

1 ANGELINA RAYLENE HARRIS

2 PRO-PER

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6 SELF REPRESENTED

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF RIVERSIDE**

10 **FAMILY LAW**

11
12 BOBBY DAVID HARRIS III,

13 Plaintiff,

14 vs.

15 ANGELINA RAYLENE HARRIS

16 Defendant.

Case No.:

**DECLARATION of ANGELINA
RAYLENE HARRIS**

17
18 I, ANGELINA RAYLENE HARRIS, declare as follows:

19 I have personal knowledge of the facts and circumstances described herein below in this
20 declaration, and will testify in open court to all of the same.

21
22 In November of 2015 I reported the physical and emotional abuse of our children by their
23 father and his associates to the authorities. The scenes that our children describe go beyond the
24 natural limits of what anyone, adult or child, should be exposed to. Over the last year I have
25 exhausted all of my available resources to bring those involved to justice. Justice was evaded.
26 Now my only concern is to ensure the safety and well being of our children.

27 I am contracted to deliver a training to state of California employees, and cannot make
28 the hearing to extend the existing restraining order. This is my new request for protection.

1 Since reporting the involvement of two Riverside County Sheriff's Deputies, including
2 Deputy Jackson, who was integrally involved in the investigation of the alleged crimes, my
3 family has been harassed, stalked, and the privacy of our home and electronic devices have been
4 violated. This became so severe, that we had to flee our home and local support base in Southern
5 California.

6 In our new city, aid is adequate and ongoing. School counselors, social workers, and CPS
7 have provided services to our family and helped us to receive a grant for regular family
8 counseling services and support groups. Open lines of communication exist between me, the
9 school, and the medical facilities involved with our children.

10 Our son was hospitalized in December of 2016 for 7 days to ensure that he did not harm
11 himself or anyone else. He suffers from PTSD and ADD, and will begin therapy with a
12 psychiatrist in January of 2017.

13 No contact has been had between the Plaintiff and our children since June of 2016.
14 Plaintiff claimed to have no income and had his mother appointed as supervisor for the visits.
15 After both children claimed to be threatened and left alone with him, and Peggy Harris refused to
16 speak to me about the situation, I asked for a change in visitation. I also presented evidence of
17 the Plaintiff regularly depositing \$30,000.00 to \$50,000 to his business account, besides his
18 regular income. The judge did not acknowledge the bank statements, and my requests were
19 denied.

20 After extremely emotional exchanges for visitations, including our son fleeing into traffic
21 to escape, and attacking the Plaintiff in the police station, I ceased the exchange. The emotional
22 toll was too high. The Plaintiff claims that I am mentally unbalanced ("crazy") and the police
23 present baseless opinions of me "coaching" the children. Yet, coaching the children to say what
24 has not been presented.

25 Since June, the Plaintiff has only documented our absence. If he felt that our children
26 were in danger, as he has expressed, his actions would reflect that. I believe that he is well aware
27 of why our children are behaving the way they are, and knows that his lifestyle and environment
28 are not conducive for peace. This is not due to alienation, but trauma suffered by the children in

1 the past while in his home. It is possible that the Plaintiff was incarcerated the month of
2 November 2016, but it is unclear to me from the public court records if that is so.

3 The Plaintiff is physically, financially, and emotionally abusive and lacks basic control of
4 his impulses. He has been convicted of three criminal offenses, violating probation twice, since
5 our separation. Plaintiff floods this case with excessive and repetitive declarations to distract
6 from the core issues. This is not about our divorce. This is about allowing two young children to
7 live and grow up in an environment that is free of abuse.

8 Although the Plaintiff makes an excess of income, he does not pay court ordered support.
9 This places a burden on me, but I will steadily move forward without it. Monthly court hearings
10 have proved ineffective and expensive.

11 Seeking justice in Riverside has failed. The Plaintiff is a life-long City of Riverside
12 employee, and Riverside County Deputies have blatantly and sloppily mishandled the
13 investigation of our case.

14 I will seek the proper legal avenues once our family is stabilized.

15 **GENERAL HISTORY OF EVENTS**

16 **MARRIAGE**

17 1. The Plaintiff and I were married on November of 2004.

18 During our marriage, the Plaintiff worked for the City of Riverside, and I stayed home
19 with our children. I accepted irregular contracts as an IT Consultant. We relied primarily on the
20 Plaintiff's income.

21 The Plaintiff was deacon of the Corona Church of Christ, which we actively
22 and regularly attended from 2005 – 2013. We made many close associations with families in the
23 community.

24 We had two children during the marriage. Our son was born in 2008 and our daughter
25 was born in 2010.

26 **SEPARATION AND DIVORCE**

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1 2. After struggling with an ongoing sexual addiction (which the Plaintiff openly admits
2 to dealing with to this day), and other irreconcilable differences, we legally separated in
3 February of 2013.

4 3. An attempt at reconciliation the weekend of Independence Day 2013 ended badly. The
5 Plaintiff and I stayed in San Diego at a hotel with our two children. Plaintiff went through my
6 phone while I was showering, became upset, forced me out of the room naked, tossed me my
7 clothes, then drove us back home. On the way back, he stopped on the highway and forced me
8 out of the car. When he returned, I reentered only to be with the children. I would not leave him
9 with them willingly in his enraged and reckless state. He pulled over again near Eastvale, CA
10 and punched and choked me in the presence of the children. When I tried to call the police, he
11 threw my cell phone out of the car into traffic and drove on.

12 Plaintiff took us to a local church member's house and exited the car. I drove away to
13 safety to call the police. The Sergeant, and a friend from church, arrived during my report. He
14 had me return the car keys to the Plaintiff and no arrest was made. I visited the hospital to treat
15 my bruises while the Plaintiff went back to San Diego and posted about his trip on Facebook.

16 I drove to San Diego and made a police report there. CPS was contacted and interviewed
17 our son at school. This incident was spoken about in depth at the December 22-23, 2015
18 hearings. The Plaintiff admitted to all but the punching and choking. Joyce Holcomb referred to
19 the fact that I dropped the DV case and that her client was going to have police officers testify
20 against me in the matter. That is correct. The Plaintiff received favorable treatment from local
21 authorities, and I dropped the case. No further reconciliation attempts were made.

22 4. Our divorce became final in 2015.

23 Attached you will find the hospital record from Kaiser **[Exhibit A]**.

24 **CPS submitted a report to the court in December of 2015** referring to the incident and
25 the interview with our son.

26 5. We shared 50/50 joint custody of our two children until November of 2015.

27 6. Early in 2015, a report was made to CPS regarding our son speaking of sexual contact
28 with the Plaintiff's girlfriend at home to classmates. I received a phone call from the agency, but

1 they only informed me that the case was closed. I became aware of the reason for the inquest
2 from the report at the December hearing in 2015. This is also referred to in the CPS report.

3 7. Throughout 2015, strange behaviors were exhibited by our children. This included:
4 bed wetting, nightmares, and depression. I thought this was due to our separation and their
5 adjustment to a new home environment. In October of 2015, we were called in to meet with a
6 long time church friend, and school counselor at our son's school. She informed us that he was
7 severely depressed and recommended that I move closer to more closely parent him with
8 Plaintiff, since he regularly asked for his mother. She reported that he regularly drug his feet and
9 hung his head, claimed he wanted to die, and cried during the school day.

10 8. I ended my contract with NBC and moved to Rancho Cucamonga on November 6th,
11 2015 at the counselor's suggestion. Plaintiff and I planned to enroll our son in sports and work
12 together to remedy the situation. My furniture was delayed and I asked for Plaintiff to have the
13 kids until it arrived, but he had suffered a flood and was undergoing construction, so he supplied
14 inflatable mattresses and tables for us to use in the meantime.

15 9. The week of Thanksgiving, our daughter disclosed alarming accounts of abuse by her
16 father and his friends. This included cops, cages, and strange games. I reported this to CPS and
17 took them to Kaiser to be examined.

18 10. We arrived at the hospital at 4:00 pm and the children were seen at 6:00 pm. The
19 children spoke to the doctor and social worker on staff. Abuse was disclosed and we waited until
20 nearly 10:00 pm before deputies Jackson and Cox arrived to privately interview the children. By
21 this time, the social worker had gone off duty.

22 11. A partial search was performed at the Plaintiff's home while were waiting at the
23 hospital. The search was performed by Riverside Country CPS case worker Baker and Riverside
24 County Sheriff's deputies Cox and Jackson.

25 12. Rancho Cucamonga CFS assigned our children case worker Taylor. Him and Ms.
26 Baker interviewed the children at our home in Rancho Cucamonga for two hours privately. Mr.
27 Taylor assured my son that he was safe and would be free of abuse. He was very concerned and
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1 recommended in front of his three colleagues in my living room that the children should have no
2 further contact with their father.

3 Two days later, Mr. Taylor informed me that he would not write a report to the court and
4 if I insisted that he did, that he would state that the children disclosed no abuse and should be
5 given over to the custody of their father. I immediately reported this to his supervisor and held a
6 conference with him at his office in Rancho Cucamonga. He stated in front of his manager that I
7 lied to get the temporary restraining order. A complete fabrication. If you look at my initial
8 request for the DVRO, it was one sentence, and was not a lie. I have reported him for
9 misconduct, and to this day, he has not written a note in the system or submitted a formal report
10 to the court.

11 13. It is customary for Rancho Cucamonga CFS to refer all reports of sexual abuse to
12 Loma Linda medical center for review. This recommendation was never made. I was urged by
13 Malachi's therapist in Rancho Cucamonga to get a recommendation for his evaluation at this
14 center, and requested from Maria Vargas to refer our children. All contact to Ms. Vargas after our
15 initial visit to her office went unreturned.

16 14. Reports of emotional abuse and intimidation during visitation did not reach Ontario
17 Police department on behalf of Rancho Cucamonga CFS until last week, presumably after local
18 authorities contacted them about what they had heard from our son during his hospitalization.

19
20 **THE DVRO HEARING DECEMBER 22-23, 2015**

21 15. Case worker Baker of Riverside CPS testified to waiting for hours outside of the
22 Plaintiff's home, while his girlfriend was inside, before the Plaintiff arrived with deputies
23 Jackson and Cox.

24 She claimed to not remember specific details of what the children said in the 4 hours of
25 interviews she witnessed, and that she "was not paying attention" during the forensic interview
26 at the police station. However, her testimony does not line up with reports from the police
27 officers or the detective involved, which claim that the children disclosed little to no abuse and
28 that they were coached.

1 Ms. Baker did recall that the Plaintiff's garage was not searched and that no evidence of
2 construction was visible when she visited the home.

3 16. Deputy in training Cox also took the stand on December 22. He appeared visibly
4 shaken and disconcerted as he testified to the fact that our daughter admitted to being abused by
5 multiple people at the hospital, but that her demeanor while describing the events was calm. In
6 his opinion, as a rookie in training, she was coached. Why a rookie was placed as my main point
7 of contact for this case is still baffling.

8 17. Deputy Jackson submitted a written statement in April of 2016. She claims that she
9 started off the interview with our daughter by asking if she wanted her daddy to go to jail. This is
10 unprofessional and is further worsened by the fact that my daughter disclosed abuse and was
11 ignored.

12 Deputy Jackson also claims that the search was not completed due to the construction at
13 the Plaintiff's residence. And that while performing the wellness check of the U-haul van, he was
14 loading construction debris. This does not coincide with the insurance documents presented
15 during the December hearing that states that the construction and cleanup was completed at the
16 home nearly two weeks prior to the search.

17 18. Neighbors also report seeing the Plaintiff loading audio visual equipment, backdrops,
18 and props into the U-haul van, and claim that it was then parked around the corner from the
19 house for nearly a week. Plaintiff's bank statements confirm this. They have been submitted
20 prior as evidence. His bank statements also show that a cleaning company was hired between the
21 time of the initial and final searches. After clearing out the contents of his garage into a u-haul
22 van and hiring a cleaning crew, no evidence was found on the final search conducted in January
23 of 2016 at the Plaintiff's home.

24 19. It is also relevant to note that the direct supervisor of Deputy Jackson at the time of
25 the investigation was the Sergeant who intervened for the Plaintiff in 2013. A year long internal
26 investigation occurred on his laptop, when it was submitted to review alleged contents relating to
27 lewd acts with children.

1 20. This investigation regarding the Sergeant's computer came back unfounded, as did
2 the investigations started due to my reports of police misconduct. I was told that he went into
3 early retirement after the most recent investigation.

4 21. The investigation consisted of the calling and asking the Plaintiff of his involvement,
5 and submitting the Plaintiff to a two question polygraph examination. The District Attorney
6 dismissed the case within one week of it hitting their desk in March of 2016. I personally spoke
7 to the man who reviewed the file and he said that he did not look at the RCCAT tape of our
8 children's interview. There was just not enough to take to trial. After reading the detective's
9 report I see why. The detective stated in the report and on the stand that my daughter claimed no
10 more than being "tapped" over her clothing by the Plaintiff.

11 22. After nearly a year of litigation, it has come down to a 730 evaluation. A doctor,
12 selected by the Plaintiff, who knows little about our family or case, will be able to make a
13 custody determination. Initially I was relieved at the order, thinking that our children would have
14 a chance to openly express themselves and have their voices heard in court. This is not the case.
15 In fact, she requires that they meet with her privately with the Plaintiff in her office for a day to
16 complete the evaluation.

17 23. Given the trauma suffered, and the current state of our son, I cannot ethically move
18 forward under this condition. Subjecting our children to the Plaintiff's care after they spoke out
19 against him and others, was incredibly damaging to them.

20 24. Plaintiff moved from the previously shared family residence in July of 2016. The
21 inspection performed on the property listed many strange modifications that were in line with the
22 children's claim of happenings at the home. I do not know where the Plaintiff currently lives.
23 This has made it impossible for me to serve him in person. Requests to Joyce Holcomb for his
24 contact information have not been returned.

25
26 **DELAY OF THE 730 EVALUATION**

27 The 730 evaluation ordered for this case has been delayed due to the following reasons:
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1 1. The approved evaluator, Shirley Harrison, was on vacation for two weeks and did not
2 return until early September.

3 2. Upon her return, I payed the initial fee of \$1700 and scheduled a meeting date to allow
4 for minimal interruption of the children's school schedule, and for me to complete my work
5 contract.

6 3. On our scheduled meeting date in September, we moved our meeting time to 12:00
7 pm. Shirley Harrison had a funeral to attend in the morning. I completed the examinations, and
8 we were able to speak about my life and background. The details of the case were never
9 discussed. We arranged to spend an extra two hours to discuss the events the following day after
10 the meeting with the children and I.

11 4. The scheduled meeting with the children and I went as planned. However, after she
12 had spoken with both children, Shirley Harrison promptly ended the session, and did not meet
13 with me further. To date, we have not made up for the time lost on the initial meeting.

14 5. I have answered all calls and communication from Shirley Harrison, and have
15 scheduled time for her to call me to discuss the status, but the the call was not made as planned. I
16 have been clear about not wanting to leave the children in the care of their father for the second
17 half of the evaluation, due to what had occurred during visitation, and our son's fragile mental
18 and emotional state.

19 6. I last spoke to Shirley Harrison on December 1st. She explained that she did not call
20 me back to allow for time for me to aid our son through recovery from his stay in the mental
21 hospital.

22 7. Shirley Harrison submitted a letter to the court recommending that the evaluation be
23 placed on hold until our son is stabilized and a clear recommendation from his psychiatrist is
24 given.

25 8. The first visit with the assigned psychiatrist is scheduled for January of 2017.
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CONCLUSION

Given recent circumstances where I have relocated and provided the sole emotional, physical, and financial support of our children, I have not had the adequate time or monetary resources to secure legal counsel.

I have a work contract in Northern California for two weeks in December, and must complete this to support our needs. A request for continuance was denied. I am reapplying for a permanent restraining order, and need time to prepare all evidence. Professional advice on how to adequately address these issues is imperative to this case.

I want to move on to live freely and in safety with our children.

Dated: 12/8/2016

ANGELINA RAYLENE HARRIS

By: 
Respondent

EXHIBIT A

Visit and Patient Information

Visit Information

Date & Time	Provider	Department
7/7/2013 7:10 PM	JAY LE MAI PA	Uccriv Ucc Uc1

Visit Summary

Vitals - Last Recorded

BP	Pulse	Temp(Src)	Resp	Ht	Wt
117/87	71	97.9 °F (36.6 °C) (Tympanic)	18	5' (1.524 m)	135 lb (61.236 kg)
BMI	SpO2	LMP	Breastfeeding?		
26.37 kg/m ²	100%	06/27/2013	No		

BMI Data

Body Mass Index	Body Surface Area
26.37 kg/m ²	1.61 m ²

Health Problems Reviewed

NUMBNESS AND TINGLING OF SKIN - Primary
CONTUSION OF MANDIBULAR JOINT AREA

Patient Instructions

Your Kaiser Permanente Care Instructions

Bruises: After Your Visit

Your Care Instructions

Bruises occur when small blood vessels under the skin tear or rupture, most often from a twist, bump, or fall. Blood leaks into tissues under the skin and causes a black-and-blue spot that often turns colors, including purplish black, reddish blue, or yellowish green, as the bruise heals.

Bruises hurt, but most are not serious and will go away on their own within 2 to 4 weeks. Sometimes, gravity causes them to spread down the body. A leg bruise usually will take longer to heal than a bruise on the face or arms.

Follow-up care is a key part of your treatment and safety. Be sure to make and go to all appointments, and call your doctor if you are having problems. It's also a good idea to know your test results and keep a list of the medicines you take.

How can you care for yourself at home?

- Take pain medicines exactly as directed.
 - If the doctor gave you a prescription medicine for pain, take it as prescribed.
 - If you are not taking a prescription pain medicine, ask your doctor if you can take an over-the-counter medicine.
- Put ice or a cold pack on the area for 10 to 20 minutes at a time. Put a thin cloth between the ice and your skin.
- If you can, prop up the bruised area on pillows as much as possible for the next few days. Try to keep the bruise above the level of your heart.