

1 Angelina Raylene Villa  
1505 Lark Lane  
2 Corona, CA 92882  
avilla@moderncourse.com  
3

4 SUPERIOR COURT OF CALIFORNIA  
5 COUNTY OF RIVERSIDE

6 BOBBY DAVID HARRIS III,  
Plaintiff,

Case No.: RID 1300823

7 vs.

DECLARATION OF ANGELINA VILLA  
REGARDING ISSUES OF SAFETY

8 ANGELINA RAYLENE HARRIS,  
9 Respondent

10 I, ANGELINA RAYLENE VILLA, declare I am the Respondent in this action and have  
11 knowledge of the facts stated herein. I have personal knowledge of the facts I state below, and if I were to be called  
12 as a witness, I could competently testify about what I have written in this declaration.  
13

14 **Summary of Recent Events**

15 In 2015 I reported the sexual and emotional abuse of my children. They claimed to have been  
16 filmed by their father and a group of men and women. We have lived the past nine months in Austin and I have  
17 given them access to regularly therapy and medical help to address the emotional disturbances from alleged abuse.  
18

19 Our lives have been disrupted, we have been displaced from our safe home environment and  
20 access to care in Austin, and our freedom to live freely and peacefully without the threat of criminal abuse has been  
21 taken away. It was ordered on March 17<sup>th</sup>, 2017 that I either abandon my children and give over full custody to their  
22 father who they allege abused them with a group on film, or face felony criminal charges.

23 I am not a criminal. I have never been convicted of a crime. Nor have my children, or anyone else  
24 for that matter, claim that I have abused them or that they are not safe in my care. None of that can be said for the  
25 Plaintiff.

26 I retained representation from two attorneys in Austin. Attorney Harris contacted Joyce Holcomb  
27 and Jennifer Gerard on April 10, 2017 to request a continuance for the April 11<sup>th</sup> hearing. They did not agree to  
28 continue, so she arranged for a local attorney to appear in her stead. Her email to me with the subject line is attached

DECLARATION OF ANGELINA VILLA REGARDING ISSUES OF SAFETY - 1

1 as Exhibit A. Hours later she withdrew from the case, and I appeared by telephone to represent myself for the  
2 scheduled April 11<sup>th</sup> hearing.

3 Attorney Carver scheduled an ex-parte hearing to protect my children from being extradited from  
4 their home in Austin to a dangerous situation. Joyce Holcomb referred to this hearing in court and said she would  
5 appear by phone. Later that afternoon, Attorney Carver withdrew from our case.

6 I do not know why appropriate action has not been taken in response to the serious allegations of  
7 abuse my children have made. And without willing and able legal representation, time allowed to present evidence  
8 and testimony from counselors, therapists, psychologists, medical professionals, and school staff who have aided our  
9 children over the last eight months, and when all criminal reports of abuse go back to Riverside County Sheriff  
10 department for investigation. I see no legal remedy to keep our children from harm in Riverside, CA.

11 I do not understand why Judge Firetag and Attorney Gerard were so quick to remove our children  
12 from my custody without investigating evidence from Austin Texas. But I can wholeheartedly claim that as their  
13 mother, I cannot be coached, bought, or threatened to subject my children to further criminal abuse. They have been  
14 through enough. Separating them from their only safe parent, and access to protective advocates will have long  
15 lasting negative effects on their lives and mine for many years to come.

16  
17  
18  
19 With the respect that is due,

20 Dated this 14th of April, 2017.

21  
22   
23 Angelina Raylene Villa  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

---

# Exhibit A

Gmail

More

## In case I die in the next few days - keep this for your records

Inbox x



**Hartwell Harris**

Apr 10 (4 days ago)



to me, Charles

The name of the attorney who is making the appearance tomorrow is Robert Chandler at [276-3022](tel:276-3022).

I really liked him. He was very helpful, looked at the docket and immediately knew what was going on the case, was familiar with the judge, was patient with me.

You may want to consider hiring him, but let's see what Texas court going to do.

[Hartwell Harris](#)  
Law Office of Hartwell Harris

Austin office and mailing address:

500 W. 10th St.