

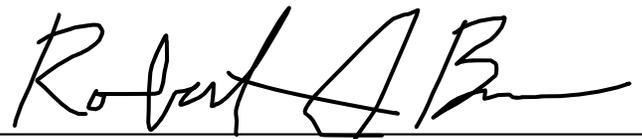
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert Julian Brown, Pro Se 2785 El Paso Way, Apt 111 Chico CA 95973 TELEPHONE NO.: 415 867 5324 FAX NO. (Optional): E-MAIL ADDRESS (Optional): rjbrown@gmail.com ATTORNEY FOR (Name):	FOR COURT USE ONLY CASE NUMBER: FDI-15-783694
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 400 McAllister Street, Room 402 MAILING ADDRESS: 400 McAllister Street, Room 402 CITY AND ZIP CODE: San Francisco CA 94102 BRANCH NAME: Unified Family Court	
PLAINTIFF/PETITIONER: Robert J Brown DEFENDANT/RESPONDENT: Eve Marie Bordoli	
<p style="text-align: center;">DECLARATION</p>	

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

Date:

Robert J Brown

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

- Attorney for Plaintiff Petitioner Defendant
 Respondent Other (Specify):

Robert J Brown - Pro Se
2785 El Paso Way, Apt 111
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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

Unified Family Court

Case Name: Brown vs. Bordoli

Case Number: FDI-15-783694

**PETITIONER'S DECLARATION IN SUPPORT OF REQUEST TO ENFORCE VIDEO
CONTACT AND ORDER IN-PERSON TIME**

Petitioner, Robert J. Brown ("Father"), appearing Pro Se, respectfully submits the following declaration:

I. BACKGROUND AND RELATIONSHIP HISTORY

I am the father of **Stella Bordoli-Brown** (DOB **April 18, 2014**), (Ex. A). I have been a constant and loving presence in Stella's life since her birth. In 2017, after a full evidentiary trial, Judge Massullo issued an 18-page decision finding that Eve, the mother, engaged in emotional abuse, gatekeeping, and alienation, and awarded me primary custody.

Over time, when Eve returned to the Bay Area, we transitioned back to a 50/50 schedule, which functioned reasonably well for several years.

Until very recently, Stella and I had an unusually close, positive relationship. Our time together was full of joy — roller skating, skateboarding, hiking, walking our dog **Rocky**, and working on creative and musical projects. We often spent time with friends, including Stella’s best friend Esme and her parents.

In early February 2025, shortly before this rupture, I captured on video a typical moment where Stella joyfully called me her “bestie” — a spontaneous, affectionate moment that captured how close we still were at that time (Ex. B).

II. FEBRUARY 26, 2025 INCIDENT

On February 26, 2025, while getting Stella ready for school at my home, she had a disproportionate outburst over a trivial issue — something I recognized as a shocking display of emotional dysregulation tied to her increasing OCD symptoms, and frankly, disturbingly reminiscent of what I had experienced when I lived with Eve. I yelled loudly in frustration, which I regret, but I de-escalated the situation quickly and got her to school safely.

On the half-hour drive to school, we talked calmly about ways to avoid similar situations in the future, but she became upset as we approached the school and lashed out again. I briefly turned the car radio up in response to her remarks, which upset her more, and I quickly turned it back down. This was not an unsafe event, but it was emotionally charged — and I immediately notified Eve by email, calling it what it was: emotional dysregulation (and noted that I regretted my harshness of tone, but was surprised by Stella's behavior).

Following this, because I was in the process of preparing to move and the house was chaotic, Eve requested that Stella stay with her for a couple of weeks, and I agreed. What I did not know was that Eve used the previous incident and the temporary visitation adjustment to exasperate the conflict — arranging for Stella to write a statement saying she did not want to live with me, so that Eve could use it in a court filing. Given Eve’s long history of undermining my relationship with Stella (as documented by this court in 2017), this was not only inappropriate but damaging, and it is not unreasonable to think it contributed to Stella's full mental breakdown which followed soon after.

III. MARCH 2025 PSYCHIATRIC CRISIS

Two weeks later, while under Eve's care, Stella experienced a severe psychiatric crisis: she threatened suicide and violence toward her mother. Police responded, and determined that Stella was in enough danger of suicide that she was to be involuntarily removed from Eve's apartment. She was placed on a 5150 psychiatric hold for nearly a week. **Eve has since refused to provide any meaningful details on the lead-up to this, or how it got so out of control that such drastic measures were necessary.**

I spoke with Stella by phone multiple times before the 5150 incident, and during and after the hospitalization. At first, our conversations were lighthearted and familiar, and it certainly seemed that the February incident was fully apologized for and behind us. Then, as Eve escalated litigation, Stella's tone grew strained and distant — an abrupt change that coincided with Eve's filings, rather than arising directly from either the February incident with me or the March incident with her mother. I got a strong indication, however, that there was something Stella was scared to tell me regarding the incident and her mother. I had gently asked what had happened that day when her tone shifted dramatically. I have not seen or spoken to her in the nearly half-year since. **Eve expects us to believe that this is entirely Stella's uninfluenced choice.**

IV. PROCEDURAL HISTORY — THREE HEARINGS

First Hearing — Emergency Order (Judge Roeca, ex parte):

Judge Roeca granted it as a tentative ruling without much input from me. The order imposed “no forced visitation” and supervised visitation.

Second Hearing — Visiting Judge:

At the next hearing before a visiting judge, the court clarified that the emergency order was no longer in effect, denied Eve's new request to change primary custody, and stated that 50/50 was “temporarily stayed” without actually clarifying how visitation was to work during this period. The court also ordered video contact — this is referred to as “previously ordered” in later hearings, but the written record is unfortunately vague.

Third Hearing — July 1, 2025 (Judge Roeca):

Judge Roeca was crystal clear: video contact must take place. He told Eve’s attorney:

“You need to encourage your client to get the child on video chats with her father.”

All of us — including Eve — had just watched Judge Roeca admonish a different parent in the case heard immediately before ours. In that case, the judge said that a parent must **require visitation** even when the child resists — even when they “scream.” This left no doubt that the court expected orders to be followed, not treated as optional based on the child’s mood. The same principle applied here: Eve was not being asked to merely “encourage” Stella, but to make sure the contact happened.

Yet when the clerk prepared the minutes, the wording was softened to:

“Mother shall encourage minor to have previously ordered video chats.”

The clerk was simply summarizing what they heard — but this wording, while perhaps innocuous to a neutral observer, created exactly the kind of loophole Eve and her attorney were waiting for. Instead of treating the judge’s statement as a directive that Eve ensure video chats take place, they seized on the watered-down language and twisted it into a mere suggestion — leaving the decision entirely to Stella, which was never the court’s intent.

I immediately complained when Eve’s attorney, tasked with writing up the orders, refused to clarify or correct the language, saying that I expected this would be exploited — and it already was in fact being exploited. (Ex. C) This was not a misunderstanding or a simple difference in interpretation; it was a deliberate, bad-faith attempt to nullify the court’s intent by Eve and her attorney. The result is that what should have been a clear order has been rendered effectively unenforceable — giving Eve license to continue blocking contact. I ask this court to restore its own authority by issuing language that leaves no room for manipulation, excuses, or further delay.

V. EVE'S CONDUCT SINCE JULY — AMBIGUITY WEAPONIZED

I repeatedly emailed Eve and her attorney asking for video contact. (Ex. D) My emails were ignored for well over a week. I had police do a wellness check, worried that something was wrong because it was incomprehensible to me that Eve would so flagrantly defy a direct court order. This seemed to encourage Eve to reply and tell me that Stella had told police that she didn't want to talk to me and that the police had surely relayed that to me. (they did not) When I very politely inquired about her interpretation of the court order, rather than answering, she complained that I was "hostile". She eventually said Stella could text or call me on her iPad at any time, and that I could call her, but that Eve would not required her to either reach out to me nor to answer. I tried calling once to no answer, but made clear to Eve and her attorney that I would not be burdening Stella with that decision given her fragile state, especially given that it was clear to me that the court order was for video chat and was not optional.

This is not facilitation. It is abdication. It shifts the entire emotional burden to Stella, who is living under one parent's influence, and predictably results in silence.

Eve seems to expect that the court is naive enough to believe her word that she is truly encouraging Stella Eve has made the extraordinary choice to spend large sums of money litigating to restrict my contact. That choice speaks louder than her claims that she is encouraging Stella's relationship with me. All the more so given her long history of gatekeeping and alienation that is well documented by this court.

As a result, there has been no video contact whatsoever, despite my repeated requests. Neither Eve nor her attorney would answer my question about their interpretation of the court order. I eventually (starting a full month after the hearing) had mostly sporadic, stilted texts from Stella — “Hi,” “ok,” “huh?” “cool,” etc, sometimes days apart — which Eve herself submitted as evidence. This is not meaningful contact. I can't even tell if she gets a joke or understands what I am saying. While it is clear from the texts that Stella is not afraid of me, it honestly does not feel like I am communicating with the Stella I know. And I don't feel that I can be pushy that Stella actually hold a real conversation of the type I am used to with her, lest I push her away and don't hear from her for another week. It is not a substitute for seeing and talking to one another. It is not a substitute for my being able to share graphic things (such as games and images I make) with her, teach her things, let her see Rocky, and so on. It is awkward and difficult, and Eve clearly prefers that. Stella typically leaves text conversations without saying goodbye, as if she has been cut off by her mother.

VI. EDUCATION, TEACHING, AND PARENTING CONTRAST

This pattern — Eve refusing to require Stella to do anything she does not want to do — has shown up in Stella's education for years. It began long before second grade, when teachers started reporting Stella was falling behind, and can be seen clearly in Eve's own words during the 2017 custody evaluation when Stella was only 2.

At that time, I had built an app called **GlowTunes** — a colorful music-learning program where Stella could play piano along with her favorite pop songs by following colored notes superimposed over music videos. It uses a color coded “piano roll” style notation rather than traditional sheet music, which is much easier for young children to follow. Stella loved this app and used it extensively at my house to play along with or just visualize music, starting at age 2. It gave her joy, encouraged her love of music, and kept her engaged for years.

Rather than celebrating this, Eve submitted the following statement to the custody evaluator:
(Ex. E)

I'm a trained speech language pathologist and musician. I have two Master's degrees, one in music and one in speech language pathology. I have been a teacher most of my

adult life. I find it rather disturbing that Rob's latest project is developing a computer program that is designed to effectively replace everything I have done with my professional life (teaching children language and music) with everything Rob has done with his professional life (computer programming). It may be that it's a worthwhile project, and it may result in the financial stability that Rob promises. It just strikes me as Rob's expression of his desire to cut me out completely, make me irrelevant, and perform all the necessary functions in Stella's life himself, free from any input from any other source, least of all me. In Rob's world, he is the ultimate authority. He listens to NO ONE, cooperates with no one, and compromises with no one. Rob also believes that the current music notation developed hundreds of years ago should not be the way it is, but a better way, his way, and that everyone would love it if only they could understand his ideas. This project sounds like Rob's ideal solution: he creates it, he operates, and he literally switches it on and off. That's how it was in our marriage. I can only hope that's not how he is as a parent.

This statement shows more than Eve's deep hostility toward my attempts to give Stella a creative, modern, and engaging way to learn music. Eve did not support GlowTunes — not because it was harmful to Stella (it obviously wasn't) - but because she resented that it was my project. She even attempted to portray it as a sign of my supposed controlling nature, rather than a father giving his daughter a joyful, productive way to engage with music.

Ironically, despite Eve's love of traditional music notation and long history as a kid's music teacher, Stella still can't read sheet music at all -- she can't even identify middle C on the staff -- because, again, Eve won't push Stella in the slightest. I have always encouraged Stella's learning — not just in music, but in academics — and built tools like GlowTunes to make that learning fun. Eve has consistently downplayed and undermined these efforts, even when Stella clearly benefits from them.

This history underscores a broader pattern: when I try to support Stella's growth, Eve views it as competition or a threat, rather than a benefit. Stella repeatedly told me that her mother hated that I built GlowTunes and regularly denigrated it. Eve's hostility to my efforts to teach and support Stella has not stopped with music — it continues in her schoolwork to this day.

By second grade, teachers were telling us that Stella was falling behind badly. In October 2022, I emailed Stella's teacher, Ms. Anita Piccetti, thanking her for her efforts, offering to monitor Stella's homework, and explicitly saying that if Eve was interfering or second-guessing her, she should tell me so I could handle it delicately. Ms. Piccetti responded: (Ex. F)

“Yes, I have definitely been targeted both through email and face-to-face contact with Eve about not pushing Stella out of her comfort zone. [the above statement about Eve interfering and second guessing her] really resonated with me.”

This shows that Eve has been actively interfering with Stella's education — lobbying the teacher not to “push” Stella. (Even I was surprised that the teacher used a term as strong as “targeted.”) Meanwhile, I have been the parent consistently trying to engage with the school, encourage Stella, and hold her accountable.

I repeatedly asked Eve to allow me to tutor Stella over video chat to help her stay on track during her time at Eve's. Eve has refused to set it up, so it doesn't happen, and she has never explained why — even when I asked her directly at a meeting with the principal about Stella's disappointing progress. Stella had previously done video chat with the remote parent at each household, but Eve now only allows voice calls and unilaterally decided I could no longer use video chat. I should note that Eve is a singer and often sings to Stella during voice calls, while I am skilled at graphics and have long made graphical educational games, so it seems unsurprising that Eve would want to disadvantage me. **It has always seemed that Eve would prefer Stella learn nothing than learn from me.**

The result: Stella does the bare minimum, falls behind, and then I am painted as “too strict” when I insist that she work harder. This dynamic also helps explain why Stella may have been easier to turn against me during this litigation. Eve shields her from discomfort, while I provide expectations and accountability. I am not harsh — I am fun, creative, and loving — but I do require respect, effort, and kindness.

When Stella lashes out or is cruel (behavior this court heard regarding the incident in February), I gently insist that she stop and make amends, with the single exception when I lost my temper and yelled. Eve’s approach is to excuse and coddle, which only reinforces avoidance. And I have to wonder: if Eve has such difficulty requiring things of Stella, did that contribute to a situation where she needed police to intervene to stop Stella from harming herself?

This gap in parenting styles means that the more my role is sidelined, the more Stella is rewarded for avoidance — academically, emotionally, and now relationally.

VII. PATTERN CONFIRMED BY THIRD PARTIES

This is not just my perspective.

Kira Cuneo, who knew Eve since they were both toddlers and was Eve's best friend through most of their lives, described Eve as having a temper, a “fear of everything,” and a chronic mean streak. She said Eve “makes me feel small,” “talks behind people’s backs,” and even “ordered Rob around like a child.” Kira recalled seeing a bruise on my arm at my wedding and believing I was covering for Eve, which I was following her violent attack on me.

Ellen Simon, Kira’s mother who also knew Eve for as many years, confirmed that Eve has been anxious since childhood and that anxiety runs in the family. (Ex. G)

Stella is now showing signs of inheriting this anxiety (her OCD which has become extreme), along with the more recent emotional dysregulation and oppositional behavior. Continuing to exclude me from her life will only reinforce those patterns and make things worse.

VIII. RELATIONSHIP WITH HER GRANDMOTHER

Recently, my 94 year old mother, who is currently in hospice, went to great effort and expense to send Stella a beautiful necklace with a star (for "Stella") as gift. It was never delivered to her, despite FedEx, the jeweler, and others making numerous attempts via various means, but being rejected. It was eventually returned to my mother, who was deeply hurt, while also fearing she will never speak with her granddaughter again.

I believe this sort of thing will haunt Stella in later years. It has never been her way to show such lack of empathy, and it concerns me the effect it will have on her.

IX. HARM TO STELLA

The harm from this extended cutoff is profound. Stella has gone from a child who called me her “bestie” and told me she loves me multiple times a day, to a child who barely responds to a text. This was not a gradual drifting apart — it was a sudden rupture coinciding with litigation and Eve’s refusal to enforce contact.

This breakdown is hurting Stella academically, emotionally, and psychologically. She needs to know she is safe with both parents, and that she cannot simply opt out of one relationship because it feels easier, or because it reduces conflict with her mother.

VII. REQUESTED RELIEF

Because the July 1 ruling has effectively been nullified by vague wording and Eve’s deliberate exploitation of that ambiguity, I am asking this court to issue fresh, unambiguous orders that cannot be twisted or treated as optional. To repair the harm and restore the court’s clear intent, I respectfully request:

- **A. Clarify and Enforce Video Chats** – Set a specific, recurring schedule (at least twice per week, 30 minutes minimum) with language that cannot be reduced to a mere suggestion. Make clear that Eve must ensure Stella participates — not merely “encourage” — and must facilitate the logistics: a stable device, quiet space, no parallel activities, and timely start and end.
- **B. In-Person Reunification** – Order regular park/outdoor visits in San Francisco or Chico. Eve may observe from a distance if she chooses; trusted mutual acquaintances (such as long-time friend Vivian, whom Eve knows and texts every Thanksgiving about Stella’s food allergies) can help facilitate. Gradual progression to overnights/weekends, starting with Thanksgiving and winter break. **This process should begin immediately and should not be delayed until after family therapy or minors’ counsel interviews — Stella needs to be safely reintroduced to me now, not months from now. Reunification must not be contingent on family therapy or minors’ counsel input — those processes can proceed in parallel, but cannot be used to justify further delay.**
- **C. Address Gatekeeping/Noncompliance** – Recognize the misuse of ambiguity, Eve’s refusal to clarify orders, and her practice of placing the choice on the child. Require that orders be clarified on the record during the hearing so that ambiguity cannot be exploited. Provide guidance or sanctions as needed to ensure compliance going forward.
- **D. Require Eve to Provide the Police Report of March 15 Incident** – The details of what happened that day remain hidden from me. The court should compel disclosure of the police report and any related records so that all parties understand what occurred and why such a serious psychiatric hold was necessary. **The police determined Stella was in danger of harming herself if she remained at her mother’s home — knowing exactly what led to that conclusion is essential to understanding her current risk and to protecting her moving forward.**

- **E. Acknowledge Strategic Use of Minors' Counsel** – During a phone call with Eve's attorney, she stated clearly that their plan was to limit Stella's contact with me until she had spoken to minors' counsel, so that counsel would hear Stella's alienated statements without the benefit of renewed, positive contact. I was surprised to hear her say "the quiet part out loud." I raised this point in open court, and although Eve's attorney denied it, I stand by what I heard. **Eve's actions since then are entirely consistent with this strategy.** I ask the court to ensure that minors' counsel is not used as a pretext to prolong the cutoff or to reward Eve's noncompliance. **The court should make clear that Stella's relationship with me is presumed beneficial and must be actively supported while minors' counsel gathers input.**

VIII. CONCLUSION

This court has already seen this pattern once before, in 2017, and called it out in exceptionally strong words. Then, decisive action by the court allowed Stella to thrive and become a happy, secure child.

But today, we are again at a breaking point — and the stakes are even higher. Stella recently had to be hospitalized and placed on a 5150 hold because of the risk of self harm, and her threats to harm others. Let's not mince words: 10 year old Stella attempted suicide. That crisis happened in Eve's home. Ever since the phone call I got late that night from a hospital nurse, every single time my phone rings, I get a lump in my throat, fearing it could be a call telling me that my daughter has done something irreversible.

I do not believe this fear is exaggerated or hypothetical — the police determined that Stella was at risk of harming herself if she remained at her mother's, and that is why she was confined. That danger has not gone away. Stella is still being exposed to, and torn apart by, her mother's misguided and shameful attempts to sever Stella's relationship with me, and I am completely unable to provide balance.

Watching my once-loving daughter turn against me so suddenly, after years of closeness, has been devastating. Watching her unravel as her mother once again uses her as a pawn in her never-ending war on me is utterly heartbreaking. The stress has taken a physical toll on me — I have struggled to function, and even preparing these filings has been overwhelming. But I am here because I cannot sit back and watch Stella slip further and further away, emotionally and literally, from being the joyful child with a promising future that I know and love.

Eve's behavior is not co-parenting. It is obstruction and avoidance, and it is causing real harm. Stella needs this court to act — not months from now, but now. She needs structure, connection, and the assurance that she is not allowed to sever ties with one parent in order to avoid conflict with the other. She needs both parents in her life if she is to recover and have a healthy future. **The best interest of the child standard cannot be met while one parent is allowed to unilaterally control contact; Stella's welfare requires that her relationship with me be restored and protected.**

For Stella's sake, I am asking this court to cut through the delays, enforce its own orders, and give my daughter back the chance to have both of her parents in her life.

X. LIST OF EXHIBITS

Exhibit	Description
A	Recent photo of Stella (December 2024), showing the child at the heart of this case
B	Early February 2025 “Bestie” Video Still – shows Stella’s affectionate relationship with me shortly before the cutoff.
C	Email Exchange with Attorney Regarding Orders (Encourage Language) – documents my immediate objection and Eve’s lawyer’s refusal to clarify.
D	Email Log to Eve – Requests for Video Contact – demonstrates my repeated attempts to restore communication after July 1.
E	2017 Custody Evaluation – GlowTunes Statement – Eve’s statement showing her hostility toward my educational efforts.
F	October 2022 Teacher Email (“Targeted” Comment) – Ms. Piccetti confirms Eve’s interference with Stella’s education.
G	Kira Cuneo & Ellen Simon Statements – corroborate Eve’s lifelong anxiety and pattern of controlling, gatekeeping behavior.

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

Executed on this 1st day of September, 2025, at Chico, California.



Robert J. Brown, Petitioner Pro Se

Exhibit A

Recent photo of Stella (December 2024), showing the child at the heart of this case



Exhibit B

Early February 2025 “Bestie” Video Still



Exhibit C

Email Exchange with Attorney Regarding Orders (Encourage Language)

In re Marriage of Brown and Bordoli
Attachment to Findings and Order

1. The 50/50 parenting schedule is temporarily stayed while the parties participate in Family Systems therapy.
2. Frank W. Davis, Jr. PHD is court appointed to work with the parties for family systems therapy.
3. The court will appoint a child's attorney in this matter and reserves jurisdiction to re-allocate said attorney's cost to the parties.
4. Father shall file an Income and Expense Declaration prior to the next hearing.
5. Mother shall encourage the minor to have contact with her Father.
6. Father and Ms. Steffenson will contact Dr. Rocha to have a joint phone call with Dr. Rocha for an update on the child, so that they can provide this court with an update as to the child.
7. The parties shall provide one updated declaration to this court prior to the next hearing.
8. Mother's attorney shall prepare the order after hearing.



rob brown <rjbrown@gmail.com>
to Kimberly ▾

Wed, Jul 2, 11:10 PM



Reply



Hi Kim, prior to signing this I'd like to expand on this item to better capture what the court said. I hope you understand why I want to be careful that what Judge Roeca said is honored in letter and especially spirit.

Mother shall encourage the minor to have contact with her Father.

Forgive me for being careful, but I don't want to leave a loophole where Eve can say she "encouraged" Stella but that Stella didn't want to. I interpreted the judge to be quite emphatic that Stella needs to be in contact with me, via video chat and otherwise, and that it is Eve's responsibility. (maybe it isn't directly relevant, but as you surely heard, he clearly elaborated on that even further with the case that preceded ours where the mother said she "refused" to do so... i.e. the judge clarified that the mother needs to make it happen) Whether we put it in the order with stronger language, or you get something in email from Eve assuring me that

she is going to truly encourage her, support it, have it continual rather than just a couple times, and that Stella is told that it is a requirement from the court and it is in her interest. I would also like to see Stella when she is in Chico, and I am open to something that includes Eve (*). I would hope that Eve will be communicative with me about her plans to be in Chico. I will not show up unannounced, of course, but I think that if she is in Chico, and Eve wants to show that she is acting in good faith to encourage contact, I think she should tell me and work with me to see her.

We can keep the order short and to the point if we can agree, via email, that this is what we are agreeing to.

I will email you shortly with some more concrete suggestions for how we can move forward on various things. I hope we can do it cordially and without an adversarial tone. Obviously I was very upset I hadn't been allowed access to Stella since the last hearing. I'm sorry if I misheard or misinterpreted you in our previous call, I certainly didn't intentionally misrepresent your words. I will accept that that is not what you meant, while hoping that your and Eve's actions, going forward, speak to that.

In the meantime, let's clarify the part about Stella and me being in contact so we can get it underway. A suggestion might be "Mother will encourage and promote the minor's relationship with her Father, and will arrange for her to regularly participate in video chats with him, have her watch any videos he sends, and to see him in person especially when and if she visits Chico".

Is Eve expected to sign this?

thanks
rob

* in october 2017, a few months after our trial, the 3 of us visited a pumpkin patch near yuba city together. I thought it was a very positive experience, significantly reduced tensions, and was very good and reassuring for Stella. I suggest something along those lines. I hope you will encourage Eve to agree to something along these lines.

Objections to proposed order after hearing

Inbox x eve x



rob brown <rjbrown@gmail.com>
to Eve, Kimberly, Kathy ▾

Jul 8, 2025, 1:06 PM



← Reply



Eve and Kim,

In the spirit of transparency, I wanted to let the two of you know that, in the absence of some form of assurance and some concrete progress of putting Stella in contact with me, I will be objecting to the orders as proposed by Kim, under rule 5.125 (https://courts.ca.gov/cms/rules/index/five/rule5_125).

This is my draft, I expect to file it (or something similar to it) this Thursday unless I see significant progress.

Thanks,
rob

Robert J. Brown – Respondent, In Pro Per

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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

**Unified Family Court – Case No. FDI-15-783694
Brown v. Bordoli**

**Declaration of Robert J. Brown
in Support of Proposed Order After Hearing**

1. I appeared at the hearing on **June 28, 2025**, regarding temporary custody issues. At the close of that hearing, the Court instructed Mother’s counsel to prepare a written “Order After Hearing.”
2. Mother’s counsel (Kim Steffenson) subsequently provided me with a draft order. I do not believe that draft accurately captures the Court’s intent, particularly as to communication between Stella and me. Its wording is vague and open to being undermined.
3. Judge Roeca stated that Stella *must* have ongoing, meaningful contact with me. He voiced concern about parents who claim they merely “encouraged” contact while allowing it to fail. His remarks placed responsibility on the *parent*, not the child.
4. The word “encourage” was used in reference to *Ms. Steffenson encouraging her client* to ensure contact. It was not intended to leave the decision entirely to an 11-year-old.
5. Ms. Steffenson’s draft order contains only the phrase “Mother shall encourage the minor to have contact with her Father.” Mother’s counsel has now asserted in writing that her client has **already** satisfied that obligation, despite Stella and I having **no contact for over a month** after the hearing.
6. A prior hearing in early May 27, 2025, before visiting judge Marjorie Slabach, addressed a similar issue. That judge made it clear that the emergency order temporarily suspending visitation — particularly the “no forced visitation” language — was no longer in effect. She expressed

discomfort with that phrasing, noting that parents routinely require their children to do things such as attend school or medical appointments, and that this is not considered “forcing.” She indicated Stella should be communicating with me even if she was reluctant, as might be expected under the current situation.

7. Notwithstanding two separate judges’ comments, Mother has failed to ensure contact and now claims past efforts are sufficient. This pattern mirrors findings in the Court’s July 25, 2017 Final Statement of Decision that Mother has historically impeded my relationship with Stella.
8. I have submitted a *Proposed Order After Hearing* (attached as **Exhibit A**) that faithfully incorporates the Court’s directives while clarifying Mother’s duty to *facilitate* regular video calls and reasonable in-person time when Stella is in Chico.
9. I am not introducing new relief; I am asking that the written order align with the Court’s expressed intent and protect Stella’s best interests by preventing further evasive conduct.
10. A true and correct copy of Ms. Steffenson’s July 6, 2025 email, in which she claims her client has already complied, is attached as **Exhibit B**. My July 8, 2025 follow-up email to Mother, attempting to establish a video-chat schedule, is attached as **Exhibit C**.
11. I respectfully request that the Court adopt Exhibit A in place of Mother’s counsel’s draft.
12. I am prepared to provide additional documentation or testify further if the Court deems it necessary.

Exhibits:

A	Proposed Order After Hearing (submitted for signature)
B	Email from Kim Steffenson to Robert Brown – July 6, 2025
C	Email from Robert Brown to Eve Bordoli – July 8, 2025

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

Dated: July ____, 2025, at Chico, California.

Robert J. Brown, Respondent Pro Se

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

Unified Family Court – Case No. FDI-15-783694

Brown v. Bordoli

Proposed Order After Hearing

Date of Hearing: June 28, 2025

Department: Unified Family Court

Judge: Hon. Richard Roeca

1. The existing 50/50 parenting schedule is temporarily stayed while the parties participate in Family Systems therapy.
2. Frank W. Davis, Jr., Ph.D., is appointed by the Court to work with the parties for Family Systems therapy.
3. The Court will appoint a child's attorney in this matter and reserves jurisdiction to reallocate the cost of said attorney between the parties.
4. Father shall file a current Income and Expense Declaration prior to the next hearing.
5. **Mother shall ensure that the minor child maintains regular and meaningful contact with her Father, including but not limited to video calls several times per week and in-person time during visits to Chico when reasonably possible.** Mother shall not leave the decision entirely to the child or take actions that discourage such contact.¹
6. Father and Ms. Steffenson shall arrange a joint telephone call with Dr. Rocha to obtain an update on the child, and shall provide that update to the Court.
7. The parties shall each submit one updated declaration to the Court prior to the next hearing date.
8. This Proposed Order is submitted by Respondent due to disagreement with the version prepared by Petitioner's counsel; Respondent believes this version more accurately reflects the substance and spirit of the Court's oral ruling.

¹ At the June 28, 2025 hearing Judge Roeca stated that Ms. Steffenson should *encourage her client* to ensure Stella has contact with Father and expressly rejected situations where a parent claims to have "encouraged" contact yet allows it to fail. This language therefore requires Mother to *facilitate* actual, ongoing communication, consistent with the Court's remarks.

Dated: July ___, 2025



Kimberly Steffenson <kim@kimbe... Jul 14, 2025, 3:31 PM



Reply



to me, Kathy, Eve ▾

You can get the minutes from the court. -Kim

From: rob brown <rjbrown@gmail.com>

Sent: Wednesday, July 9, 2025 5:21 PM

To: Kimberly Steffenson <kim@kimberlysteffenson.com>

Cc: Kathy Helm <kathy@kimberlysteffenson.com>; Eve Marie Bordoli <evemariebordoli@gmail.com>



Kimberly Steffenson <kim@k... Jul 16, 2025, 8:23 AM



Reply



to me, Kathy, Eve ▾

I will take out the previously ordered.

-Kim

From: rob brown <rjbrown@gmail.com>

Sent: Thursday, July 10, 2025 6:38 PM

To: Kimberly Steffenson <kim@kimberlysteffenson.com>

Cc: Kathy Helm <kathy@kimberlysteffenson.com>; Eve Marie Bordoli <evemariebordoli@gmail.com>

Subject: Re: Objections to proposed order after hearing

Kim,

Would you send the minutes so I can see how closely your proposed order matches the words from the judge? I remain confused as to what you mean by "previously ordered video chat". It seems like if you are acknowledging that it was ordered, it would be listed as that, an order. If it was ordered by the previous judge, it should have been listed in your previous proposed order.

In re Marriage of Brown and Bordoli
Attachment to Findings and Order

1. Mother's request for sole legal and physical custody is denied.
2. The 50/50 parenting schedule is temporarily stayed while the parties participate in Family Systems therapy.
3. The parties shall exchange a list of three (each) potential family therapists and choose one

no later than June 17, 2025.

4. The parties shall meet and confer as to a minor's counsel prior to the next court hearing.
5. The parties shall each file and exchange an updated Income & Expense Declaration and a declaration describing the current medical status of the child by June 17, 2025.
6. The hearing shall be continued to July 1, 2025, at 9:00 in Dept. 403 to determine 1) the share of the costs of the family therapist, 2) the filing of an order appointing the chosen therapist, 3) the question of whether the parents can afford an appointed minor's counsel,

Exhibit D

Email Log to Eve – Requests for Video Contact

Contact with Stella 🗨️ eve x



rob brown <rjbrown@gmail.com>
to Eve ▾

Mon, Jul 7, 5:32 PM



Reply



Hi Eve,

I wanted to follow up after last week's hearing. It seemed clear from the court's comments -- and your responses at the time -- that there was agreement that Stella should be having contact with me, especially through video chat while we're apart. Judge Roeca was very direct on this point, and I hope you'll agree it's important for all of us to act in the spirit of what he said, not just the letter.

As you know, I now live in Chico, specifically because you come here regularly (it was intended to bring stability by offering you the chance to return to your hometown and allow Stella to be near her grandmother and uncle), and I would really appreciate it if you'd let me know in advance when you plan to bring Stella. I won't ever show up unannounced, but I do think it would be healthy and helpful for Stella to see me in person during those visits -- and I'm absolutely open to including you in that time if that makes it easier for her.

In terms of regular contact, I'd like to propose that we set up a short nightly video chat, even just 10-15 minutes. I want to keep things low-pressure for Stella, so my plan is to mostly focus on tutoring and helping her get closer to grade level in the things where she is behind, as well as music, etc. I've noticed when we last talked that she's been quiet and hesitant, and I understand that this whole situation has been hard on her. But I also believe it's been made more awkward than it needs to be -- and I think having something concrete to talk about (like academics) will make it easier.

If you're okay with that plan, I'd like to get it going as soon as possible. If you're not okay with that plan, or want to propose something else, please let me know right away. I'm hoping we can resolve this quickly and cooperatively without further court involvement, but if I don't hear from you within the next few days, I will need to submit a competing order and let the court review the situation.

Thanks,
Rob

← Reply

→ Forward



Request for video chat with Stella today 🗨️ eve x



rob brown <rjbrown@gmail.com>
to Eve ▾

Wed, Jul 9, 12:43 PM



Reply



I have asked repeatedly and have not heard back. While I will ask regularly, please consider this a standing request. I would like to speak with her daily on video chat as Judge Roeca

into a standing request. I would like to speak with her daily, on video chat as Judge Roeca said.

My understanding is that you were to make it happen, even if Stella is reluctant. The awkwardness of the situation makes it understandable that she would be. I consider it your responsibility to help alleviate that on your end, and to make the content happen.

Thank you.

-rob

 Reply  Forward 

Request to video chat with Stella eve x



rob brown <rjbrown@gmail.com>

Jul 10, 2025, 2:27 PM



 Reply



to Eve ▾

I have asked repeatedly and have not heard back. While I will ask regularly, please consider this a standing request. I would like to speak with her daily, on video chat as Judge Roeca said.

Kim noted in her proposed amendment of the orders that video chat was "previously ordered". She notes that a new order is that you "encourage" her to, but that is on top of the fact that the video chat itself is ordered.

Thank you.

-rob

 Reply  Forward 

court order IS still being aetiea inbox x eve x   



rob brown <rjbrown@gmail.com>

Jul 11, 2025, 3:01 PM



Reply



to Kimberly, Kathy, Eve ▾

I have not heard a reply from Eve on my being in contact with Stella.

I am extremely worried Stella is in a dangerous situation. I can't imagine that Eve thinks this is a good idea, given that it is in blatant disregard / defiance of a court order that everyone knows exists (regardless of how it is written up). Not even replying, for days on end, is even more concerning.... it appears to me to be reckless and I am concerned Stella is in danger.

I worry that something else is going on. Stella's suicide attempt (or "threat of self harm" or however you want to water it down) was during a period where she was under similar pressure and control.

Please tell me Stella's status, where she is so I can have police do a wellness check, and, obviously, my request for video chat remains in effect.

-rob



Eve Marie Bordoli <evemariebordol... Jul 11, 2025, 4:12 PM



Reply



to me, Kimberly, Kathy ▾

Hi Rob,

A Burlingame police officer came this afternoon, prior to your email being sent, to do a wellness check. It is my understanding that he has told you that Stella is okay and healthy. It is also my understanding that Stella told the police officer that she does not want to speak with you.

Eve



Eve Marie Bordoli eve@evemarieb... Jul 11, 2025, 8:41 PM



Reply



to me, Kimberly, Kathy ▾

Hi Rob,

I've been encouraging Stella to communicate with you, and each time she refuses. I will be sure to let you know when that changes.

Eve



rob brown <rjbrown@gmail.com>

Jul 11, 2025, 9:11 PM



Reply



to Eve, Kimberly, Kathy ▾

Hi Eve,

Thanks for your note just now. I want to make sure I understand your position correctly -- and I think it's important the court does too. It appeared to me, in court, that you were agreeable to things that you no longer seem to agree to.

I will need to file something Monday, unless something changes dramatically between now and then.

I had just drafted some clarifying questions before your reply came in. Since we're clearly still not in agreement on what's required, I'd appreciate direct answers to each. That way, when I respond to the court -- whether with an objection or a request for further orders -- I can accurately represent your position. I expect to file this entire thread as an exhibit.

(and if your position has been misunderstood by me, you can correct it here)

1. Do you believe that the court order requires you to **require** Stella to do the video chats -- regardless of her wishes?
Or do you believe that merely "encouraging" her is sufficient?
2. Why have you not gotten her on a video chat with me yet?
3. Do you agree that parents are often expected to require things of their children -- such as going to school or to the doctor -- even when the child resists?
And that being able to do so is part of a parent's responsibility?
4. If I send short videos -- e.g., of Rocky at the bidwell park creek, or of my new place and her room here, of she and I doing fun things in the past -- would you show them to Stella in a positive and encouraging way?
5. Are you open to my having in-person visits with Stella? If so, under what circumstances?

Thanks,
rob



Eve Marie Bordoli <evemariebord... Jul 16, 2025, 11:51 AM



Reply



to me, Kimberly, Kathy ▾

Hi Rob,

If you want to send me cordial messages I can respond.

I will not respond to your hostile messages.

Eve



rob brown <rjbrown@gmail.com>

Jul 16, 2025, 12:06 PM



Reply





to Eve, Kimberly, Kathy ▾

I apologize if the message came off as hostile. I have sent several messages over the course of a week and a half regarding communication, and I think it is factual that the court order is being defied, and I think my questions are reasonable. I am looking at the message I am responding to, and not seeing the hostility other than stating my position firmly and requesting you clarify yours.

If there is something in particular that you think is hostile, let me know and I will do my best to avoid that in the future.

This is my message from 9 days ago, which I think was extremely polite. There was no reply.

Hi Eve,

I wanted to follow up after last week's hearing. It seemed clear from the court's comments -- and your responses at the time -- that there was agreement that Stella should be having contact with me, especially through video chat while we're apart. Judge Roeca was very direct on this point, and I hope you'll agree it's important for all of us to act in the spirit of what he said, not just the letter.

As you know, I now live in Chico, specifically because you come here regularly (it was intended to bring stability by offering you the chance to return to your hometown and allow Stella to be near her grandmother and uncle), and I would really appreciate it if you'd let me know in advance when you plan to bring Stella. I won't ever show up unannounced, but I do think it would be healthy and helpful for Stella to see me in person during those visits -- and I'm absolutely open to including you in that time if that makes it easier for her.

In terms of regular contact, I'd like to propose that we set up a short nightly video chat, even just 10-15 minutes. I want to keep things low-pressure for Stella, so my plan is to mostly focus on tutoring and helping her get closer to grade level in the things where she is behind, as well as music, etc. I've noticed when we last talked that she's been quiet and hesitant, and I understand that this whole situation has been hard on her. But I also believe it's been made more awkward than it needs to be -- and I think having something concrete to talk about (like academics) will make it easier.

If you're okay with that plan, I'd like to get it going as soon as possible. If you're not okay with that plan, or want to propose something else, please let me know right away. I'm hoping we can resolve this quickly and cooperatively without further court involvement, but if I don't hear from you within the next few days, I will need to submit a competing order and let the court review the situation.

Thanks,
Rob

I'd appreciate if you'd respond to the proposals in that email, as well as the questions I asked in the email you are replying to. If you wish to just jump to the last two, which are uncontroversially polite, that's ok for now.

1. If I send short videos -- e.g., of Rocky at the bidwell park creek, or of my new place and her room here, of she and I doing fun things in the past -- would you show them to Stella in a positive and encouraging way?
2. Are you open to my having in-person visits with Stella? If so, under what circumstances?

Would you mind answering them?

Thank you.

Communication with Stella



Inbox x

eve x



Eve Marie Bordoli <evemariebordo... Jul 15, 2025, 6:35 PM



Reply



to me, Kimberly, Kathy ▾

Hi Rob,

Stella has a Google Voice account she can use on her iPad, any time she wants to contact you, and you can contact her there as well!

I have encouraged Stella to contact you, and I have set up the means for her to communicate with you, directly, without me.

Her Google Voice number is:

(650) 260- 3572

Eve



rob brown <rjbrown@gmail.com>

Jul 15, 2025, 7:26 PM



Reply



to Eve, Kimberly, Kathy ▾

I will try tonight but the court order is for video chat which is much better for alleviating the awkwardness, so I can show her rocky, show various other things. It is already obviously very awkward for her due to the time passed and all the other things. I hope she will pick up but honestly I wouldn't if I were her.

-rob



rob brown <rjbrown@gmail.com>

Jul 15, 2025, 10:11 PM



Reply



to Kimberly, Kathy ▾

Kim and Kathy,

I am not sending this to Eve, at least not yet. I don't wish to inflame matters so I will give you first chance to advise.

Here is my position. I will NOT be a party to putting Stella in the terrible position of making this very adult decision to re-establish a relationship with me. That is unfair to her, in fact cruel.

And frankly, it is dangerous. She needs to be REQUIRED to talk to me, and via VIDEO CHAT, as per the court. Eve, as her parent, can make this easy for her. Eve should not burden an unstable child with such a thing.

Stella should never have to feel guilt for having played a part in severing a relationship with me, even if temporarily. She has already felt that guilt, after being put in a position of (coerced into? tricked into? manipulated into?) writing a statement of wanting to push me out of her life. I have plenty of reasons for thinking that this **very thing** – specifically the guilt related to it, led to her suicide attempt **just days later**. I also believe that is why it is so hard for her to talk to me right now, due to the awkwardness, due to her guilt around this.

Here are some of my reasons for thinking putting Stella in that position is directly related to her suicide attempt.

- 1) Eve has refused to tell me details of what happened
- 2) She also attacked her mom, according to the information I was given
- 3) a psychiatrist I spoke with on the phone (while she was at the hospital) said something about Stella speaking of some kind of written statement. This was before I knew about the written statement so I have had to piece together information after the fact
- 3) I know my daughter. When I did talk to her, I could hear it in her voice. She was being torn apart.

Stella is being put in a terrible position, of making decisions that will only make her feel more guilt, and make it harder for her to talk to me when she does. Sure, she can justify it now, to herself and others by just repeating what her mom has said about me.

And yes, on the latter, she's been hearing this stuff since she was old enough to understand language. (see attached pdf, of Dr. Ryan Turner describing what Stella was hearing (yes, she was right there) when she was just old enough to understand spoken sentences. ("For the first 20 minutes mom went off on multiple small nonmedical issues related to her custody battle Mom continued to talk about her custody battle and that there is concern for patient's welfare. Told mom that I am focusing on the patient's medical care")

When she was 2, she was being checked out by an emergency room for supposed sexual abuse, which she knew was not happening but as a legal strategy. Her pediatrician described Eve's behavior as despicable. (see attached: "Everyone who has seen Eve not impressed with mom's allegations. Dad trying hard but getting allegations of child abuse -- it's despicable")

When Stella was four, she told me about her mother photographing her privates. She understood very well that it was because she knew her mother was building a case against me and that it was a secret. Imagine what she was thinking.

Forcing Stella into the position of feeling the weight of responsibility for trying to sever a relationship is simply cruel. I will not play this game with the mind of a vulnerable, conflicted, fragile child who we all know is a suicide risk.

Secondly, the court explicitly ordered video chat. Video chat will be easier for Stella because we don't have to talk about awkward subjects, we can just hang out, enjoy the dog, etc. In fact, we could even have a "no talking rule" for the first chat. We can do staring contests. Anything to make it easier and more fun

anything to make it easier and more fun.

I am insisting that Eve follow the court order. She and I can decide the time in advance, and we will do video chat. Eve will set it up, tell her I'm on, etc, just as she does when she does video therapy. She can be told that needs to do it because it is a court order and that it is decided that it is best for her. She does not need to be told that I am demanding it, she does not need to be told it is her option to not do it.

I hope you advise her of this, whether you think it is a good legal strategy to not anger the court, or because it is the right thing to do.

I will inform Eve of this tomorrow if I do not hear back from you first. I would prefer you tell her that she must put Stella on video chat (as she seems to be able to do for her medical appointments) and that she must NOT burden Stella with this decision. (if she doesn't want to put Stella on video because it will reveal she is in Chico, I already know this, I'm not dumb)

I can and will make this case to the court if I must. If I must, I am confident it will only be one more datapoint the court will have, strongly suggesting that Eve is not capable of being a primary decision maker for Stella.

thanks,
rob

rocky in chico video for Stella



eve x



rob brown <rjbrown@gmail.com>

Sun, Jul 13, 7:22 PM



Reply



to Eve ▾

Eve please show this to Stella thanks.

Hi Stella!

Rocky is doing well and gets at least 4 miles of walks a day. He's far less reactive than he used to be, and we practice walking with him off leash when it is safe to (I am very vigilant about other dogs)..... he does it really well and stays right beside me.

He loves swimming in Big Chico creek in bidwell park, which is really fun and perfect temperature for wading in.

By the way he misses you and gets excited and jumps in my lap if a video of you is on the computer.

<https://www.youtube.com/watch?v=BLbcNbjsf74>

Love you...
Dad



← Reply

→ Forward



Exhibit E

2017 Custody Evaluation – GlowTunes Statement (and photo of app)

I'm a trained speech language pathologist and musician. I have two Master's degrees, one in music and one in speech language pathology. I have been a teacher most of my adult life. I find it rather disturbing that Rob's latest project is developing a computer program that is designed to effectively replace everything I have done with my professional life (teaching children language and music) with everything Rob has done with his professional life (computer programming). It may be that it's a worthwhile project, and it may result in the financial stability that Rob promises. It just strikes me as Rob's expression of his desire to cut me out completely, make me irrelevant, and perform all the necessary functions in Stella's life himself, free from any input from any other source, least of all me. In Rob's world, he is the ultimate authority. He listens to NO ONE, cooperates with no one, and compromises with no one. Rob also believes that the current music notation developed hundreds of years ago should not be the way it is, but a

better way, his way, and that everyone would love it if only they could understand his ideas. This project sounds like Rob's ideal solution: he creates it, he operates, and he literally switches it on and off. That's how it was in our marriage. I can only hope that's not how he is as a parent.

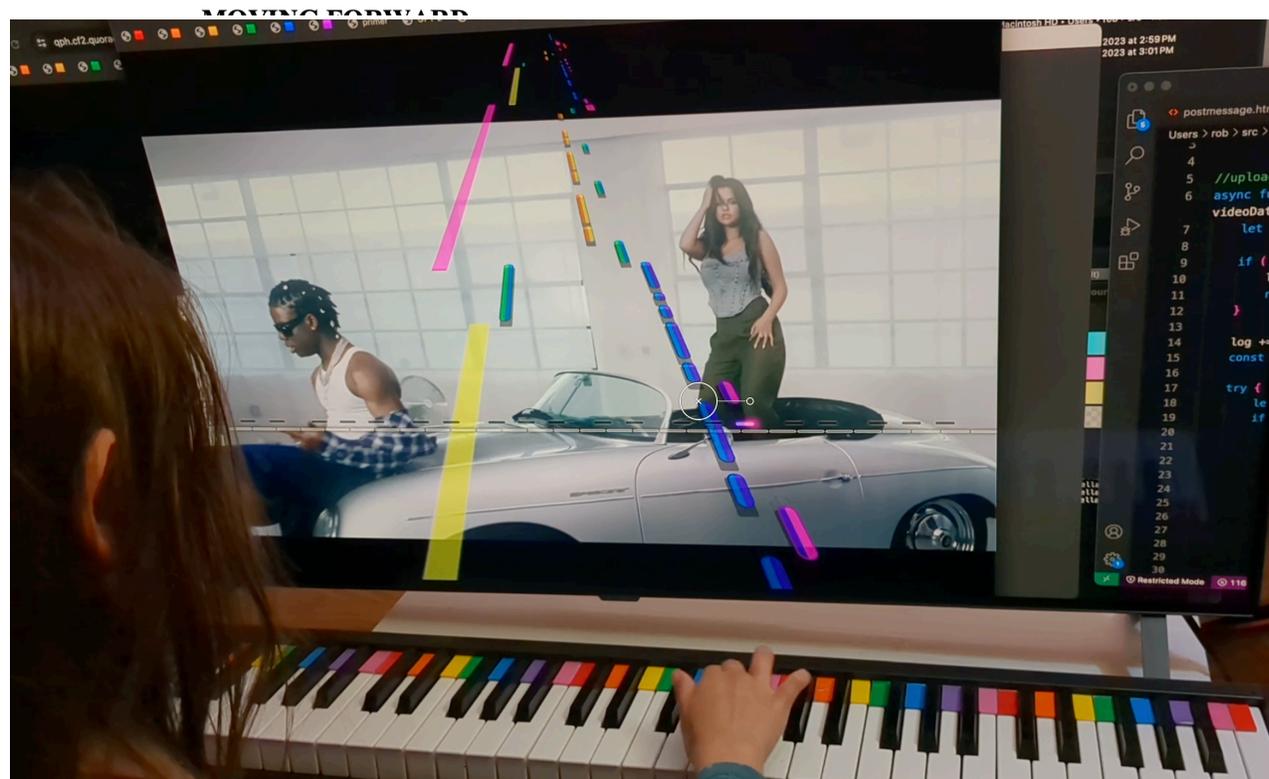


Exhibit F

October 2022 Teacher Email (“Targeted” Comment)

working on the math I include each week.

Also, the pick-up situation could be helped if one of you provided her with a reminder card in her backpack about who is picking her up vs. Champions each day. Today, she went to Champions but her mother was here to pick her up. I can remind Stella to look at her reminder card before dismissal. That would be a great help!

...



rob brown <rjbrown@gmail.com>
to Anita ▾

Mon, Oct 3, 2022, 11:49 PM ☆ 😊 ↩ Reply ⋮

Thanks so much for the additional information, this is good to know but obviously very concerning. You are more than welcome to send an email to me whenever you observe something I should know and can talk to Stella about. Inattentiveness is not ok, and if any additional details can be shared (such as what is distracting her or what she seems to be inappropriately focusing on), now or in the future, I can talk to her about it. The more I know, the sooner after it happens, the better I think I can handle it and hopefully help get things back on track. (Also, if Eve is second guessing you or being protective of Stella in a way that makes you feel like you can't do your job effectively, you are welcome to let me know and I can do my best to delicately handle it on this end.... I promise, I do understand.... :))

I also believe Stella's potential is much higher. I was thinking I will monitor her as she does homework, and ask her to tell me how she is going to answer before she writes her answer down. The last time she did homework at my house she seemed to write the bare minimum, and put a disappointingly small amount of thought and effort into it. She said she was done after just a couple things, which didn't seem right. I had her erase and redo some answers that were particularly poor, but I think it would be better, at least for a while, if she discussed them with me before putting pencil to paper.

We'll work on making sure she knows where she is supposed to go at the end of the day. Normally I only pick her up from school on Tuesdays.

-rob

...



Anita Picetti <apicetti@burlingameschools.org>
to me ▾

📧 Tue, Oct 4, 2022, 8:30 AM ☆ 😊 ↩ Reply ⋮

Hello Rob,

I wanted to attach copies for you of the packet materials I was hoping you would have seen following the conference. Thank you for understanding my end as well. Yes, I have definitely been targeted both through email and face-to-face contact with Eve about not pushing Stella out of her comfort zone. Your last sentence in the first paragraph of your email really resonated with me. As far as the homework is going, that is the same effort and progress she is making in class. She needs (at this point) much support to get going and stay motivated with the assignments, particularly reading and writing. I do call on her and she answers with intelligence so I know she is understanding (mostly in math) but is not as interested or focused on anything to do with reading or writing. We have been studying about communities the last 3 weeks. We are having our first ELA test on October 11th. I will be splitting the test into two parts as the first part is reading (comprehension ability) and the latter part is writing. It will probably take our class two days to complete. I should have a score by the end of next week. Her first official math test will be on October 18th most likely split between two days because it is long. Thank you for keeping Stella accountable with homework and working on the part that Eve is not completing (should be highlighted on the packet). Sometimes she has also written on a sticky note that it takes 48 hours to complete the reading for homework. That is also very concerning to me. Homework should take about 100 minutes per week. Also, thank you for the pick up reminder. By the way, today the far corner gate will most likely not be working like yesterday, so I will be dismissing from the larger black gate near the portables. I will make sure Stella is near me so she can easily find you. Feel free to reach out when necessary if you have questions.

Exhibit G

Kira Cuneo & Ellen Simon Statements (Custody Evaluation)

interpreted as materially inconsistent with his prior issued recommendations. The text below is submitted with the intent to further the best interest of the whole family, with focus on the continued wellbeing of the minor child, Stella Bordoli-Brown.

A. Telephone Contact with Kira Cuneo

The undersigned spoke with Ms. Cuneo on April 3, 2017, for approximately half an hour. I reviewed my role and the absence of confidentiality with Ms. Cuneo and she said she understood.

Ms. Cuneo states that she has known Eve since they were two years old and that they were friends throughout most of their lives. She reports that it was *"always a difficult relationship."* Ms. Cuneo attributes this difficulty to Eve's temper, her *"fear of everything,"* and her chronic mean streak. She reports that Eve's significant fear makes being her friend difficult. She states that Eve talks behind people's backs and complains about everything. She notes that Eve ordered Rob around like a child. *"Eve makes me feel small,"* Ms. Cuneo states.

Ms. Cuneo recounts that when a friend of Eve's hosted a bridal shower for Eve and friends, Eve was so critical and mean to the host that Ms. Cuneo cut off her relationship with Eve. She reports that at their wedding, Ms. Cuneo saw a bruise on Rob's arm which she asked Rob about. He stated that some boxes had fallen on his arm, but she remained suspicious and believed he was covering up for Eve.

Ms. Cuneo stated at multiple points in our conversation that she does not know Rob well but that every time she has seen him (*"a handful of times"*), he seems like *"a nice guy."* She reports that she has not seen any of my original report or recommendations. She notes that it has been three years since she last spoke with Eve and concludes, *"I hate to talk like this [about Eve], it makes me sad."* Ms. Cuneo gave numerous examples, spoke from first-hand observations and experiences, and appeared to be genuine and credible.

B. Telephone Call with Ellen Simon, Ms. Cuneo's Mother

The undersigned spoke with Ms. Simon on April 3, 2017, for slightly over five minutes. I reviewed my role and the absence of confidentiality; she responded that she understood.

CONFIDENTIAL – NOT TO BE SHOWN TO THE MINOR CHILD AT ANY TIME

Ms. Simon met Eve's mother at a breastfeeding group and the women remained friends until recently. She notes that her daughter, Kira, and Eve were close friends for years. She sums up Eve's mother as being highly anxious about all things. She recalls Eve developing similar anxious behavior starting at age 7 and that Eve has been anxious since then. When asked if there was anything else she wanted me to know about this family, Ms. Simon reiterates that anxiety is a significant theme within the Bordoli family.

Ms. Simon has extensive history with this family and her statements appear credible. While she was able to provide her perspective on Eve's emotional functioning, it must also be noted that she has had no contact with Eve in the last three years.

C. Analysis of Calls with Ms. Cuneo and Ms. Simon

Both women gave similar reports about Eve. Overall, the theme that emerged was Eve's

Both women gave similar reports about Eve. Overall, the theme that emerged was Eve's anxiety. I find their comments and observations to be credible and aligned with other data from the evaluation, such as psychological testing and the comments of several other collateral individuals.

It is likely that the observations of both women regarding Eve are accurate. The observations have accrued over forty years and led to the disengagement of the two families.

While these findings do not alter my basic recommendations in any way; they do underscore the