

DECLARATION OF LINDSAY LOHAN

I, Lindsay Lohan, declare as follows:

1. I do not know and am not personally acquainted with Mr. David Cocordan (AKA: David Hilton, Elexia, Alexis Hilton, DJ Elexia, and Alexia) and I have no desire to have any contact with him. Nevertheless, since June 2009 or earlier, Mr. Cocordan has repeatedly attempted to contact me, by unwanted and unsolicited phone calls and text messages numbering over one hundred, in which he has expressed delusional thoughts and irrational feelings about his belief that we are in a relationship. In the last four weeks, Mr. Cocordan’s behavior has escalated significantly, and he has come to my private residence at least three different times and has left me packages containing a heart shaped box of chocolates and extensive magazine articles about me with Mr. Cocordan’s name written into the articles as if they were about the two of us. Mr. Cocordan has followed me to at least two public appearances, and threatened to move close to me in his repeated texts. Mr. Cocordan has continued to stalk and harass me despite repeated requests for him to stop which have been directly communicated to him by my security director, Oded Krashinsky. Given this obsessive and harassing behavior, I am frightened of Mr. Cocordan and feel that my personal safety, and the safety of those around me, is in jeopardy.

2. Mr. Cocordan has sent me many text messages about his delusional belief that we are in a relationship, most recently texting me, “I’m glad we’re engaged.” (See Text message sent May 11, 2011, 4:13 PM, attached as Exhibit A.) He even informed me he has tattooed himself with my name. (See text message sent Sept 2, 2010, attached as Exhibit B [“Hey my tatto artist Amy is on LA Ink she did my Lindsay tatto my design”].) Recently, his behavior has escalated, and he has shown up at my apartment, left me packages, and followed me to public appearances. (See, e.g., text messages attached as Exhibit C: May 15, 2011, 2:46 PM [“Im on my way to bring u something I hope youll grant me a reception im still coming over even though ur now coming over i cant help it and I want to see u today kkk :)”]; May 10, 2011, 9:24 PM [“ill be to you with luggage will stop over with ur chocolates hour hollywood reporter scientology 0-8 book and blue topaz sterling silver ring before that probably at the start of anklet confinement and I’m not mad at ur brother :D”]; Apr. 24, 2011, 3:30 PM: [“Did u get all the stuff i threw over ur back gate friday the sheriff told me everythings going to be ok when i was in ur court room i saw u and ur dad did u see me??”].) He has also threatened to move into my neighborhood, which I believe will only increase his attempts to contact me. (See text message sent Apr 27, 2011, 12:57 AM,

1 attached as Exhibit D ["It's David . . . I love you and want to have dinner on abbot kinny when I
2 move there or sooner don't know exactly where I'll be staying but maybe even on [my street]"].)

3 3. I am frightened of Mr. Cocordan's obsessive and harassing behavior and believe it
4 will escalate. Mr. Cocordan has increasingly sent me disturbing messages, including one which
5 said "Fucking n sucking wit u kkk i need it more thn." [See text message sent May 5, 2011, 9:38
6 PM, attached as Exhibit E.) Due to Mr. Cocordan's delusions about our relationship and his
7 repeated attempts to make contact with me, I am afraid that this text message shows that Mr.
8 Cocordan intends to sexually assault me.

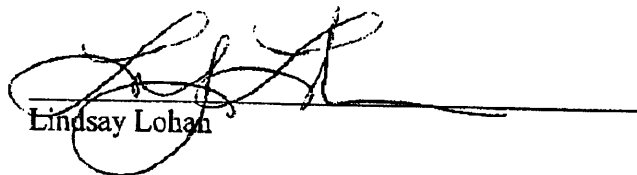
9 4. Due to my significant fear of Mr. Cocordan's escalating obsessive, harassing, and
10 threatening behavior, I reported his harassing and stalking conduct to the Los Angeles Police
11 Department Threat Management Unit on Friday, May 13, 2011. Detective Jeff Dunn, a Senior
12 Detective with the Threat Management Unit of the Los Angeles Police Department has initiated a
13 criminal investigation and has discovered that Mr. Cocordan has a significant psychiatric history
14 of acting on his delusional beliefs. I have been informed that Detective Dunn has determined that
15 Mr. Cocordan is schizophrenic, that he is not currently taking his anti-psychotic medication, and
16 that he is hearing voices which direct him to interact with me. I have also been informed that
17 Detective Dunn believes that Mr. Cocordan will continue his delusional threatening and harassing
18 conduct and that a restraining order must be secured and enforced.

19 5. Without a restraining order, I fear that there will not be sufficient law enforcement
20 mechanisms to keep Mr. Cocordan away from me, or those around me, especially since he 1) has
21 a delusional belief that we are in a relationship or engaged; 2) has repeatedly attempted to
22 communicate and make contact with me in a harassing and fear-inducing manner, 3) has managed
23 to find my private residence, which he has come to without permission on multiple occasions, and
24 4) has began to threaten violence against me.

25 6. I believe Mr. Cocordan will continue to engage in this behavior, and that this
26 behavior will only escalate, unless and until he is ordered by this court to stop.

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

28 Executed this 19 day of May, 2011, in Los Angeles, California.


Lindsay Lohan