

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

SUPERIOR COURT OF CALIFORNIA

COUNTY OF RIVERSIDE

BOBBY DAVID HARRIS III,
Plaintiff,

vs.

ANGELINA RAYLENE HARRIS,
Respondent

Case No.: RID 1300823

RESPONSIVE DECLARATION TO SHERRY
EVERSOLE

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

Exceptions to Child Abduction

I read the following on RivCoda.org and have contacted the Child Recovery Unit:

"A child may be taken, concealed, or detained in violation of a custody or visitation order if there is a good faith and reasonable belief that the child or children, if left with another person, will suffer immediate bodily injury or emotional harm. However, if you do take your child or children under this exception, you MUST call the District Attorney's Office Child Abduction Unit immediately. The Child Recovery Unit will initiate a "good cause" exception case to ensure that the proper procedures are followed."

Summary of Recent Events

In 2015 I reported the sexual and emotional abuse of my children. They claimed to have been filmed by their father and a group of men and women. The scenes they described were graphic and disturbing. I was hesitant to report the incident to police, because they claimed that some scenes involved police officers, and I knew that their father was well connected in the county of Riverside California.

I thought that doctors would treat the injuries, therapists would counsel our children, social services would work with our family, police would arrest the offenders, and attorneys would prosecute the

1 case. However, none of that happened. Riverside and San Bernardino county agencies dropped the ball at every
2 pass.

3 Since reporting the crimes, I have done all that I can to ensure that my children have medical and
4 psychiatric help, social support, and legal representation. I had never spent much time dealing with child
5 welfare agencies or authorities before 2015, but San Bernardino CFS did not write notes, submit a formal report to
6 court, nor did they refer our children to Loma Linda Medical Center for screening. This is standard procedure for
7 sexual abuse allegations.

8 The investigating officers performed the search of the Petitioner's home in two parts, allowing
9 him to empty the contents of his garage into a U Haul and hire a professional cleaning agency. Given this allowance,
10 no evidence of the alleged crimes was found.

11 The restraining order we were granted due to past abuses, did little to protect us from stalking,
12 theft and home invasion. By reporting their father, a lifelong City of Riverside employee, and the misconduct of
13 Riverside County Sheriff deputies, we shed light on a ring of people who operated in the dark.

14 The family court in Riverside California and its paid agents ignored and deflected attention away
15 from the crimes alleged by our children. Despite my experience there, I will continue to help my family out of
16 a criminally abusive situation; And I must remain free to do so.

17 This deadlock situation where I've been given the choice to hand over custody of my children to
18 those they claim hurt them, or face prosecution, is a mother's worst nightmare. I fear for the safety of my children
19 and for myself under the circumstances.

20 **Our Move to Austin Texas: August 2016**

21 I did not post anything to my Instagram account about taking the children to Texas in March of
22 2017. We have maintained a residence in Austin Texas since August of 2016.

23 I had sole legal and physical custody of our children at the time of the move, and had appealed to
24 the judge about the emotional harm and threat suffered during visitation with their father. No remedy was offered.

25 We needed to find people and resources willing to aid our family under displacement and duress.
26 Our children and I had to be a safe distance from the ring of men and women they claimed abused them in Southern
27 California.

1 The cost of living, access to social support, and technical jobs made Austin Texas a logical
2 relocation choice under the circumstances. Our children and I loaded a diesel truck and moved our belongings the
3 first week of August of 2016.

4 In Austin, our children have a protection team that includes professionals from medicine, criminal
5 justice, social work, and education who understand and appreciate the different roles, responsibilities, strengths, and
6 weaknesses of the other team members. They have full access to communicate with me and with each other to
7 coordinate efforts and develop effect plans. Plans of treatment to address the emotional issues faced by our children.
8 The skills of each person and agency are different but equally important.

9 I am not a mother who is alienating her children. I am protecting and supporting their healthy
10 development in a safe environment.

11 **Riverside's Response: March 2017**

12 on March 17th, 2017, the Judge Firetag granted full legal and physical custody of the children to
13 their father. He did this at the recommendation of their assigned lawyer, Jennifer Gerard. This lawyer had met the
14 children two days prior in her office for one hour.

15 However, at the hearing on March 10th, she expressed to the Judge and I that this was a case of
16 "parental alienation" before ever meeting her clients or looking in to the references I had provided her.

17 Jennifer Gerard spoke of the abuse she had heard from the children in her office. She seemed to
18 mock them... mentioning "Good cop, bad cop" and that my son spoke of being chased around with a sword. She
19 mentioned that our daughter did talk about being touched in a sexual manner by her father. Why this was not cause
20 for concern or action, I don't know.

21 Attorney Gerard focused mainly on the weight gain suffered by my son after being put on
22 Risperidone after his stay in the Austin mental hospital. And referred to our daughter as "average looking". Ms.
23 Gerard was mainly concerned over how many schools they had attended... including their pre-K education.
24 Something is clearly wrong.

25 I had signed releases for Jennifer Gerard to speak with the children's regular therapist and school
26 staff counselors. However, she only mentioned she could not get information from the mental hospital about our
27 son's stay. She said about me and my report of our son's hospitalization that, "...she may be telling the truth about
28 the hospital [stay]."

1 The hospital acknowledged that our son was a patient, but could not disclose information to her. I
2 did not have the opportunity to go in to the facility to sign a release waiver the week of the hearing. This is not made
3 up, or a situation to take lightly.

4 In her office, attorney Jennifer Gerard asked me if the children could positively identify the police
5 officers involved in the group, and asked for contact information for those who could support the allegations. I told
6 her I would supply the information when I returned home, after Spring break.

7 It is clear now that her interest did not lie in bringing these people to justice. Attorney Gerard
8 worked in the interest of the Sheriff's department and the abusive father by recommending that the children be
9 thrown back in to the lion's den, without investigation. This is a prevailing theme in this case.

10 Such bias and drastic actions are irresponsible and unprofessional.

11 But Jennifer Gerard, like all others who heard the claims of our children, did not protect them and
12 ensure their safety. In fact, she did the opposite. Without validating their statements or speaking to the contacts
13 provided to her, she recommended that they be given over to their father.

14 Judge Firetag ignored all evidence I presented him and followed the biased and outrageous
15 recommendation of Jennifer Gerard.

16 A proper investigation and response to abuse allegations brought against a former city employee
17 and Riverside County Sheriff deputies have proven fruitless in the Riverside court system. A change of venue is
18 needed.

19 I confirmed with the judge that I was to have no contact with my children. He affirmed that all
20 contact by phone would be at the discretion of their father. He gave me two hours to bring our children to their
21 father at the police station in Riverside. It was nearly 10 am.

22 **Outside of the Courtroom**

23 I attempted to deliver the message to my mother outside of the courtroom. The children had plans
24 for the movies that afternoon, and I had to arrange for a ride for them and for myself. We had flown out of Austin
25 the Friday before for court, and they were on Spring break.

26 Plaintiff's girlfriend, Crystal Turner, began to closely follow me on foot. She was uncomfortably
27 too close to my person, not lagging 24" behind at any given time. From what I had heard about her from our
28 children, she is a dangerous and sadistic woman. I asked her to leave me alone and to give me space.

1 I turned my cell phone camera on her. I did not know what her plans were for me. She followed
2 me around for nearly an hour through the back streets and neighborhoods of downtown Riverside. After thirty
3 minutes, I called the police, and arranged for them to meet me at a liquor store to take my report. But when I saw
4 that she had followed me, I decided to walk back to the court house and wait for the police officers to meet me there.

5 I walked in to the Family Court House on Main Street, and Crystal Turner entered a black SUV
6 driven by Plaintiff. There was no license plate on the vehicle. I walked into the courtroom and quietly asked for the
7 bailiff's assistance. It was a little after 11 am, and I indicated to him that I needed some time to locate the children
8 and arrange for safe transport. But first, I wanted to make a report to local authorities.

9 I showed him the video and he escorted me downstairs until the police pulled up to the front of the
10 courthouse.

11 I began to tell the officers about what had occurred in court and on the streets, but one of the
12 officers immediately reached for my hand bag and asked to look at my documents that were sticking out of the
13 zippered front.

14 The officer handed my bag to the other officer, who began to search it. I contested the search, and
15 the officer told me to take a seat on the front bumper of his SUV.

16 "I just want to make a report." I said repeatedly.

17 The officer grabbed me, handcuffed me tightly, and placed me into the back of his SUV. The
18 vehicle was not running and it was hot inside. The contents of my bag were placed on the hood.

19 I shouted, asking why I was being detained. The officer who handcuffed me, entered the front of
20 the SUV to turn on the air. He would not speak to me. The other officer opened the back door to obtain my consent
21 to search my bag for weapons and other illegal items. I refused, and he said that they would have to hold me. I asked
22 for what. He indicated that they were investigating a crime; the crime that I was reporting.

23 I was hindering the investigation into the crime I was reporting, yet they would not take my
24 statement, nor allow me to leave until I consented to their search. I asked what would happen if I refused. He said he
25 would have to get his Sergeant to come and release me. I wanted out of the back of the vehicle, and felt I had no
26 choice but to let them search my bag.

27 All contents were thoroughly looked through and placed on the hood of the SUV. This took place
28 in front of the court with a high volume of traffic just before lunch time. The experience was confusing, humiliating
RESPONSIVE DECLARATION TO SHERRY EVERSOLE - 5

1 and upsetting. During the search, one of the officers came across my gun permit. He made the handgun gesture with
2 his fingers and the other officer nodded with a smile.

3 The officer who had spoken to me at the door before, came back and said that they had received
4 reports that I was armed. Therefore, a search was mandatory before taking my statement, to ensure their safety.

5 I did not want to speak to him further. I told him, "It's OK." and turned away.

6 He said "What's OK? I'm doing nothing wrong."

7 I knew that there was nothing I could do but remain calm, silent, and to wait. I would give them no
8 excuse to detain me longer than necessary or to harm my person. They concluded the search of my bag, found
9 nothing of concern, and held me for nearly thirty more minutes until their Sergeant arrived.

10 A man, who I assumed was the Sergeant, opened the door to the SUV and allowed me to exit. He
11 sighed loudly when he saw how tight the handcuffs were placed on my wrists. He then released me, and asked if I
12 had anything to report. I shook my head, grabbed my bag, and walked away. I was too upset to speak.

13 I heard one of the officers mention Ms. Holcomb's name on the phone. I'm unsure if he was on
14 the phone with Attorney Holcomb, or on the phone with someone speaking of her. Either way, the exchange did not
15 take place at the police station at noon, as ordered.

16 Given what had just occurred outside of the courtroom, I feared for my safety and for the safety of
17 my children. I immediately called Texas CPS.

18 The safety and wellbeing of our children and I are compromised. We need the aid of the District
19 Attorney's office; not prosecution and separation.

20 I do not own a gun. I purchased one in Ontario, CA May of 2016, when my home was invaded.
21 This also coincided with the reports I made against the police officers for misconduct. I have submitted a detailed
22 declaration with police reports, images, and links to video of people stalking and stealing cameras from the front of
23 my residence in Rancho Cucamonga. Being a single mother, under these conditions, I felt I needed a weapon to
24 protect myself and my children.

25 However, since residing in Texas, I no longer have the weapon. Reports that I am armed, or that I
26 claim to be armed are false or fabricated.

The Petitioner sent emails to all his friends and contacts with my personal information, including date of birth, social security number, address, driver's license number, and all contact information and addresses for my immediate family.

In this email Petitioner claimed I was armed, dangerous, and mentally unstable. This is a direct threat to my safety and to the safety of our children and immediate family. He is inciting undue violence against us.

I believe that the Petitioner and his associates are indeed armed, dangerous, and more than willing to use force to apprehend and silence our children.

A true and correct copy of this email is attached as Exhibit A.

Videos and documentation to the above statements will be maintained at www.protectedpaths.com.

Dated this 7th of April, 2017.

Angelina Raylene Villa

Exhibit A

From: "Bobby Harris" <bobbydharrisiii@gmail.com>
Date: Mar 20, 2017 5:15 AM
Subject: Fwd: Angelina's Information
To:
Cc:

Hello All,

For nearly two years I've remained relatively private and silent with my situation regarding my ex wife and children but now I am asking for your help! On Friday 3/17, after almost two years of dealing with numerous false allegations presented to family court and law enforcement by my ex wife, I was FINALLY cleared and given full legal and physical custody of my children with their mom having no visitation rights. She has been extremely manipulative and emotionally abusive to our children and has been ordered to undergo psychological evaluations before being allowed to visit with our children again.

I do not intend to go into all the details, but I'm sure many of you are aware of her allegations and conspiracy theories all of which were thoroughly investigated by law enforcement and Child Protective Services in two different counties (Riverside and San Bernardino). My house was raided several times and my children were taken from me and examined by medical doctors. In addition to Law Enforcement, CPS, and medical doctors, the investigation also included a court ordered Psychologist, Court appointment supervised monitor, and court appointment Minor's Lawyer to represent our children exclusively.

During these investigations, I was allowed limited access to my children all while complying with the orders and limitations placed on me. The investigation concluded that there was NO EVIDENCE TO SUPPORT HER CLAIMS... NONE! And after nearly two years, the case was dropped. It was concluded that these allegations were fabricated by my ex and my children endured intensive coaching, manipulation, and brainwashing to help her. My children admitted to their Lawyer and to the supervised monitor that their mom would tell them what to say and that they would like to see me but "their mom won't let them"!!

I know this is difficult for many of you as some of you once supported Angelina and her allegations and fell victim to her manipulation. But quite frankly, she played on your emotional heartstrings as child abuse is a very sensitive, emotional, and heart wrenching subject. So it's either Law Enforcement in Riverside & San Bernardino county, Child Protective Services in Riverside and San Bernardino County, Riverside County Family Court, the DA's office, the court appointed psychologist, the court appointed professional supervised monitor, and the court appointed Minor's council are all working to help me get away with harming my children, or Angelina is lying... You decide.

In court on Friday she was ordered to go to her mother's house where the kids were staying and bring the kids to me by Friday at noon at the Riverside Police station. However, following court she fled and is now on the run with my children. Law enforcement in three different counties so far are looking for her and have done searches at a few family members' homes already. We are in the process of getting a national Amber Alert posted and federal agents on the case as her and my children have been MIA for over 2 days now!!!

This is extremely serious!! If you come in contact with her, please encourage her to turn herself in and seek the help that she needs. Please also encourage her to allow this to end peacefully without any harm to my children.

Below is her information as well as the information for my children and some of her family members to help us track her down.

This is her company website
<http://www.moderncourse.com>

This is her other website.
<http://www.angelinavilla.com>

Instagram Account
<https://www.instagram.com/angelinarvilla/>

Facebook
I believe she deleted this account yesterday.

She post on here regularly and a couple times since Friday. She is on the run and seeking financial assistance through her Instagram post and modern course website.

Angelina Info
NAME - ANGELINA RAYLENE VILLA (HARRIS)
MOBILE - [909-229-1463](tel:909-229-1463)
DOB - 02-11-1983
DL # - B9989343
SSN - 572-75-8330
MAKE - BMW

MODEL - 525I
LICENCE PLATE - 5UCD311

Kid's info
Malachi David Harris
DOB - 03 - 04 - 2008
Male
4' - 85 lbs

Sariah Noelle Harris
DOB - 04 - 21 - 2010
Female
4' - 70 lbs

Attached is a picture of Angelina, Malachi, and Sariah

The LA County Sheriff's and I went to her grandparents house in Carson Saturdaynight around 10PM. She was not there. Corona PD and I went to her mothers house on Friday around 4PM and Saturday around midnight and no one was there. Perhaps her mother is on the run with her as her mom was not home either of the times we went by there and we've gone pretty late at night over the past couple days. Her mother drives a green Toyota SUV (Highlander I think)

I'm pretty sure she's left the state by now, either back to Texas where she resides or somewhere else. She has family in Mexico as her Dad is mexican. They are from Michoacán, Mexico.

Family Info

Mom - Sherry Hilliard (Holden) - 1505 Lark Lane, Corona, Ca 92880 949 - 285 - 2567
Grandparents - Carl & Ivy Holden - 414 E Clarion Dr, Carson, Ca Carl - [310 - 283 - 9972](tel:310-283-9972)
Aunt- Carla Holden - [323 - 363 - 6665](tel:323-363-6665) - Lives in Hollywood
Uncle - Craig Holden [310 - 410 - 1155](tel:310-410-1155) - Lives in LA
Dad - Mark Villa & Victoria Villa - 14672 Appian Way Fontana Ca 92337 - [951-201-0093](tel:951-201-0093)

If you or anyone you know can help in anyway, please let me know. She may be armed and is definitely mentally unstable.

Thanks

--

Bobby D Harris III
[951-588-5515](tel:951-588-5515)

2 Attachments

