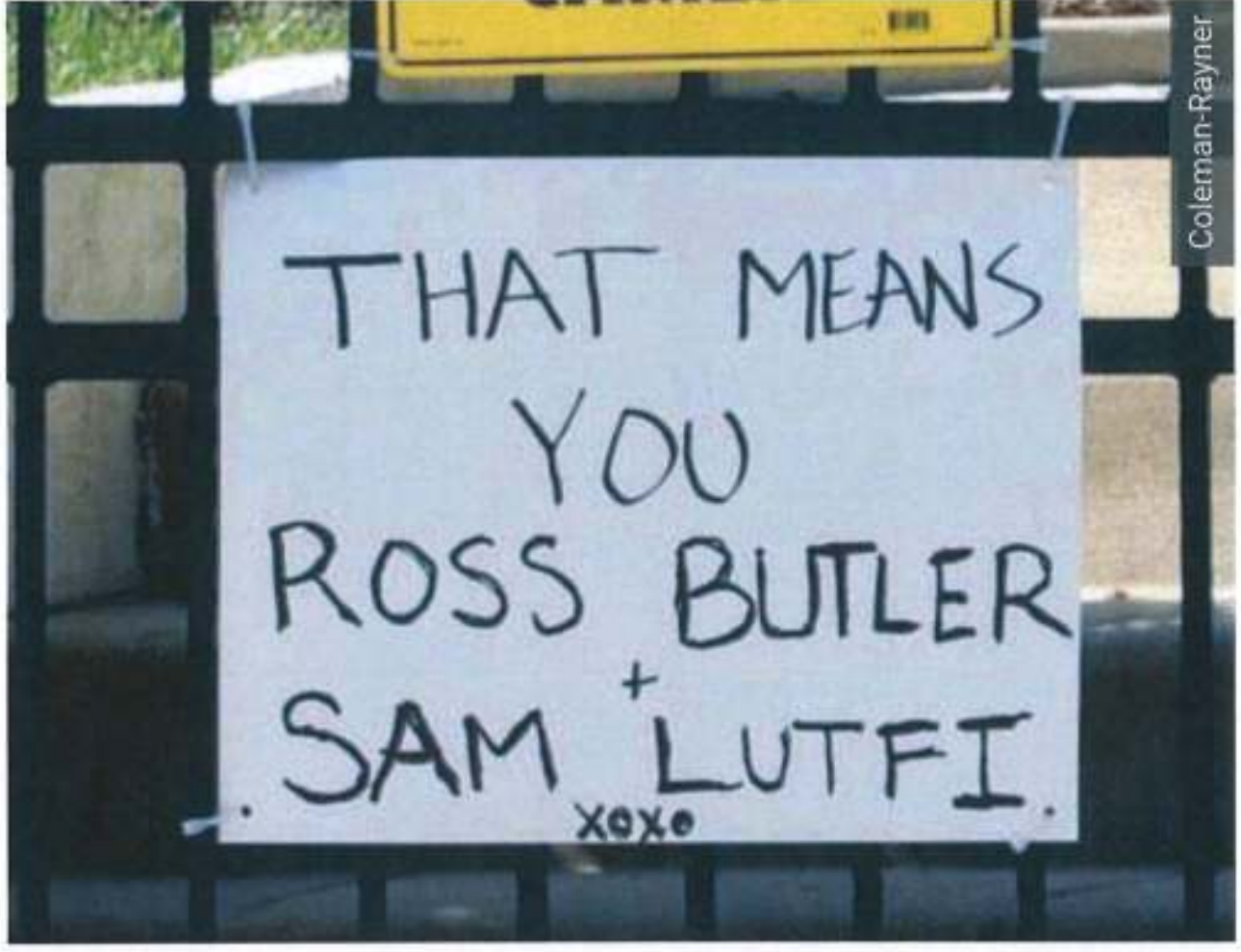
UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 5



Coleman-Ra



Coleman-Rayner



Coleman-Rayner

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 6

**Text Messages Between
COURTNEY LOVE & ISAIAH SILVA**

February 4, 2015 // 16:50:25-17:13:38

1
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6 LOVE: Just know Sam doesn't have access to this phone and I had it double checked at
7 Apple Store just in case but I seriously doubt he'd do that . I know we have ups
8 and downs but seriously he's a rott weiler when it comes to protecting me and
9 my assets and a good friend .

10
11 LOVE: He's just trying to make sure im never broke again . So sorry to hear about your
12 health . If it's something serious I know and Sam being a former usc pre med
13 student at the top frat - plus my brother in law from Nicole whose an oncology
14 rock star - he literally has the cure for Hodgkin's lymphoma plus Edward who im
15 reconnected with has massive connections in the medical world . Please
16 remember im me and I've always collected a good network of medical people
17 because I absolutely do not trust ama doctors first diagnoses

18
19 LOVE: If you've never read " outliers " I suggest you do as your defintly an outlier
20 yourself and there's a cheaper about how rich kids deal are taught to deal with
21 doctors as opposed to poor kids who are taught to be docile and not question
22 whatever any doctor says . I can tell something is getting you down . But you
23 have people who love you and you have powerful people who love you eg me
24 who can pitch in when you feel like discussing it .

25
26 LOVE: Money is freedom.

27
28 LOVE: Money does buy health .
29

30 LOVE: I'm comitted at the age of 50 to throw out my old. " sell out " playbook and with
31 taste and grace and dignity always - send money into the world on the assets I
32 do have my talent - my vision. And what Kurt left me And how degraded
33 that's been from sole heir to one of a voice on a comittee is absurd / but that's
34 what happened . I will always keep his dignity but there are no absolutes . And
35 that's something I want you to understand .

36
37 LOVE: And something my daughter needs to come to terms with in her own identity
38 quest . She was hurt and has a hole yes - his action was terrible - but he left a
39 great legacy and I wish she would come to terms with that and not be arrogant -
40 self loathing - about it . I also wish there was more trust after what she put me
41 through witt no warning with the restraining order etc - I never want to go
42 backwards ... But eg not letting you and me have a normal relationship that
43 family members have / why ? What's the threat. ? I am trying to understand .
44 Sometimes I wish she'd consent to see a therapist with me because you only
45 have one mom and in her case one parent and I only have her . And what
46 occurred was the most humiliating , degrading and nonsensical and greedy thing
47 that's ever happened to me . I am not angry im just aware the lengths she can go
48 to for money . Well she's my daughter and im not going to starve or be in penury
49 because she isht pissed that she has a half billion dollar hole . Her dad wrote "
50 she'll come back as fire and burn all the liars leave a blanket of ash on the ground
51 " at his most anguished and hopeless and helpless feeling . He was talking to our
52 baby . But she doesn't seem to care about it to the point of aversion . Id really
53 like to sit down and try and work through this stuff so there's no festering
54 secrets . Anyway I do love her unconditionally I just won't go backwards .

55
56 LOVE: Anyway please delete my texts I don't want to incur some sort of wrath - that's
57 terrifying and I have a temper too / Im not a doormat .

58

59 LOVE: But witt her I know it seems I am . It's just I love her so much and feel so guilty I
60 couldn't protect her .

61

62 LOVE: But I am conflicted about the decision to destroy me public ally with attorneys
63 and not think twice about it . I don't know what she feels now she has never
64 apologised for it . In fact I am used to people thinking I beat her or something .
65 But she like me is a fighter - I hope she uses that energy with love and an open
66 heart . Anyway im now officially worried about you / I don't think Fbc could
67 survive without you - and Id like to talk to like real family that's loving talks to
68 real family . I wish only the best to tot Isiah . Only the best and all your dreams
69 will happen and im behind you 1000% . Love you kiddo . X c

70

71 *February 8, 2015 // 09:55:12-19:22:40*

72

73 LOVE: Im really worried about what's going on with you . I wish like a real family you
74 would just tell me . I won't tell anyone . X c

75

76 SILVA: As always, I wish you and Sam nothing except all of the happiness and success in
77 the world. I'm happy to talk with you in person when you get home. My desire to
78 meet in person has nothing to do with privacy regarding Sam Lutfi or Frances.
79 Lots of love & safe travels.

80

81 SILVA: *[Image – Screenshot of messages from Courtney Love & Sam Lutfi]*

82

83 *Courtney Mama-in-Law: (I')m really worried about what's going o(n)*
84 *with you. I wish like a real family you..*

85

86 *Sam Lutfi: don't believe a thing you're saying at (a)ll fyl. So*
87 *just know that.*

88

89 SILVA: PS If u have a moment, reread each of the texts I've sent you over the course of
90 the past 3 weeks. If you don't have them I do and I'll share them with you in
91 person.

92

93 LOVE: Ok I'm just really worried . Xc

94

95 LOVE: Fbc just told me about Sam . I had no idea I have a Rottweiler whose out of
96 control. Just fucking ignore him . Im so sorry . Terribly so .

97

98 LOVE: I told him to knock it the fuck off . If he continues please tell me . Ignore him .

99

100 LOVE: I should not have shared nr concern with him . Im sorry you are being growled at
101 and threatened . He's probably drunk . Just ignore it .

102

103 *February 9, 2015 // 18:20:48-19:12:00*

104

105 LOVE: I think I made a mistake with Franny and told her you and Sam have spoken in
106 the past . It just sort of came out - I am not trying to throw you under the bus !!!
107 Im in NYC to do letterman and will be back in la wednesday and want to see Fbc in
108 person / I don't want it taken out on me what Sam said I do not share his
109 opinions - and he was very much out of line . I sent him back to his dogs and
110 would like him out of my life entirely - im really really sorry and terribly sorry for
111 the health problems your having . I have some major high end medical
112 connections and If you'll accept my help I want to help . But as you said she
113 keeps us separated - I don't know why - I feel like she's taking it out on me . Sam
114 is not my representing on earth . He doesn't even reflect what I think or feel and
115 the last thing you need is to feel attacked right now . Again I apologise for his
116 behavior I don't know what else to say except im sending you love and light . So

146 LOVE: Please Lmk .

147

148 LOVE: Are you touring w fob ? I have a lame little tour with lana del Rey . Oh god .. How
149 I got into that one !

150

151 SILVA: Hi, Frances is with John. I haven't been in touch her tho. I've been working all
152 day. Sorry I've got to go. Look forward to hanging soon.

153

154 LOVE: Likewise .

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02-04-2015 16:50

Just know Sam doesn't have access to this phone and I had it double checked at Apple Store just in case but I seriously doubt he'd do that . I know we have ups and downs but seriously he's a rott weiler when it comes to protecting me and my assets and a good friend .

02-04-2015 16:53

He's just trying to make sure im never broke again . So sorry to hear about your health . If it's something serious I know and Sam being a former usc pre med student at the top frat - plus my brother in law from Nicole whose an oncology rock star - he literally has the cure for Hodgkin's lymphoma plus Edward who im reconnected with has massive connections in the medical world . Please remember im me and I've always collected a good network of medical people because I absolutely do not trust ama doctors first diagnoses

02-04-2015 16:55

If you've never read " outliers " I suggest you do as your defintly an outlier yourself and there's a cheaper about how rich kids deal are taught to deal with doctors as opposed to poor kids who are taught to be docile and not question whatever any doctor says . I can tell something is getting you down . But you have people who love you and you have powerful people who love you eg me who can pitch in when you feel like discussing it .

02-04-2015 16:55

If you've never read " outliers " I suggest you do as your defintly an outlier yourself and there's a cheaper about how rich kids deal are taught to deal with doctors as opposed to poor kids who are taught to be docile and not question whatever any doctor says . I can tell something is getting you down . But you have people who love you and you have powerful people who love you eg me who can pitch in when you feel like discussing it .

Money is freedom.

Money does buy health .

02-04-2015 16:57

I'm comitted at the age of 50 to throw out my old " sell out " playbook and with taste and grace and dignity always - send money into the world on the assets I do have my talent - my vision. And what Kurt left me And how degraded that's been from sole heir to one of a voice on a comittee is absurd / but that's what happened . I will always keep his dignity but there are no absolutes . And that's something I want you to understand .

And that's something I want you to understand .

02-04-2015 17:08

And something my daughter needs to come to terms with in her own identity quest . She was hurt and has a hole yes - his action was terrible - but he left a great legacy and I wish she would come to terms with that and not be arrogant - self loathing - about it . I also wish there was more trust after what she put me through with no warning with the restraining order etc - I never want to go backwards ... But eg not letting you and me have a normal relationship that family members have / why ? What's the threat. ? I am trying to understand . Sometimes I wish she'd consent to see a therapist with me because you only have one mom and in her case one parent and I only have her . And what occurred was the most humiliating , degrading and nonsensical and greedy thing that's ever happened to me . I am not angry im just aware the lengths she can go to for money . Well she's my daughter and im not going to starve or be in penury because she isht pissed that she has a half billion dollar hole . Her dad wrote " she'll come back as fire and burn all the liars leave a blanket of ash on the ground " at his most anguished and hopeless and helpless feeling . He was talking to our baby . But she doesn't seem to care about it to the point of aversion . Id really like to sit down and try and work through this stuff so there's no festering secrets . Anyway I do love her unconditionally I just won't go backwards .

Anyway I do love her unconditionally
I just won't go backwards .

Anyway please delete my texts I
don't want to incur some sort of wrath
- that's terrifying and I have a temper
too / im not a doormat .

02-04-2015 17:09

But with her I know it seems I am . It's
just I love her so much and feel so
guilty I couldn't protect her .

02-04-2015 17:13

But I am conflicted about the decision
to destroy me public ally with
attorneys and not think twice about it
. I don't know what she feels now she
has never apologised for it . In fact I
am used to people thinking I beat her
or something . But she like me is a
fighter - I hope she uses that energy
with love and an open heart . Anyway
im now officially worried about you / I
don't think Fbc could survive without
you - and Id like to talk to like real
family that's loving talks to real family
. I wish only the best to tot Isiah .
Only the best and all your dreams will
happen and im behind you 1000% .
Love you kiddo . X c

happen and im behind you 1000% .
Love you kiddo . X c

02-08-2015 09:55

Im really worried about what's going
on with you . I wish like a real family
you would just tell me . I won't tell
anyone . X c

02-08-2015 13:06

As always, I wish you and Sam
nothing except all of the happiness
and success in the world. I'm happy
to talk with you in person when you
get home. My desire to meet in
person has nothing to do with privacy
regarding Sam Lutfi or Frances. Lots
of love & safe travels.

Messages (25)

Courtney Mama-in-Law 9:55 AM
m really worried about what's going o
with you . I wish like a real family you..

Sam Lutfi Yesterday
don't believe a thing you're saying at
ll fyi. So just know that.

PS
If u have a moment, reread each of
the texts I've sent you over the
course of the past 3 weeks. If you
don't have them I do and I'll share
them with you in person.

PS

If u have a moment, reread each of the texts I've sent you over the course of the past 3 weeks. If you don't have them I do and I'll share them with you in person.

02-08-2015 16:27

Ok I'm just really worried . Xc

02-08-2015 19:13

Fbc just told me about Sam . I had no idea I have a Rottweiler whose out of control. Just fucking ignore him . Im so sorry . Terribly so .

02-08-2015 19:22

I told him to knock it the fuck off . If he continues please tell me . Ignore him .

I should not have shared nr concern with him . Im sorry you are being growled at and threatened . He's probably drunk . Just ignore it .

growled at and threatened . He's probably drunk . Just ignore it .

02-09-2015 18:20

I think I made a mistake with Franny and told her you and Sam have spoken in the past . It just sort of came out - I am not trying to throw you under the bus !!! Im in NYC to do letterman and will be back in la wednesday and want to see Fbc in person / I don't want it taken out on me what Sam said I do not share his opinions - and he was very much out of line . I sent him back to his dogs and would like him out of my life entirely - im really really sorry and terribly sorry for the health problems your having . I have some major high end medical connections and if you'll accept my help I want to help . But as you said she keeps us separated - I don't know why - I feel like she's taking it out on me . Sam is not my representing on earth . He doesn't even reflect what I think or feel and the last thing you need is to feel attacked right now . Again I apologise for his behavior I don't know what else to say except im sending you love and light . So sorry he's out of control dude . Now my daughter is mad at me . We do better in person on the occasion she comes by . I want this family to be prosperous and loving . And I will do whatever that takes to make that happen . But you need to assert yourself too . Your her husband . If you want me included then you should say so . Im not attacking you please don't think that - im trying to be supportive . I do adore you . Know it . With love and sincerity . X c

adore you . Know it . With love and sincerity . X c

02-09-2015 18:47

Thank you. All good vibes. Don't sweat it. Totally fine. I think it's a positive thing you did that. Talking in person will keep each one of us accountable. Look forward to getting together when you're home. Lots of love.

02-09-2015 19:01

I didn't mean to . I don't feel free to text what I would like to . But I assure you I do not share his opinion on any level . We will talk this week . Keep your chin up kiddo . X c

02-09-2015 19:11

Honestly don't sweat it. Totally fine. I think it's a positive thing you did that. I have the skin of an alligator.

02-09-2015 19:12

I sort of do and sort of don't . Im in a fucking hell of my own making with this guy and its spilling onto you . I feel like shit . I feel like shit . I feel like shit . About it and I can't text much more than that .

shit . About it and I can't text much more than that .

02-13-2015 14:35

Hey . Are you recovering from the grenade he launched ? I had no idea and I don't know the contents . Im just really sorry . Im trying to get ahold of my kid so she can come over and we can make a plan to just end it - but she hasn't responded to me . Is she alright ? Are you ? Lmk . Xx c

02-13-2015 15:01

Please Lmk .

02-13-2015 15:24

Are you touring w fob ? I have a lame little tour with lana del Rey . Oh god .. How I got into that one !

02-13-2015 16:43

Hi, Frances is with John. I haven't been in touch her tho. I've been working all day. Sorry I've got to go. Look forward to hanging soon.

02-13-2015 16:43

Hi, Frances is with John. I haven't been in touch her tho. I've been working all day. Sorry I've got to go. Look forward to hanging soon.

02-13-2015 16:44

Likewise .

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 7

● Sam Lutfi
To Me

Oct 11 at 12:04 PM

Gotcha, no prob. Sorry in my own state of panic myself. Alan Goldman and byrnes promised your mom a check on Oct 15th that she was counting on to pay these settlement deadlines. Now they're saying Dec 15th which cant work cause she will be penniless for two more months. Hell can I ask you a favor? Won't be upset if you say no. But think you can email byrnes and Alan and cc your mom? Just saying hey, my mother was told she'd receive a check on Oct 15th and that it's very unfair if that doesn't happen...

alan@goldmarkneil.com, DavidB@ziffrenlaw.com, courtneylove@gmail.com

They basically rubbed it in our face already that you don't care that it's coming in Dec rather than next week.

> Show message history

Reply, Reply All or Forward | More

● Me
To Sam Lutfi

Oct 11 at 12:17 PM

Tell u what I'll do that if I can get a package delivered tonight or tomorrow. Fair trade off?

On Oct 11, 2013, at 12:04 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

● Sam Lutfi
To Me

Oct 11 at 4:46 PM

Ok so here's my dilemma. Your mom was told she'd get a big check on Oct 15 so we accounted for that. Due Oct 1st were a legal retainer of 50k, a check to bryan Freedman for another 50k, rent 16k and amex for 15k. We negotiated with everyone to wait till the 15th, they all agreed to do so but this week Alan and Byrne's said woops it'll come December 15th. I've managed to borrow around 60k so far but short the rest. And truly, your mom's been living very frugally all year. But even if they advance her 50k there s still two months till her next check and numerous other bills to pay till then. I wish they'd change the format to a monthly disbursement rather than quarterly. Do you go through this as well? They truly are not maximizing the potential of this catalogue, they keep claiming that you're fine and happy with the way things are. I don't think they ever expected that you and your mom would ever speak again. But surely, both you and Courtney should really have millions in savings and in properties and other investments. Sorry to vent to you here but its hard to discuss with your mom without having her fall into pandemonium, although rightfully so. I mean I get it, she's made plenty mistakes in the past, but times have changed.. Would be nice to see her buy a home and start a savings account etc. Bahh im venting to you here yet I have no real underlying question. Just feels like everytime we plug one hole in this boat, another one is being drilled. I know you're thinking Fuck this guy and where's Ross lol, don't worry, that's being taken care of... but I'll be dry after that, so trying desperately to work on refilling the cookie jar.

Reply, Reply All or Forward | More

On Oct 11, 2013 7:08 PM, <elficoc@yahoo.com> wrote:

I was out shopping for my step kid for school. Please re-send their emails and maybe a nicer rough draft of what i should say because i don't have this problem with these people. I doubt my emailing them will do anything but i will email them and I'll see what i can do. If they aren't postponing my check I'll even tell them to give my eom check to her. Okay. This is coming close to crossing boundaries, just thought i would give you fair warning. The only solution i can think of is sending her a check myself. If they don't listen to me there's not much more I can do even if I hound them everyday. I don't have much power when it comes to eom. In fact this email will be the first time I've contacted them directly and not through lawyers. If they don't listen to me you cannot continue to ask me to send a barrage of emails/calls etc to them because that will put into jeopardy my eom checks as well. Do u know what time ross is coming??

On Oct 11, 2013, at 4:46 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

● Sam Lutfi
To Me

Oct 11 at 7:11 PM

Don't worry about it Don't have to do it and certainly no need to lend your own money. I'll text him,now

> Show message history

Reply, Reply All or Forward | More

On Oct 11, 2013 7:43 PM, <elfcoo@yahoo.com> wrote:

I keep my word I'll email them I'm not gonna dick you or my mother around just gimme their emails please. I want my mother to be able to pay her rent.

Sam Lutfi

Oct 11 at 7:49 PM

To Me

No. It wasn't a condition. It was a request and by no means are you obligated to do it especially when you're uncomfortable doing so. Topic dropped. Ross should be done before ten btw

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[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

On Oct 11, 2013 8:04 PM, <elfcoo@yahoo.com> wrote:

I understand what was being asked of me wasn't an obligation but i keep my word always. All i meant by that particular message about almost crossing boundaries was the intense amount of detail. Please resend me their emails. If you don't i will find them regardless. I want my mother to not have to owe anyone anything and she already owes a lot of ppl \$. I think it's ridiculous that they pushed the check back and I want to at least say I tried. I was just saying to you that if they don't listen to me I've done what I can do. Please let me do something. I want to do this for my mother because she's my mom and she has very few ppl coming to her defense. don't strip away my ability to defend her and try to get her what's rightfully hers. Please resend emails Sam. Subject won't be dropped until I get their emails. Also tell Ross to be as quiet as possible because I have my in laws over. Talk to you soon i hope.

On Oct 11, 2013 8:04 PM, <elfcoo@yahoo.com> wrote:

I understand what was being asked of me wasn't an obligation but i keep my word always. All i meant by that particular message about almost crossing boundaries was the intense amount of detail. Please resend me their emails. If you don't i will find them regardless. I want my mother to not have to owe anyone anything and she already owes a lot of ppl \$. I think it's ridiculous that they pushed the check back and I want to at least say I tried. I was just saying to you that if they don't listen to me I've done what I can do. Please let me do something. I want to do this for my mother because she's my mom and she has very few ppl coming to her defense. don't strip away my ability to defend her and try to get her what's rightfully hers. Please resend emails Sam. Subject won't be dropped until I get their emails. Also tell Ross to be as quiet as possible because I have my in laws over. Talk to you soon i hope.

On Oct 11, 2013, at 7:49 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

Sam samlutfi@gmail.com

Oct 11 at 8:13 PM

To Me

davidb@offirenlaw.com,
alan@goldmarknell.com

Ok I'll write up a draft in brevity and send it shortly

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[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

samlutfi@gmail.com

Sam Lutfi

Oct 11 at 8:13 PM

To Me

Btw thank you, truly awesome of you

[Show message history](#)

[Reply](#), [Reply All](#) or [Forward](#) | [More](#)

Sam Lutfi

Oct 11 at 8:24 PM

To Me

Or just write whatever you feel you want to and maybe cc Courtneylove@gmail.com
But now I have to figure out how to refill the jar, how much time do I have to do that btw?

> Show message history

Reply, Reply All or Forward | More

Me

Oct 11 at 8:57 PM

To Sam Lutfi

I get script on 20th (I thought it was the 18th I was wrong) so sooner the better but I can make these 20 last me this week + a few days I hope so anytime before the 20th would be ideal just so I don't, you know, have a seizure or anything. But really since ur going to another country for the cookie jar go whenever u have the time. I don't think u get how appreciative me & CL are. Seriously, you rock. Imma email those fuckers in the morning as a big fucking fat thank you.

On Oct 11, 2013, at 8:13 PM, Sam Lutfi <samlutfi@gmail.com> wrote:

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 8

SILVA, Isaiah – WITH 1959 MARTIN GUITAR AT CURSON AVENUE HOUSE

January 8, 2014



Silva v. Love, et al



Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 9

**Text Messages Between
NADIR MARASCHIN & ISAIAH SILVA**

January 13, 2014 // 17:50:03-18:04:54

MARASCHIN: Can't wait to sleep though was good biz in Vegas

SILVA: Michael said he'd let me know tomorrow morning ASAP

SILVA: Prob around 7am I'll know

MARASCHIN: awesome ... I'm working though let me know so I can be down in early eve and
Rock new cymbal

MARASCHIN: ;)

MARASCHIN: Banging ;) and thsnk u

MARASCHIN: I heard a bird telling my u are playing Kurt guitar ? Fuck yeah

MARASCHIN: that is an honor ;)

SILVA: Word

SILVA: No prob

SILVA: It was a anniversary present

29 SILVA: Wedding gift

30

31 MARASCHIN: Did she like the room ?

32

33 SILVA: Since he can't meet me it was Frances way of letting me get to know her dad

34

35 MARASCHIN: It's pretty cool man

36

37 MARASCHIN: u should write on it and see what happens ;)

38

39 SILVA: It's weird it just feels like an awesome vintage guitar but I don't ever think about
40 who it belonged to in that way. I think about it in terms of my father in law gave
41 me a guitar. Just like my dad giving Frances a guitar. It's hard to think about it in
42 terms of what the general population thinks of it as, like a "Kurt Cobain" guitar.
43 Weird.

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45 MARASCHIN: Yeah that's true too , Brandon just texted me that he is coming over at 7 30 ?

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47 SILVA: Coo

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January 13, 2014

Index: 4698-4716-A

MARASCHIN, Nadir

(323) 474-2276

01-13-2014 17:50

Can't wait to sleep though was good
biz in Vegas

Michael said he'd let me know
tomorrow morning ASAP

Prob around 7am I'll know

awesome ... I'm working though let
me know so I can be down in early
eve and Rock new cymbal

;)

Banging ;) and thnk u

I heard a bird telling my u are playing
Kurt guitar ? Fuck yeah

that is an honor ;)

Cobain v. Silva

that is an honor ;)

01-13-2014 17:51

Word

No prob

It was a anniversary present

Wedding gift

Did she like the room ?

01-13-2014 17:52

Since he can't meet me it was Frances way of letting me get to know her dad

01-13-2014 17:53

It's pretty cool man

u should write on it and see what happens ;)

January 13, 2014

Index: 4698-4716-C

MARASCHIN, Nadir

(323) 474-2276

u should write on it and see what happens ;)

01-13-2014 18:00

It's weird it just feels like an awesome vintage guitar but I don't ever think about who it belonged to in that way. I think about it in terms of my father in law gave me a guitar. Just like my dad giving Frances a guitar. It's hard to think about it in terms of what the general population thinks of it as, like a "Kurt Cobain" guitar. Weird.

01-13-2014 18:01

Yeah that's true too , Brandon just texted me that he is coming over at 7 30 ?

01-13-2014 18:04

Coo

Cobain v. Silva

**Text Messages Between
IAN VOLKER & ISAAH SILVA**

January 26, 2014 // 18:18:47-18:33:16

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SILVA: *[Photo of Martin guitar]*

SILVA: *[Photo of Martin guitar]*

SILVA: I was just given that

VOLKER: Wow man incredible.

SILVA: It's from the unplugged show

SILVA: The original case had these trinkets in it and guitar like 20 guitar picks and an extra pair of strings they've been sitting in storage for 20 years

VOLKER: I was going to guess that. How does it sound? Will it turn you into an ambidextrous guitar player?

VOLKER: What an awesome piece of his life to own. Truly incredible!

SILVA: It was strung right handed. I was told by cl that he'd play right handed around the house. The strings are original. It's weird. I've started to forget "what it is" probably a good thing or id never touch it cuz it's worth more than my life

SILVA: Hence why nobody can know it's out of storage

30 SILVA: And given to me

31

32 SILVA: People would kill for that literally

33

34 VOLKER: Yeah. What's the estimated value? If you don't mind sharing that with me. If not
35 I understand.

36

37 SILVA: 2m

38

39 VOLKER: Wow. Well I think you should play it! I think he would have wanted you to.
40 Especially considering your past history with his music.

41

42 VOLKER: Ps. Your life is worth more than \$2m!

43

44 SILVA: Not to crazy ppl

45

46 VOLKER: I know. But crazy people are crazy.

47

48 VOLKER: Let's try and hang out soon. Catch up.

49

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01-26-2014 18:19



I was just given that

Wow man incredible.

01-26-2014 18:20

It's from the unplugged show

01-26-2014 18:21

The original case had these trinkets in it and guitar like 20 guitar picks and an extra pair of strings they've been sitting in storage for 20 years

01-26-2014 18:21

The original case had these trinkets in it and guitar like 20 guitar picks and an extra pair of strings they've been sitting in storage for 20 years

I was going to guess that. How does it sound? Will it turn you into an ambidextrous guitar player?

01-26-2014 18:22

What an awesome piece of his life to own. Truly incredible!

01-26-2014 18:24

It was strung right handed. I was told by cl that he'd play right handed around the house. The strings are original. It's weird. I've started to forget "what it is" probably a good thing or id never touch it cuz it's worth more than my life

Hence why nobody can know it's out of storage

01-26-2014 18:25

And given to me

People would kill for that literally

January 26, 2014

Index: 17994-18011-C

VOLKER, Ian

(714) 932-2791

Cobain v. Silva

People would kill for that literally

Yeah. What's the estimated value? If you don't mind sharing that with me. If not I understand.

01-26-2014 18:26

2m

01-26-2014 18:27

Wow. Well I think you should play it! I think he would have wanted you to. Especially considering your past history with his music.

01-26-2014 18:32

Ps. Your life is worth more than \$2m!

Not to crazy ppl

01-26-2014 18:33

I know. But crazy people are crazy.

Let's try and hang out soon. Catch up.

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 10

Text Message

FRANCES COBAIN

Silva v. Love, et al

November 12, 2014 // 0237 hrs.

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7 COBAIN: So I almost dies tonight. I had a grand mal seizure. Isaiah thought I had died in
8 his arms. Pretty intense. I shouldn't be alive but I am which is a good thing so I'm
9 texting everyone I love and telling them I LOVE YOU!!! Thank you for being my
10 friend, someone I can always count on who constantly shows me nothing but
11 respect and humor and kindness and creativity which is hard to find in the world.
12 Ur an --
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11-12-2014 02:37

So I almost died tonight.
I had a grand mal
seizure. Isaiah thought I
had died in his arms.
Pretty intense. I
shouldn't be alive but I
am which is a good thing
so I'm texting everyone I
love and telling them I
LOVE YOU!!! Thank you
for being my friend,
someone I can always
count on who constantly
shows me nothing but
respect and humor and
kindness and creativity
which is hard to find in
the world. Ur an

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 11

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Handwritten Note
FRANCES COBAIN to ISAIAH SILVA

Silva v. Love, et al

February 12, 2016

COBAIN: Isaiah, I love you. Please don't think of this as abandoning you or as cruel or crude. That's not my intention in the slightest. I simply want to be the best version of myself & I feel like as scary as it is to live without this numbness / warm safety blanket, not having it will force me to evaluate my priorities & to be productive about who I know I am and (illegible) I know I can be. I feel I have been stuck in the same cycle of misery and the chaos & almost physical pain of wondering when, where, how & the gnawing need that eats away at the pit of my stomach forces me to focus most of my energy on that & know in my heart of hearts, within my truth that it's not healthy, it's essentially a deathwish for me. I don't want to have a deathwish. I need to have a lust for life or I fear my soul's ambition will loose (sic) all it has to offer. I need to learn to love myself before... (illegible)...

Isiah,

I love you. Please don't think of this as abandoning you ^{or} as a cruel or ~~unkind~~ ~~thing~~ ~~my intention~~, in the slightest I simply want to be the best version of myself & I feel

like as scary as it is to live

without this number/warm safety

^{Not having it} blanket, will force me to ^{evaluate} ~~evaluate~~ my

priority & to be productive about what

I know I am ~~not~~ ~~not~~ ~~not~~

can. bc. I feel I have been

stuck in the same cycle of

military and the chaos & almost physical

pain of wondering when, where, how & the

ghastly need that eats away at the

part of ~~my~~ ~~statement~~ forces me to focus

most of my energy on that & I know

in my heart of hearts, within my truth

that it's not healthy, it's essentially a death wish

for me, I don't want to have a death wish,

I need to have a just for life or I fear

my current ambition will cease all if has to

~~stop~~ ~~to~~ ~~leave~~ ~~to~~ ~~love~~ ~~my~~ ~~of~~ ~~both~~ ~~of~~ ~~both~~ ~~of~~ ~~both~~ ~~of~~ ~~both~~

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

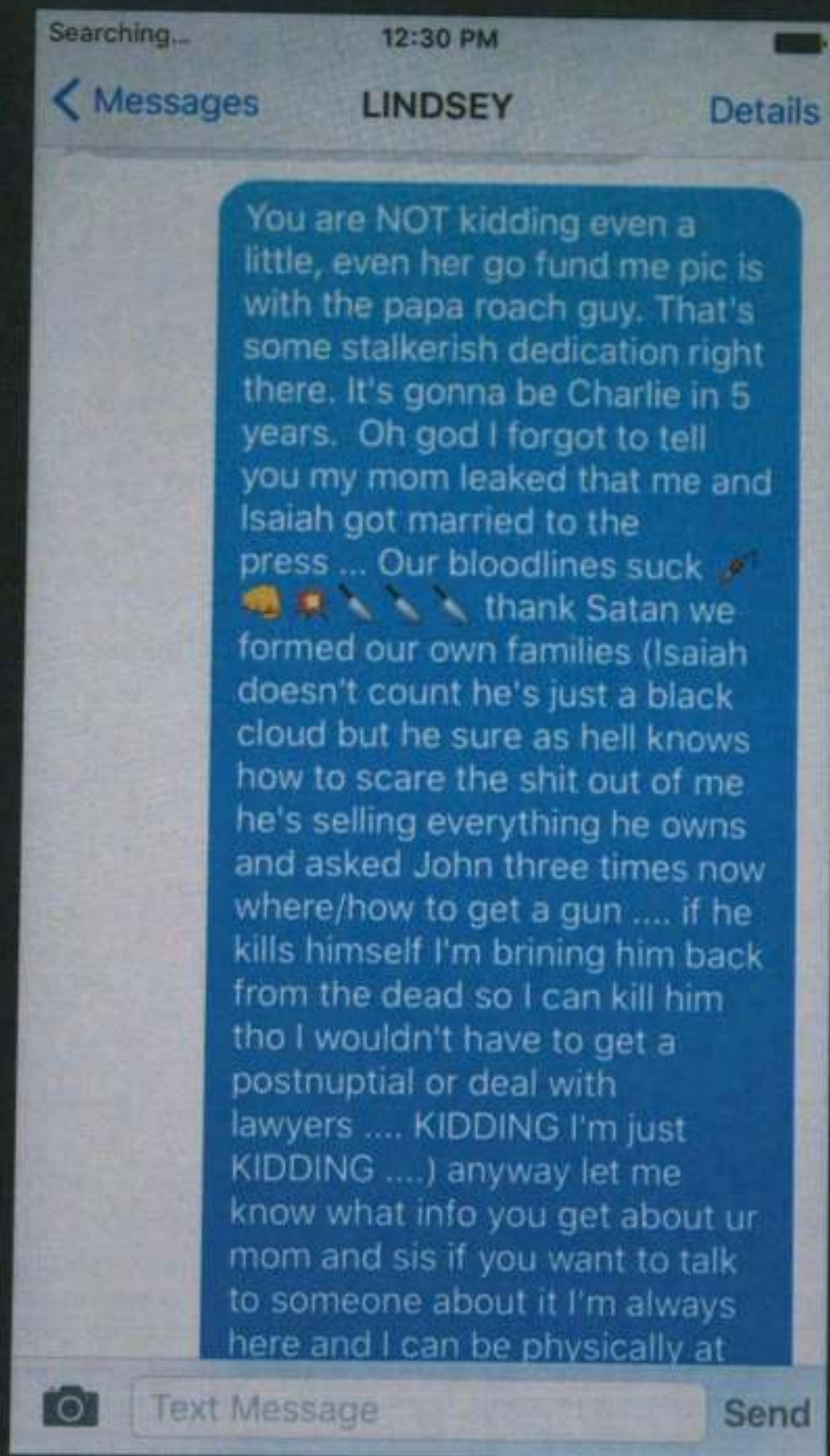
Exhibit: 12

Text Message Exchange
FRANCES COBAIN & LINDSEY

Silva v. Love, et al

September 2015

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7 COBAIN: You are NOT kidding even a little, even her go fund me pic is with the papa roach
8 guy. That's some stalkerish dedication right there. It's gonna be Charlie in 5
9 years. Oh god I forgot to tell you my mom leaked that me and Isaiah got married
10 to the press... Our bloodlines suck [emojis – hypodermic syringe, fist, explosion,
11 knife, knife, knife] thank Satan we formed our own families (Isaiah doesn't count
12 he's just a black cloud but he sure knows how to scare the shit out of me he's
13 selling everything he owns and asked John three times now where/how to get a
14 gun....if he kills himself I'm bringing him back from the dead so I can kill him tho I
15 wouldn't have to get a postnuptial or deal with lawyers....KIDDING I'm just
16 KIDDING....) anyway let me know what info you get about ur mom and sis if you
17 want to talk to someone about it I'm always here and I can be physically at your
18 side in 20 minutes.
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Searching...

12:30 PM

Messages

LINDSEY

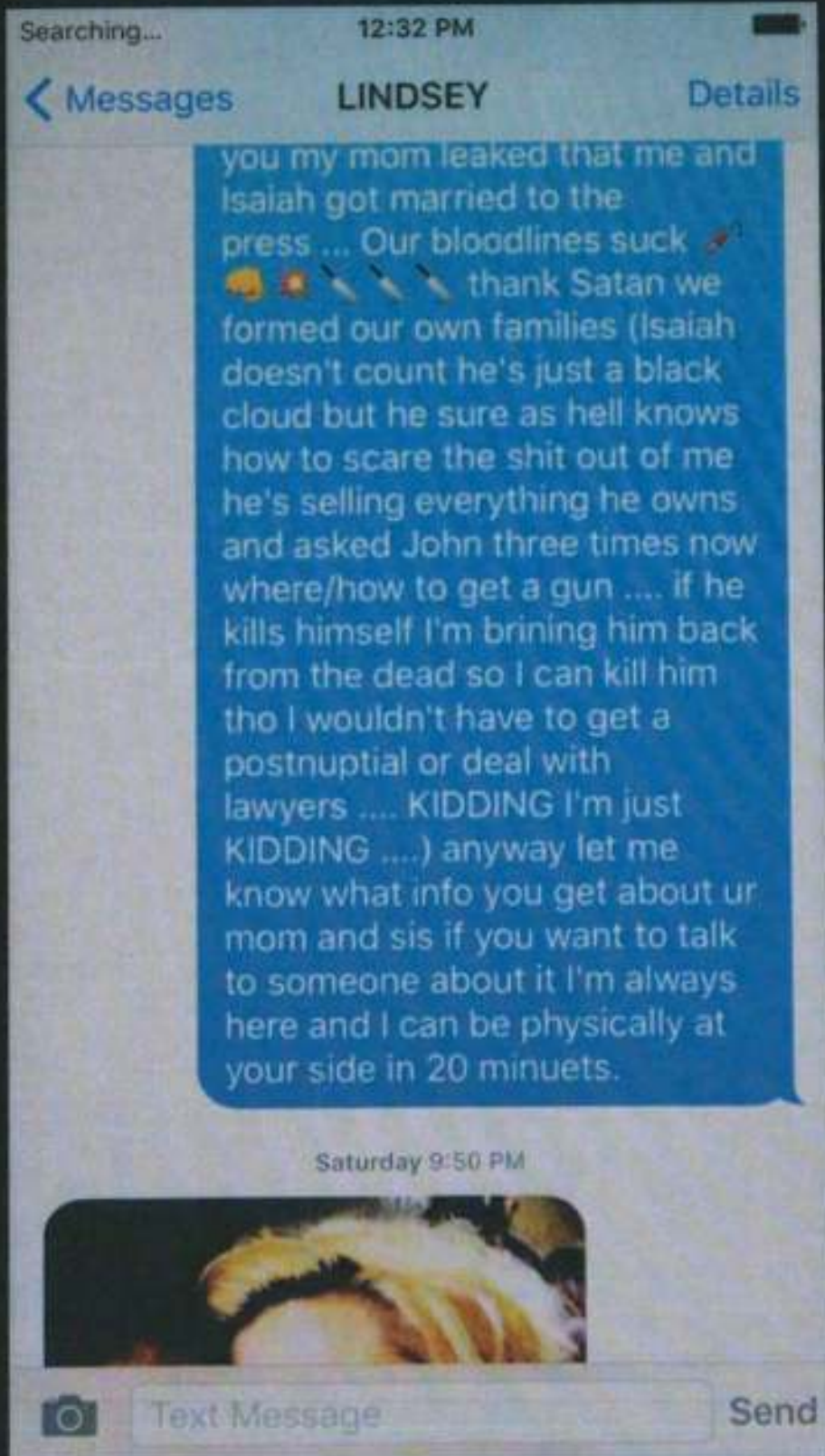
Details

You are NOT kidding even a little, even her go fund me pic is with the papa roach guy. That's some stalkerish dedication right there. It's gonna be Charlie in 5 years. Oh god I forgot to tell you my mom leaked that me and Isaiah got married to the press ... Our bloodlines suck 🍌🍌🍌🍌🍌 thank Satan we formed our own families (Isaiah doesn't count he's just a black cloud but he sure as hell knows how to scare the shit out of me he's selling everything he owns and asked John three times now where/how to get a gun if he kills himself I'm brining him back from the dead so I can kill him tho I wouldn't have to get a postnuptial or deal with lawyers KIDDING I'm just KIDDING) anyway let me know what info you get about ur mom and sis if you want to talk to someone about it I'm always here and I can be physically at



Text Message

Send



Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 13

Text Message Exchange

SUBJECT IMPERSONATING ISAAH SILVA & SIMON BENNETT

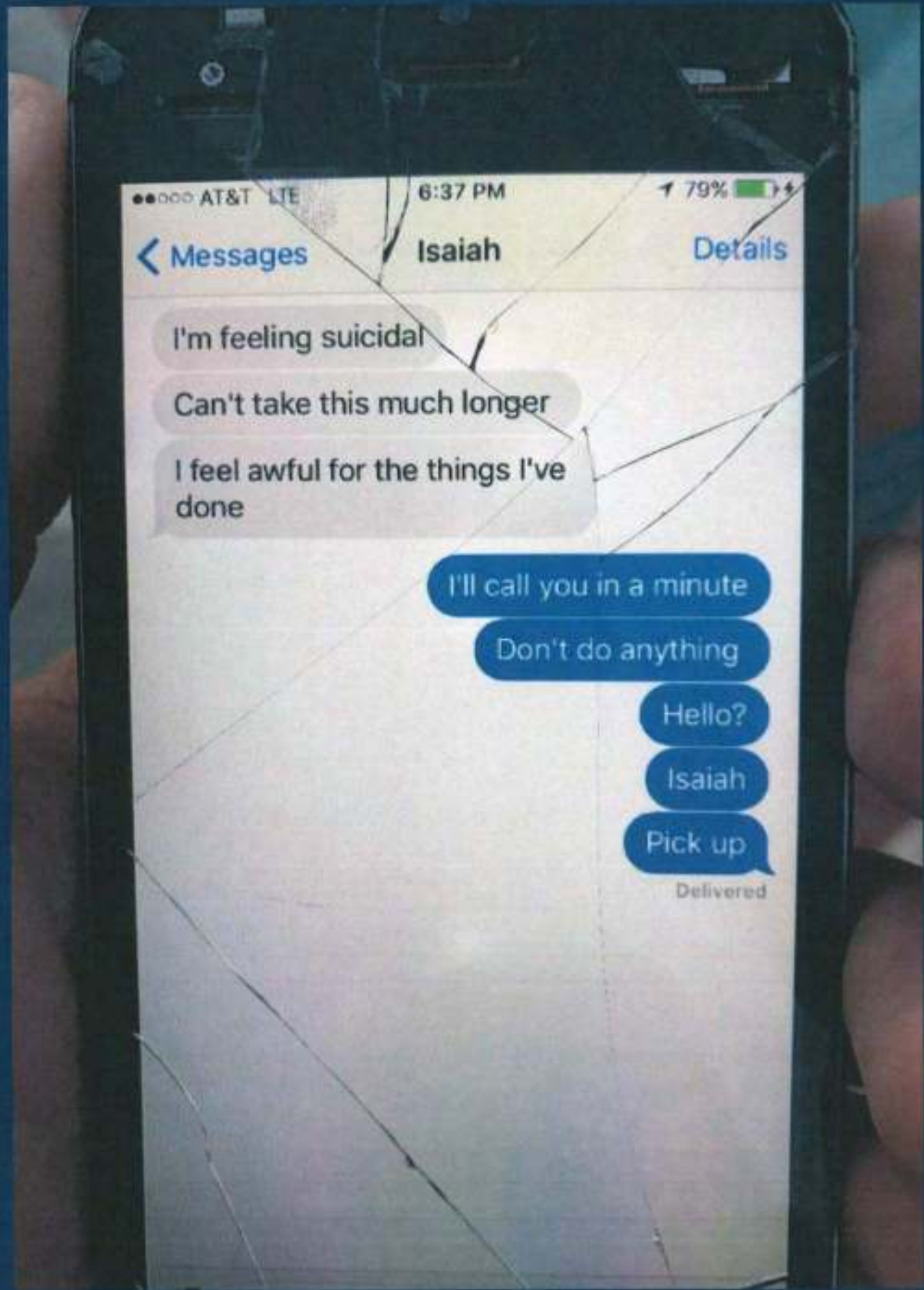
Silva v. Love, et al

May 2016

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7 SILVA*: I'm feeling suicidal
8 Can't take this much longer
9 I feel awful for the things I've done

10
11 BENNETT: I'll call you in a minute
12 Don't do anything
13 Hello?
14 Isaiah
15 Pick up
16
17
18
19
20
21
22
23
24
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28 [* - Subject impersonating Isaiah Silva via his hacked iMessage account.]



Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 14

CH-140**Restraining Order After Hearing to Stop Harassment**

- ① Your name (person asking for protection):
Samuel Barth

Your address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

City: _____ State: _____ Zip: _____

Your telephone (optional): (_____) _____

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number): Blair Berk (159087) and David Harris (255557), Tarlow & Berk, 9119 Sunset Blvd., Los Angeles, CA 90069, (310) 278-2111

- ② Name of person to be restrained:
Osama Lutfi (AKA "Sam Lutfi")

Description:

Sex: M F Height: 5'7" Weight: 180 lbs. Race: Arabic
 Hair Color: N/A Eye Color: Brown Age: 36 Date of Birth: 08/16/1974

- ③ **Hearing**

There was a hearing:

on (date): 9/28/10 at (time): 8:30 a.m. p.m. Dept.: 75 Rm: 736

KENJI MACHIDA made the orders at the hearing.
 (Name of judicial officer)

These people were at the hearing:

- a. Plaintiff (the person in ①) c. Plaintiff's lawyer (name): DAVID HARRIS
 b. Defendant (the person in ②) d. Defendant's lawyer (name): _____

- ④ **This Is a Court Order**

You must obey all the orders indicated below. If you do not obey this Order, you can be arrested and charged with a crime. And you may have to go to jail, pay a fine of up to \$1,000, or both.

- ⑤ **Expiration Date**

This Order, except for an award of lawyer's fees, expires at:

(time): 9:00 a.m. p.m. or midnight on (date): 9/28/2013 K

If no date is present, this Order expires three years from the date of issuance.

FILED

LOS ANGELES SUPERIOR COURT
 Clerk and Deputy Clerk

SEP 28 2010

JOHN A. CLARKE, CLERK
 BY SHARRON CHARLES, DEPUTY
Sharon Charles

Fill in court name and street address:

Superior Court of California, County of
 Los Angeles
 111 North Hill Street
 Los Angeles, CA 90012

Fill in case number:

Case Number:

BS128349

67/62/60

This is a Court Order.

Case Number:
BS128349

Your name: Samuel Barth

6 **Personal Conduct Orders**

You must *not* do the following things to the people listed in ① and ⑪:

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. Contact (directly or indirectly), telephone, send messages, mail, or e-mail.
- c. Take any action, directly or through others, to obtain the addresses or locations of the persons in ① and ⑪. (If item c is not checked, the court has found good cause not to make this order.)

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case does not violate these orders.

7 **Stay-Away Order**

You must stay at least (specify): 100 yards away from:

- a. The person listed in ①
- b. The people listed in ⑪
- c. The home of the persons in ① and ⑪
- d. Jobs or workplaces of the persons in ① and ⑪
- e. Vehicle of person in ①
- f. Vehicles of persons in ⑪
- g. The protected children's school or child care
- h. Other (specify): _____

This stay-away order does not prevent the person in ② from going to or from that person's home or place of work.

8 **No Guns or Other Firearms**

You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get a gun or firearm.

9 **Turn In or Sell Guns or Firearms**

You must:

- Sell to a licensed gun dealer or turn in to police any guns or firearms that you possess or control. This must be done within 24 hours of being served with this order.
- File a receipt with the court within 48 hours of receiving this order that proves guns have been turned in or sold. (You may use CH-145 for this.)

10 **Other Orders (specify):** You must not log into or otherwise access online accounts registered to and/or setup by the persons listed in (1). This includes, but is not limited to, e-mail, Twitter, and Facebook accounts. You also must not use the Internet to impersonate the persons listed in (1).

11 **Other Protected Persons**

List of the full names of all family and household members protected by these orders:

This is a Court Order.

**Restraining Order After Hearing
to Stop Harassment (CLETS)
(Civil Harassment)**



03/15/05/608

Case Number:

BS128349

Your name: Samuel Barth

Instructions for the Protected Person

To the person in ① (*Write the name of the person in ①*): Samuel Barth

⑫ **Delivery to Law Enforcement**

If the court issues restraining orders, by the close of business on the date this Order is made, you or your attorney must deliver a copy of this Order and any proof of service forms to each law enforcement agency listed below:

Name of Law Enforcement Agency:
LAPD - Pacific Community Police Stat
Fairfax County PD - McLean District S

Address (City, State, Zip)
12312 Culver Blvd., L.A., CA 90066
1437 Balls Hill Road, McLean, VA 22101

⑬ **No Fee for Service of Order by Law Enforcement**

The sheriff or marshal will serve this Order without charge because:

- a. The Order is based on stalking.
- b. The Order is based on a credible threat of violence.
- c. The person in ① is entitled to a fee waiver.

Date: 9/29/10


Judicial Officer **KENJI MACHIDA**

Warnings and Notices to the Restrained Person in ②

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get a gun while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to a licensed gun dealer or turn in to police any guns or firearms that you have or control in accordance with item ③ above. The court will require you to prove that you did so. If you do not obey this Order, you can be charged with a crime.

Instructions for Law Enforcement

This Order is effective when made. It is enforceable anywhere in all 50 states, the District of Columbia, all tribal lands, and all U.S. territories and shall be enforced as if it were an Order of that jurisdiction by any law enforcement agency that has received the Order, is shown a copy of the Order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the Order and then shall enforce it. Violations of this restraining order are subject to criminal penalties.

(Clerk will fill out this part)

Clerk's Certificate

Clerk's Certificate
[seal]

I certify that this *Restraining Order After Hearing to Stop Harassment (CLETS)* is a true and correct copy of the original on file in the court.

Date: _____ Clerk, by _____, Deputy

This is a Court Order.

**Restraining Order After Hearing
to Stop Harassment (CLETS)**
(Civil Harassment)

CH-100**Request for Orders to Stop Harassment**

1 Your name (person asking for protection):
Samuel Barth

Your address (skip this if you have a lawyer); (If you want your address to be private, give a mailing address instead):

City: _____ State: _____ Zip: _____

Your telephone number (optional): (_____) _____

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number):
Blair Berk (159087) and David Harris (255557)

Tarlow & Berk, 9119 Sunset Blvd., Los Angeles, CA 90069
(310) 278-2111

2 Name of person you want protection from:
Osama Lutfi (AKA "Sam Lutfi")

Describe the person: Sex: M F Weight: 180 lbs.

Height: 5'7" Race: Arabic Hair Color: N/A

Eye Color: Brown Age: 36 Date of Birth: 08/16/1974

Home Address (if you know): 12629 Caswell Avenue, Unit P2

City: Los Angeles State: CA Zip: 90066

Work Address (if you know): N/A

City: N/A State: N/A Zip: N/A

3 Besides you, who needs protection? (Family or household members)

Full Name	Sex	Age	Lives with you?	How are they related to you?
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 3—Describe Protected Persons" at the top of the page.

4 Why are you filing in this court? (Check all that apply):

- The person in 2 lives in this county.
 I was hurt (physically or emotionally) by the person in 2 here.
 Other (specify): _____

5 How do you know the person in 2? (Describe):

Please see attached Declarations of Samuel Barth, Deborah Barth, Nathan Barth, and Torcy Barth.

Clerk stamps date here when form is filed.

FILED
 LOS ANGELES SUPERIOR COURT

SEP 10 2010

JOHN J. CLARKE, CLERK

BY Veronica
 VERONICA CABRERA, DEPUTY

Fill in court name and street address:

Superior Court of California, County of
 Los Angeles
 111 North Hill Street
 Los Angeles, CA 90012

Court fills in case number when form is filed.

Case Number:

BS128849

This is not a Court Order.

Case Number:

BS128349

Your name: Samuel Barth

- 6 Describe how the person in 2 has harassed you:
- a. Date of most recent harassment: 09/09/2010
- b. Who was there? Please see attached Declarations of Samuel Barth, Deborah Barth, Nathan Barth, and Torey Barth.
- c. Did the person in 2 commit any acts of violence or threaten to commit any acts of violence against you?
 Yes No
If yes, describe those acts or threats: Please see attached Declarations of Samuel Barth, Deborah Barth, Nathan Barth, and Torey Barth.
- d. Did the person in 2 engage in a course of conduct that harassed you and caused substantial emotional distress? Yes No
If yes, describe: Please see attached Declarations of Samuel Barth, Deborah Barth, Nathan Barth, and Torey Barth.
- e. Did the conduct of the person in 2 described above seriously alarm, annoy, or harass you? Yes No
 Check here if you need more space. Attach a sheet of paper and write "CH-100, item 6—Describe Harassment" at the top of the page.

Check the orders you want

7 **Personal Conduct Orders**

I ask the court to order the person in 2 to not do the following things to me or anyone listed in 3:

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. Contact (either directly or indirectly), or telephone, or send messages or mail or e-mail.

The person in 2 will also be ordered not to take any action to get the addresses or locations of any protected persons, their family members, or their caretakers unless the court finds good cause not to make the order.

8 **Stay-Away Orders**

I ask the court to order the person in 2 to stay at least (specify): 100 yards away from me and the people listed in 3 and the places listed below: (Check all that apply):

- a. My home
- b. My job or workplace
- c. My children's school or child care
- d. My vehicle
- e. Other (specify): _____

If the court orders the person in 2 to stay away from all the places listed above, will that person still be able to get to his or her home, school, or job? Yes No

If no, explain: _____

This is not a Court Order.

Case Number:

BS128349

Your name: Samuel Barth

9 Others to Be Protected

Should the other people listed in (3) also be covered by the orders described above?

Yes No Does not apply

If yes, explain:

10 Order About Guns or Other Firearms

I ask the court to order the person in (2) to be prohibited from owning, possessing, purchasing, or receiving, or attempting to purchase or receive firearms and to sell or turn in any guns or firearms that he or she controls.

11 Other Orders

I ask the court to order the person in (2) to (specify): not log into or otherwise access online accounts registered to and/or setup by me. This includes, but is not limited to, e-mail, Facebook, and Twitter accounts. I also ask the court to order the person in (2) to not use the Internet to impersonate me or pretend to be me.

12 Temporary Orders

Do you want the court to make orders now on the matters listed in (7), through (11) that will last until the hearing? Yes No

If yes, explain why you need these orders right now: Please see attached Declarations of Samuel Barth, Deborah Barth, Nathan Barth, and Torey Barth.

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 12—Temporary Orders" at the top of the page.

13 Delivery of Orders to Law Enforcement

My lawyer or I will give copies of the orders to the following law enforcement agencies:

a. Name of Agency: LAPD - Pacific Community Station

Address: 12312 Culver Blvd.

City: Los Angeles State: CA Zip: 90066

b. Name of Agency: Fairfax County Police Department - McLean District Station

Address: 1437 Balls Hill Road

City: McLean State: VA Zip: 22101

14 Other Court Cases

Have you ever asked any court for other restraining orders against the person in (2)? Yes No

If yes, specify the counties and case numbers if you know them.

This is not a Court Order.



09/13/14

Case Number:

BS128349

Your name: _____

15 **Time for Service**

You must have your papers personally served on (notify) the person in **3** at least 5 days before the hearing, unless the court orders a different time for service. (Form CH-135 explains "What Is Proof of Service?" Form CH-130 may be used to show the court that the papers have been served.) If your papers cannot be served at least 5 days before the hearing and you need more time, explain why:

16 **No Fee for Filing**

I ask the court to waive the filing fee because the person in **3** has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence. I am asking for a restraining order to stop this conduct.

17 **No Fee to Serve Orders**

I ask the court to order the sheriff or marshal to serve (notify) the person in **3** about the orders for free because:

- a. My request for orders is based on stalking; or
- b. My request for orders is based on a credible threat of violence; or
- c. I am entitled to a fee waiver.

(If you are requesting free service of the orders based on a fee waiver, you must complete and file the Application for Waiver of Court Fees and Costs (Form FW-001).)

18 **Lawyer's Fees and Costs**

I ask the court to order payment of my:

- a. Lawyer's fees
- b. Out-of-pocket expenses

The amounts requested are:

Item	Amount	Item	Amount
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____

Check here if you need more space. Attach a sheet of paper and write "CH-100, Item 18—Lawyer's Fees and Costs" at the top of the page.

19 **Additional Relief**

I ask the court for additional relief as may be proper.

20 Number of pages attached to this form, if any: _____

Date: 09/09/2010

David Harris

Lawyer's name

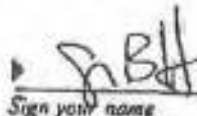

Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: 09/09/2010

Samuel Barth

Type or print your name


Sign your name

This is not a Court Order.

Request for Orders to Stop Harassment
(Civil Harassment)

CH-100, Page 1 of 4

09/09/2010

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DECLARATION OF DEBORAH BARTH

I, Deborah Barth, declare as follows:

Mother of T

1. I have never actually met Mr. Osama Lutfi (AKA Sam Lutfi) and have no desire to have any contact with him. Nonetheless, as detailed in the attached Declaration of Samuel Barth, Mr. Lutfi has persistently stalked and harassed me, repeatedly calling and sending my family, my friends, and me unwanted and unsolicited text, chat, and email messages. In these communications, he has expressed delusional thoughts and irrational feelings, verbally attacked and threatened me, and even tried to disrupt my relationship with my minor daughter, offering her a cell phone she could use to avoid my supervision, suggesting he send her airline tickets to Los Angeles, and urging her to seek a court order to terminate my custody. He has also created fake online accounts in my name and pretended to be me while communicating with others over the Internet. In the past week, Mr. Lutfi has somehow managed to obtain access to my personal emails, including at least one email I had written to my attorney, and has been forwarding these emails to my son, Samuel.

2. Even more troubling, Mr. Lutfi has also stalked and harassed my minor daughter, Torey. Despite my daughter's efforts to cutoff communication with him and despite my explicit request that he stop communicating with her, Mr. Lutfi has continued to contact my daughter and purposefully attempted to disrupt her life. In recent weeks, he has even gone so far as to try to damage her relationship with a high school friend. While pretending to be a girl named "Alisha", Mr. Lutfi sent a negative email about my daughter to my daughter's friend. While pretending to be my son Samuel, Mr. Lutfi posted an insulting tirade about my daughter on her friend's public Facebook page, viciously insulting her and accusing her of all sorts of wrongdoing. These actions have greatly disturbed and distressed my daughter at a time when she should be focusing on graduation, prom, and college applications.

3. Mr. Lutfi apparently suffers from some sort of delusion that my family and I are "evil" and have purposefully worked to undermine my son Samuel's life. He has become obsessed with the idea that Samuel needs his help and this idea has driven him to engage in increasingly bizarre and harassing behavior. This behavior has disturbed, upset, and disrupted my entire family. Both my minor daughter and I are now quite frightened of Mr. Lutfi and feel that our personal safety is in immediate jeopardy.

DECLARATION OF DEBORAH BARTH

Deborah Barth (m)

09/09/2011

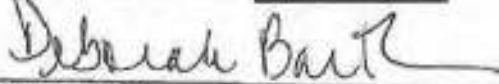
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4. Without a restraining order, I fear that there will not be sufficient law enforcement mechanisms to keep Mr. Lutfi away from me or my daughter, especially since he has (1) a history of engaging in obsessive, stalking, and harassing behavior and has previously had multiple restraining orders issued against him with regard to other parties, (2) incessantly contacted me, my family, and my family's friends, (3) purposefully worked to distress and emotionally disturb my family and me, even going so far as to try to disrupt my daughter's personal relationships with high school friends, (4) evinced a willingness to bend and/or break the law, breaking into my son Samuel's Internet accounts, impersonating others online, and obtaining access to my personal emails, (5) repeatedly made threatening statements to and about me, telling my minor daughter, for example, that he hopes I die "the most evil and painful death possible", and (6) continued to escalate in his obsessive, stalking, and harassing behavior. I am particularly concerned about Mr. Lutfi's conduct towards my daughter, Torrey, since she is (1) a minor and (2) hoping to attend college in Los Angeles, which is where Mr. Lutfi resides.

3. I firmly believe that Mr. Lutfi will persist in this conduct, and that this conduct will only worsen, unless and until he is ordered by this court to stop.

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

Executed this 9th day of September, 2010, in [REDACTED]


Deborah Barth

DECLARATION OF NATHAN BARTH

Nathan Barth

I, Nathan Barth, declare as follows:

1. I have never actually met Mr. Osama Lutfi (AKA "Sam Lutfi") and have no desire to have any contact with him. Nonetheless, as detailed in the attached Declaration of Samuel Barth, Mr. Lutfi has persistently attempted to contact me, repeatedly sending me unwanted and unsolicited text, chat, and email messages. In these communications, he has expressed delusional thoughts and irrational feelings, verbally attacked and insulted me and my family, urged me to commit suicide, and directly threatened me. Mr. Lutfi apparently suffers from some sort of delusion that my family and I, particularly my mother, have purposefully tried to undermine my brother, Samuel Barth. Mr. Lutfi is obsessed with "helping" my brother Samuel overcome and/or escape our family at any and all costs and regardless of the fact that Samuel does not want or need his supposed "help." Given Mr. Lutfi's obsessive thoughts and harassing behavior, I am now quite frightened of him and feel that my personal safety and the safety of those around me is in jeopardy.

2. Without a restraining order, I fear that there will not be sufficient law enforcement mechanisms to keep Mr. Lutfi away from me or my loved ones, especially since he has (1) a history of engaging in obsessive, stalking, and harassing behavior and has previously had multiple restraining orders issued against him with regard to other parties, (2) repeatedly and incessantly contacted me, my family, and my family's friends, (3) evinced a willingness to make contact at all costs, even going so far as to illegally break into my brother's online accounts and then contact me using those accounts, (4) purposefully worked to distress and emotionally disturb my family and me, (5) directly and indirectly threatened me, writing, for example, "[y]ou fuck with my life asshole and you opened up a can of worms for yourself."

3. Given all of the above, I firmly believe that Mr. Lutfi will persist in this conduct, and that this conduct will only worsen, unless and until he is ordered by this court to stop.

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

Executed this 9th day of September, 2010, in [REDACTED]

Nathan Barth
Nathan Barth

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DECLARATION OF TOREY BARTH

written by TB

I, Torey Barth, declare as follows:

1. As detailed at length in the attached Declarations of Samuel and Deborah Barth, Mr. Osama Lutfi (AKA "Sam Lutfi") has engaged in a pattern of obsessive, stalking, and harassing behavior towards me. I am now quite frightened of Mr. Lutfi and feel that my personal safety is in immediate jeopardy. I respectfully urge the court to issue an order protecting both my mother and I from Mr. Lutfi.

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

Executed this 9th day of September, 2010, in [REDACTED]

Torey Barth
Torey Barth

DECLARATION OF TOREY BARTH

Torey (mina Sista)

09/09/2011

CH-140

Restraining Order After Hearing to Stop Harassment

1 Your name (person asking for protection): Deborah Barth

Your address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

City: State: Zip:

Your telephone (optional): ()

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number): Blair Berk (159087) and David Harris (255557), Tarlow & Berk, 9119 Sunset Blvd., Los Angeles, CA 90069, (310) 278-2111

2 Name of person to be restrained: Osama Lutfi (AKA "Sam Lutfi")

Clerk stamps date here when form is filed.

FILED

LOS ANGELES SUPERIOR COURT

SEP 28 2010

JOHN A. CLARKE, CLERK

BY SHARRON CHARLES, DEPUTY

Fill in court name and street address:

Superior Court of California, County of Los Angeles 111 North Hill Street Los Angeles, CA 90012

Fill in case number:

Case Number: BS128351

Description:

Sex: [X] M [] F Height: 5'7" Weight: 180 lbs. Race: Arabic Hair Color: N/A Eye Color: Brown Age: 36 Date of Birth: 08/16/1974

3 Hearing

There was a hearing: on (date): 9/28/10 at (time): 8:30 a.m. [X] p.m. Dept.: 75 Rm: 736

(Name of judicial officer) KENJI MACHIDA made the orders at the hearing.

These people were at the hearing:

- a. [] Plaintiff (the person in 1) b. [] Defendant (the person in 2) c. [X] Plaintiff's lawyer (name): DAVID HARRIS d. [] Defendant's lawyer (name):

4 This is a Court Order

You must obey all the orders indicated below. If you do not obey this Order, you can be arrested and charged with a crime. And you may have to go to jail, pay a fine of up to \$1,000, or both.

5 Expiration Date

This Order, except for an award of lawyer's fees, expires at: (time): 9:00 a.m. [X] p.m. or [] midnight on (date): 9/29/2013

If no date is present, this Order expires three years from the date of issuance.

This is a Court Order.

Restraining Order After Hearing to Stop Harassment (CLETS) (Civil Harassment)

Your name: Dborah Barth

6 **Personal Conduct Orders**

You must *not* do the following things to the people listed in ① and ⑪:

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. Contact (directly or indirectly), telephone, send messages, mail, or e-mail.
- c. Take any action, directly or through others, to obtain the addresses or locations of the persons in ① and ⑪. (If item c is not checked, the court has found good cause not to make this order.)

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case does not violate these orders.

7 **Stay-Away Order**

You must stay at least (specify): 100 yards away from:

- a. The person listed in ①
- b. The people listed in ⑪
- c. The home of the persons in ① and ⑪
- d. Jobs or workplaces of the persons in ① and ⑪
- e. Vehicle of person in ①
- f. Vehicles of persons in ⑪
- g. The protected children's school or child care
- h. Other (specify): _____

This stay-away order does not prevent the person in ② from going to or from that person's home or place of work.

8 **No Guns or Other Firearms**

You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get a gun or firearm.

9 **Turn In or Sell Guns or Firearms**

You must:

- Sell to a licensed gun dealer or turn in to police any guns or firearms that you possess or control. This must be done within 24 hours of being served with this order.
- File a receipt with the court within 48 hours of receiving this order that proves guns have been turned in or sold. (You may use CH-145 for this.)

10 **Other Orders (specify):** You must not log into or otherwise access online accounts registered to and/or setup by the persons listed in (1) and (11). This includes, but is not limited to, e-mail, Twitter, and Facebook accounts. You also must not use the Internet to impersonate the persons listed in (1) and (11).

11 **Other Protected Persons**

List of the full names of all family and household members protected by these orders:

Troy Barth (17)

This is a Court Order

**Restraining Order After Hearing
to Stop Harassment (CLETS)
(Civil Harassment)**

Case Number:
BS128351

Your name: Deborah Barth

Instructions for the Protected Person

To the person in ① (Write the name of the person in ①): Deborah Barth

⑫ **Delivery to Law Enforcement**

If the court issues restraining orders, by the close of business on the date this Order is made, you or your attorney must deliver a copy of this Order and any proof of service forms to each law enforcement agency listed below:

Name of Law Enforcement Agency:
LAPD - Pacific Community Police Stat
Fairfax County PD - McLean District S

Address (City, State, Zip)
12312 Culver Blvd., L.A., CA 90066
1437 Balls Hill Road, McLean, VA 22101

⑬ **No Fee for Service of Order by Law Enforcement**

The sheriff or marshal will serve this Order without charge because:

- a. The Order is based on stalking.
- b. The Order is based on a credible threat of violence.
- c. The person in ① is entitled to a fee waiver.

Date: 9/20/10

Judicial Officer: 
KENJI MACHIDA

Warnings and Notices to the Restrained Person in ②

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get a gun while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to a licensed gun dealer or turn in to police any guns or firearms that you have or control in accordance with item ⑨ above. The court will require you to prove that you did so. If you do not obey this Order, you can be charged with a crime.

Instructions for Law Enforcement

This Order is effective when made. It is enforceable anywhere in all 50 states, the District of Columbia, all tribal lands, and all U.S. territories and shall be enforced as if it were an Order of that jurisdiction by any law enforcement agency that has received the Order, is shown a copy of the Order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the Order and then shall enforce it. Violations of this restraining order are subject to criminal penalties.

(Clerk will fill out this part)

Clerk's Certificate

Clerk's Certificate
[seal]

I certify that this Restraining Order After Hearing to Stop Harassment (CLETS) is a true and correct copy of the original on file in the court.

Date: _____ Clerk, by _____, Deputy

This is a Court Order.

**Restraining Order After Hearing
to Stop Harassment (CLETS)
(Civil Harassment)**

CH-140

Restraining Order After Hearing to Stop Harassment

1 Your name (person asking for protection): DANIEL HAINES

Your address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

City: State: CA Zip:

Your telephone (optional):

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number):

2 Name of person to be restrained: OSAMA LUTFI

Description:

Sex: [X] M [] F Height: 5'9" Weight: 160 Race: ARAB Hair Color: BLACK Eye Color: BROWN Age: 32 Date of Birth: 1975

3 Hearing

There was a hearing: 4/25/07 on (date): 2:30 at (time): [] a.m. [X] p.m. Dept: N-9 Rm: G. BERENSON made the orders at the hearing.

These people were at the hearing:

- a. [X] Plaintiff (the person in 1) b. [X] Defendant (the person in 2) c. [] Plaintiff's lawyer (name): d. [] Defendant's lawyer (name):

4 This is a Court Order

You must obey all the orders indicated below. If you do not obey this Order, you can be arrested and charged with a crime. And you may have to go to jail, pay a fine of up to \$1,000, or both.

5 Expiration Date

This Order, except for an award of lawyer's fees, expires at: (time): [] a.m. [] p.m. or [] midnight on (date): If no date is present, this Order expires three years from the date of issuance.

Clerk stamps date when form is filed. FILED ORANGE COUNTY SUPERIOR COURT APR 25 2007 ALAN SLATER, DEPUTY CLERK BY: M. SUCHEY DEPUTY

Fill in court name and street address: Superior Court of California, County of North Justice Center 1275 N. Berkeley Avenue Fullerton, CA 92838-0500

Fill in case number: Case Number: 07NL02915

This is a Court Order.

FAX

Your name: DANIEL HAINES

Case Number:

07NL02915

6 **Personal Conduct Orders**

You must *not* do the following things to the people listed in ① and ⑬:

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. Contact (directly or indirectly), telephone, send messages, mail or e-mail.

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case does not violate these orders.

7 **Stay-Away Order**

You must stay at least (specify): 100 yards away from:

- a. The person listed in ①
- b. The people listed in ⑬
- c. The home of the persons in ① and ⑬
- d. Jobs or workplaces of the persons in ① and ⑬
- e. Vehicle of person in ① Vehicles of persons in ⑬
- f. The protected children's school or child care
- g. Other (specify): _____

This stay away order does not prevent the person in ② from going to or from that person's home or place of work.

8 **No Guns or Other Firearms**

You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get a gun or firearm.

9 **Turn In or Sell Guns or Firearms**

You must:

- Sell to a licensed gun dealer or turn in to police any guns or firearms that you possess or control. This must be done within 48 hours of receiving this order. But if you were at a hearing on this order, it must be done within 24 hours of the hearing.
- Bring a receipt to the court within 72 hours of receiving this order, to prove that guns have been turned in or sold. (You may use CH-145 for this.)

10 **Other Orders (specify):** _____

11 **Other Protected Persons**

List of the full names of all family and household members protected by these orders:

PATRY HAINES, ANNE HAINES

This is a Court Order

RESTRAINED PERSON SERVED
DATE APR 5 2007 TIME 2:49 PM IN COURT
BY DEPUTY M. Lee

Case Number: 07NL02915

Your name: DANIEL HAINES

Instructions for the Protected Person

To the person in ① (Write the name of the person in ①): DANIEL HAINES

⑫ Delivery to Law Enforcement

If the court issues restraining orders, by the close of business on the date this Order is made, you or your attorney must deliver a copy of this Order and any proof of service forms to each law enforcement agency listed below:

Name of Law Enforcement Agency:

ANAHEIM POLICE

Address (City, State, Zip)

425 S. HARBOR BLVD 92903

⑬ No Fee for Service of Order by Law Enforcement

The sheriff or marshal will serve this Order without charge because the Order is based on stalking or a credible threat of violence resulting from a threat of sexual assault or stalking.

Date:

4/25/07

Judicial Officer

George Berenson

Warnings and Notices to the Restrained Person in ②

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get a gun while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to a licensed gun dealer or turn in to police any guns or firearms that you have or control in accordance with item ③ above. The court will ask you for proof that you did so. If you do not obey this Order, you can be charged with a crime.

Instructions for Law Enforcement

This Order is effective when made. It is enforceable anywhere in all 50 states, the District of Columbia, all tribal lands, and all U.S. territories and shall be enforced as if it were an Order of that jurisdiction by any law enforcement agency that has received the Order, is shown a copy of the Order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the Order and then shall enforce it. Violations of this restraining order are subject to criminal penalties.

(Clerk will fill out this part)

Clerk's Certificate

Clerk's Certificate

[seal]

I certify that this Restraining Order After Hearing to Stop Harassment (CLETS) is a true and correct copy of the original on file in the court.

Date: _____ Clerk, by _____, Deputy

This is a Court Order.

CH-100

Request for Orders to Stop Harassment

1 Your name (person asking for protection):
DANIEL HAINES
 Your address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

 City: _____ State: CA Zip: _____
 Your telephone number (optional): (_____) _____
 Your lawyer (if you have one): (Name, address, telephone number, and State Bar number):

Clerk stamps date here when form is filed.
FILED
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF ORANGE
 NORTH JUSTICE CENTER
 MAR 29 2007
 ALAN SLATER, Clerk of the Court
 MR.

2 Name of person you want protection from:
OSAMA LUTFI
 Describe the person: Sex: M F Weight: 160
 Height: 5' 9" Race: ARAB Hair Color: BLACK
 Eye Color: BROWN Age: 32 Date of Birth: 1975
 Home Address (if you know): 12629 CASWELL AVE UNIT #16 OR PR
 City: MIRA VISTA State: CA Zip: 90066
 Work Address (if you know): _____
 City: _____ State: _____ Zip: _____

Fill in court name and street address:
 Superior Court of California, County of
 North Justice Center
 1275 N. Berkeley Avenue
 Fullerton, CA 92838-0500
 Could file in case number when form is filed.
 Case Number: **07NL02915**

3 Besides you, who needs protection? (Family or household members)

Full Name	Sex	Age	Lives with you?	How are they related to you?
<u>PATTY HAINES</u>	<u>F</u>	<u>55</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>MOTHER</u>
<u>APRIL HAINES</u>	<u>F</u>	<u>32</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<u>SISTER</u>
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 3—Describe Protected Persons" at the top of the page.

4 Why are you filing in this court? (Check all that apply):
 The person in 2 lives in this county.
 I was hurt (physically or emotionally) by the person in 2 here.
 Other (specify): _____

6 How do you know the person in 2? (Describe):
SAM, OR OSAMA CONTACTED ME THROUGH THE INTERNET WEBSITE "MYSPACE"
FROM THERE HE INVITED ME TO HIS HOUSE IN MIRA VISTA TO MEET
UP AND GO BAR HOPPING IN CA

This is not a Court Order

Your name: DAVID L HAINES

Case Number

07 NL 02915

6 Describe how the person in **2** has harassed you:

- a. Date of most recent harassment: 3-15-07
- b. Who was there? THREATENING TEXT MESSAGE WAS RECEIVED AFTER SHERIFF TRIED TO SERVE HIM AT HIS HOME.

c. Did the person in **2** commit any acts of violence or threaten to commit any acts of violence against you?

Yes No

If yes, describe those acts or threats: _____

d. Did the person in **2** engage in a course of conduct that harassed you and caused substantial emotional distress? Yes No

SAM CAME SIX TO MY HOUSE UNANNOUNCED AT LEAST TWICE AT NIGHT WALKING AROUND THE HOUSE AND EVENTUALLY CAME TO THE DOOR WHEN HE WAS HEARD SNEAKING AROUND. THE SECOND TIME HE DID THIS I CALLED THE POLICE. SAM REFUSED TO LEAVE UNTIL THE POLICE ASKED HIM TO, HE HAS BEEN HARRASSING ME VIA TEXT AND E-MAIL MESSAGES "I HOPE YOU END UP BURNED DEAD OR SIX FEET UNDER SOON!! I'VE PRAY THAT SOMEONE GETS RAPED TO DEATH!!"

e. Did the conduct of the person in **2** described above seriously alarm, annoy, or harass you? Yes No

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 6— Describe Harassment" at the top of the page.

Check the orders you want

7 **Personal Conduct Order**

I ask the court to order the person in **2** to NOT do the following things to me or anyone listed in **3**:

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. Contact (either directly or indirectly), or telephone, or send messages or mail or e-mail.

8 **Stay-Away Order**

I ask the court to order the person in **2** to stay at least (specify): 100 yards away from me and the people listed in **3** and the places listed below: (Check all that apply):

- a. My home
- b. My job or workplace
- c. My children's school or child care
- d. My vehicle
- e. Other (specify): _____

If the court orders the person in **2** to stay away from all the places listed above, will that person still be able to get to his or her home, school, or job? Yes No

If no, explain: _____

9 **Others to Be Protected**

Should the other people listed in **3** also be covered by the orders described above?

Yes No Does not apply

If yes, explain: SAM HAS EXPRESSED HIS HATRED FOR MY MOTHER AND MY SISTER. I HAVE RECEIVED NUMEROUS EMAILS WHERE HE WISHES THEM DEAD, TO BE RAPED AND SOME MESSAGES WHERE HE EXPLAINS THE JOY

This is not a Court Order

IT WOULD BRING HIM TO SEE THEM DEAD.



Your name:

DANIEL HAINES

Case Number:

07NL02975

10 Order About Guns or Other Firearms

I ask the court to order the person in 2 to be prohibited from owning, possessing, purchasing, or receiving, or attempting to purchase or receive firearms and to sell or turn in any guns or firearms that he or she controls.

11 Other Orders

I ask the court to order the person in 2 to (specify):

12 Temporary Orders

Do you want the court to make orders now on the matters listed in 7, through 13 that will last until the hearing? Yes No

If yes, explain why you need these orders right now: I BELIEVE SAM IS A DANGEROUS PERSON, THE POLICE HAVE TOLD ME FOR THEM TO BE ABLE TO DO ANYTHING IN REGARDS TO CONTACT (VIA THE SON) I MUST HAVE A RESTRAINING ORDER. AS OF 3-15-07 I RECEIVED THE FOLLOWING MESSAGE: "HAINES/I DON'T THINK THAT IS WISE FOR YOU OR YOUR SISTER TO PLAY GAMES AT THIS POINT. VERY UNWISE MOVE!!!"

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 12-Temporary Orders" at the top of the page.

13 Delivery of Orders to Law Enforcement

My lawyer or I will give copies of the orders to the following law enforcement agencies:

a. Name of Agency: ANAHEIM POLICE
Address: 425 S. HARBOR BLVD
City: ANAHEIM State: CA Zip: 92803

b. Name of Agency:
Address:
City: State: Zip:

14 Other Court Cases

Have you ever asked any court for other restraining orders against the person in 2? Yes No

If yes, specify the counties and case numbers if you know them: ORANGE COUNTY, CASE NO 07NL02063

15 Time for Service

You must have your papers personally served on (notify) the person in 2 at least 5 days before the hearing, unless the court orders a different time for service. (Form CH-135 explains "What is Proof of Service?" Form CH-130 may be used to show the court that the papers have been served.) If your papers cannot be served at least 5 days before the hearing and you need more time, explain why:

This is not a Court Order.

Your name: _____

DANIEL HAINES

Case Number
07NL02915

16 **No Fee for Filing**

I ask the court to waive the filing fee because the person in ② has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence. I am asking for a restraining order to stop this conduct.

17 **No Fee to Serve Orders**

I ask the court to order the sheriff or marshal to serve (notify) the person in ② about the orders for free because that person has stalked me or threatened me with sexual assault.

(To get free service of the court's orders without paying a fee, you must fill out and file the Request and Order for Free Service of Restraining Order (Form CH-101), and if you qualify for a fee waiver, you must also fill out and file the Application for Waiver of Court Fees and Costs (Form 982(a)(17).)

18 **Lawyer's Fees and Costs**

I ask the court to order payment of my:

- a. Lawyer's fees
- b. Out-of-pocket expenses

The amounts requested are:

Item	Amount	Item	Amount
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____

Check here if you need more space. Attach a sheet of paper and write "CH-100, Item 18—Lawyer's Fees and Costs" at the top of the page.

19 **Additional Relief**

I ask the court for additional relief as may be proper.

20 Number of pages attached to this form, if any: _____

Date: _____

Attorney's name

Attorney's signature

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

Date: 3-28-07

DANIEL HAINES
Type or print your name

Sign your name

This is not a Court Order

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name & Address): <u>DANIEL HAINES</u> Telephone No.: [REDACTED] Fax No. (Optional): [REDACTED] E-Mail Address (Optional): [REDACTED] Bar No.: [REDACTED] ATTORNEY FOR (Name): [REDACTED]	FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF ORANGE N 10TH JUSTICE CENTER MAR 29 2007 ALAN SLATER, Clerk of the Court BY <u>D. KOTILA</u>
2 SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE JUSTICE CENTER: <input type="checkbox"/> Central - 700 Civic Center Dr. West, Santa Ana, CA 92701-4045 <input type="checkbox"/> Civil Complex Center - 751 W. Santa Ana Blvd., Santa Ana, CA 92701-4512 <input type="checkbox"/> Harbor-Laguna Hills Facility - 23141 Moulton Pkwy., Laguna Hills, CA 92653-1251 <input type="checkbox"/> Harbor-Newport Beach Facility - 4801 Jamboree Rd., Newport Beach, CA 92660-2595 <input checked="" type="checkbox"/> North - 1275 N. Berkeley Ave., P. O. Box 5000, Fullerton, CA 92838-0500 <input type="checkbox"/> West - 8141 13 th Street, Westminster, CA 92683-4593	CASE NUMBER: <u>07NL02975</u>
PLAINTIFF / PETITIONER: <u>DANIEL HAINES</u> DEFENDANT / RESPONDENT: <u>OSAMA LUTFI</u>	
DECLARATION RE: NOTICE Temporary Restraining Order Civil Harassment, Workplace Violence, Transitional Housing	

On (date) _____ at (time) _____, I telephoned Plaintiff/Petitioner or Defendant/Respondent (name) _____ I said that on (date) _____ at (time) _____, I would ask the Court for a Temporary Restraining Order (describe order, e.g. "against violence") _____

I gave the location of the Courthouse as Dept. _____ at (address) _____

I have been unable to give notice to the Plaintiff/Petitioner or Defendant Respondent for the following reasons:
I WOULD LIKE TO AVOID ANY CONTACT WITH THE DEFENDANT

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
 Date: 3-28-07
DANIEL HAINES (TYPE OR PRINT NAME) [Signature] (SIGNATURE OF DECLARANT)

DECLARATION RE: NOTICE
Temporary Restraining Order
Civil Harassment, Workplace Violence, Transitional Housing

CH-120

Notice of Hearing and Temporary Restraining Order

Clerk stamps date here when form is filed.

FILED
ORANGE COUNTY SUPERIOR COURT

MAR 29 2007

ALAN SLATER, EXECUTIVE OFFICER/CLERK

C Valko
BY: C. VALKO, DEPUTY

Fill in court name and street address:

Superior Court of California, County of

North Justice Center
1275 N. Berkeley Avenue
Fullerton, CA 92838-0500

Court fills in case number when form is filed.

Case Number:

07NL02915

1 Name of person asking for protection: DANIEL T. HOINES

Address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

[Redacted]

City: [Redacted] State: CA Zip: [Redacted]

Your telephone number (optional): [Redacted]

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number):

2 Name of person to be restrained: OSAMA LUTFI

Description of that person:

Sex: [X] M [] F Height: 5'9" Weight: 160 Race: ARAB
Hair Color: BLACK Eye Color: [Redacted] Age: 32 Date of Birth: 1975
Home Address (if known): 12629 CASWELL AVE UNIT # 16 OR P2
City: MAR VISTA State: CA Zip: 90066

To the person in 2:

3 Notice of Hearing

A court hearing is scheduled on the request for orders against you to stop harassment:

Hearing Date: 4.11.07 Time: 1:30 pm Name and address of court if different from above:
Dept.: NA Rm.:

If you do not want the court to make orders against you, file Form CH-110. Then go to the hearing and tell the court why you disagree. You may bring witnesses and other evidence. If you do not go to this hearing, the court may make restraining orders against you that could last up to 3 years.

4 Court Orders

The court (check a or b):

- a. Has scheduled the hearing stated in 3. No orders are issued against you at this time.
b. [X] Has scheduled the hearing stated in 3 and has issued the temporary orders against you specified on page 2. If you do not obey these orders, you can be arrested and charged with a crime. And you may have to go to jail, pay a fine of up to \$1,000, or both.

This is a Court Order.

FAX

Case Number: **07NL02915**

Your name: Daniel Hawes

Temporary Orders Against the Restrained Person

(Write the name of the person in ②): OSAMA LUTFI

The court has made the temporary orders indicated below against you. You must obey all these orders. These orders will expire on the date of the hearing listed in ③ unless they are extended by the court.

⑤ **Personal Conduct Orders**

You must not do the following things to the people listed in ① and ⑩:

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. Contact (directly or indirectly), telephone, send messages, mail, or e-mail.

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this Order.

⑥ **Stay-Away Order**

You must stay at least (specify): 100 yards away from:

- a. The person listed in ①
- b. The people listed in ⑩
- c. The home of the persons in ① and ⑩
- d. Jobs or workplaces of the persons in ① and ⑩
- e. Vehicle of person in ①
- f. The protected children's school or child care
- Vehicles of persons in ⑩
- Other (specify): _____

This stay-away order does not prevent the person in ② from going to or from that person's home or place of employment.

⑦ **No Guns or Other Firearms**

You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get a gun or firearm.

⑧ **Turn In or Sell Guns or Firearms**

You must:

- Sell to a licensed gun dealer or turn in to police any guns or firearms that you possess or control. This must be done within 48 hours of receiving this order. But if you were at a hearing on this order, it must be done within 24 hours of the hearing.
- Bring a receipt to the court within 72 hours of receiving this order, to prove that guns have been turned in or sold. (You may use Form CH-145 for this.)

⑨ **Other Orders (specify):** _____

⑩ **Other Protected Persons**

List of the full names of all family or household members protected by these orders:

PATTY HAWES, APRIL HAWES

This is a Court Order.



Your name:

DANIEL HAINES

Case Number:

07NL02915

Instructions for the Protected Person

To the person in ①: (Write the name of the person in ①): DANIEL W HAINES

⑪ Service of Order on Law Enforcement

If the court issues temporary restraining orders, by the close of business on the date the orders are made, you or your lawyer should deliver a copy of this Order and any proof of service forms to each law enforcement agency listed below.

Name of Law Enforcement Agency:

ANAHEIM POLICE

Address (City, State, Zip)

425 S HARBOR BLVD 92403

⑫ Service of Documents

You must have someone personally deliver to the person in ② a copy of all the documents checked below:

- a. CH-120, Notice of Hearing and Temporary Restraining Order (CLETS) (completed and file-stamped)
- b. CH-100, Request for Orders to Stop Harassment (completed and file-stamped)
- c. CH-110, Answer to Request for Orders to Stop Harassment (blank form)
- d. CH-145, Proof of Firearms Turned In or Sold (blank form)
- e. CH-151, How Can I Answer a Request for Orders to Stop Harassment?
- f. Other (specify): _____

You must file with the court before the hearing a proof of service of these documents on the person in ②.

⑬ Time for Service (check a, b, or c)

- a. A copy of the documents listed in ⑬ must be served in person to the person in ② at least 5 days before the hearing.
- b. A copy of the documents listed in ⑬ must be served in person to the person in ② at least 2 days before the hearing.
- c. A copy of the documents listed in ⑬ must be served in person to the person in ② at least 1 days before the hearing.

⑭ No Fee for Filing

Filing fees are waived.

⑮ No Fee for Service of Order by Law Enforcement

The sheriff or marshal will serve this Order without charge because the order is based on a credible threat of violence resulting from a threat of sexual assault or on stalking.

Date:

3/29/07

Judicial Officer

R. LUESEBRINK

This is a Court Order.

Your name:

DANIEL HAINES

07NL02915

Warnings and Notices to the Restrained Person

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get a gun while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to a licensed gun dealer or turn in to police any guns or firearms that you have or control in accordance with item 8 above. The court will ask you for proof that you did so. If you do not obey this Order, you can be charged with a crime.

Instructions for Law Enforcement

This Order is effective when made. It is enforceable anywhere in all 50 states, the District of Columbia, all tribal lands, and all U.S. territories and shall be enforced as if it were an order of that jurisdiction by any law enforcement agency that has received the Order, is shown a copy of the Order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the Order and then shall enforce it. Violations of this Order are subject to criminal penalties.



Requests for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least 5 days before the hearing. Contact the clerk's office for Request for Accommodations by Persons with Disabilities and Order (form MC-410). (Civil Code, § 54.8)

(Clerk will fill out this part)
--Clerk's Certificate--

Clerk's Certificate (cont)

I certify that this Notice of Hearing and Temporary Restraining Orders is a true and correct copy of the original on file in the court.

Date: _____ Clerk, by _____, Deputy

This is a Court Order.

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 15

Text Messages

OSAMA "Sam" LUTFI to ROBIN DIAZ

Isaiah Silva v. Courtney Love, et al.

Yesterday 7:24 PM

LUTFI: divorce is the least of his problems

LUTFI: Robin, he smart. I'm here with these guys and they're telling me you're pandering

LUTFI: be smart I meant to say

LUTFI: you've got your own family to protect and future and career and He isn't going to provide that for you

LUTFI: right now you're nothing less than accomplice to commit a crime. that's really what you want here?

LUTFI: conspiracy, fraud, blackmail, extortion, undue influence

Yesterday 9:18 PM

LUTFI: Robin, listen to me. you're playing games and I'll target you

Today 9:57 AM

LUTFI: answer me Robin because I'm pulling you into this

LUTFI: you showed your true colors. you have no clue what hell you're facing .. no clue

LUTFI: you're calling Isaiah?? for help??? wow, you're a mess. go ahead sacrifice your entire future for Isaiah .. smart choice buddy, very smart

LUTFI: that's right, hang up like a pussy. make the right choice or live in hell.. you decide

LUTFI: call me this second. you're making the worst choice of your life right now

LUTFI: that's cool Robin, both cl and Billy are contacting everyone in this town. that's what you just asked for

42 LUTFI: going to dedicate this entire day to making sure we've spoken to everyone. is
43 that what you want??? tell me
44

45 *Today 12:38 PM*
46

47 LUTFI: listen to me. do not relay anything to anyone. give me the cell number Isaiah is
48 currently using
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50 *Today 2:49 PM*
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52 LUTFI: I'm not asking again
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AT&T

3:07 PM

52%

Messages

Sam

Details

Yesterday 7:24 PM

divorce is the least of
his problems

Robin, he smart. I'm
here with these guys
and they're telling me
you're pandering

be smart I meant to
say

you've got your own
family to protect and
future and career and
He isn't going to
provide that for you

right now you're



Text Message

Send

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3:07 PM

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< Messages

Sam

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right now you're
nothing less than
accomplice to commit
a crime. that's really
what you want here?

conspiracy, fraud,
blackmail, extortion,
undue influence

Yesterday 9:18 PM

Robin, listen to me.
you're playing games
and I'll target you

Today 9:57 AM

answer me Robin
because I'm pulling
you into this



Text Message

Send

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3:07 PM

51%

[← Messages](#)

Sam

[Details](#)

you showed your true colors. you have no clue what hell you're facing.. no clue

you're calling Isaiah?? for help??? wow, you're a mess. go ahead sacrifice your entire future for Isaiah.. smart choice buddy, very smart

that's right, hang up like a pussy. make the right choice or live in hell.. you decide

call me this second. you're making the



Text Message

Send

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3:07 PM

51%

[← Messages](#)

Sam

[Details](#)

that's right, hang up like a pussy. make the right choice or live in hell.. you decide

call me this second. you're making the worst choice of your life right now

that's cool Robin, both cl and Billy are contacting everyone in this town. that's what you just asked for

going to dedicate this entire day to making sure we've spoken to everyone. is that what



Text Message

Send

AT&T

3:07 PM

51%

[← Messages](#)

Sam

[Details](#)

this town. that's what you just asked for

going to dedicate this entire day to making sure we've spoken to everyone. is that what you want??? tell me

Today 12:38 PM

listen to me. do not relay anything to anyone. give me the cell number Isaiah is currently using

Today 2:49 PM

I'm not asking again



Text Message

Send

**Text Message Exchange Between
COURTNEY LOVE & ROBIN DIAZ**
Isaiah Silva v. Courtney Love, et al.

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DIAZ: Please give me a call

LOVE: Do not contact me. Period. Do you understand me?

LOVE: I'm going to spend every dime I have and all the energy in the world to put you behind bars along with your best friend. Calls are being made. You will never work again in this town I promise you this

LOVE: If you so much as dare try to contact me (sic) kid in any way. Then I will physically show up in person

DIAZ: This is robin not Isaiah.

LOVE: Do not text me robin. You're about to set forth on a journey of serious pain

LOVE: Oh I know it's robin.

LOVE: Stay the fuck away

DIAZ: What have i done?

LOVE: Stop typing to me. Do you understand?? That house is under surveillance. You chose the wrong side. Isaiah was born a psychopath. You chose to be one. I'm going to make sure everyone in this (sic) town is aware. I promise you. You just walked straight into hell and you'll pay eternally

LOVE: Youre a sick Fuck. I should have known

LOVE: Just spoke to mr daughtry. Boy oh boy the web of lies your entangled in

LOVE: I'm going to speak with everyone in this town. Learn a much better understanding of the con artist you are and how you assisted isai (sic) in his evil doings. It goes to show what your true colors are robin. Your reaction on that call to Sam is indicative of a guilty person. Evil never prevails my dear. Never

AT&T

12:16 PM

74%

Messages

Courtney

Details

Today 10:05 AM

Please give me a call

Do not contact me.
Period. Do you
understand me ?

I'm going to spend
every dime I have and
all the energy in the
world to put you
behind bars along with
your best friend.
Calls are being made.
You will never work
again in this town I
promise you this

If you so much as dare
try to contact me kid



iMessage



●●●●● AT&T

12:16 PM

74%

< Messages Courtney

Details

in any way. Then I will physically show up in person

This is robin not
Isaiah.

Do not text me robin.
You're about to set forth on a journey of serious pain

Oh I know it's robin.

Stay the fuck away

What have i done?

Delivered

Stop typing to me. Do you understand ??
That house is under



iMessage



[← Messages](#) Courtney[Details](#)

Delivered

Stop typing to me. Do you understand ?? That house is under surveillance. You chose the wrong side. Isaiah was born a psychopath. You chose to be one. I'm going to make sure everyone in this town is aware. I promise you. You just walked straight into hell and you'll pay eternally

You're a sick Fuck. I should have known

Just spoke to mr
daughter. Boych boy



iMessage



< Messages Courtney

Details

You're a sick Fuck. I should have known

Just spoke to mr daughtry. Boy oh boy the web of lies your entangled in

I'm going to speak with everyone in this town. Learn a much better understanding of the con artist you are and how you assisted isai in his evil doings. It goes to show what your true colors are robin. Your reaction on that call to Sam is indicative of a



iMessage



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7:34 PM

↑ 58% 

Done

4 of 17

Just spoke to mr
daughtry. Boy oh boy
the web of lies your
entangled in

I'm going to speak
with everyone in this
town. Learn a much
better understanding
of the con artist you
are and how you
assisted isai in his evil
doings. It goes to
show what your true
colors are robin. Your
reaction on that call to
Sam is indicative of a
guilty person. Evil
never prevails my
dear. Never

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 16

BROKEN GLASS DOOR AT CURSON HOUSE

Point of Entry



Point of Entry



Silva v. Love, et al

BROKEN GLASS DOOR AT CURSON HOUSE



Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 17

Detailed Activity Report

6/3/2016 0001 - 6/20/2016 1530

COBAIN, FRANCES

█ N Curson Ave

Premise █

West Hollywood, CA 90046

Transmitter ID# OMD1883

Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-03-2016 00:19:57	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	
06-03-2016 00:20:33	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	
06-03-2016 00:21:07	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	
06-03-2016 00:21:09	OMD1883	OPERATOR ACCESSED	MMB					
		ALARM						
06-03-2016 00:21:11	OMD1883	6266 - DOOR		E134	1	1	MAIN	
06-03-2016 00:21:15	OMD1883	E401 - OPEN (LOG ONLY)	User 1	E401	1			
06-03-2016 00:21:29	OMD1883	FULL CLEAR, INCIDENT COMPLETED	MMB					ALARM WITH OPEN
06-03-2016 05:48:18	OMD1883	R381 - Restore Loss of supervision - RF		R381	1	33	STUDIO 1	
06-03-2016 05:48:52	OMD1883	R381 - Restore Loss of supervision - RF		R381	1	33	STUDIO 1	
06-03-2016 07:57:46	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0		
06-03-2016 09:21:29	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1			
06-03-2016 12:11:34	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	
06-03-2016 12:11:39	OMD1883	E401 - OPEN (LOG ONLY)	User 1	E401	1			
06-03-2016 12:16:38	OMD1883	OPERATOR ACCESSED	SHW					
		ALARM						
06-03-2016 12:16:53	OMD1883	PARTIAL CLEARED FOR QC	SHW					
06-03-2016 12:20:54	OMD1883	OPERATOR ACCESSED	CRR					
		ALARM						
06-03-2016 12:22:06	OMD1883	FULL CLEAR, INCIDENT COMPLETED	CRR					ALARM WITH OPEN

Detailed Activity Report

6/3/2016 0001 - 6/20/2016 1530

Transmitter ID#	OMD1883	Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-03-2016	15:19:44	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1				
06-03-2016	16:33:55	OMD1883	E401 - OPEN (LOG ONLY)	User 1	E401	1				
06-03-2016	16:34:30	OMD1883	E401 - OPEN (LOG ONLY)	User 1	E401	1				
06-03-2016	16:35:06	OMD1883	E401 - OPEN (LOG ONLY)	User 1	E401	1				
06-03-2016	22:51:57	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1				
06-03-2016	22:52:24	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1				- ANI:(323)380-7596
06-04-2016	02:34:23	OMD1883	761 - REAR DOOR OPERATOR ACCESSED ALARM	DAG	E131	1	13	LIVING ROOM		
06-04-2016	02:34:45	OMD1883	Call (310)658-9653	DAG	E131	1	13	LIVING ROOM		- ANI:(323)380-7596
06-04-2016	02:34:48	OMD1883	761 - REAR DOOR OPERATOR ACCESSED ALARM	User 1	E401	1				- ANI:(323)380-7596
06-04-2016	02:34:50	OMD1883	E401 - OPEN (LOG ONLY)	DAG Site						
06-04-2016	02:34:52	OMD1883	Call (310)658-9653 - CALL TERMINATED BY OPERATOR	DAG						
06-04-2016	02:35:03	OMD1883	ALARM WITH OPEN / CLOSE	DAG						
06-04-2016	02:35:11	OMD1883	FULL CLEAR, INCIDENT COMPLETED	DAG						
06-04-2016	07:57:38	OMD1883	E602 - NORMAL TIMER TEST		E602	0		TT0		- ANI:(323)380-7596
06-04-2016	07:58:04	OMD1883	E602 - NORMAL TIMER TEST		E602	0		TT0		- ANI:(323)380-7596
06-04-2016	07:58:37	OMD1883	E602 - NORMAL TIMER TEST		E602	0		TT0		
06-04-2016	20:33:52	OMD1883	E381 - Loss of Supervision - RF		E381	1	33	STUDIO 1		

Detailed Activity Report

6/3/2016 0001 - 6/20/2016 1530

Transmitter ID#	OMD1883	Date	Xmit#	Event / Operator Action Email Sent - Email Sent	Initials/User	Signal	Area	Point	Point Description	Comment
06-04-2016	20:33:52	OMD1883								TALLY BARUCH{[info@omdsecurity.com]} TALLY BARUCH{[meine@omdsecurity.co m]} TALLY BARUCH{[monitoring@omdsecu rity.com]}
06-04-2016	20:48:17	OMD1883		OPERATOR ACCESSED ALARM	ELM					
06-04-2016	20:49:00	OMD1883		FOLLOW UP CREATED	ELM					
06-04-2016	20:49:02	OMD1883		FOLLOW UP CREATED	ELM					
06-04-2016	20:49:03	OMD1883		FULL CLEAR, INCIDENT COMPLETED	ELM					
06-05-2016	07:57:26	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		PREM1ST RP LOG IF RESTORE 33 STUDIO 1 LOSS OF SUPERVISION RF REF 15363
06-05-2016	07:58:01	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		- ANI:(323)380-7596
06-05-2016	07:58:25	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		- ANI:(323)380-7596
06-05-2016	16:10:01	OMD1883		R381 - Restore Loss of supervision - RF		R381	1	33	STUDIO 1	
06-05-2016	19:49:16	OMD1883		OPERATOR ACCESSED ALARM	XMF					
06-05-2016	19:49:33	OMD1883		PARTIAL CLEARED FOR QC	XMF					WITH RESTORE
06-05-2016	19:49:44	OMD1883		OPERATOR ACCESSED ALARM	JRA					
06-05-2016	19:49:53	OMD1883		FULL CLEAR, INCIDENT COMPLETED	JRA					
06-06-2016	07:57:42	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		

Detailed Activity Report

6/3/2016 0001 - 6/20/2016 1530

Transmitter ID#	OMD1883	Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-06-2016	07:58:17	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			
06-06-2016	07:58:50	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			
08-06-2016	20:00:53	OMD1883	E381 - Loss of Supervision - RF		E381	1	30	FAMILY ROOM 2		
06-06-2016	20:00:53	OMD1883	Email Sent - Email Sent							
06-06-2016	20:03:11	OMD1883	OPERATOR ACCESSED ALARM	XMF						TALLY BARUCH[info@omdsecurity.com], TALLY BARUCH[meira@omdsecurity.com], TALLY BARUCH[monitoring@omdsecurity.com]
06-06-2016	20:06:17	OMD1883	FOLLOW UP CREATED	XMF						NOTIFY PREM AND FIRST 1ST RP FOR LOSS OF SUPERVISION ZN 30, LOG W RESTORE
06-06-2016	20:08:43	OMD1883	PARTIAL CLEARED FOR QC	XMF						
06-06-2016	20:12:22	OMD1883	OPERATOR ACCESSED ALARM	JRA						
06-06-2016	20:12:29	OMD1883	FULL CLEAR, INCIDENT COMPLETED	JRA						
06-06-2016	22:59:25	OMD1883	R381 - Restore Loss of supervision - RF		R381	1	30	FAMILY ROOM 2		- ANI:(323)380-7598
06-06-2016	23:00:00	OMD1883	R381 - Restores Loss of supervision - RF		R381	1	30	FAMILY ROOM 2		- ANI:(323)380-7598
06-07-2016	07:57:33	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			
06-07-2016	07:57:56	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			
06-07-2016	07:58:33	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			

Detailed Activity Report

6/3/2016 0001 - 6/20/2016.1530

Transmitter ID#	Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
OMD1883	06-07-2016 07:59:08	OMD1883	E902 - NORMAL TIMER TEST		E602	0	TT0		- ANI: (323)380-7598
	06-07-2016 10:08:29	OMD1883	E384 - RF Sensor Low battery		E384	1	33	STUDIO 1	TALLY BARUCH(info@omdsecurity.com), TALLY BARUCH(meira@omdsecurity.co m), TALLY BARUCH(monitoring@omdsecuri ty.com)
	06-07-2016 10:08:29	OMD1883	Email Sent - Email Sent						
	06-07-2016 10:09:01	OMD1883	E384 - RF Sensor Low battery		E384	1	33	STUDIO 1	TALLY BARUCH(info@omdsecurity.com), TALLY BARUCH(meira@omdsecurity.co m), TALLY BARUCH(monitoring@omdsecuri ty.com)
	06-07-2016 10:09:01	OMD1883	Email Sent - Email Sent						
	06-07-2016 12:07:31	OMD1883	OPERATOR ACCESSED	VIV					
	06-07-2016 12:07:58	OMD1883	ALARM	VIV					
	06-07-2016 12:08:33	OMD1883	Call (310)659-9653	VIV Site					
	06-07-2016 12:08:38	OMD1883	Call (310)659-9653 - NO MESSAGE LEFT	VIV					
	06-07-2016 12:08:38	OMD1883	Call (310)562-3776	VIV FRANCES COI					
	06-07-2016 12:09:07	OMD1883	Call (310)562-3778 - TROUBLE WITH NUMBER DIALED	VIV FRANCES COI					NOT ACCEPTING CALLS AT THIS TIME
	06-07-2016 12:09:07	OMD1883	PROBLEM WITH PHONE NUMBER	VIV					
	06-07-2016 12:09:08	OMD1883	Call (310)562-3776	VIV					
	06-07-2016 12:09:20	OMD1883	Call (310)562-3778 - TROUBLE WITH NUMBER DIALED	VIV FRANCES COI					

Detailed Activity Report

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Transmitter ID#	OMD1883	Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-07-2016	12:09:28	OMD1883		PROBLEM WITH PHONE NUMBER	VIV					
06-07-2016	12:09:45	OMD1883		Call (310)562-3776	VIV					
06-07-2016	12:09:52	OMD1883		Call (310)562-3778 - TROUBLE WITH NUMBER DIALED	VIV FRANCES COF					
06-07-2016	12:09:52	OMD1883		PROBLEM WITH PHONE NUMBER	VIV					
06-07-2016	12:11:36	OMD1883		FULL CLEAR, INCIDENT COMPLETED	VIV					
06-07-2016	12:18:46	OMD1883		R384 - Restore RF low battery		R384	1	33	STUDIO 1	- ANI:(323)380-7598
06-07-2016	12:19:06	OMD1883		R384 - Restore RF low battery		R384	1	33	STUDIO 1	- ANI:(323)380-7598
06-08-2016	07:57:30	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		
06-08-2016	07:58:05	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		
06-08-2016	17:13:19	OMD1883		R401 - CLOSE (LOG ONLY)	User 1	R401	1			- ANI:(323)380-7598
06-08-2016	17:13:53	OMD1883		R401 - CLOSE (LOG ONLY)	User 1	R401	1			- ANI:(323)380-7598
06-08-2016	17:13:56	OMD1883		761 - REAR DOOR		E131	1	13	LIVING ROOM	- ANI:(323)380-7598
06-08-2016	17:13:59	OMD1883		E457 - Exit Error (user)	User 1	E457	1			- ANI:(323)380-7598
06-08-2016	17:14:03	OMD1883		E401 - OPEN (LOG ONLY)	User 1	E401	1			- ANI:(323)380-7598
06-08-2016	17:14:56	OMD1883		OPERATOR ACCESSED ALARM	LLB					ALARM WITH OPEN
06-08-2016	17:15:02	OMD1883		FULL CLEAR, INCIDENT COMPLETED	LLB					
06-09-2016	07:57:16	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		- ANI:(323)380-7598
06-10-2016	07:57:23	OMD1883		E602 - NORMAL TIMER TEST		E602	0	TT0		
06-10-2016	16:20:00	OMD1883		R401 - CLOSE (LOG ONLY)	User 1	R401	1			

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Transmitter ID#	OMD1883	Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-10-2016	18:20:08	OMD1883	761 - REAR DOOR			E131	1	13	LIVING ROOM	
06-10-2016	18:20:39	OMD1883	761 - REAR DOOR			E131	1	13	LIVING ROOM	
06-10-2016	18:20:42	OMD1883	E457 - Exit Error (user)	User 1		E457	1			
06-10-2016	18:20:49	OMD1883	E401 - OPEN (LOG ONLY)	User 1		E401	1			
06-10-2016	18:21:20	OMD1883	E401 - OPEN (LOG ONLY)	User 1		E401	1			
06-10-2016	18:22:16	OMD1883	OPERATOR ACCESSED ALARM	VLW						
06-10-2016	18:22:23	OMD1883	FULL CLEAR, INCIDENT COMPLETED	VLW						WITH OPEN
06-10-2016	21:16:50	OMD1883	R401 - CLOSE (LOG ONLY)	User 1		R401	1			
06-10-2016	21:17:24	OMD1883	R401 - CLOSE (LOG ONLY)	User 1		R401	1			
06-10-2016	21:17:52	OMD1883	R401 - CLOSE (LOG ONLY)	User 1		R401	1			- ANI:(323)380-7598
06-10-2016	21:18:26	OMD1883	R401 - CLOSE (LOG ONLY)	User 1		R401	1			- ANI:(323)380-7598
06-10-2016	21:19:50	OMD1883	R401 - CLOSE (LOG ONLY)	User 1		R401	1			- ANI:(323)380-7598
06-11-2016	07:57:17	OMD1883	E602 - NORMAL TIMER TEST			E602	0	TT0		
06-12-2016	07:57:08	OMD1883	E602 - NORMAL TIMER TEST			E602	0	TT0		
06-13-2016	07:57:17	OMD1883	E602 - NORMAL TIMER TEST			E602	0	TT0		
06-13-2016	07:57:44	OMD1883	E602 - NORMAL TIMER TEST			E602	0	TT0		- ANI:(323)380-7598
06-14-2016	06:43:59	OMD1883	761 - REAR DOOR			E131	1	13	LIVING ROOM	
06-14-2016	06:44:40	OMD1883	761 - REAR DOOR			E131	1	13	LIVING ROOM	
06-14-2016	06:44:40	OMD1883	E401 - OPEN (LOG ONLY)	User 1		E401	1			
06-14-2016	06:52:45	OMD1883	OPERATOR ACCESSED ALARM	JHW						

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Transmitter ID# OMD1883

Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-14-2016 06:52:53	OMD1883	FULL CLEAR, INCIDENT COMPLETED	JHW					ALARM WITH OPEN
06-14-2016 07:28:09	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1			
06-14-2016 07:32:54	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	
06-14-2016 07:33:28	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	
06-14-2016 07:33:43	OMD1883	OPERATOR ACCESSED ALARM	ANJ					
06-14-2016 07:33:52	OMD1883	Call (310)658-9653	ANJ	E131	1	13	LIVING ROOM	- ANI:(323)380-7598
06-14-2016 07:33:54	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	- ANI:(323)380-7598
06-14-2016 07:34:19	OMD1883	761 - REAR DOOR						
06-14-2016 07:34:27	OMD1883	Call (310)658-9653 - NO ANSWER	ANJ Site					
06-14-2016 07:34:29	OMD1883	Call (310)562-3778	ANJ					
06-14-2016 07:34:48	OMD1883	Call (310)562-3778 - DISCONNECTED	ANJ FRANCES CO					
06-14-2016 07:34:48	OMD1883	NUMBER	ANJ					
06-14-2016 07:34:50	OMD1883	PROBLEM WITH PHONE NUMBER	ANJ					
06-14-2016 07:34:56	OMD1883	Call (949)697-0658	ANJ					
06-14-2016 07:34:58	OMD1883	761 - REAR DOOR		E131	1	13	LIVING ROOM	- ANI:(323)380-7598
06-14-2016 07:34:59	OMD1883	E401 - OPEN (LOG ONLY)	User 1	E401	1			- ANI:(323)380-7598
06-14-2016 07:35:16	OMD1883	Call (949)697-0658 - CALL TERMINATED BY OPERATOR	ANJ JOHN HAMILT					
06-14-2016 07:35:21	OMD1883	ALARM WITH OPEN / CLOSE	ANJ					
06-14-2016 07:35:26	OMD1883	FULL CLEAR, INCIDENT COMPLETED	ANJ					
06-14-2016 07:35:40	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1			- ANI:(323)380-7598
06-14-2016 07:36:25	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1			- ANI:(323)380-7598
06-14-2016 07:57:14	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0		

Detailed Activity Report

6/3/2016 0001 - 6/20/2016 1530

Transmitter ID#	OMD1883	Date	Xmits#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-15-2016	07:57:16	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			
06-16-2016	07:57:17	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			
06-16-2016	13:26:54	OMD1883	761 - REAR DOOR	User 1	E131	1	13	LIVING ROOM		
06-16-2016	13:26:59	OMD1883	E401 - OPEN (LOG ONLY)		E401	1				
06-16-2016	13:30:37	OMD1883	OPERATOR ACCESSED ALARM	CAM						WITH OPEN
06-16-2016	13:30:54	OMD1883	FULL CLEAR, INCIDENT COMPLETED	CAM						
06-16-2016	17:15:30	OMD1883	E381 - Loss of Supervision - RF		E381	1	32	FAMILY ROOM EXIT		
06-16-2016	17:15:30	OMD1883	Email Sent - Email Sent							
06-16-2016	17:20:04	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1				TALLY BARUCH@omdsecurity.com
06-16-2016	17:21:13	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1				TALLY BARUCH@omdsecurity.com
06-16-2016	17:21:47	OMD1883	R401 - CLOSE (LOG ONLY)	User 1	R401	1				m), TALLY BARUCH@omdsecurity.com
06-16-2016	20:53:45	OMD1883	OPERATOR ACCESSED ALARM	VLW						- ANI:(323)380-7598
06-16-2016	20:54:34	OMD1883	FOLLOW UP CREATED	VLW						- ANI:(323)380-7598
06-16-2016	20:54:36	OMD1883	FOLLOW UP CREATED	VLW						CALL PREMISE AND NOTIFY ON LOSS OF SUPERVISION ZN 32 LOG WITH RESTORE
06-16-2016	20:54:37	OMD1883	FULL CLEAR, INCIDENT COMPLETED	VLW						
06-17-2016	07:57:16	OMD1883	E602 - NORMAL TIMER TEST		E602	0	TT0			- ANI:(323)380-7598

Detailed Activity Report

6/3/2016 0001 - 6/20/2016 1530

Transmitter ID#	OMD1883	Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
06-17-2016	07:59:14	OMD1883	E602 - NORMAL TIMER			E602	0	TT0		- ANI:(323)380-7598
06-17-2016	07:59:48	OMD1883	TEST							
06-17-2016	07:59:48	OMD1883	E602 - NORMAL TIMER			E602	0	TT0		- ANI:(323)380-7598
06-17-2016	15:58:52	OMD1883	TEST							
06-17-2016	15:58:52	OMD1883	OPERATOR ACCESSED	SPD						
06-17-2016	15:59:43	OMD1883	ALARM							
06-17-2016	15:59:43	OMD1883	Call (310)658-9653	SPD						VOICE MAIL IDENTIFIED AS DIFFERENT PERSON
06-17-2016	16:01:25	OMD1883	Call (310)658-9653 - NO MESSAGE LEFT	SPD Site						
06-17-2016	16:01:25	OMD1883	Call (310)562-3778	SPD						TELCO MESSAGE *PERSON NOT ACCEPTING CALLS AT THIS TIME*
06-17-2016	16:02:38	OMD1883	Call (310)562-3778 - UNABLE TO LEAVE MESSAGE	SPD FRANCES CC						
06-17-2016	16:02:52	OMD1883	FULL CLEAR, INCIDENT COMPLETED	SPD						
06-17-2016	16:03:58	OMD1883	FOLLOW UP CREATED	SPD						
06-18-2016	07:57:22	OMD1883	E602 - NORMAL TIMER			E602	0	TT0		CALL PREMISE AND NOTIFY ON LOSS OF SUPERVISION ZN 32 LOG WITH RESTORE
06-18-2016	13:51:48	OMD1883	TEST							
06-18-2016	13:51:48	OMD1883	OPERATOR ACCESSED	LCK						
06-18-2016	13:53:44	OMD1883	ALARM							
06-18-2016	13:53:44	OMD1883	Valid Code Word Received	LCK						ISIAH CALLING ON ALARM ACTIVITY
06-18-2016	14:03:22	OMD1883	CONFIRMED CAPTURE	LCK						PER ISIAH, HOME WAS BROKEN INTO ON 6/3, THE REAR DOOR RECEIVED W/OPEN AT 0019
06-19-2016	07:57:13	OMD1883	CONFIRMED CRIME	LCK						ISIAH NOTIFIED
06-19-2016	14:03:43	OMD1883	FULL CLEAR, INCIDENT COMPLETED	LCK						
06-19-2016	14:19:29	OMD1883	E602 - NORMAL TIMER			E602	0	TT0		- ANI:(323)380-7598
06-19-2016	07:57:13	OMD1883	TEST							
06-20-2016	07:57:25	OMD1883	E602 - NORMAL TIMER			E602	0	TT0		
06-20-2016	07:57:25	OMD1883	TEST							

Detailed Activity Report

6/3/2016 0001 - 6/20/2016 1530

Transmitter ID#	Date	Xmit#	Event / Operator Action	Initials/User	Signal	Area	Point	Point Description	Comment
OMD1883	06-20-2016 14:33:21	OMD1883	SERVICE - SERVICE OR GENERAL MESSAGE	JRA					
	06-20-2016 14:33:26	OMD1883	OPERATOR ACCESSED ALARM	JRA					ISIAH 310-729-3847 WOULD LIKE COPY OF ACTIVITY REPORT FOR THE 3RD FOR PD AS THEY WERE BROKEN INTO
	06-20-2016 14:34:39	OMD1883	SERVICE CALL INFORMATION	JRA					TALLY BARUCH(jinfo@omdsecurity.com), TALLY BARUCH(meira@omdsecurity.co m), TALLY BARUCH(jmonitoring@omdsecu rity.com)
	06-20-2016 14:34:39	OMD1883	Email Sent - Email Sent						ISIAH TRANSFERRED TO OFFICE
	06-20-2016 14:34:46	OMD1883	Call (818)342-6022	JRA					
	06-20-2016 14:34:53	OMD1883	Call (818)342-6022 - CONTACTED	JRA O.M.D., INC.					
	06-20-2016 14:34:57	OMD1883	FULL CLEAR, INCIDENT COMPLETED	JRA					

Total Events 176

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 18



PHILLIP MUNSEY EMERGENCY CALL (911)

Silva v. Love, et al

MUNSEY: Phillip Munsey – reporting party

911 OPER: 9-1-1 Emergency Operator

DISPATCHER: Radio communications directed to LAPD personnel

LUTFI: Sam Lutfi - one of three male suspects who forced Silva into their vehicle

SILVA: Isaiah Silva

UNIT 6A76: LAPD unit responding to Munsey's call

AIR 3: LAPD helicopter

TIME STAMP: Computer generated voice overlay

TIME STAMP: Friday June three, two thousand sixteen, zero twenty-three and forty-five seconds (06.03.2016 / 0023:45 hrs).

911 OPER: Nine-one-one emergencyoperator 583 (R-835).

MUNSEY: Ah, someone broke into my friend's house – [REDACTED] N. Curson Avenue - and they got three big ol' huge guys and I'm freaking out. Like they busted in the house, the alarm went off, they were threatening him.

911 OPER: Okay.

MUNSEY: They're huge and I don't....

29 911 OPER: Sir, we're going to send the police there. Are they... Is this a house or an
30 apartment?
31
32 MUNSEY: It's a house.
33
34 911 OPER: Okay, are they white, black...
35
36 MUNSEY: It's Francis Cobain's house and they...
37
38 911 OPER: Are they white, black, or Hispanic, or Asian?
39
40 MUNSEY: Ah, he looks – well, one Asian, one Mex... and maybe two Mexicans, or Persian
41 or something, in suits...
42
43 911 OPER: Are they (unintelligible) the house?
44
45 MUNSEY: ...and they just busted in the door. I'm freaked out right now.
46
47 911 OPER: Sir...
48
49 MUNSEY: I'm freaked out for my life.
50
51 911 OPER: ...I'm going to get the police going. This is at [REDACTED] North Curson Avenue, C-U-
52 R-S-O-N?
53
54 MUNSEY: Yes.
55

56 911 OPER: Okay, let me get the police going. I'm gonna stay on the line 'cause I'm gonna
57 need more information for the officers, okay?

58

59 MUNSEY: Okay.

60

61 911 OPER: Let me get 'em going. Was your friend still inside?

62

63 MUNSEY: Yeah they're like holding him - they're like, they're like pushing him into a
64 bathroom.

65

66 911 OPER: Okay, alright.

67

68 MUNSEY: I'm freaked out. I don't have any muscles, and they're...

69

70 911 OPER: That's fine stay on the line, okay?

71

72 DISPATCHER: And he's the victim, male no further description. Code three incident and I
73 need...

74

75 [RADIO CROSSTALK COVERING]

76

77 DISPATCHER: All units 4-5-9 in progress [REDACTED] North Curson, [REDACTED] North Curson;
78 suspects are three males; one's a male Asian; two and three are male Hispanics;
79 stand by for further; code three incident ninety-eight (unintelligible).

80

81 911 OPER: Okay sir.

82

83 [RADIO CROSSTALK COVERING]

84

85 MUNSEY: I need to call his folks too. This is crazy.

86

87 911 OPER: Okay sir, do you have any clothing description of them?

88

89 MUNSEY: They're all in black. They're in black suits. There's an Asian guy, and looks like
90 he's like in a work out outfit, but there's another, looks like a bodyguard in a
91 black suit, and this other guy just black in...

92

93 911 OPER: Okay so the male Hispanics you said were wearing black suits, and the male
94 Asian what color shirt was he wearing?

95

96 MUNSEY: Uh, maybe grayish it looked like he was working out.

97

98 911 OPER: Gray shirt. Okay did they have any weapons?

99

100 MUNSEY: Uh, I couldn't, I couldn't tell. They were like, "Get the fuck out of the house."
101 "You get the fuck out of the house." And then they were trying to shove him in a,
102 in the bathroom and then I see a ca... They're like parked outside in a car, but I
103 have the street blocked off...

104

105 [RADIO CROSSTALK COVERING]

106

107 911 OPER: (Unintelligible) they in?

108

109 MUNSEY: I can't tell from here, it looks like a Suburban.

110

111 911 OPER: Their car is a Suburban?

112

113 MUNSEY: Yeah.

114

115 911 OPER: What color is the Suburban?

116

117 MUNSEY: Black. My phone's about to die, I can't leave him by himself, but I'm freaked out.

118

119 911 OPER: Okay, well the police...

120

121 MUNSEY: Are people coming?

122

123 911 OPER: Yeah, the police are on the way, okay. One moment let me get...give 'em the
124 further information.

125

126 [RADIO CROSSTALK COVERING]

127

128 911 OPER: Hold on okay.

129

130 DISPATCHER: (Unintelligible) two stand by.

131

132 MUNSEY: Okay, my phone is about to die.

133

134 DISPATCHER: (Unintelligible) units on 4-5-9- suspects on [REDACTED] North Curson; the male
135 Asian's wearing a black shirt; the males Hispanics are wearing black suits; their
136 vehicle is a black Suburban on incident ninety-eight.

137

138 MUNSEY: They're all getting in a car.

139

140 911 OPER: What color...

141

142 MUNSEY: I think there trying to make him go in a car with them.

143

144 911 OPER: Okay, hold on okay?

145

146 MUNSEY: I think it is an Escalade they have the (unintelligible) white (unintelligible)...

147

148 DISPATCHER: Six-A-thirty-one, additional; they're attempting to force a person into a black
149 Escalade...

150

151 MUNSEY: (Unintelligible) screamed at me and said, "We are the cops."

152

153 DISPATCHER: ...at twenty fifteen North Curson.

154

155 MUNSEY: Now they're going, I don't know if Curson goes anywhere else, but-- No, they're
156 going to try to get out right now and I'm blocking the road and I don't want to let
157 them leave with my friend in there.

158

159 911 OPER: They said they were the police?

160

161 MUNSEY: Yeah they said, "We're the cops." And then I said, "Who are the cops? Who's the
162 cops?" And then they're like... And then they just took him in a car. I'm freaking
163 out.

164

165 911 OPER: Hold on okay?

166

167 [RADIO CROSSTALK COVERING]

168
169 DISPATCHER: Unit backing six-A-thirty-one repeat, and repeat your status (unintelligible) and
170 your starting location.
171
172 MUNSEY: They're leaving right now. They're about to like...
173
174 UNIT 6A76: Six-adam-seventy-six from De Longpre and Highland.
175
176 MUNSEY: What should I do, should I box them in, or should I let them go?
177
178 DISPATCHER: All units six-A-seventy-six responding from De Longpre and Highland that's [REDACTED]
179 [REDACTED] North Curson.
180
181 Six-A-thirty-one additional; the suspects forced PR's friend into a black
182 Escalade...
183
184 MUNSEY: I believe it's a Suburban...
185
186 DISPATCHER: ...the suspects stated they were police officers on incident ninety-eight.
187
188 MUNSEY: Okay. I'm going back to look. They're right behind me. But if I see a cop...
189
190 911 OPER: What type of car are you (unintelligible)?
191
192 [RADIO CROSSTALK COVERING]
193
194 MUNSEY: I'm in a Toyota Matrix.
195

196 911 OPER: What color is your Toyota Matrix?

197

198 MUNSEY: Gray.

199

200 911 OPER: What does your friend look like so the police won't get him confused with...

201

202 MUNSEY: He's got long hair. I think there's a—Is there a helicopter over here or
203 something? There's lights going.

204

205 911 OPER: Hold on, okay?

206

207 MUNSEY: Yeah the helicopter's on us. And the second car's behind me...

208

209 DISPATCHER: Appears to be in a gray Toyota Matrix on incident ninety-eight.

210

211 MUNSEY: I'm going to stop, but the helicopter is-- light is flashing.

212

213 AIR 3: Air three - I've got possible suspect vehicle headed southbound Curson.

214

215 DISPATCHER: Air three has a possible suspect vehicle headed southbound Curson.

216

217 LUTFI: (Unintelligible) my number?

218

219 MUNSEY: Yes.

220

221 LUTFI: He'll be fine. He'll be fine.

222

223 MUNSEY: No, 'cause that's the cops for you guys. That's the...

224

225 SILVA: I'm fine.

226

227 LUTFI: Phil, he's o-- We're on his side, Phil.

228

229 911 OPER: What are they saying sir?

230

231 MUNSEY: They said they are on his side.

232

233 LUTFI: Tell them—call them and tell them it's okay. Okay?

234

235 DISPATCHER: ...a black Escalade and...

236

237 MUNSEY: I'm feaking out.

238

239 LUTFI: (Unintelligible). Please call them and tell them it's okay.

240

241 911 OPER: What did they say?

242

243 MUNSEY: I'm on the phone with (unintelligible).

244

245 LUTFI: (Unintelligible) he's saying it's fine, alright?

246

247 [RADIO CROSSTALK COVERING]

248

249 MUNSEY: Will you please call his parents? Will you call...

250

251 LUTFI: Yes, we will. (unintelligible) is (unintelligible) for him, okay?

252 911 OPER: What is he saying?

253

254 LUTFI: (Unintelligible)

255

256 911 OPER: What's going on sir?

257

258 MUNSEY: Alright.

259

260 911 OPER: What's going on?

261

262 MUNSEY: He's saying it's a false alarm and they got him in this car and I don't know
263 whether to believe them, or not.

264

265 911 OPER: A false alarm for what?

266

267 MUNSEY: He's in the middle of a divorce with Curt Cobain's daughter.

268

269 911 OPER: With who?

270

271 [RADIO CROSSTALK COVERING]

272

273 MUNSEY: The cops are here.

274

275 911 OPER: The police are there?

276

277 MUNSEY: Yes.

278

279 [RADIO CROSSTALK COVERING]

280 TIME STAMP: Zero thirty and twenty-five seconds (0030:25).

281

282 *****

283

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Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 19

Text Message

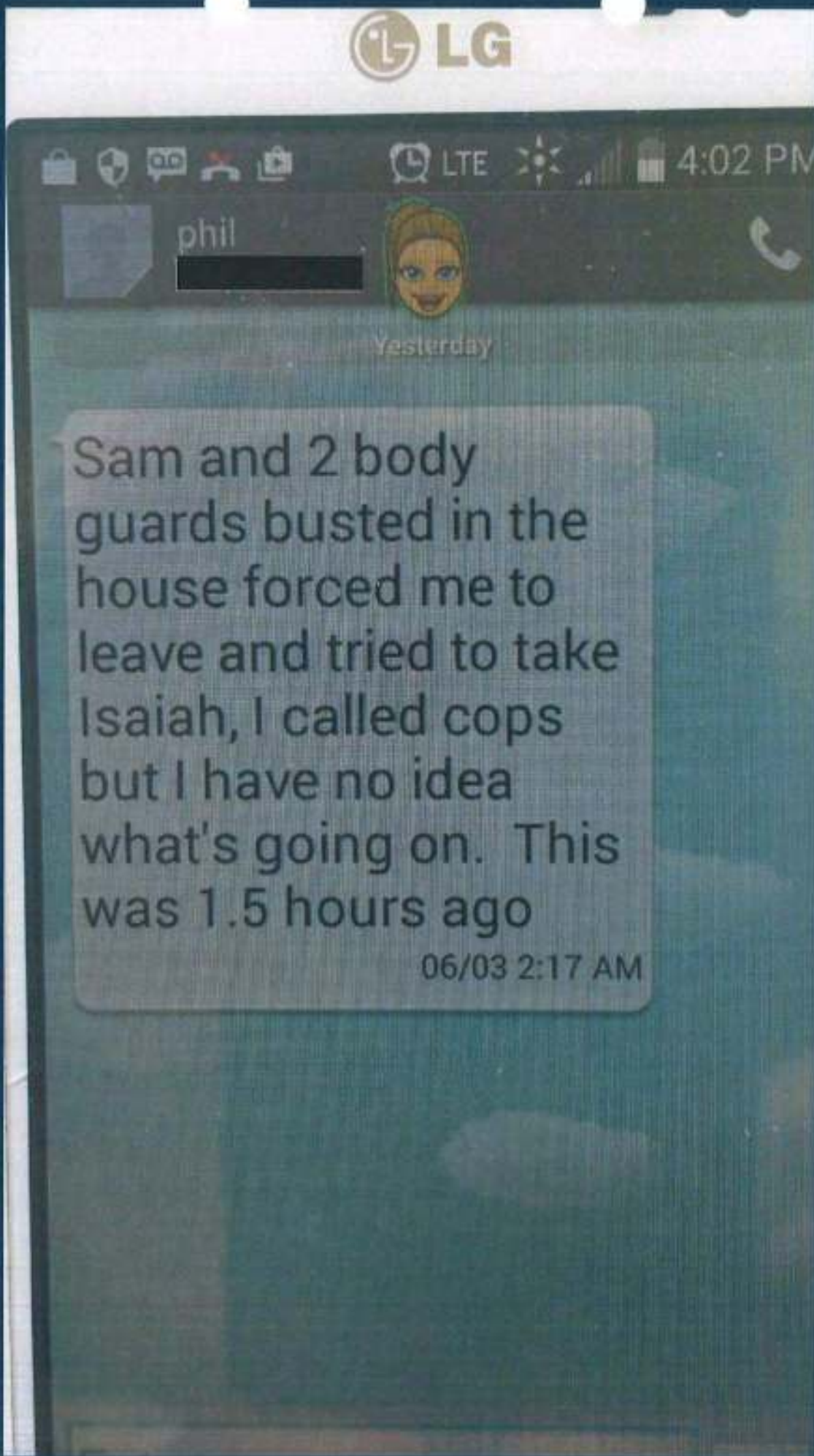
PHILLIP MUNSEY to MARY SILVA

Silva v. Love, et al

June 3, 2016 // 0217 hrs.

7 **MUNSEY:** Sam and 2 body guards busted in the house forced me to leave and tried to take
8 Isaiah, I called cops but I have no idea what's going on. This was 1.5 hours ago

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Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 20



Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 21

Legend:

Messages from LUTFI

Messages from SILVA

Hi call when possible to discuss details

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 4:50:35 PM

yea hold on.. talking to cl

6/4/2016

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 5:21:01 PM

I've got cl to calm down alot

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 5:49:20 PM

Courtney is all good. now she's gotta work on fbc

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 5:49:28 PM

calling you in a minute

SMS Message sent 6/3/2016 5:49:36 PM

Kk

SMS Message sent 6/3/2016 5:49:43 PM

Thank u

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 6:07:35 PM

hang tight. will call you back

SMS Message sent 6/3/2016 6:38:46 PM

Kk

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 7:01:02 PM

I'm ten mins from getting fbc to agree to walk

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 7:01:02 PM

hang tight

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 7:29:47 PM

ok you need to be very quiet for a few hours.

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 7:29:47 PM

I'm getting this done and hope to have paperwork you can hand to your lawyer

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 7:30:27 PM

you can't screw this up. it will include an agreement to drop everything

SMS Message sent 6/3/2016 7:31:42 PM

What do u mean by quiet? Literally don't speak? Or walk? Or am I still waiting to be served?

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 7:33:04 PM

don't mention this to anyone. I'll call you soon

SMS Message sent 6/3/2016 7:34:16 PM

I understand that. But am I still waiting for a knock on my door?

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 8:29:16 PM

ok, two hours on phone with her. she's calling her lawyer now

SMS Message sent 6/3/2016 8:30:23 PM

SMS Conversation with Sam Lutfi Alternate Phone

Thank u. What wud u like me to do?

I've gotta a lot of cleaning up to do due to the initial escapade so I'm not leaving. Just want to be able to sweep up glass/vacuum and take care of the pets and cook etc aka make noise/be seen taking out the trash etc.

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 9:53:25 PM

yes that's fine. I know that fbc called her lawyers. but they're just dragging their heels right now

SMS Message sent 6/3/2016 9:54:01 PM

Also gotta find my brand new phone. I need light to look. Still no luck.

SMS Message sent 6/3/2016 9:54:15 PM

Ok

SMS Message sent 6/3/2016 9:56:24 PM

I had that thing less than a week. Just venting. No sleep... I know ur in the same boat.

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 9:56:42 PM

ok. let me know if you need anything. your lawyer can also email neil and tell him hes aware that fbc is accepting to resolve this all right away etc

SMS Message received from Sam Lutfi Alternate Phone 6/3/2016 9:57:18 PM

yea no I hear you on that. I'm a bit loopy at the moment.

SMS Message sent 6/3/2016 10:00:32 PM

Ya there's a lot to take of. I'll do my best to get in touch w him ASAP but as u know it's 10pm on the weekend but I'll reach out and get it taken care of ASAP.

SMS Message sent 6/3/2016 10:02:18 PM

Will docs be arriving to me to take in physically or it's best he reach out to Neal once I know they're completed?

6/5/2016

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 5:35:01 PM

hey, we need to talk

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 5:35:01 PM

you should get dressed and drive over or Uber over but you need to make sure you get out fine

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 5:35:02 PM

hello?

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:12:28 PM

marc@marcgans.com, nfreedman@wksllp.com

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:12:28 PM

have your lawyer email both those

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:12:28 PM

i know you're attempting to play games and pretend to create a different story now, when I said be honest to the lawyer that meant be honest about the oxy and the extortion etc etc

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:12:29 PM

but you're more than welcome to go about it your way Isaiah. everyone told me you'd do this. I even got you a settlement more than she promised

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:15:29 PM

I'm sorry, I don't think you deserve my help here. you need to just face this battle on your own. Perhaps fbc was right, maybe you did sucker me

SMS Message sent 6/4/2016 6:15:53 PM

Huh? I just did what u asked

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:16:39 PM

no you didn't, you haven't the slightest clue what's going on

SMS Message sent 6/4/2016 6:17:11 PM

I hung up and called my attorney

SMS Message sent 6/4/2016 6:17:36 PM

Told him it was urgent

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:18:31 PM

that's fine, hope he emails the above emails asap but those attorneys want a fight. they have the memorandum

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:18:44 PM

but I think i was far to generous with it

SMS Message sent 6/4/2016 6:19:48 PM

I've thanked u this entire time and followed ur instructions to the t.

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:21:39 PM

no, you began committing another felony by conspiring yet again.. However this time against me

SMS Message sent 6/4/2016 6:22:21 PM

I haven't spoken to anyone but my attorney

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:31:38 PM

I have an agreement, an MOU that sets you free from criminal charges for conspiracy, extortion, "revenge with sex tape" which is an actual felony. I told you to discuss these facts with your attorney. you did not

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:33:19 PM

included in this is a promissory for fbc to pay you, even more than you originally agreed to. but Im beginning to believe her about you and not to believe in you etc etc.

SMS Message sent 6/4/2016 6:33:32 PM

I never plotted any revenge with any sex tape. I told him everything we discussed last night. Everything. Nothing was left out.

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:34:27 PM

you did not tell him about all the money you had her pull out weekly for all the drugs etc etc

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:34:45 PM

you didn't tell him what you told Simon

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:36:07 PM

and you're unaware of what friends are actually taking your side on matters.

SMS Message sent 6/4/2016 6:37:34 PM

I haven't spoken with anyone besides u and my attorney today. I did everything u asked.

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:38:19 PM

your attorney has yet to contact fbc's lawyer

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:40:01 PM

they want to slam you behind bars and make an example of you. just remember this, I spent all day yesterday and today to get this done for you. and her lawyer just basically told me he warned me I was wasting my time

SMS Message sent 6/4/2016 6:40:52 PM

I'm not. He will call. I'll call him again now.

SMS Message sent 6/4/2016 6:42:44 PM

I'm going to call him now. Don't interpret my lack of response as ignoring as I'm going to hound him over n over until I hear back. And he gets in touch with Neal.

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 6:43:44 PM

do as you wish. they are going to be very happy to hear you didn't jump on this get out of jail card. trust me, last thing they want is a quick settlement. they get paid hourly. they'd love to drag you through the mud for as long as possible



I, ISIAHSILVA, agree to the following terms to resolve my divorce with Frances Cobain:

1. I agree that I have no interest in the Curson house, which is titled in the name of Frances Cobain's Trust, and will vacate same on or before Thursday, June 16, 2016, leaving same in clean condition and providing all keys to Sam Lutfi.
2. I agree that the Willoughby Trust be amended and that Frances Cobain shall replace Walter Silva as Trustee.
3. I will turn over all tapes, videos and photos of Frances Cobain to Sam Lutfi forthwith.
4. Frances Cobain has agreed to pay me \$10,000 per month spousal support for one year, and, after receiving same, I waive any and all claims to spousal support.
5. I will never threaten, bully, extort or try to intimidate Frances Cobain.
6. I agree to return the guitar Frances provided to me which belonged to her father.
7. I will file a Response to the current divorce proceedings and these terms shall be incorporated into a Stipulated Judgment which the parties shall sign.

Dated: _____, 2016 at Los Angeles, California.

Isiah Silva

Witness:

APPROVED BY:

Counsel for Isiah Silva



SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 9:02:18 PM

the game that you're up to. I can assure you, will not be successful for you. the above was your ticket to peace

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 9:02:18 PM

sign that, have a friend witness and sign it, and email it to the emails i sent above and cc your lawyer and say thank you. do this tonight asap

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 10:07:15 PM

Isaiah at 10pm you're lawyer shopping??

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 10:08:07 PM

get in an Uber now and head to Canters deli and bring Robin or Phil.

SMS Message sent 6/4/2016 10:08:39 PM

No u said to look into other people that'll respond so that's another avenue I'm looking into.

SMS Message sent 6/4/2016 10:09:33 PM

Back up incase my lawyer doesn't get back to me

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 10:09:51 PM

at this hour? I'll give you some lawyers to call then

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 10:20:12 PM

you're playing games. you have less than two hours

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 10:20:12 PM

Isaiah you're going to destroy your life.

SMS Message received from Sam Lutfi Alternate Phone 6/4/2016 10:20:12 PM

you lied. you're going to lose everything

SMS Message sent 6/4/2016 10:56:42 PM

Got him: Neal can email the papers to Surfman4452@aol.com. His name is Douglas S. Unger Law Offices of Douglas S. Unger. Already on my way down.

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 12:21:13 AM

ok they emailed the lawyer

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 1:17:14 AM

did you meet with Unger?

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 1:55:01 AM

don't say anything incriminating, calling you Threeway with x

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 3:44:42 PM

ok cool. so no more restraining order. thank you for keeping your word. sorry for getting frustrated earlier. jess is frustrating

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 3:44:42 PM

are you up? I need to come by and pick up several packages. can you help locate them

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 3:44:42 PM

text me as soon as your up. here's what's going to happen. this is going to end friendly. you keep your promise to sign the agreement and I keep mine to keep the peace and in fact, I may be able to talk the family into releasing a nice statement about you. that's the polar opposite of getting a restraining order etc

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 3:44:42 PM

leaving to sf tonight so let's get this done soon

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 3:44:42 PM

I don't want to get frustrated and angry again. so call me asap

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 3:44:42 PM

fed's have you and wally discussing where to move and hide money.. you know what? I think it's time both you and wally face the authorities. you people are con artists

SMS Message received from Sam Lutfi Alternate Phone 6/5/2016 3:44:42 PM

you Jessica and Walter have been too careless. ci and fbc want to see you all in prison. the amount of fraud you all have committed is unbelievable

SMS Message received from Sam Lutfi Alternate Phone 6/15/2016 9:43:21 PM

don't you think we should talk? as your aware, most of your friends have been contacted by the cops. how long do you want to let this continue

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 22

From: Marc Gans
Sent: Saturday, June 4, 2016 11:28 PM
To: douglasungerlaw@gmail.com
Cc: Neil H. Freedman; Yazmin A. Arreguin
Subject: Memorandum of Understanding

Douglas:

I represent Frances Cobain's mother, Courtney Love Cobain. Neil Freedman was unavailable tonight due to a prior commitment, so I assisted in finalizing the attached memorandum of understanding that he prepared. Please return a fully executed copy as soon as possible. Thank you.

Best,
Marc

LAW OFFICES OF
MARC GANS

Marc Gans | Attorney at Law

433 N. Camden Drive
Suite 600
Beverly Hills, CA 90210
P: 310.945.2420 | F: 310.945.2417
marc@marcgans.com

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I, ISAAH SILVA, agree to the following terms to resolve my divorce with Frances Cobain:

1. I agree that I have no interest in the Curson house, which is titled in the name of Frances Cobain's Trust, and will vacate same on or before Thursday, June 16, 2016, leaving same in clean condition and providing all keys to Sam Lutfi.
2. I agree that the Willoughby Trust be amended and that Frances Cobain shall replace Walter Silva as Trustee.
3. I will turn over all tapes, videos and photos of Frances Cobain to Sam Lutfi forthwith.
4. Frances Cobain has agreed to pay me \$10,000 per month spousal support for one year, and, after receiving same, I waive any and all claims to spousal support.
5. I will never threaten, bully, extort or try to intimidate Frances Cobain.
6. I agree to return the guitar Frances provided to me which belonged to her father.
7. I will file a Response to the current divorce proceedings and these terms shall be incorporated into a Stipulated Judgment which the parties shall sign.

Dated: June ____, 2016 at Los Angeles, California.

Isaiah Silva

Witness:

APPROVED BY:

Douglas S. Unger
Counsel for Isaiah Silva

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 23



ORANGE COUNTY SHERIFF'S DEPARTMENT

SUPPORT SERVICES DIVISION
320 N. FLOWER
SANTA ANA, CA 92703
FAX: 714-834-5466

SHERIFF-CORONER
SANDRA HUTCHENS

REQUEST AUTHORIZATION FORM RELEASE OF CASE INFORMATION

NAME SUMMER SILVA DATE 10/12/2017
ADDRESS [REDACTED] CITY [REDACTED] STATE CA ZIP [REDACTED]
CASE # 16-147935

CONTACT PHONE _____
YOUR INVOLVEMENT VICTIM
(ex: victim, witness, suspect, attorney for , insurance for)
REQUESTOR'S SIGNATURE See attachment

BELOW SECTION TO BE COMPLETED BY ORANGE COUNTY SHERIFF PERSONNEL

RECORDS SIGNATURE murillo

FEE \$ 0.45 CHECK # 17-596928362 RECEIPT # 1967166

REQUEST Approved Approved / Redacted Denied

Document(s) released:

- Initial Crime Report
- Initial Crime Rpt Supplemental
- Deputy Follow Up
- Initial Follow Up
- Traffic Accident
- CHP180
- TC Property Damage
- Property Report
- Casualty Report
- Supplemental DV Report
- CAD Report ID Theft
- Other _____
- Fees returned 0.00
- Released pursuant to Family Code Section 6228
- Released pursuant to Welfare and Institutions Code section 827 and Juvenile Court Administrative Order No. 12/003-903 "Exchange of Information".
- Released pursuant to Vehicle Code section 20012
- Released pursuant to Court Authorization and Penal Code Section 1203.097(a)(7)(B)

Authorized Signature Lorena Murillo

Mailed Pick Up Date 11/10/2017 By _____

1. Copies To: Yorba Linda

R-2

2. Case No. 16-147935

3

 ORIGINAL

SHERIFF'S DEPARTMENT
ORANGE COUNTY
SANTA ANA, CALIFORNIA

2a. Citation No.

Priority: Yes No

SANDRA HUTCHENS, SHERIFF-CORONER

INITIAL CRIME REPORT


3. OFFENSE CPC 422 - Criminal Threats		4. DATE-TIME COMMITTED Friday, June 17, 2016 / approx. 0012 hours	
5. WHERE COMMITTED		6. GRID 739J2/4A02	7. DATE-TIME REPORTED
8. INFORMANT Silva, Summer Morning ()		9. ADDRESS-PHONE	
10. VICTIM Silva, Summer Morning DOB		11. ADDRESS-PHONE	
12. BUSINESS ADDRESS-PHONE		13. CONTACT TIME-ADDRESS Anytime -	
14. FIRM NAME OF VICTIM		15. BUSINESS ADDRESS-PHONE	
16. VICTIM'S OCCUPATION Customer Service	RACE W	SEX F	AGE 42
17. TYPE OF PREMISES OR LOCATION WHERE OFFENSE WAS COMMITTED Single family residence			

COMPLETE ON ALL APPLICABLE FELONIES, MISD., SEX AND THEFTS	18. POINT OF ENTRY CRIMES AGAINST PROPERTY		22. WEAPON OR MEANS USED CRIMES AGAINST PERSONS Written and verbal threats	
	19. INSTRUMENT OR MEANS USED		23. VICTIM'S ACTIVITY AT TIME OF OFFENSE Sleeping	
	20. METHOD USED		24. EXACT WORDS USED BY SUSPECT "I'm coming to get you. I'm outside your house."	
	21. WHERE WERE OCCUPANTS AT TIME OF OFFENSE?		25. FORCE OR METHOD USED Sent text message and called on telephone	
	26. APPARENT MOTIVE - TYPE PROPERTY TAKEN To threaten or intimidate - none		27. TOTAL VALUE STOLEN \$0.00	
	28. UNIQUE OR UNUSUAL ACTIONS BY SUSPECT(S) Text messages and phone call came from stolen cell phone of victim's brother			

30. WITNESSES R/9 RESIDENCE/BUSINESS ADDRESS-PHONE		R	
(1) Unknown		B	
(2)		R	
		B	
(3)		R	
		B	

31. SUSPECT(S) (IF ARRESTED, NAME, ADDRESS, AND BOOKING NUMBER)		BKG. NBR.						
(1) Osama "Sam" Lutfi, Male, Middle-Eastern								
(2)		BKG. NBR.						
(3)		BKG. NBR.						
NAME	ADDRESS	SEX	RACE	DOB	HT.	WT.	HAIR	EYES

32. DETAILS OF OFFENSE: EVIDENCE COLLECTED, DESCRIPTION AND VALUE OF PROPERTY TAKEN, LIST ADDITIONAL WITNESSES AND SUSPECTS							
QUAN.	ARTICLE	BRAND	SERIAL NO.	MODEL NO.	MISC. DESCRIPTION	VALUE	
See continuation page for further details.							

33. INVESTIGATING OFFICERS		REPORT BY DEP. A. GIUSIANA #8953	34. DATE OF REPORT 6/17/16	35. APPROVED 
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SHERIFF'S DEPARTMENT
ORANGE COUNTY
SANTA ANA, CALIFORNIA

SANDRA HUTCHENS, SHERIFF-CORONER

REPORT CONTINUATION

Narrative:

On Friday, June 17, 2016 at approximately 0112 hours, Deputy C. Hunt #7612 and I were dispatched to [REDACTED] in [REDACTED] reference a report of threatening phone calls. Upon arrival, I contacted the informant, Summer Morning Silva ([REDACTED]), who told me the following:

Summer stated she received a threatening phone call and text messages from a man named Osama "Sam" Lutfi. Sam is the subject of an incident involving Summer's brother, which is being investigated by Los Angeles Police Department Officer Banting #41049. The incident occurred on Monday, June 6, 2016 in the city of Los Angeles. During the incident, Sam allegedly attempted to kidnap Summer's brother and in the process, Sam took her brother's cell phone ([REDACTED]). On Wednesday, June 8, 2016, Summer began receiving text messages from her brother's cell phone although it was no longer in her brother's possession. On Friday, June 17, 2016 at approximately 0112 hours, Summer received a threatening text message from her brother's cell phone. The text message stated, "Send this to your whore mother and piece of shit father. Everything in that house was photographed and documented you piece of shit trash mother fuckers. I'm going to make sure you and your whore wife spend many years behind bars you filthy son of a bitch. You sick fucks." At approximately 0114 hours, Summer received a phone call from her brother's cell phone. The phone call came to the landline at her residence ([REDACTED]). During the phone call, the caller told Summer, "You whore bitch, I'm coming to get you. I'm outside your house." The caller then hung up the phone. Summer recognized the voice was Sam's and was scared he was outside her house. Summer went to the window to look outside but no one was there. Summer stated, "I thought he may be outside. He would bust down the door and try to freakin' kill us. Do the exact same thing he did to [my brother], get his bodyguards and come take us." Summer lives at the residence with her father, mother and daughter and is concerned for her family's safety. Summer is afraid of what Sam may do to her family because he has armed bodyguards who work for him.

I attached screenshots of the text messages Summer received from her brother's cell phone. I gave Summer a Marsy's Victim's Bill of Rights card with the case number on it for her records. I asked Summer to contact the Orange County Sheriff's Department with any further information regarding the case.

33. INVESTIGATING OFFICERS	REPORT BY DEF. A. Giusiana #8953	DATE OF REPORT 6/17/16	APPROVED Sgt. S. Schmidt #1644
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SHERIFF'S DEPARTMENT
ORANGE COUNTY
SANTA ANA, CALIFORNIA

SANDRA HUTCHENS, SHERIFF-CORONER

REPORT CONTINUATION

1:58 AM
Isaiah Bro

Thu, Jun 2, 11:33 AM

Wed, Jun 8, 11:00 PM

Hi this is Merv. I found this phone on my lawn

Saturday 9:43 PM

Do you think for a moment that Isaiah is not going to face some serious trouble ?

I've downloaded everything off both his phones. It's time for the cops to take over

I meant it's not time

He needs help first

Today 1:12 AM

Send this to your whore mother and piece of shit father

iMessage

1:45 AM
Isaiah Bro

Saturday 9:43 PM



Do you think for a moment that Isaiah is not going to face some serious trouble ?

I've downloaded everything off both his phones. It's time for the cops to take over

I meant it's not time

He needs help first

Today 1:12 AM

Send this to your whore mother and piece of shit father

Everything in that house was photographed and documented you piece of shit trash mother fuckers. I'm going to make sure you and your whore wife spend many years behind bars you filthy son of a bitch. You sick fucks

iMessage

33. INVESTIGATING OFFICERS	REPORT BY DEP. A. GIUSIANA *8953	DATE OF REPORT 6/17/16	APPROVED <i>Sgt. J. Schmitt</i>
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Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 24

TELEPHONE CALL

OSAMA "Sam" LUTFI & JESSICA SULLIVAN

June 6, 2016

SULLIVAN: [Unintelligible]

LUTFI: Yeah. I'm going to tell you right now, record whatever you want. I'll put you in the street you fucking cunt. You dyke, fucking bitch, whore, fuck. You are fucking in the streets. I don't scare you? Don't worry about me. My lawyers and the police are after you. So, fuck you. You fucking dirty cunt. You think you're going to rape this girl out of money? Steal more of Kurt Cobain's money? For what? What do you deserve? Your kid will be in an orphanage. I'm going to put you away. I'm going to put your little fucking boyfriend away. Laugh all you want. I swear to God you fucking dirty whore. You're going to be in the streets where you belong.

SULLIVAN: [Unintelligible]

LUTFI: I swear to God. Mark my fucking words, every Goddamn dime I have –

UNK. MALE: Yo Sam –

LUTFI: -- I'm going to put you in jail.

UNK. MALE: Yo Sam--

LUTFI: You're fucking done.

UNK. MALE: Yo Sam –

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 25

29 BENNETT: Fuck
30 You at the house?
31
32 SILVA*: No
33
34 BENNETT: Cool. Just wanted to make sure you were ok
35
36 SILVA*: He tell you everything?
37
38 BENNETT: Not really
39 I got a new phone
40
41 SILVA*: (illegible)
42
43 BENNETT: Can u talk on phone?
44
45 SILVA*: Not now
46
47 BENNETT: K. Call when you can
48
49 SILVA*: Dont come over again till i say
50
51 BENNETT: Ok
52
53 SILVA*: I'm running low
54
55 BENNETT: Battery low or energy?
56

57 SILVA*: Brainwaves
58 Did you go see her in person?
59
60 BENNETT: Who?
61
62 SILVA*: F
63 You still at that hotel?
64
65 BENNETT: No
66 I'm in LA
67
68 SILVA*: I should have gone there
69
70 BENNETT: I haven't seen F since chateau
71 Last time I saw her was with you
72
73 SILVA*: K
74 I need you to do me a favor
75
76 BENNETT: Sure
77
78 SILVA*: Can you download all our texts somehow and email them to me?
79
80 BENNETT: These texts?
81
82 SILVA*: All our texts even from your old phone
83 Send to this temp email. Not sandwich.
84 Guntherhall@gmail.com

85

86 BENNETT: I took screen shots of some
87 But deleted most

88

89 SILVA*: Ok send me everything you can to that email

90

91 BENNETT: I will
92 A lot are from Abreea

93

94 SILVA*: Thank you

95

96 BENNETT: Have u talked to F?

97

98 SILVA*: Send me those too
99 And please don't give anyone this number or info

100

101 BENNETT: I won't
102 Did Lufti try to remove you from the house?

103

104 SILVA*: Dont listen to Phil
105 Send those screenshots now please

106

107 BENNETT: Phil?
108 Who is that?

109

110 SILVA*: Send to that email can't talk right now

111

112 BENNETT: If this is really Isaiah call me

113

114 SILVA*: Why are you talking to robin?

115

116 BENNETT: If this is Isaiah call me

117

118 SILVA*: I can't talk

119

120 BENNETT: No idea who Robin is

121

122 SILVA*: Simon, you need to back off

123 you hear me? I'm going to have talk with Mr Balasz about all this.

124

125 BENNETT: Who is this?

126

127 SILVA*: Feds.

128

129 BENNETT: Hahaha

130 I know this isn't Isaiah

131 Please leave me alone

132

133

134

135

136

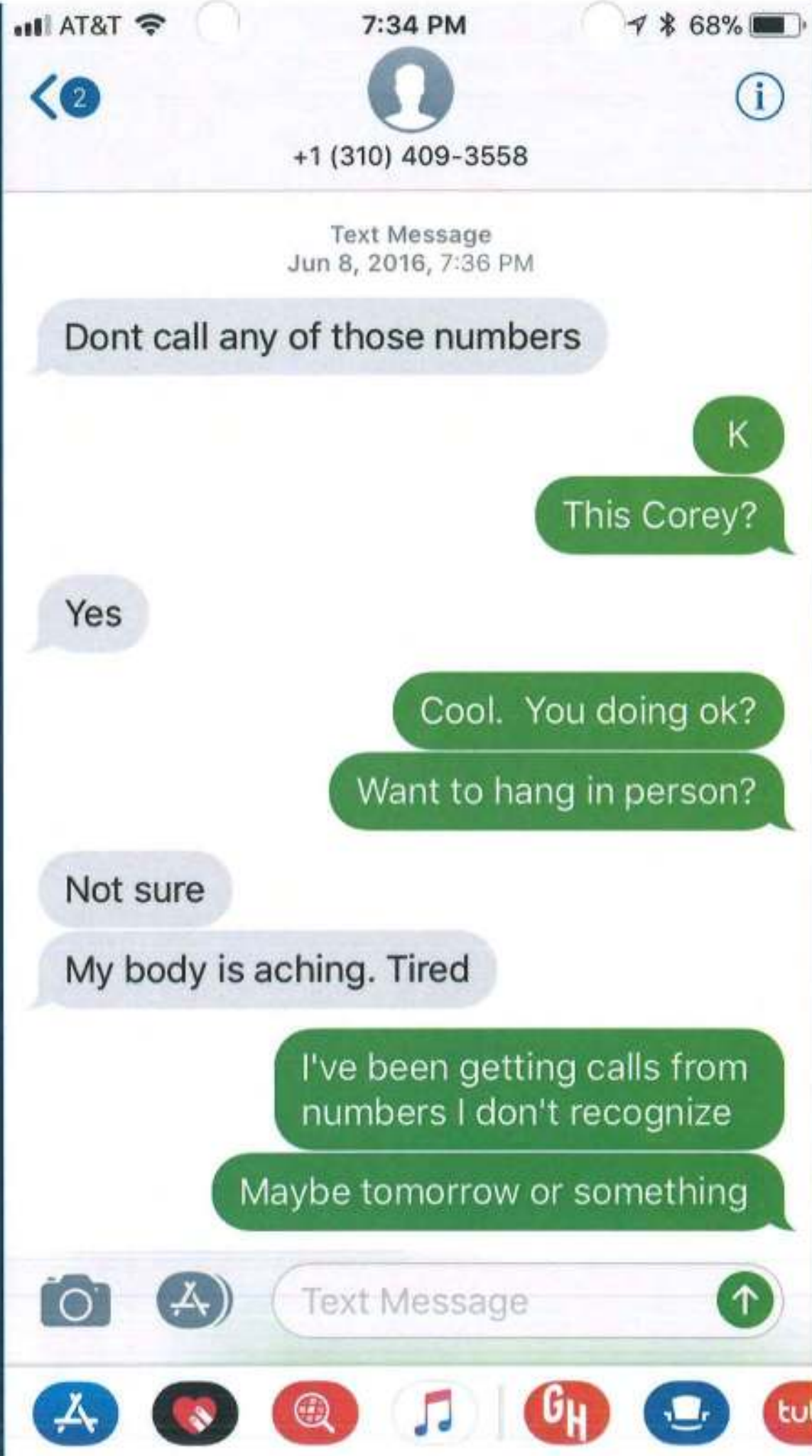
137

138

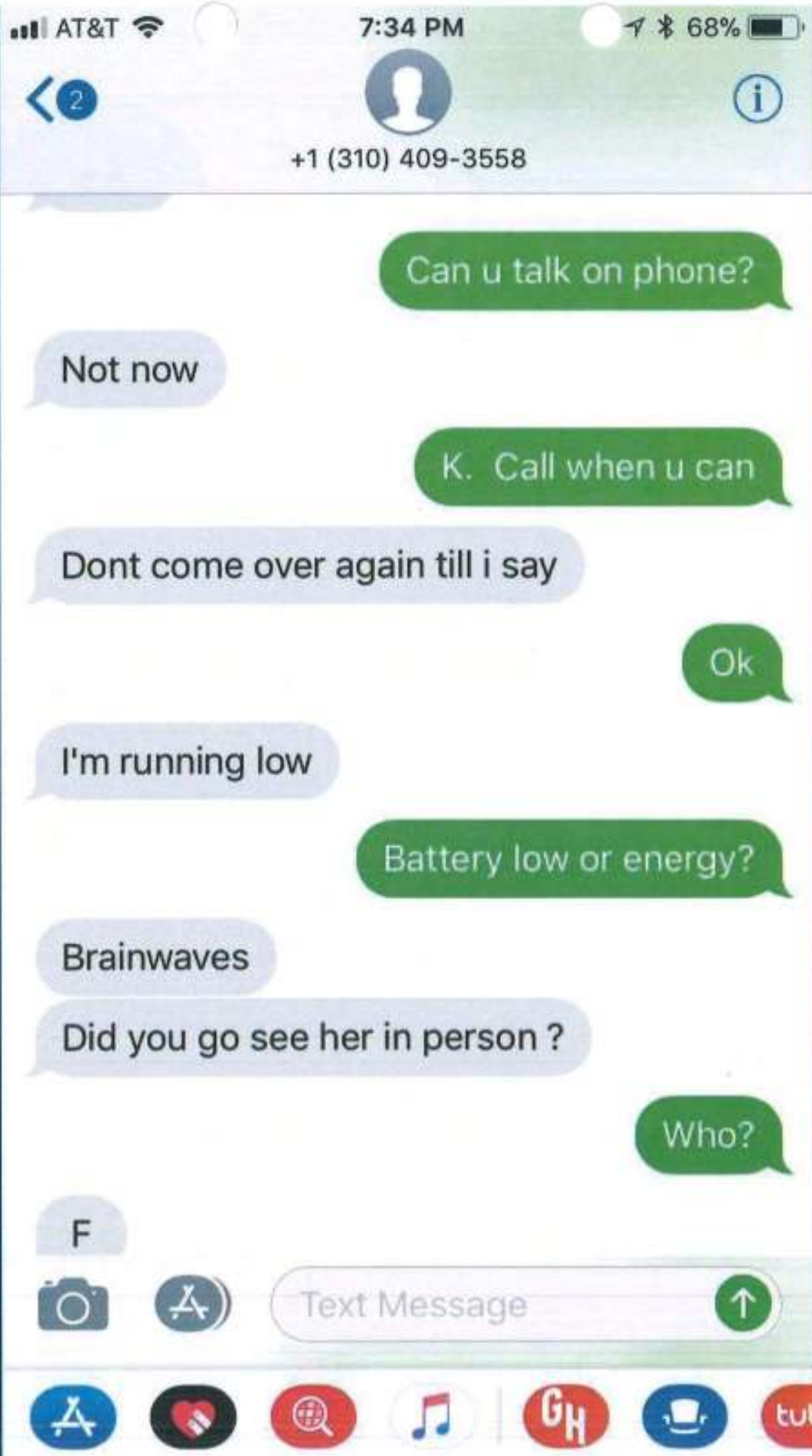
139

140

[* - Lutfi impersonating Isaiah Silva via his stolen iPhone.]















AT&T 7:35 PM 66%



+1 (310) 409-3558

Jun 8, 2016, 10:50 PM

If this is really Isaiah call me

Why are you talking to robin ?

If this is Isaiah call me

I can't talk

No idea who Robin is

REAL MESSAGE Today 11:07 PM

Simon, you need to back off

you hear me? I'm going to have talk with Mr Balasz about all this

Text Message [send button]





Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 26

Los Angeles Police Department
INVESTIGATIVE REPORT

A CODE

COMBINED EVID. REPORT

MULTIPLE CRIM ON THIS REPORT

Page 1 of 03.01.04 (1/15)

REPORT OF:

KIDNAP FOR ROBBERY

INVEST. DIV. INC # MWD 16060800

DR #

CASE SCREENING FACTOR(S)		VICTIM	
<input type="checkbox"/> SUSPECT/VEHICLE NOT SEEN <input type="checkbox"/> PRINTS OR OTHER EVIDENCE NOT PRESENT <input type="checkbox"/> MO NOT DISTRICT <input type="checkbox"/> PROPERTY LOSS LESS THAN \$5,000 <input type="checkbox"/> NO SERIOUS INJURY TO VICTIM <input type="checkbox"/> ONLY ONE VICTIM INVOLVED		LAST NAME, FIRST, MIDDLE (OR NAME OF BUSINESS) SILVA, ISADH SEX: M DESC: WHT HT: 510 WT: 145 AGE: 31	
<input type="checkbox"/> PREMISES (SPECIFIC TYPE) <input type="checkbox"/> ATM HOUSE		ADDRESS: [REDACTED] ZIP: 90046 PHONE: [REDACTED]	
ENTRY: FRONT <input type="checkbox"/> REAR <input type="checkbox"/> SIDE <input type="checkbox"/> ROOF <input type="checkbox"/> FLOOR <input type="checkbox"/> OTHER <input type="checkbox"/>		LOCATION OF OCCURRENCE: SAME AS V# <input checked="" type="checkbox"/> REG. <input type="checkbox"/> BUS. <input type="checkbox"/> R.O. DATE & TIME OF OCCURRENCE: 6-3-16 0045 DATE & TIME REPORTED TO PD: 6-8-16 1346	
INSTRUMENT/TOOL USED:		TYPE PROPERTY: CELL PHONE / GLASS DOORS STOLEN/LOST/DAMAGED: \$800 RECOVERED: \$ EST. DAMAGED: \$5,000	
VICTIM'S VEH. (IF INVOLVED) YEAR, MAKE, TYPE, COLOR, LIC. NO.		NOTIFICATION(S) (PERSON & DIVISION): DET EBERHART #35873 CONNECTED REPORT(S) (TYPE & DR #):	
MO IF LONG FORM. LIST UNIQUE ACTIONS. IF SHORT FORM, DESCRIBE SUSPECT'S ACTIONS IN BRIEF PHRASES, INCLUDING WEAPON USED. DO NOT REPEAT ABOVE INFO BUT CLARIFY REPORT AS NECESSARY. IF ANY OF THE MISSING ITEMS ARE POTENTIALLY IDENTIFIABLE, ITEMIZE AND DESCRIBE ALL ITEMS MISSING IN THIS INCIDENT IN THE NARRATIVE. S-1, S-2, AND SUSP-3 GRABBED VICT AND CARRIED HIM TO CAR SUSPS TOOK PHONE FROM VICT. VICT IN FEAR FOR LIFE DID NOT WANT TO GO WITH SUSPS.			
REPORTING EMPLOYEE(S): NONE		PERSON REPORTING: [REDACTED] DESK	

Complete below sections if any CASE SCREENING FACTOR(S) boxes are not checked.

SUSP'S VEHICLE	YEAR	MAKE	MODEL	TYPE	INTERIOR	EXTERIOR	BODY	WINDOWS
BJR	15	ESCAPE	SUV	COLOR: BJK	<input type="checkbox"/> 1 CUSTOM WHEELS <input type="checkbox"/> 2 FRONT SPOILER <input type="checkbox"/> 3 LEAD FILTERS <input type="checkbox"/> 4 FLUSTRATER <input type="checkbox"/> 5 CUSTOM PAINT <input type="checkbox"/> 6 WHEEL TOP	<input type="checkbox"/> 1 DAMAGE <input type="checkbox"/> 2 MIRROR <input type="checkbox"/> 3 STOKER <input type="checkbox"/> 4 LEFT	<input type="checkbox"/> 1 DAMAGE <input type="checkbox"/> 2 FRONT <input type="checkbox"/> 3 CURTAIN <input type="checkbox"/> 4 LEFT	
PERSONAL CLOTHES (UNUSUAL FEATURES, SCARS, TATTOOS, ETC.):		WEAPON (VERBAL THREATS, BODILY FORCE, SIMULATED GUN, ETC. IF KNIFE OR GUN, DESCRIBE FULLY.):		BODILY FORCE - BODILY FORCE				
PERSONAL CLOTHES (UNUSUAL FEATURES, SCARS, TATTOOS, ETC.):		WEAPON (VERBAL THREATS, BODILY FORCE, SIMULATED GUN, ETC. IF KNIFE OR GUN, DESCRIBE FULLY.):		BODILY FORCE				

INVOLVED PERSON(S)		W - WITNESS; R - PERSON REPORTING; S - PERSON SECURING (ASR); D - PERSON DISCOVERING (ASR); P - PARENT;	
NAME	SEX	DESC	DOB
MUNSEY, PHIL	M	WHT	34YRS
DR. LIC. NO. (IF NONE, LIST OTHER ID & NO.)	FOREIGN LANGUAGE SPOKEN	ADDRESS	CITY
NAME	SEX	DESC	DOB
DR. LIC. NO. (IF NONE, LIST OTHER ID & NO.)	FOREIGN LANGUAGE SPOKEN	ADDRESS	CITY
NAME	SEX	DESC	DOB
DR. LIC. NO. (IF NONE, LIST OTHER ID & NO.)	FOREIGN LANGUAGE SPOKEN	ADDRESS	CITY

10.16.00 GIVEN?	Preliminary Drug Test	SUPV. INV. OPCR. TESTING SERIAL NO.	WITNESS OPCR.	SERIAL NO.
<input type="checkbox"/> Y <input type="checkbox"/> N				
MODEL NO. / DRUG TEST RESULT	MISC.			



PHONE: (213) 972-2955
 FAX: (323) 957-5489
 TTY: (213) 485-0399
 www.lapdonline.org
 www.joinlapd.com

LOS ANGELES POLICE DEPARTMENT
 HOLLYWOOD AREA
 HOLLYWOOD PATROL DIVISION

DET EBERHART, W

1358 N. WILCOX AVENUE
 LOS ANGELES, CA 90028

JOIN THE LAPD (866)444-LAPD RECRUITMENT HOTLINE

IS ANY OF THE VICTIM'S PROPERTY MARKED WITH AN OWNER APPLIED IDENTIFICATION NUMBER? IF YES, EXPLAIN IN NARRATIVE. YES NO

DIVISION	DETECTIVE SUPERVISOR REVIEWING	SERIAL NO.
DIVISION		CATEGORY

REVIEW DATE & TIME: 6/8/16 1346



PHONE: (213) 872-2971

FAX: (323) 957-6489

TTY: (213) 485-9899

www.lapdonline.org

www.joinlapd.com

LOS ANGELES POLICE DEPARTMENT

HOLLYWOOD AREA

HOLLYWOOD PATROL DIVISION

BAZI
JANUARY 40000
By TEONGKI, 40000

1358 N. WILCOX AVENUE
LOS ANGELES, CA 90028

JOIN THE LAPD 1866) 444-LAPD RECRUITMENT HOTLINE

DATE: 06/27/16 TRF: 0100 INC. NO: 0098

[Handwritten scribbles]

IMPERSONATION OF POLICE OFFICER - CIVIL RIGHTS

If you wish to comment on the level of service you receive, please contact a Department supervisor or telephone 800-368-7828, or TTY for the hearing-impaired (213) 485-3884.

LOS ANGELES POLICE DEPARTMENT
 Date: 7/20/2016 2:19:58 PM User: N5178

LPD160603000098

INCIDENT RECALL

Incident	Time	Type	Pri	Dispo	Address Location	Bldg Apt	Caller Name	P-Unit	Close Date/Time	Operator
					TEAM/Dist AREA	Address Phone				
LPD160603000098	00:24	459SN	3	OCCSY	N CURSON AV			PD/6A31-W3	06/03/16 01:54	PD/E9835
					0622	06		Contact	Complainant: N	

Date	Cons	Operator
06/03/16 00:24	F4	PD/E9835
06/03/16 00:24	F4	PD/E9835
06/03/16 00:24	F4	PD/E9835
06/03/16 00:26	F4	PD/E9835
06/03/16 00:26	F4	PD/E9835
06/03/16 00:26	F4	PD/E9835
06/03/16 00:26	3J	PD/N2321
06/03/16 00:26	3J	PD/N2321
06/03/16 00:26	3J	PD/N2321
06/03/16 00:26	3J	PD/N2321
06/03/16 00:27	F4	PD/E9835
06/03/16 00:27	F4	PD/E9835
06/03/16 00:27	F4	PD/E9835
06/03/16 00:28	3J	PD/N2321
06/03/16 00:28	3J	PD/N2321
06/03/16 00:28	F4	PD/E9835
06/03/16 00:28	3J	PD/N2321
06/03/16 00:28	F4	PD/E9835
06/03/16 00:29	3J	PD/N2321
06/03/16 00:29	3J	PD/N2321
06/03/16 00:29	F4	PD/E9835
06/03/16 00:30	3J	PD/N2321
06/03/16 00:30	3J	PD/N2321
06/03/16 00:30	3J	PD/N2321
06/03/16 00:31	3J	PD/N2321
06/03/16 00:31	3J	PD/N2321
06/03/16 00:32	3J	PD/N2321
06/03/16 00:32	3J	PD/N2321
06/03/16 00:39	3J	PD/N2321
06/03/16 00:40	00	PD/40346
06/03/16 00:42	00	PD/41245
06/03/16 00:44	3J	PD/N2321
06/03/16 00:45	3J	PD/N2321
06/03/16 00:49	3J	PD/N2321
06/03/16 00:50	3J	PD/N2321
06/03/16 01:03	00	PD/39695
06/03/16 01:03	00	PD/39695
06/03/16 01:06	00	PD/37182
06/03/16 01:40	00	PD/41245
06/03/16 01:40	00	PD/41245
06/03/16 01:50	00	PD/40346
06/03/16 01:50	00	PD/40346
06/03/16 01:50	00	PD/40346
06/03/16 01:50	00	PD/40346
06/03/16 01:54	3J	PD/N5210
06/03/16 01:54		

Unit Summary

Unit PD/6A31-W3 Dispatch 00:26:30 Enroute 00:26:30 AtScene 00:40:02 Canc Cmp 01:50:57

Dispo OCCSY;	IncType 459SN	Int	Tot Int	Oper Fr/Dispo	
Unit PD/6A44-W7	Dispatch 00:32:35	Enroute	AtScene 00:32:35	Canc	Cmp 01:03:43
Dispo OCCSY;FI2;	IncType 459SN	Int	Tot Int	Oper Fr/Dispo	
Unit PD/6A76-W7	Dispatch 00:28:28	Enroute 00:28:28	AtScene 00:42:06	Canc	Cmp 01:40:37
Dispo OCCSY;FI1;	IncType 459SN	Int	Tot Int	Oper Fr/Dispo	
Unit PD/6A77-W3	Dispatch 00:26:35	Enroute 00:26:35	AtScene 00:50:16	Canc	Cmp 01:54:10
Dispo OCC;	IncType 459SN	Int	Tot Int	Oper Fr/Dispo PD/N5210	
Unit PD/6L50-W3	Dispatch 00:31:55	Enroute	AtScene 00:31:55	Canc	Cmp 01:06:11
Dispo OCCSN;	IncType 459SN	Int	Tot Int	Oper Fr/Dispo	
Unit PD/AIR3-W3	Dispatch 00:29:00	Enroute	AtScene 00:29:00	Canc	Cmp 00:44:17
Dispo OCC;	IncType 459SN	Int	Tot Int	Oper Fr/Dispo PD/N2321	

Attached Docs

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 27

Clerk stamps date here when form is filed

1 Person Seeking Protection

a. Your Full Name:

Isaiah James Silva

Your Lawyer (if you have one for this case):

Name: State Bar No.:

Firm Name:

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.):

Address: N. CURSON AVE.

City: Hollywood State: CA Zip: 90046

Telephone: Fax: N/A

E-Mail Address:

FILED
Superior Court of California
County of Los Angeles
JUN 27 2016
Sheri R. ... Deputy Clerk
By Veronica Cabrera Deputy

Fill in court name and street address:

Superior Court of California, County of Los Angeles Superior Court
11 N. Hill Street,
Los Angeles, CA 90012

Court fills in case number when form is filed

Case Number: 85182951

2 Person From Whom Protection is Sought

Full Name: Osama "Sam" Lutfi

The court will complete the rest of this form.

3 Notice of Hearing

A court hearing is scheduled on the request for restraining orders against the person in 2:

Name and address of court if different from above:

Hearing Date: Date: 7/19/16 Time: 8:30
Dept.: 20 Room: 243

4 Temporary Restraining Orders (Any orders granted are on Form CH-110, served with this notice.)

a. Temporary Restraining Orders for personal conduct and stay-away orders as requested in Form CH-100, Request for Civil Harassment Restraining Orders, are (check only one box below):

- (1) [X] All GRANTED until the court hearing.
(2) [] All DENIED until the court hearing. (Specify reasons for denial in b, below.)
(3) [] Partly GRANTED and partly DENIED until the court hearing. (Specify reasons for denial in b, below.)

b. Reasons for denial of some or all of those personal conduct and stay-away orders as requested in Form CH-100, *Request for Civil Harassment Restraining Orders*, are:

(1) The facts as stated in Form CH-100 do not sufficiently show acts of violence, threats of violence, or a course of conduct that seriously alarmed, annoyed, or harassed the person in ① and caused substantial emotional distress.

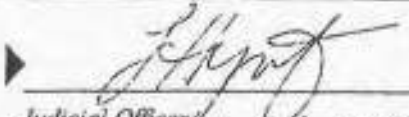
(2) Other (specify): As set forth on Attachment 4b.

⑤ Service of Documents by The Person in ①

At least five _____ days before the hearing, someone age 18 or older—not you or anyone to be protected—must personally give (serve) a court file-stamped copy of this Form CH-109, to the person in ② along with a copy of all the forms indicated below: *Notice of Court Hearing*.

- a. CH-100, *Request for Civil Harassment Restraining Orders* (file-stamped)
- b. CH-110, *Temporary Restraining Order* (file-stamped) **IF GRANTED**
- c. CH-120, *Response to Request for Civil Harassment Restraining Orders* (blank form)
- d. CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*
- e. CH-250, *Proof of Service of Response by Mail* (blank form)
- f. Other (specify): _____

Date: JUN 27 2016,


Judicial Officer / L. Tymowitz

To the Person in ①:

- The court cannot make the restraining orders after the court hearing unless the person in ② has been personally given (served) a copy of your request and any temporary orders. To show that the person in ② has been served, the person who served the forms must fill out a proof of service form. Form CH-200, *Proof of Personal Service*, may be used.
- For information about service, read Form CH-200-INFO, *What Is "Proof of Personal Service"?*
- If you are unable to serve the person in ② in time, you may ask for more time to serve the documents. Use Form CH-115, *Request to Continue Court Hearing and to Reissue Temporary Restraining Order*.

Case Number: _____

To the Person in ②:

- If you want to respond to the request for orders in writing, file Form CH-120, *Response to Request for Civil Harassment Restraining Orders*, and have someone age 18 or older—not you or anyone to be protected—mail it to the person in ①.
- The person who mailed the form must fill out a proof of service form. Form CH-250, *Proof of Service of Response by Mail*, may be used. File the completed form with the court before the hearing and bring a copy with you to the court hearing.
- Whether or not you respond in writing, go to the hearing if you want the judge to hear from you before making an order. You may tell the judge why you agree or disagree with the orders requested.
- You may bring witnesses and other evidence.
- At the hearing, the judge may make restraining orders against you that could last up to five years and may order you to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms that you own or possess.



Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms for *Request for Accommodations by Persons with Disabilities and Response* (Form MC-410). (Civ. Code, § 54.8.)

(Clerk will fill out this part.)

—Clerk's Certificate—

I certify that this *Notice of Court Hearing* is a true and correct copy of the original on file in the court.

Clerk's Certificate
[seal]

Date: _____

Clerk, by _____

_____, Deputy



JUN 27 2016

Clerk stamps date here when form is filed.

Person in ① must complete items ①, ②, and ③ only.

① Protected Person

a. Your Full Name: Enrique James Silva

Your Lawyer (if you have one for this case):

Name: N/A State Bar No.: N/A

Firm Name: N/A

b. Your Address (if you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.):

Address: N. CURSON AVE.

City: Hollywood State: CA Zip: 90046

Telephone: [Redacted] Fax: N/A

E-Mail Address: [Redacted]

FILED
Superior Court of California
County of Los Angeles
JUN 27 2016
By [Signature] Deputy
Veronica Cabrera

Fill in court name and street address:
Superior Court of California, County of
Los Angeles Superior Court
444 N. Hill Street,
Los Angeles, CA 90012

Court file in case number when form is filed.

Case Number:
85162951

② Restrained Person

Full Name: Osama "Sam" Lutfi

Description:

Sex: M F Height: 5'6" Weight: 200 lbs Date of Birth: 8-16-74
Hair Color: BLACK Eye Color: BROWN Age: 42 Race: Middle Eastern
Home Address (if known): 12629 CASWELL AVE. #2
City: Mar Vista State: CA Zip: 90066
Relationship to Protected Person: My Mother-in-law's best friend.

③ Additional Protected Persons

In addition to the person named in ①, the following family or household members of that person are protected by the temporary orders indicated below:

Full Name	Sex	Age	Household Member?	Relation to Protected Person
<u>Arlo Bear Silva</u>	<u>F</u>	<u>7</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Daughter</u>
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if there are additional persons. List them on an attached sheet of paper and write "Attachment 3—Additional Protected Persons" as a title. You may use Form MC-025, Attachment.

The court will complete the rest of this form.

④ Expiration Date

This Order expires at the end of the hearing scheduled for the date and time below:

Date: 7/19/16 Time: 8:30 a.m. p.m.

This is a Court Order.



To the Person in ②:

The court has granted the temporary orders checked as granted below. If you do not obey these orders, you can be arrested and charged with a crime. You may be sent to jail for up to one year, pay a fine of up to \$1,000, or both.

⑤ Personal Conduct Orders

Not Requested Denied Until the Hearing **Granted as Follows:**

a. You must **not** do the following things to the person named in ①

and to the other protected persons listed in ③:

- (1) Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- (2) Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- (3) Take any action to obtain the person's address or location. If this item (3) is not checked, the court has found good cause not to make this order.
- (4) Other (specify):
 Other personal conduct orders are attached at the end of this Order on Attachment 5a(4).

b. Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this order. However, you may have your papers served by mail on the person in ①.

⑥ Stay-Away Order

Not Requested Denied Until the Hearing **Granted as Follows:**

a. You must stay at least 100 yards away from (check all that apply):

- (1) The person in ①
- (2) Each person in ③
- (3) The home of the person in ①
- (4) The job or workplace of the person in ①
- (5) The school of the person in ①
- (6) The school of the children of the person in ①
- (7) The place of child care of the children of the person in ①
- (8) The vehicle of the person in ①
- (9) Other (specify):

b. This stay-away order does not prevent you from going to or from your home or place of employment.

⑦ No Guns or Other Firearms and Ammunition

a. You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get guns, other firearms, or ammunition.

b. You must:

- (1) Sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms in your immediate possession or control. This must be done within 24 hours of being served with this Order.

This is a Court Order.



(2) File a receipt with the court within 48 hours of receiving this Order that proves that your guns or firearms have been turned in, sold, or stored. (You may use Form CH-800, Proof of Firearms Turned In, Sold, or Stored for the receipt.)

c. The court has received information that you own or possess a firearm.

8 Other Orders

Not Requested Denied Until the Hearing Granted as Follows (specify):

Additional orders are attached at the end of this Order on Attachment 8.

To the Person in 1:

9 Mandatory Entry of Order Into CARPOS Through CLETS

This Order must be entered into the California Restraining and Protective Order System (CARPOS) through the California Law Enforcement Telecommunications System (CLETS). (Check one):

- a. The clerk will enter this Order and its proof-of-service form into CARPOS.
- b. The clerk will transmit this Order and its proof-of-service form to a law enforcement agency to be entered into CARPOS.
- c. By the close of business on the date that this Order is made, the person in 1 or his or her lawyer should deliver a copy of the Order and its proof-of-service form to the law enforcement agency listed below to enter into CARPOS:

Name of Law Enforcement Agency

Address (City, State, Zip)

Additional law enforcement agencies are listed at the end of this Order on Attachment 9.

10 No Fee to Serve (Notify) Restrained Person Ordered Not Ordered

The sheriff or marshal will serve this Order without charge because:

- a. The Order is based on unlawful violence, a credible threat of violence, or stalking.
- b. The person in 1 is entitled to a fee waiver.

11 Number of pages attached to this Order, if any: _____

Date: JUN 27 2016

Judicial Officer

J. Hymowitz

This is a Court Order.



Warnings and Notices to the Restrained Person in 2**You Cannot Have Guns or Firearms**

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get guns, other firearms, or ammunition while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms that you have or control as stated in item 7 above. The court will require you to prove that you did so.

Notice Regarding Nonappearance at Hearing and Service of Order

If you have been personally served with this Temporary Restraining Order and Form CH-109, *Notice of Court Hearing*, but you do not appear at the hearing either in person or by a lawyer, and a restraining order that is the same as this Temporary Restraining Order except for the expiration date is issued at the hearing, a copy of the order will be served on you by mail at the address in item 2.

If this address is not correct or you wish to verify that the Temporary Restraining Order was converted into a restraining order at the hearing without substantive change, or to find out the duration of the order, contact the clerk of the court.

After You Have Been Served With a Restraining Order

- Obey all the orders.
- Read Form CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*, to learn how to respond to this Order.
- If you want to respond, fill out Form CH-120, *Response to Request for Civil Harassment Restraining Orders*, and file it with the court clerk. You do not have to pay any fee to file your response if the Request claims that you inflicted or threatened violence against or stalked the person in 1.
- You must have Form CH-120 served by mail on the person in 1 or that person's attorney. You cannot do this yourself. The person who does the mailing should complete and sign Form CH-250, *Proof of Service of Response by Mail*. File the completed proof of service with the court clerk before the hearing date or bring it with you to the hearing.
- In addition to the response, you may file and have declarations served, signed by you and other persons who have personal knowledge of the facts. You may use Form MC-030, *Declaration*, for this purpose. It is available from the clerk's office at the court shown on page 1 of this form or at www.courts.ca.gov/forms. If you do not know how to prepare a declaration, you should see a lawyer.
- Whether or not you file a response, you should attend the hearing. If you have any witnesses, they must also go to the hearing.
- At the hearing, the judge can make restraining orders against you that last for up to five years. Tell the judge why you disagree with the orders requested.

Instructions for Law Enforcement**Enforcing the Restraining Order**

This order is enforceable by any law enforcement agency that has received the order, is shown a copy of the order, or has verified its existence on the California Restraining and Protective Orders System (CARPOS). If the law enforcement agency has not received proof of service on the restrained person, the agency must advise the restrained person of the terms of the order and then must enforce it. Violations of this order are subject to criminal penalties.

This is a Court Order.

Start Date and End Date of Orders

This order *starts* on the date next to the judge's signature on page 3. The order *ends* on the expiration date in item ④ on page 1.

Arrest Required if Order is Violated

If an officer has probable cause to believe that the restrained person had notice of the order and has disobeyed the order, the officer must arrest the restrained person. (Pen. Code, §§ 836(c)(1), 13701(b).) A violation of the order may be a violation of Penal Code section 166 or 273.6. Agencies are encouraged to enter violation messages into CARPOS.

Notice/Proof of Service

The law enforcement agency must first determine if the restrained person had notice of the order. Consider the restrained person "served" (given notice) if (Pen. Code, § 836(c)(2)):

- The officer sees a copy of the Proof of Service or confirms that the Proof of Service is on file; or
- The restrained person was informed of the order by an officer.

An officer can obtain information about the contents of the order and proof of service in CARPOS. If proof of service on the restrained person cannot be verified, the agency must advise the restrained person of the terms of the order and then enforce it.

If the Protected Person Contacts the Restrained Person

Even if the protected person invites or consents to contact with the restrained person, this order remains in effect and must be enforced. The protected person cannot be arrested for inviting or consenting to contact with the restrained person. The order can be changed only by another court order. (Pen. Code, § 13710(b).)

Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued, the orders must be enforced according to the following priorities (see Pen. Code, § 136.2, Fam. Code, §§ 6383(h)(2), 6405(b)):

1. *EPO*: If one of the orders is an *Emergency-Protective Order* (form EPO-001) and is more restrictive than other restraining or protective orders, it has precedence in enforcement over all other orders.
2. *No Contact Order*: If there is no EPO, a no-contact order that is included in a restraining or protective order has precedence over any other restraining or protective order.
3. *Criminal Order*: If none of the orders includes a no contact order, a domestic violence protective order issued in a criminal case takes precedence in enforcement over any conflicting civil court order. Any nonconflicting terms of the civil restraining order remain in effect and enforceable.
4. *Family, Juvenile, or Civil Order*: If more than one family, juvenile, or other civil restraining or protective order has been issued, the one that was issued last must be enforced.



(Clerk will fill out this part.)

—Clerk's Certificate—

I certify that this *Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Date: July 27, 2015 Clerk, by [Signature], Deputy

This is a Court Order.

CH-100**Request for Civil Harassment Restraining Orders**

Clerk stamps date here when form is filed.

Read *Can a Civil Harassment Restraining Order Help Me?* (Form CH-100-INFO) before completing this form. Also fill out *Confidential CLETS Information* (Form CLETS-001) with as much information as you know.

FILED
Superior Court of California County of Los Angeles
JUN 27 2016
Sherril R. Carter, Clerk
By <u>Veronica Cabrera</u> , Deputy

1 Person Seeking Protection

a. Your Full Name: Isaiah Silva Age: 31
 Your Lawyer (if you have one for this case):
 Name: _____ State Bar No.: _____
 Firm Name: _____

Fill in court name and street address:

Superior Court of California, County of Los Angeles Superior Court N. Hill Street, Los Angeles, CA 90012

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.):

Address: [REDACTED] N. CURSON AVE
 City: Hollywood State: CA Zip: 90046
 Telephone: _____ Fax: _____
 E-Mail Address: [REDACTED]

Court files in case number when form is filed.

Case Number: <u>BS182951</u>

2 Person From Whom Protection Is Sought

Full Name: Osama Lufti Age: _____
 Address (if known): _____
 City: _____ State: _____ Zip: _____

3 Additional Protected Persons

a. Are you asking for protection for any other family or household members? Yes No *If yes, list them:*

Full Name	Sex	Age	Lives with you?	How are they related to you?
<u>Arlo Bear Silva</u>	<u>F</u>	<u>7</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>daughter</u>
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use Form MC-025, Attachment.

b. Why do these people need protection? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

Mr. Lufti has threaten myself and family. Refer to my declaration.

This is not a Court Order.

4 Relationship of Parties

How do you know the person in (2)? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

A friend of my mother-in-law

5 Venue

Why are you filing in this county? (Check all that apply):

- a. The person in (2) lives in this county.
- b. I was harassed by the person in (2) in this county.
- c. Other (specify): _____

6 Other Court Cases

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

Yes No *If yes, check each kind of case and indicate where and when each was filed:*

Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1) <input type="checkbox"/> Civil Harassment	_____	_____	_____
(2) <input type="checkbox"/> Domestic Violence	_____	_____	_____
(3) <input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(4) <input type="checkbox"/> Paternity, Parentage, Child Custody	_____	_____	_____
(5) <input type="checkbox"/> Elder or Dependent Adult Abuse	_____	_____	_____
(6) <input type="checkbox"/> Eviction	_____	_____	_____
(7) <input type="checkbox"/> Guardianship	_____	_____	_____
(8) <input type="checkbox"/> Workplace Violence	_____	_____	_____
(9) <input type="checkbox"/> Small Claims	_____	_____	_____
(10) <input type="checkbox"/> Criminal	_____	_____	_____
(11) <input type="checkbox"/> Other (specify): _____	_____	_____	_____

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? No Yes *If yes, attach a copy if you have one.*

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.

- (1) When did it happen? (provide date or estimated date): June 3, 2016
- (2) Who else was there?
Phil Munsey II, Ross Butler & driver/bodyguard (name unknown), and Defendant Osama Lufti

This is not a Court Order.

(3) How did the person in (2) harass you? (Explain below):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

See Attachment 7a(3)—Describe Harassment

(4) Did the person in (2) use or threaten to use a gun or any other weapon?

- Yes No (If yes, explain below):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

(5) Were you harmed or injured because of the harassment?

- Yes No (If yes, explain below):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

I sustained bruises to my arms where I was grabbed and forced into their vehicle.

(6) Did the police come? Yes No

If yes, did they give you or the person in (2) an Emergency Protective Order? Yes No

If yes, the order protects (check all that apply):

- a. Me b. The person in (2) c. The persons in (3)

Attach a copy of the order if you have one.

b. Has the person in (2) harassed you at other times?

- Yes No (If yes, describe prior incidents and provide dates of harassment below):

- Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

Prior to the incident where Mr. Lutfi broke into my house he contacted my friend "Robin" and threatened to kill him and his wife

This is not a Court Order.

Check the orders you want.

8 **Personal Conduct Orders**

I ask the court to order the person in **(2)** not to do any of the following things to me or to any person to be protected listed in **(3)**:

- a. Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- c. Other (specify):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

not to contact the mother of my child or any members in my band

The person in **(2)** will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

9 **Stay-Away Orders**

a. I ask the court to order the person in **(2)** to stay at least 100 yards away from (check all that apply):

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Me | (8) <input checked="" type="checkbox"/> My vehicle |
| (2) <input checked="" type="checkbox"/> The other persons listed in (3) | (9) <input type="checkbox"/> Other (specify): |
| (3) <input checked="" type="checkbox"/> My home | _____ |
| (4) <input checked="" type="checkbox"/> My job or workplace | _____ |
| (5) <input type="checkbox"/> My school | _____ |
| (6) <input checked="" type="checkbox"/> My children's school | _____ |
| (7) <input checked="" type="checkbox"/> My children's place of child care | _____ |

b. If the court orders the person in **(2)** to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? Yes No (If no, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

10 **Guns or Other Firearms and Ammunition**

Does the person in **(2)** own or possess any guns or other firearms? Yes No I don't know

If the judge grants a protective order, the person in **(2)** will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is in effect. The person in **(2)** will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any guns or firearms within his or her immediate possession or control.

This is not a Court Order.

11 Immediate Orders

Do you want the court to make any of these orders now that will last until the hearing without notice to the person in ②? Yes No (If you answered yes, explain why below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 11—Immediate Orders" for a title.

My life has been threatened and I am terrified of the defendant and need the orders without notice to him because he may take actions against me before the issuance of orders. I have filed a report with the Los Angeles Police Department and the matter is under investigation.

12 Request to Give Less Than Five Days' Notice

You must have your papers personally served on the person in ② at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 12—Request to Give Less Than Five-Days Notice" for a title.

13 No Fee for Filing or Service

- a. There should be no filing fee because the person in ② has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. The sheriff or marshal should serve (notify) the person in ② about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. There should be no filing fee and the sheriff or marshal should serve the person in ② for free because I am entitled to a fee waiver. (You must complete and file Form FW-001, Application for Waiver of Court Fees and Costs.)

14 Lawyer's Fees and Costs

I ask the court to order payment of my: a. Lawyer's fees b. Court costs

The amounts requested are:

Item	Amount	Item	Amount
Attorney fees & costs	\$ 15,000	ACCORDING TO PROOF AT HEARING	\$
	\$		\$
	\$		\$

Check here if there are more items. Put the items and amounts on the attached sheet of paper or Form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

This is not a Court Order.

Case Number:

99-11151

15 **Additional Orders Requested**

I ask the court to make the following additional orders (*specify*):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or Form MC-025 and write "Attachment 15—Additional Orders Requested," for a title.

Lined area for specifying additional orders requested.

16 Number of pages attached to this form, if any: _____

Date: _____

Lawyer's name (if any)

Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: 6/27/16

Isaiah Silva
Type or print your name

Sign your name

This is not a Court Order.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): - <u>Isaiah James Silva</u> [REDACTED] N. CURSON AVE.		FOR COURT USE ONLY
TELEPHONE NO: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. HILL ST. MAILING ADDRESS: LOS ANGELES, CA 90012 CITY AND ZIP CODE: BRANCH NAME: CENTRAL		
PLAINTIFF/PETITIONER: <u>Isaiah James Silva</u> DEFENDANT/RESPONDENT: <u>Samuel Sam' Lutfi</u>		
DECLARATION		CASE NUMBER: <u>BS182957</u>

On June 3rd 2016 I was in the bedroom of my residence when I heard glass breaking down stairs. Within 1-2mins somebody began pounding on my locked bedroom door. The person was yelling "police open up." I opened the door to be confronted by Sam Lutfi who grabbed me and began to pull me out of my bedroom. Mr. Lutfi and 2 other suspects who had accompanied him to my house dragged me down stairs and forced me into an awaiting vehicle, against my will, then began driving away.

A friend who was staying at my home called 911 and an LAPD patrol unit soon stopped the vehicle containing Mr. Lutfi, the two other suspects and myself. Everyone was detained by LAPD and an investigation was soon initiated by detectives at LAPD'S Hollywood division. Please see the attached LAPD report.

Since this incident I have been constantly harassed by phone calls and text messages by Mr. Lutfi.

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

Date:

Isaiah James Silva
 (TYPE OR PRINT NAME)


 (SIGNATURE OF DECLARANT)

- Attorney for Plaintiff Petitioner Defendant
 Respondent Other (specify):

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Date	07-19-16		
Honorable	Carol Boas Goodson	Judge	S. Charles
Honorable		Judge Pro Tem	R. Innis
10	M. Lewis	Deputy Sheriff	Veronica Porras, CSR #12703

Dept: Dept.
 CE 2C
 [CE2C]
 Deputy Clerk
 Court Assistant
 Reporter

8:30 am

BS162951

Isaiah James Silva (X)

Counsel For
Petitioner:

In Pro Per (X)

VS.

Osama Lutfi (N/A)

Counsel For
Respondent:

Nature of Proceedings: HEARING ON PETITION REQUESTING ORDERS PROHIBITING HARASSMENT

The hearing on request for orders prohibiting harassment above is continued to August 8, 2016 at 8:30 a.m., in Department 2C.

Reissuance, form CH-116, is signed by the Court and filed this date.

The Temporary Restraining Orders remain in effect.

The Petitioner is to give notice.

SILVA, ISAIAS JAMES

GF TRO

1. A SUPERIOR COURT STANLEY MOSK 19100
111 N. HILL ST Branch: 01
LOS ANGELES, CA 90012

Case Number/BS162951

Plaintiff: SILVA, ISAIAS JAMES
Defendant: LUTFI, OSAMA

NOT FOUND/NO SERVICE/CANCELED
DOC/3011606280155/SVCE/P003/R004

1. At the time of attempted service, I was at least 18 years of age and not a party to this action, and WAS UNABLE TO SERVE COPIES OF THE: NOTICE OF HEARING AND TEMPORARY ORDER (CLETS) (CIVIL HARASSMENT)
2. Party Attempted To Be Served:
LUTFI, OSAMA AKA: OSAMA "SAM" LUTFI

Address Attempted:
12629 CASWELL AVE #2
MAR VISTA, CA 90066

Reason For Non-Service:

AT LEAST THREE ATTEMPTS AT SERVICE HAVE BEEN MADE AT TIME WHEN THE DEFENDANT COULD REASONABLY HAVE BEEN EXPECTED TO BE PRESENT AT THE LOCATION OF SERVICE.
NO ANSWER AT INTERCOM

Unpaid Sheriff's costs per GC6103.2: 35.00

Deputy ID: B431979
Deputy CHRISTOPHE JORDAN
SHERIFF'S OFFICE
1725 MAIN ST., RM 114
SANTA MONICA, CA 90401
(310)-553-5033

I am a California Sheriff. I certify that the foregoing is true & correct.

Jim McDonnell, Sheriff

Date: 07/11/16
Br.: 01 80

By: _____
C. JORDAN, Deputy

SILVA, ISAIAH JA

GF TRO

...A SUPERIOR COURT STANLEY MOSK 19100
711 N. HILL ST Branch: 01
LOS ANGELES, CA 90012

Case Number/BS162951

Plaintiff: SILVA, ISAIAH JAMES
Defendant: LUTFI, OSAMA

NOT FOUND/NO SERVICE/CANCELED
DOC/3011606280155/SVCE/P003/R004

Documents:

DECLARATION; INVESTIGATIVE RPT; DECL OF EX PARTE NOTICE

Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 28



Los Angeles Police Department
INVESTIGATIVE REPORT

R CODE

COMBINED EVID. REPORT
MULTIPLE DR'S ON THIS REPORT

CASE SCREENING FACTOR(S) <input type="checkbox"/> SUSPECT VEHICLE NOT SEEN <input type="checkbox"/> PRINTS OR OTHER EVIDENCE NOT PRESENT <input type="checkbox"/> NO NOT DISTINCT <input type="checkbox"/> PROPERTY LOSS LESS THAN \$5,000 <input type="checkbox"/> NO SERIOUS INJURY TO VICTIM <input type="checkbox"/> ONLY ONE VICTIM INVOLVED		REPORT OF: BATTERY PRESENT DIV: 11111 RIG # 11111 DR # 11111	
PREMISES (SPECIFIC TYPE) <input type="checkbox"/> ATM RESIDENCE		DR. LIC. NO. (IF NONE, OTHER ID # NO.) CA FOREIGN LANGUAGE SPOKEN - OCCUPATION RETIRED	
ENTRY (CLASSIFY POINT OF ENTRY) POINT OF EXIT <input type="checkbox"/> FRONT <input type="checkbox"/> REAR <input type="checkbox"/> SIDE <input type="checkbox"/> ROOF <input type="checkbox"/> FLOOR <input type="checkbox"/> OTHER		LOCATION OF OCCURRENCE N OLIVSON SAME AD. VS. <input type="checkbox"/> RES. <input type="checkbox"/> BUS. R.D. 11022	
METHOD - DATE & TIME OF OCCURRENCE 06/24/16 1230 DATE & TIME REPORTED TO PD 06/26/16/1720		INSTRUMENT/POOL USED - TYPE PROPERTY STOLEN/LOST/DAMAGED: <input type="checkbox"/> \$0.00 GIVEN <input type="checkbox"/> \$ - STOLEN/LOST <input type="checkbox"/> \$ - RECOVERED <input type="checkbox"/> \$ - EST. DAMAGED <input type="checkbox"/> \$ -	
VICT'S VEH. (IF INVOLVED) YEAR, MAKE, TYPE, COLOR, LIC. NO.		NOTIFICATIONS: (PERSON & DIVISION) - CONNECTED REPORT(S) (TYPE & DR #) -	
MO (LONG FORM) LIST UNIQUE ACTIONS. IF SHORT FORM , DESCRIBE SUSPECT'S ACTIONS IN BRIEF PHRASES, INCLUDING WEAPON USED. DO NOT REPEAT ABOVE INFO BUT CLARIFY REPORT AS NECESSARY. IF ANY OF THE MISSING ITEMS ARE POTENTIALLY IDENTIFIABLE, ITEMIZE AND DESCRIBE ALL ITEMS MISSING IN THIS INCIDENT IN THE NARRATIVE. SUSP PUSHED VICT THROUGH REAR/DOOR (BROKEN) WITH/WH/ CAUSING W/LS TO 1/2 LEFT AXIL. AT TIME OF INC VICT DECLINED PPA.			
MANDATORY MARY'S RIGHTS CARD PROVIDED TO THE VICTIM <input type="checkbox"/>		MOTIVATED BY HATRED/PREJUDICE <input type="checkbox"/> DOMESTIC VIOLENCE <input type="checkbox"/>	
REPORTING EMPLOYEE(S) INITIALS, LAST NAME Feldis SERIAL NO. 33814 DIV./DETAIL 11111/1256		PERSON REPORTING Y. May Silva SIGNATURE OR RECEIVED BY PHONE <input type="checkbox"/>	
NOTE: IF SHORT FORM AND VICTIM/PRESENT ARE NOT THE SAME, ENTER PR INFORMATION IN INVOLVED PERSONS SECTION.			

THIS REPORT DOES NOT CONSTITUTE VALID IDENTIFICATION

KEEP THIS REPORT FOR REFERENCE. INSTRUCCIONES EN ESPANOL AL REVERSO.

Your case will be assigned to a detective for follow-up investigation based upon specific facts obtained during the initial investigation. Studies have shown that the presence of these facts can predict whether a detailed follow-up investigation would likely result in the arrest and prosecution of the suspect(s) or the recovery of property, in a manner that is cost-effective to you, the taxpayer. Significant decreases in personnel have made it impossible for detectives to personally discuss each and every case with all crime victims. A detective will not routinely contact you, unless the detective requires additional information.

TO REPORT ADDITIONAL INFORMATION: If you have specific facts to provide which might assist in the investigation of your case, please contact the detective Monday through Friday, between 8:00 A.M. and 9:30 A.M., or between 2:30 P.M. and 4:00 P.M. at telephone number _____. If the detective is not available when you call, please leave a message and include the telephone number where you can be reached.

COPY OF REPORT: If you wish to purchase a copy of the complete report, phone (213) 486-8130 to obtain the purchase price. Send a check or money order payable to the Los Angeles Police Department to Records and Identification Division, Box 30158, Los Angeles, CA 90030. Include a copy of this report or the following information with your request: 1) Name and address of victims; 2) Type of report and DR number (if listed above); 3) Date and location of occurrence. NOTE: Requests not accompanied by proper payment will not be processed.

DR NUMBER: If not entered on this form, the DR number may be obtained by writing to Records and Identification Division and giving the information needed to obtain a copy of the report (see above paragraph). Specify that you only want the DR number. It will be forwarded without delay. There is no charge for this service.

CREDIT CARDS/CHECKS: Immediately notify concerned credit corporation or banks to avoid possibility of being liable for someone else using your stolen or lost credit card or check.

HOW YOU CAN HELP THE INVESTIGATION OF YOUR CASE:

- * Keep this memo for reference.
- * If stolen items have serial numbers not available at time of report, attempt to locate them and phone them to the detective at the listed number.
- * If you discover additional losses, complete and mail in the Supplemental Property Loss form given to you by the reporting employee.
- * Promptly report recovery of property.
- * Promptly report additional information such as a neighbor informing you of suspicious activity at time crime occurred.

VICTIM-WITNESS ASSISTANCE PROGRAM: The Los Angeles City and County Victim-Witness Assistance Program (VWAP) can help to determine if you qualify for Victim of Violent Crime compensation. If you qualify, they will assist with filling your claim application. If you are a victim or a witness to a crime and will be going to court, they will explain the court procedures to you. Their staff may also assist you with other problems created by the crime.

To find the program location nearest to you, call the Victim-Witness Assistance Program at the Los Angeles City Attorney's Office (213) 485-6976, or the Los Angeles County District Attorney's Office (800) 380-3811.

VICTIMS OF VIOLENT CRIME COMPENSATION: Refer to paragraph at bottom of reverse side.



PHONE (213) 972-2971
 FAX (323) 957-6489
 TTY (213) 485-9099
www.lapdonline.org
www.joinlapd.com

LOS ANGELES POLICE DEPARTMENT
 HOLLYWOOD AREA
 HOLLYWOOD PATROL DIVISION

BY Max 37650 / Aquino 41515
 1358 N. WILCOX AVENUE
 LOS ANGELES, CA 90028
 JOIN THE LAPD (866) 444-LAPD RECRUITMENT HOTLINE



PHONE (213) 972-2971
 FAX (323) 957-6489
 TTY (213) 485-9099
www.lapdonline.org
www.joinlapd.com

LOS ANGELES POLICE DEPARTMENT
 HOLLYWOOD AREA
 HOLLYWOOD PATROL DIVISION

BY Desk
Alan Fields 33844
 1358 N. WILCOX AVENUE
 LOS ANGELES, CA 90028
 JOIN THE LAPD (866) 444-LAPD RECRUITMENT HOTLINE

DATE: 06/24/16 TIME: 1230 PM NO: 1910

L.A. City Attorney
(213) 485-8324

If you wish to comment on the level of service you received, please
contact a Department supervisor or telephone 800-339-6868, or
TTY for the hearing-impaired (213) 485-3604.



DATE: 06/26/16 TIME: 1245 PM NO:

16062400 (910)

ROAD INFO
FOR BATTERY RPT

If you wish to comment on the level of service you received, please
contact a Department supervisor or telephone 800-339-6868, or
TTY for the hearing-impaired (213) 485-3604.



29 DANTE: The first is to tell the truth, as always is the case. The second is if you don't
30 understand a question, ask me to rephrase it; I sometimes ask a poorly worded
31 question.

32

33 BANUELOS: Okay.

34

35 DANTE: The third is, don't guess; if you're not sure, let me know you're maybe taking an
36 approximation but don't guess.

37

38 BANUELOS: Okay.

39

40 DANTE: What I'd like to talk to you about today is an incident that happened back in June
41 2016 and as I understand it, you were acting as a private investigator on behalf of
42 some of the Silva family members.

43

44 BANUELOS: Correct.

45

46 DANTE: Would you happen to remember the date?

47

48 BANUELOS: Not off the top of my head.

49

50 DANTE: If I gave you a date, do you think it would refresh your recollection?

51

52 BANUELOS: I just recall it's been some time ago. The specific date, I couldn't tell you exactly
53 when it was.

54

55 DANTE: Do you think it is possible it was in June 2016?

56

57 BANUELOS: It's possible.

58

59 DANTE: Do you remember the location where this occurred?

60

61 BANUELOS: It was somewhere in Hollywood, in the Hollywood Hills, off of... I think it was Sunset
62 Boulevard.

63

64 DANTE: If I gave you the address, do you think it would remind you?

65

66 BANUELOS: Oh boy, yes. The street?

67

68 DANTE: Yes, does Curson ring a bell?

69

70 BANUELOS: Yes.

71

72 DANTE: And the location you were at, who owns that home to your knowledge?

73

74 BANUELOS: To my knowledge it was Frances Cobain and Isaiah Silva's house.

75

76 DANTE: And you were there acting as a private investigator on behalf of the Silva family. Is
77 that right?

78

79 BANUELOS: Correct. I was being a subcontractor for this private investigator that knew an
80 attorney that was either friends or had worked for Mary Silva.

81

82 DANTE: What was your purpose in being there that day?

83

84

85 BANUELOS: Basically just to keep the peace and be a witness.

86

87 DANTE: As I understand it, some arrangement had been made between the Silva side and
88 the Cobain side as to meeting at the house it that day. Is that right?

89

90 BANUELOS: Yes.

91

92 DANTE: Can you tell me a little about what you knew about that at that time?

93

94 BANUELOS: What I knew is the attorneys had agreed to have Frances and Isaiah meet at the
95 house and Frances was going to remove some property from the house.

96

97 DANTE: Who did you get that information from?

98

99 BANUELOS: From Mary or it might have been Isaiah.

100

101 DANTE: Silva?

102

103 BANUELOS: Correct.

104

105 DANTE: So you were there at the location and just tell me what happened.

106

107 BANUELOS: We were in there for a while. We went inside the house and we came outside. I
108 noticed that the back window, the back sliding door was broken and in fact I think
109 we spent some time trying to put a board up because the house was accessible
110 through that back sliding glass door. While were there waiting, Isaiah's sister kept
111 looking outside and she started talking about that there was somebody out there
112 that was following them or she felt that the person out there was someone that she

113 had seen previously that had been following them. We went outside to the backyard
114 and all of a sudden there was one guy that appeared... well to me, appeared to be
115 the lead guy of this group of guys that were accompanying Frances Cobain. The one
116 guy, he was short, stocky; baldheaded and he had an accent.

117

118 DANTE: Let me stop you there. If I showed you a photograph of that person, do you think
119 you'd recognize him?

120

121 BANUELOS: It's possible that I might remember.

122

123 DANTE: I'm going to go ahead and show you what I've marked as RB1.

124

125 BANUELOS: Yes, that's him.

126

127 DANTE: So I have a printout of what you're looking at, just compare it to RB1. The color
128 version is on my computer that you are looking at. Does that look the same to you?

129

130 BANUELOS: Yes.

131

132 DANTE: Would you just initial it and date it at the bottom? Do you know who this individual
133 is?

134

135 BANUELOS: No. After that day I came home and I did some research and I talked to some of my
136 PI colleagues and they said that it was possible that he was this one private
137 investigator who is well-known in the Hollywood celebrity area.

138

139 DANTE: If I gave you a name, do you think you would recognize it, or did you ever know the
140 name?

141

142 BANUELOS: You know, it was one of these things that when I looked him up, I saw the name and
143 then I spoke with some guys and they confirmed it but off the top of my head, right
144 now I couldn't tell you what his name was.

145

146 DANTE: But the person in what's marked as RB1 is the same person.

147

148 BANUELOS: Yes, that's him.

149

150 DANTE: So he arrived then at the Curson property.

151

152 BANUELOS: Correct.

153

154 DANTE: What happened after he arrived?

155

156 BANUELOS: What happened was, we were in the backyard on the other side of this gate and this
157 guy here and it was two or three guys that were over 6... I'm 6.2", they were
158 somewhat taller; they were about 6.4", 6.5". It was either two or three that were
159 behind him and then there was like either three or four young... I would say either
160 college kids... and each one had a little video camera and they were recording while
161 they were making contact. This guy here, to me, he was aggressive. Mary, she was in
162 front of me... they came up to the gate almost at the same time and this guy just
163 pushed the gate. He forcefully pushed the gate and that's when Mary, Isaiah... I
164 don't recall the sister's name, Isaiah's sister's name... they all ran in the house and I
165 was left out there alone. I put up my hands and I said, "Whoa, whoa, whoa"
166 something to the effect of, "Hold on, wait up," and Frances Cobain made the
167 statement, "Who in the fuck are you?" and I said to her, "I'm here to keep the peace
168 and be a witness." The other...

169 DANTE: Let me stop you there for just a second. I'd like to show you what's been marked as
170 RB3. This is the color version. Do you recognize who that is?

171

172 BANUELOS: Yes, that's her. Yes, that's Frances.

173

174 DANTE: Okay and again I have a hard copy black and white, if you to take a look at that and
175 see if that's the same person that's in RB3 on the computer.

176

177 BANUELOS: Yes, it is.

178

179 DANTE: Go ahead and initial it and date it for me. Great, thank you. Then while we are on
180 this, I have no idea whether this individual was there or not, but let me show you
181 another photograph that's what's marked as RB2. Do you recognize that person?

182

183 BANUELOS: I don't recognize this guy here.

184

185 DANTE: Okay, you don't recognize him as having been there that day?

186

187 BANUELOS: No.

188

189 DANTE: Alright, so Frances Cobain then addressed you.

190

191 BANUELOS: She says, "Who the fuck are you?" whatever and I'm like, "I'm here to keep the
192 peace and be a witness." I put my hands up and right away the confrontation kind of
193 came down and I got on the cell phone and I called LAPD. I felt threatened myself, I
194 mean like I said, this guy, I recall him pushing the gate open and that's what caused
195 Mary Silva, Isaiah and the sister to run into the house. They left me out there and
196 Frances made that statement. Then the guy asked who was I and I just replied to

197 him, "You don't need to know." LAPD showed up, I would say pretty fast, they were
198 there pretty quick and I recall that this one PI guy, the baldheaded guy, he had this
199 paper in his hand and I assumed it was the deed to the house because he was
200 showing it to the sergeant and I assumed that what they were trying to do was get
201 Silva out of the house. The sergeant came over and talked to me afterwards and he
202 says, "Yeah, you know that..." I don't recall his name but I knew that they didn't have
203 any right to force this guy out of his own home... Isaiah. I went around until this
204 truck pulled up and they started removing some of the property out of the house
205 and the sergeant even asked me, "Is it okay?" And I said, "Hey, that's what we're
206 here for." I was here because she was supposed to take some of her stuff and I was
207 supposed to be here just to keep the peace while this was going to go on.
208
209

210 DANTE: Let me just back up to the incident at the gate. So as I understand it, Mary Silva,
211 Isaiah Silva, Isaiah's sister and you are in proximity to the gate, with Mary standing in
212 front of you.
213

214 BANUELOS: Right.

215

216 DANTE: Was Mary touching the gate?

217

218 BANUELOS: I don't recall her touching the gate. What I recall is this one guy, a short, heavyset,
219 bald guy...

220

221 DANTE: The guy you identified in RB1?

222

223 BANUELOS: Right... forcefully pushed the gate open and I didn't know about Mary's alleged
224 injury until after everything settled down and she came out and she was holding her

225 hand or arm and she was telling me that it had happened when the guy pushed the
226 gate open.

227

228 DANTE: So before the guy pushed the gate open... so we're talking about RB1... before RB1
229 pushed the gate open, were there words exchanged? Was there anything that
230 happened prior to that?

231

232 BANUELOS: No, well it happened almost at the same time. They quickly came up the... you
233 know, they were right there and when I turned around, this guy was already shoving
234 the door... the gate and like I said, I know that Mary was in front of me. She was the
235 one closest to the gate and this guy forcefully pushed it open and that's when Mary,
236 Isaiah and his sister ran into the house.

237

238 DANTE: So when you are telling me this, you're making kind of like a shoving motion with
239 your hand.

240

241 BANUELOS: Correct. The gate opened towards us. It was a... I would say a 5 foot gate maybe, it
242 was about up to here, chain link. I think it was a chain link and it opened into the
243 yard, it opened into the yard. So like this guy pushed it, forced it open and was
244 coming in and I had to put my... "Hey, hold up," you know, "Wait up," and that's
245 when...

246

247 DANTE: Had you been through that gate when you entered the property?

248

249 BANUELOS: Oh boy, yes... well you know what, I don't remember. I don't know if we went in
250 through the front but I know we went in and out of the house maybe a couple of
251 times through that broken sliding glass door and I even helped them try to secure
252 that door with a piece of plywood or something that was there.

253

254 DANTE: So two questions about the fence itself. Do you have an opinion about whether or
255 not it took that much force to open the gate? In other words was it a sticky gate that
256 you had to put that much force on?

257

258 BANUELOS: No, no, no, it was a free opening gate, no obstructions. He forced it open because I
259 guess... you know, he was trying to make like he was being a bully, you know, trying
260 to make that impression. I didn't see Mary put her hands up against the gate
261 because she was in front of me and I just remember that this guy, he forced it open.
262 He didn't just open it and came in, no. He was barging in and bullying himself into
263 the yard and that's what he did.

264

265 DANTE: I know that you described it to the best of your recollection as a chain link fence.

266

267 BANUELOS: Correct.

268

269 DANTE: Could you see through the fence?

270

271 BANUELOS: Yes.

272

273 DANTE: Okay, so there's no doubt in your mind that he saw Mary was there.

274

275 BANUELOS: Yes, they were face-to-face.

276

277 DANTE: Then did Mary ask you anything about what she should do?

278

279 BANUELOS: After everything calmed down and she was standing in the back, we were back there
280 talking and she was holding her hand and can't recall seeing if there was any type of

281 injury to her hand but I know she was holding it and she was complaining about her
282 hand and she said it happened when the car forced the gate open. I thought to
283 myself it's possible that she did hurt her hand because the guy... you know, if I
284 would have been standing there, it would have hurt me too because the guy, he just
285 pushed the gate really hard to open it and he didn't have to. I told her, "Hey, if he's
286 the one that caused the injury, you have the right to make a citizen's arrest, if that's
287 what you want to do," and I left it at that. I don't know if she spoke to the officers
288 that showed up... wait, I take that back, I think I recall her talking that she did have...
289 she had spoken to some officers about it and I think the officer was trying to, you
290 know, piss it off. You know, that kind of thing.

291

292

293 DANTE: You described the person in RB1, the baldheaded guy who... did he tell you that day
294 that he was a private investigator or did you find that out subsequently?

295

296 BANUELOS: Subsequently, I guess he's like a high-profile Hollywood type of guy. I mean after the
297 incident, I wanted to find out who this guy was, so I went online and I looked it up
298 and I said, "Oh, that's him right there," and I don't know what I used to look him up
299 but it might have been something like "Hollywood PI guy" or something. Then, like I
300 said, I spoke with some other PI guys that I know and they... you know, I guess he is
301 well-known in the Hollywood circles as a PI.

302

303 DANTE: So there's that guy and two or three really big guys?

304

305 BANUELOS: Really big guys, light skinned guys, to me they either... I don't know why but they...
306 to me they seemed like maybe either... they were light skinned, tall white guys but
307 to me, they didn't come across as like American guys or maybe from... I'm not even
308 going to say Russia but you know, somewhere over there, Croatia but they were

309 pretty big guys. It was either three... I mean two for sure, maybe three but I do
310 remember those guys and they were also bald, you know, intimidating looking guys.
311 They were well-built guys, not like this guy. These guys were tall, I'd say maybe 6.5",
312 260, 270; well-built and like I said, three or four, I would say young kids. To me they
313 even looked like they might have been Spanish-speaking, the guys with the cameras.
314 I'm not going to say illegal aliens but they kind of seemed like maybe they were
315 working for this guy. Of course they were working for this guy but each one had a
316 camera and it was just a contrast from the two to three big guys and this guy here
317 too, compared to the guys with the cameras.

318

319 DANTE: Then Frances Cobain.

320

321 BANUELOS: Correct.

322

323 DANTE: With the exception of those, was there anyone else present, not including the Silva
324 family?

325

326 BANUELOS: That was it pretty much it.

327

328 DANTE: So you never saw an attorney that represented...?

329

330 BANUELOS: No. Nobody came up and said they were the attorneys... they are an attorney.

331

332 DANTE: Based upon your observation, did you get a sense of who it was that was kind of in
333 charge of the Cobain side of this whole deal?

334

335 BANUELOS: Yes, the one...

336

337 DANTE: RB1?

338

339 BANUELOS: Yes, RB1.

340

341 DANTE: Was he giving instruction and direction to the others?

342

343 BANUELOS: Yes, he was.

344

345 DANTE: Did you ever talk to him? Did he say anything to you?

346

347 BANUELOS: The only thing he said to me, he asked who was I and I told him he didn't need to
348 know and then he also made a statement, "I've been doing this for a long time."
349 That's what he said, "I've been doing this for a long time." Those are the things I
350 remember that he said.

351

352 DANTE: Was Frances Cobain in their company?

353

354 BANUELOS: Yes, she was there.

355

356 DANTE: But like with them or did she...?

357

358 BANUELOS: Yes, right next to them. It was this big guy, I mean it was this baldheaded... what do
359 you refer to him as?

360

361 DANTE: RB1.

362

363 BANUELOS: RB1 and she was right next to him and then the big guys were behind the
364 baldheaded guy. She was always there in front with the guy.

365

366 DANTE: Just so there's no confusion, let me... one more time show you the... the reason I'm
367 calling him RB1 is that's the exhibit number, that's RB 1 there.

368

369 BANUELOS: Yes, that's him.

370

371 DANTE: Alright Ray, anything else you can think of that maybe I haven't asked you about that
372 you think is significant or important to know?

373

374 BANUELOS: That's about it. I mean those are the things that stand out in my mind from this
375 incident. Like I said, they wanted a confrontation, it was obvious that they wanted
376 one and I guess they didn't expect that I was going to be there. So I told them that I
377 was a retired policeman and they backed off. That was it.

378

379 DANTE: Okay. Ray, I'm going to go ahead and close out the interview. I have 10:40.

380

381

382

383

384 *****

385

386

387 This recording was transcribed:

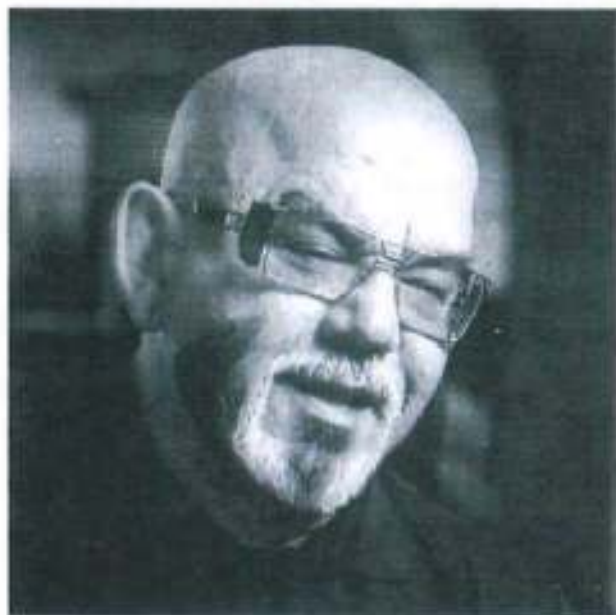
388

389 By: Charmaine Keough, Transcriber

390 Date: 04.20.2018

391

392



RG 4-16-18

16TVG10001 - RB1



16TVG10001 - RB2



AZ A-16-13

16TVG10001 - RB3

Love Turns To Investigator Again Over Amex Charges

By WENN on 31 May 2009



Follow Courtney Love

Courtney Love

Courtney Love has hired a private detective to track down the fraudsters who racked up a \$350,000 (£233,333) bill on her American Express card. AmEx chiefs claim the rocker ran up a huge bill on her Gold card and has refused to pay it off, and have filed suit against the star in a bid to reclaim the money.

Love's lawyer quickly dismissed the allegation, insisting his client has been battling the charges for months because she didn't spend the money. The attorney told TMZ.com, "AmEx knows the claim has no merit. We have told them this for a long time. AmEx's law policies allowed fraudulent transactions to be charged to my client's card."

Now the former Hole singer has hired private investigator John J. Nazarian to trace the origins of the fraud and compile a case for the Los Angeles Police Department.

He tells New York gossip column PageSix, "She's not a person without means. We're ready to go to the LAPD because someone gained access to her Social Security number and applied for cards in her name. It's astounding AmEx didn't question the charges beforehand."

It's not the first time Love has hired private investigators due to financial problems - in April (09) she hired a team of detectives to try to reclaim the millions of dollars she alleged were stolen from her late husband Kurt Cobain's estate.



Picture: Courtney Love arriving at the O2 Shepherd's Bush Empire to see The Killers and Coldplay in concert. It appears that Courtney has had a few...

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video



Courtney Love pays tribute to Kurt Cobain on his birthday



Courtney Love settles unpaid tax bill

John J Nazarian Unleashed

After 24 Years John J Nazarian
Tells Everything - Coming soon!!

Courtney Is "Cool"

September 19, 2012 | Desperate Exes | 140 comments



Just last night I was having a nice conversation with an old acquaintance, Sam Lutfi. We talked about the weather, the heat, the water temperature in Tampa Bay as well as the water temperature in my pool. We may have even touched on the lives and well being of penguins, it was a delightful conversation. While discussing some other mutual friends and interest it was brought to my attention that I was on a list of people to be called for a deposition AGAINST Courtney Love!

Tweet

I almost dropped my Oreo cookie into my hot chocolate, I was shocked! I almost burned my fingers saving the cookie. "What I asked?", Sam again told me, "you are on a list from lawyer Keith Fink's office" as a 'witness'? Let me just make myself perfectly clear. I WILL NOT TESTIFY AGAINST MS. LOVE, E V E R..... Courtney treated me, my son with the utmost of respect. She was fun and almost at all times great to be around.....she was very into her music and was working on a huge project that was coming up fast.

One of my best memories of hanging with Courtney was the time we spent with her at the recording studio in the early morning hours. My son Mike still talks of how "cool she was"..... One night out in front of the Cicada Club, downtown L.A. Courtney gave my son two of her framed records. Courtney strolled out to her black Mercedes and had her chauffeur open the trunk and surprised Mike with these wonderful gifts. To this very day those two amazing gifts hang in Mike's room.

For me, John J. Nazarian and my family? Courtney is 'oak'.....

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Silva v. Love, et al

UNLIMITED CIVIL CASE AMOUNT IN EXCESS OF \$25,000
COMPLAINT FOR DAMAGES

Plaintiff's Exhibits

Exhibit: 29

1 VIDEO RECORDING OF JOHN J. NAZARIAN
2 How to Throw Your Husband Out - Divorce Advice

3 Silva v. Love, et al

4
5
6 **NAZARIAN:** Hey, welcome. I'm reading the Bible, remember I do God's work. Now if you
7 women... have you ever thought about trying to get rid of your husbands? Not like
8 shooting them and digging a hole and putting them in. No, no, that's not what I'm
9 talking about here. What I'm talking about is the fact that putting the trash out,
10 you've had it up to here. You don't want to see his hair, you don't want to smell his
11 breath. You're done but how do you get him thrown out of the house? It's tough,
12 you don't have 10 or \$15,000 to hire a lawyer.

13
14 Here's my suggestion, one nice day when he goes to work, you go get your hair
15 done, get your nails done and I know for some of you out there, this might sound
16 utterly impossible but you know, women do this. They get their hair done, nails
17 done, clean themselves up, put on a pretty dress. And if you know your husband
18 hates meatloaf, you make the biggest meatloaf you've ever made. If you know your
19 husband hates spaghetti, make the biggest pot of sauce and macaroni you've ever
20 made.

21
22 And when he comes home that night and he's sitting there giving you all the usual
23 shit that he gives you, this is your Waterloo or I should say, his Waterloo. This is
24 where Napoleon meets the bad... this is... this is it, it's over. You look at him, he
25 goes, "What the fuck is this? You know I don't like meatloaf," or, "You know I don't
26 like spaghetti sauce." You look at him, you throw that meatloaf up in the air, you
27 take pieces of it, you throw it around the room or if it's spaghetti, you throw that
28 spaghetti everywhere. You rub it all over yourself, you don't touch him.

29

30 And right about now, he's looking at you like, "What the hell?" You go hit 911 and
31 start screaming, "He's trying to kill me!" And you throw that food all over the house,
32 all over the kitchen, break the dishes. And if you happen to hit yourself in the head
33 with the kitchen door, coming and going, that's good too. And I'm here to guarantee
34 you something, when the cops show up and they look at you, all nicely dressed and
35 now you look like you've got food all over you; he's sitting there looking like Prince
36 Charming, he will go from looking like Prince Charming to an expression
37 of Wiley Coyote as to, "What just happened?"

38
39 And you're going to tell the cops this, you know, you made the mistake. You made a
40 nice dinner, he didn't like it and he freaked out.

41
42 Try that ladies, show him the door. Otherwise known as, you just put the trash out.

43
44
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58

1 VIDEO RECORDING OF JOHN J. NAZARIAN

2 Pound of Flesh for Rich and Powerful

3 Silva v. Love, et al

4
5 **NAZARIAN:** The rich and powerful always want their pound of flesh and we kind of go out and
6 collect it for them. My name is John Nazarian, private detective, Nazarian &
7 Associate's attitude and behavior has always been, we will work for whoever has the
8 ability to pay us. I didn't take any vows of poverty when I took this job. I think a lot of
9 people have the image of the, you know, Magnum PI and Barnaby Jones and those
10 guys did great jobs portraying what being a private eye is all about. I personally find
11 myself leaning towards Jack Nicholson in Chinatown. I think he portrayed a great
12 character in that movie back in the day. I think it's just as relevant today as it was
13 when he did the movie.

14
15 *(Voice of Jack Nicholson in movie clip)* "I goddamn near lost my nose and I like it, I
16 like breathing through it. And I still think that you're hiding something."

17
18 I've got a major family law issue whereas a critical component of one of those
19 individuals is getting him to show up to a deposition, so he can show up and lie.

20
21 *(Nazarian speaking to unknown subjects in the doorway of residence)* My name's
22 John Nazarian, I'm a private detective. I'm looking for your brother. So I appreciate if
23 you'd have him call or contact me, you know, less aggravation for you and your
24 family but we're going to find him, so there's no need for him ducking. I mean, he's
25 been in the system before so he knows the game. Alright?

26
27 Sometimes it's good just to rock their world. You know, let them realize everything's
28 not going to go their way, everything is not peaceful in the valley because I'm

29 roaming around. Some people build walls, some people dig ditches, some people
30 practice medicine, some people are scientists; we just go around and scoop up
31 garbage.

32
33 Get the recycling too. If you're easily intimidated or have any kind of a real serious
34 fear factor, this isn't the job for you.

35
36 *(Nazarian sorting through trash at a dumpster)* This is my favorite stuff, I love
37 bathroom garbage. Trash from a bathroom can be very revealing. You know, what
38 medications are you taking? It can also reveal to us how much you're drinking, how
39 much alcohol you drink. How much you are and... using. How you're cooking your
40 meals. Are you feeding your children right?

41
42 For us, the trash can be a great source of information. Oh, big piece, big piece. You
43 pick your worst lawyer that you know, we're 10 floors below him. That's what we get
44 paid to do. We don't... I mean I do God's work because God's too busy.

45
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1 VIDEO RECORDING OF JOHN J. NAZARIAN

2 Playing Fair

3 Silva v. Love, et al

4
5 **NAZARIAN:** Oh hey, here we are. You know, I was just thinking... oh, by the way, this is Ben my
6 grandson and I was just as cute as he was, back a lot time ago. He doesn't agree with
7 me but you know what? That's a lie, I was cute but not as cute and not as adorable
8 as I find myself today. But look, you know, marriage and relationships pretty much
9 suck and it depends upon the level of sucking as to how long they will last. And you
10 know, often we hear from people that they're going to be filing for divorce and my
11 advice to people... now get this, right. My advice to people is this, if you try to play
12 fair in a divorce, you will get your ass handed to you on a plate. Probably a small
13 plate because there will be no money to buy a big plate.

14
15 You have got to do whatever you have to do to protect yourself and do the right
16 thing for yourself and your child and this goes for males or females. However in my
17 case, most of our clients tend to be females. And if you've got little guys like this in
18 the picture... you, yeah, Ben... or other little... you have to think about their future
19 also, not just your own. And I've got news for you, if you do *(baby makes noises)*...
20 and look, I bring the kid in the show, now he's trying to steal my part.

21
22 And you know, and you can hire the best lawyers but you know what? If you take to
23 the advice of the lawyers as they tell you, sometimes it may not always be safe. You
24 need to think for yourself, take their advice; think outside the box. Talk to people
25 like me, if you can afford me talk to me and believe me, we'll get you through the
26 war. And remember, with every war there's wins, there's losses and there'll be
27 battles, there'll be skirmishes and that's exactly what a divorce is. You are fighting

28 for your life, for what could be your future and you're entitled to whatever you can
29 get. That's just some of my advice. Ben and I right now are going to take a nap.

30

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