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DECLARATION OF SAMUEL BARTH

I, Samuel Barth, declare as follows:

1. I do not want any form of contact with Mr. Osama Lutfi (AKA "Sam Lutfi") and have repeatedly requested that he cease all efforts to communicate or physically meet with me and those around me. Nevertheless, as detailed below, Mr. Lutfi has incessantly called, sent unwanted and unsolicited text and email messages, made ominous and aggressive statements and/or threats, and generally behaved in an obsessive and harassing manner. He has also persistently contacted my friends and family members, none of whom he has ever actually met. He has made threatening comments to and about my mother, Deborah Barth, insulted and verbally attacked my brother, Nathan Barth, and even attempted to talk my minor sister, Torey Barth, into seeking a court order to take away our mother's primary custody of her. In addition, he has sent unwanted, unsolicited, and harassing texts and/or emails to my father, my aunt, my cousin, family friends, and my minor sister's friends. Mr. Lutfi apparently suffers from some sort of delusion that my mother is an evil individual who has damaged me emotionally and mentally, and he is obsessed with "helping" me to fix this damage at any and all costs and regardless of the fact that I do not want his supposed "help."

2. In recent weeks, Mr. Lutfi's obsessive, stalking, and harassing behavior has escalated to the point that I now believe he poses an immediate danger to me and my family. Mr. Lutfi has broken into my Gmail, Facebook, and Twitter accounts, changed the relevant login information so as to lock me out, and proceeded to send emails, engage in chats, and post messages in my name and while pretending to be me. He has also apparently started to impersonate other individuals I know while attempting to contact my family members and my family members' friends via email, and, on one occasion, has done so in a concerted effort to disrupt and damage my minor sister's relationship with a friend from high school. Finally, his ceaseless phone calls, texts, and emails to me and those around me have become increasingly disturbing and detached from reality, vacillating from compliments to accusations, from promises to threats, from apologies to enraged diatribes. He has even repeatedly hoped aloud for my death and the death of my loved ones, writing, for example, in one recent text message: "oh nevermind youre a pathetic miserable waste of human flesh that no one gives a shit. go die you worthless piece of shit. do the world a favor you scum." Given Mr. Lutfi's conduct, I am now quite

1 frightened of him and believe that my personal safety and security and the safety and security of
2 my family are in jeopardy.

3 3. Without a restraining order, I fear that there will not be sufficient law enforcement
4 mechanisms to keep Mr. Lutfi away from my family or me, especially since he has (1) a history
5 of engaging in obsessive, stalking, and harassing behavior and has previously had multiple
6 restraining orders issued against him with regard to other parties (*see e.g.*, news articles attached
7 as Exhibit 1), (2) emailed, texted, and posted a host of aggressive, threatening, and ominous
8 messages, (3) repeatedly managed to locate my new cell phone number each and every time I
9 have changed it in order to avoid contact with him, (4) repeatedly and incessantly contacted my
10 family members and friends, none of whom he knows or has ever personally met, (5)
11 purposefully worked to distress my family members and disturb their emotional well-being, (6)
12 evinced a willingness to make contact with me at all costs, even going so far as to illegally break
13 into my online accounts and impersonate me, and (7) continued to escalate in his obsessive,
14 stalking, and harassing behavior. I firmly believe that Mr. Lutfi will persist in this conduct, and
15 that this conduct will only worsen, unless and until he is ordered by this court to stop.

16 **MR. LUTFI'S OBSESSIVE, STALKING, AND HARASSING BEHAVIOR**

17 4. My brief and tumultuous relationship with Mr. Lutfi began in February of 2010, a
18 month or so after I moved from Virginia to California to pursue a career in acting. Mr. Lutfi
19 happened to live only a block away from my apartment and was, at least according to him,
20 employed as a manager/counselor to celebrities suffering from addictions. Given our close
21 proximity and mutual interest in acting and actors, a friendship seemed natural. At the beginning,
22 my relationship with Mr. Lutfi appeared normal enough. We talked, spent time together, and
23 went to gatherings and parties. He also introduced me to various individuals involved in the
24 entertainment industry and seemed genuinely interested in helping me pursue and achieve my
25 career objectives. In short, we became close friends in a relatively short period of time.

26 5. However, within a few weeks, Mr. Lutfi began acting in increasingly peculiar
27 ways. He started to "diagnose" me with multiple disorders, insisting that I suffered from various
28 mental and emotional problems and forcefully suggesting solutions to cure my supposed ailments.
At the same time, he also started to behave erratically, overreacting to various situations and
becoming enraged at me for no particular reason at all. On or about March 14, 2010, this odd
behavior escalated to the point that Mr. Lutfi stormed into my apartment uninvited and began
yelling and screaming at me and falsely and bizarrely accusing me of everything from hiring

1 prostitutes, to taking drugs, to purposefully worsening the supposed mental disorders he had
2 diagnosed me with. In response to this disturbing behavior, I demanded that Mr. Lutfi leave my
3 apartment and thereafter refused to communicate with him. However, in the days that followed,
4 Mr. Lutfi began texting me on a regular basis, stating time and again that I had overreacted, that
5 he was worried about me, and that we should re-forge our friendship. After a week or so, I
6 relented and agreed to talk to him.

6 6. My relationship with Mr. Lutfi returned to relative normality for a period of time
7 in early April of 2010. Towards the end of the month, the lease on my apartment ended and I
8 found myself in need of a place to stay. Mr. Lutfi offered me a room in his residence free of
9 charge, and I agreed. Shortly after moving in, Mr. Lutfi began inquiring about my family and
10 upbringing. At the time, I thought nothing of these questions or conversations about my past,
11 reasoning that, as a friend, Mr. Lutfi was simply interested in learning more about me. However,
12 after a short period of time, Mr. Lutfi began to insist that my mother was “evil” and my family
13 relationships unhealthy; he claimed that all of the supposed problems that he had diagnosed me
14 with stemmed from my familial relations. In the weeks that followed, Mr. Lutfi appeared to
15 become increasingly obsessed with these notions and continually bombarded me with accusations
16 that I was allowing my mother and family to undermine my life and my well-being. He even
17 began baselessly asserting that my mother was stealing from my trust account and that I should
18 remove her as trustee and have her criminally prosecuted.

18 7. Worse yet and far more disruptive, Mr. Lutfi managed to obtain my family’s
19 contact information during this period of time and began randomly and frequently calling, texting,
20 emailing, and/or instant messaging my mother, aunt, brother, and minor sister, none of whom he
21 knew or had ever personally met. In most instances, these unsolicited communications began as
22 brief, friendly messages, but they all turned increasingly disturbing as Mr. Lutfi’s apparent
23 obsession with me, my supposed problems, and my allegedly “evil” mother grew. For example,
24 on April 9, 2010, Mr. Lutfi sent a relatively innocent text to my Aunt Vicki, stating that I was
25 doing well in Los Angeles. (*See* Exhibit 2.) In the weeks that followed, he continued to text my
26 aunt and those texts became increasingly disturbing. (*Id.* at pp. 2-3.) By April 23, 2010, he was
27 sending my aunt far lengthier messages in which he detailed his thoughts on my emotional state
28 and what sort of help I supposedly needed. (*Id.* at pp. 3-6.) By April 28, 2010, he was sending
messages to my aunt in which he accused my mother of being “a very unstable lady who pose[s]
a serious danger to her children.” (*Id.* at pp. 6-7.) These communications were not solicited, nor

1 were they wanted, and my aunt very plainly asked Mr. Lutfi to “[s]top contacting” her on April
2 28, 2010. (*Id.* at p. 8.) Mr. Lutfi nevertheless continued to text my aunt, apparently operating
3 under some sort of a delusion that my mother was a puppeteer, forcing those around her to turn
4 against him and cutoff communication: “you ceased dialogue with me cause debbie instructed
5 you to.” (*Id.* at p. 11.)

6 8. Most disturbingly, Mr. Lutfi took a similar approach with my minor sister Torey.
7 Although his early communications with my sister started out rather plainly, by May of 2010, Mr.
8 Lutfi was making a concerted effort to turn my minor sister against our mother, incessantly
9 calling, emailing, and texting her about me and our supposedly unhealthy family life. By May 8,
10 2010, he was telling my sister that she “had the most power and control” and pressing her to ask a
11 court to take away primary custody of her from our mother since our mother had behaved “so
12 wrong.” (*See* Exhibit 3 [stating “tday court would flip and remand primary custody to your
13 father”].) Similarly, on May 12, 2010, Mr. Lutfi attempted to convince my sister that our mother
14 had somehow “abused” me and suggested that someone should go “kick that bitch outta bed and
15 demand some respect.” (*See* Exhibit 4.)

16 9. My family became increasingly concerned about Mr. Lutfi’s bizarre behavior,
17 particularly with regard to my minor sister Torey. I asked Mr. Lutfi to stop contacting my family,
18 but he denied he was doing anything wrong and claimed that it was my family members who
19 were contacting him. As the days went on and the communications continued, Mr. Lutfi and I
20 started to argue on a frequent basis. Unable to tolerate Mr. Lutfi’s obsessive behavior, I flew
21 home to Virginia. I thereafter returned to Los Angeles and proceeded to move out of Mr. Lutfi’s
22 apartment on or around June 13, 2010. I checked into a hotel, hoping that things would go back
23 to normal once Mr. Lutfi and I were not living together.

24 10. In response to my moving out, however, Mr. Lutfi began sending a non-stop
25 barrage of emails and text messages to me. In these communications, he would vacillate between
26 overly nice and disturbingly angry, complimenting me one moment and then accusing me of all
27 sorts of wrongdoing the next. He repeatedly stated that I was jeopardizing my career by not
28 following his advice, and even went so far as to threaten to purposefully damage my professional
relationships if I did not do as he instructed. All the while, he continued to insist that I was
suffering from some sort of mental and/or emotional problem caused by my mother and that he
was merely trying to help me become healthy. By the end of June, I was forced to change my cell

1 phone number in an effort to end the constant stream of accusations and threats --- but the emails
2 continued.

3 11. The calls, emails, and texts to my friends and family members also continued after
4 I moved out of Mr. Lutfi's apartment and these communications became increasingly hateful and
5 threatening as Mr. Lutfi's apparent obsession with me and my mother seemed to deepen. For
6 example, on July 1, 2010, after my mother refused to respond to his unsolicited communications,
7 he sent her a series of messages in which he accused her of purposefully harming her children and
8 stealing from our trust accounts. (*See Exhibit 5, p. 4*) He then went on to hope that her silence
9 was a sign that she was dead: "Or perhaps you've overdosed on xanax and alcohol. Well if
10 unfortunately you recover and wake up. Let me know if you're ready to discuss how viciously
11 you destroyed your children's lives." (*Id.* at p. 5)

12 12. Mr. Lutfi also continued to send disruptive and disturbing texts and messages to
13 my minor sister, Torey. On June 12, 2010, for example, he sent my sister a string of messages in
14 which he verbally attacked our mother and stated that he hoped both our mother and aunt would
15 die. In Mr. Lutfi's words, "I wish those two sick women the most evil and painful death possible.
16 The joy these whores get off seeing this innocent boy suffer and wimper [sic] like a wounded
17 animal makes me ill to my stomach." (*See Exhibit 6.*) Although my minor sister asked Mr. Lutfi
18 to refrain from making such comments about our family, Mr. Lutfi continued to send her chat and
19 text messages verbally attacking our family, particularly our mother. (*Ibid.*) He also began trying
20 to separate my minor sister from our mother, offering to give her a cell phone so that she could
21 call and text him without our mother's knowledge. On June 12, 2010, for example, he wrote:
22 "Yo. I might add two extra lines to my cell acct. Think we might get you a new phone and
23 number. And just use the new one in case you ever text me or your bro etc. And keep the old one
24 for everyone else. Cool?" (*See Exhibit 7.*)

25 13. Worn down by his barrage of communications, concerned about his threats to ruin
26 my career, disturbed by the chaos he was causing in my family, and hoping that I could calm
27 things down with my one-time friend, I called Mr. Lutfi on July 3, 2010. He again assured me
28 that I had misunderstood him and his intentions, that he was only concerned with my well-being,
and that our friendship was too important to give up on. Concerned about the costs of continuing
to live in a hotel, I reluctantly agreed to move back in with him, naively thinking that perhaps the
worst was over. However, Mr. Lutfi's obsessive and harassing behavior was unrelenting and I

1 quickly moved back out of his apartment for a second and final time only a week or so later on
2 July 24, 2010. I stayed in a hotel until June 27, 2010, and then decided to return to Virginia.

3 14. Following my return to Virginia, my family members desperately tried to extricate
4 Mr. Lutfi from their lives. However, their attempts seemed only to intensify Mr. Lutfi's
5 obsessive, stalking, and harassing behavior, which continued to wildly vacillate between bizarrely
6 friendly and frighteningly aggressive. For instance, on July 28, 2010, when my mother found out
7 that Mr. Lutfi was still contacting and communicating with my minor sister, Torey, she sent a text
8 message asking Mr. Lutfi to cease all communication with her. (*See Exhibit 8, p.1.*) He
9 responded with a lengthy string of messages, calling my mother a "bitch" and stating: "No one
10 needs you. You are nothing, you do nothing but damage. Evil evil lady." (*Id.* at pp. 2-6.) He
11 thereafter threatened to call child protective services. (*Id.* at p. 6.) A handful of days later, on
12 August 4, 2010, he sent another series of messages to my mother in which he made strange and
13 false claims about some sort of investigation, apparently trying to convince her that she was being
14 accused of criminal wrongdoing. (*Id.* at pp. 8-9.) However, on August 7, 2010, Mr. Lutfi's tone
15 changed completely and he sent yet another group of messages to my mother, asking her to
16 consider attending a seminar a friend of his was giving in Arizona, noting it "would be comped"
17 and stating "i think you might enjoyt the retreat." (*Id.* at pp. 9-12.)

18 15. During this period of time, Mr. Lutfi sent similarly bizarre and frightening texts to
19 my brother. On August 3, 2010, for instance, Mr. Lutfi sent a lengthy tirade via text messages to
20 my brother, Nathan, in which he ranted about my mother's supposed wrongdoings and my
21 brother's shortcomings: "You have your head so far up your clinically ill mothers ass that your
22 unable to think on youre own." (*See Exhibit 9, p. 5*) When my brother asked Mr. Lutfi to "please
23 stop contacting me", Mr. Lutfi responded with a vulgar string of attacks, texting statements such
24 as "[g]o fuck your mother dumbfuck", "you're the biggest douche bag ever", "[f]uck off nate you
25 fuckin loser", "[h]ow them pills that whore Debbie treatin ya", "waste of human flesh", "[g]o hit
26 up a gay bar queer", and so on. (*Id.* at pp. 9-12.) Even though my brother did not respond in any
27 way, Mr. Lutfi's tirade continued the next day, and became even more aggressive as he pushed
28 my brother to commit suicide like our maternal grandmother had done a month prior: "[g]o out
like your grand mother did dude, no one wants your sick ass around here." (*Id.* at p. 16.) He then
proceeded to directly threaten my brother, writing: "You fuck with my life asshole and you
opened up a can of worms for yourself." (*Id.* at p. 17.)

1 16. I too attempted to extricate Mr. Lutfi from my life, but Mr. Lutfi persistently
2 resisted and obstructed my efforts. For example, he attempted to prevent me from having my car
3 shipped back to Virginia. When I left Los Angeles, I temporarily left my car in the gated garage
4 of Mr. Lutfi's apartment complex. At the time, Mr. Lutfi had agreed to allow me to leave the car
5 there for several days until I could arrange to have a shipping company transport the vehicle to
6 my home in Virginia. However, after my return to Virginia, Mr. Lutfi began claiming that my car
7 was no longer parked at his apartment complex, insisting instead that he had dropped it off at a
8 random location. I repeatedly asked him via phone text messages to tell me where my car was
9 parked and he repeatedly declined to answer, choosing instead to make bizarre and unrelated
10 comments and accusations. (See Exhibit 10.) Eventually, on August 8, 2010, Mr. Lutfi texted me
11 that the vehicle was parked outside of a donut shop located at a particular intersection in Los
12 Angeles. A family friend drove to that location, but the car was nowhere to be found. Unable
13 locate my car, my mother and I contacted law enforcement in Los Angeles and the police
14 eventually found my car was still parked in the gated garage at Mr. Lutfi's apartment complex,
15 exactly where I had left it. After another barrage of text messages from Mr. Lutfi that lasted into
16 the early morning, Mr. Lutfi finally released my car to the transport company on August 9, 2010.

17 17. Over the past month, since the incident with my car, Mr. Lutfi's conduct has
18 escalated even further and has now reached a point where I firmly believe that my own personal
19 safety and security, as well as the safety and security of my family, are in immediate jeopardy.
20 On August 10, 2010, the day after the shipping company took possession of my vehicle, I learned
21 that my Gmail, Facebook, and Twitter accounts had all been compromised. Mr. Lutfi had
22 apparently hacked into these accounts, changed the relevant login information, and locked me
23 out. (See Exhibit 11 [documents showing that my Gmail account had been accessed by someone
24 in California and that the emails were now being forwarded to a Yahoo! email address].) When I
25 confronted Mr. Lutfi, he falsely and bizarrely claimed that the accounts had been shut down as
26 part of some sort of investigation by the District Attorney's Office and he openly refused to send
27 me the information to regain control of them. (See Exhibit 12.) Since then, however, Mr. Lutfi
28 has repeatedly admitted to having access to my accounts. For example, on September 7, 2010, he
sent an unsolicited and unwanted email to my new Gmail account in which he stated the
following: "did you want me to just delete the gmail and fb sammy?" (See Exhibit 13.)

 18. Worse still, since hacking into my accounts, Mr. Lutfi has begun chatting and
posting online using my name. On August 25, 2010, for instance, Mr. Lutfi used my Twitter

1 account to link to and repost an ominous message he had previously put up using his own account
2 --- namely, "Sometimes people run away just to see if anyone cares to follow." (See Exhibit 14.)
3 Similarly, on August 27, 2010, Mr. Lutfi used my Gmail account to send a chat message to my
4 brother, Nathan, stating, "well i hope you guys are all well. there was never any bad intentions on
5 anyones behalf. everyone just tried to help in their own ways. thats life. its not always perfect.
6 your brothers an outstanding human being, always will be." (See Exhibit 15.) On August 28,
7 2010, Mr. Lutfi accessed my Facebook account, posted 125 pictures of my family and me, and
8 changed my profile to list my mother as "Satan." (See Exhibit 16.) Most recently, Mr. Lutfi has
9 used my Facebook account to post a lengthy tirade about my family, including my minor sister,
10 on my sister's friend's Facebook page. In this post, he insulted and assaulted my minor sister,
11 calling her a "dumfuck controlling psychotic sick sister", and accused my mother of being
12 "psychotic" and "evil." (See Exhibit 17 [edited and redacted to remove baseless factual
13 accusations as well as identifying information about my sister's friend].) Mr. Lutfi has admitted
14 to chatting and posting online using my name but has not stopped this behavior. For example, on
15 September 7, 2010, he wrote the following to me: "i dont see why you should delete your fb. i
16 cleaned up whatever was on it and uploaded all your pics so you have em to keep. theyre
17 awesome photos and a depict your history and shouldnt be thrown away." (See Exhibit 13.)

18 19. Mr. Lutfi has also apparently begun using the Internet to impersonate other
19 individuals online as well. For example, he appears to have sent a number of emails while
20 pretending to be someone named "Alisha." On August 18, 2010, "Alisha" sent an email to my
21 minor sister verbally attacking her for supposedly undermining my health and success, and
22 calling her a "disgusting jealous pig," a "sicko[]", "gross", an "ugly fat ass", a "loser" and a
23 "stupid bitch." (See Exhibit 18.) The following day, on August 19, 2010, "Alisha" sent an email
24 to one of my minor sister's high school friends, claiming that my sister was trying to undermine
25 her friend's success. In other words, Mr. Lutfi apparently went so far as to try to disrupt and/or
26 damage my minor sister's relationship with her high school friend.

27 20. Moreover, Mr. Lutfi has managed to obtain access to my mother's emails. On
28 September 5, 2010, Mr. Lutfi sent a series of emails to my new email address in which he had cut
and paste verbatim copies of emails my mother had previously sent to other people. Particularly
troubling, Mr. Lutfi had a copy of an email my mother had sent to her attorney, asking for advice
on how to deal with Mr. Lutfi and his refusal to tell me where my car was located. (See Exhibit

1 19.) Exactly how Mr. Lutfi has obtained these emails is wholly unclear at this point, but it is
2 deeply distressing.

3 21. Of course, throughout all of this, Mr. Lutfi has continued to contact me and my
4 family against our wishes, sending thousands of unwanted and unsolicited text messages and
5 emails in which he has criticized my family, cursed and threatened us, asked for forgiveness,
6 accused us of criminal wrongdoing, treated us like his best friends, told us to leave him alone,
7 agreed to leave us alone, and so on. (*See e.g.*, Exhibit 20.) Temporal restraints prevent a
8 summary of all of these messages, but some have been particularly frightening. For example, On
9 August 15, 2010, I received a series of text messages, apparently from Mr. Lutfi, in which he
10 ominously stated: "lets see if you keep this to yourself or if you start telling everyone your
11 getting this text. dont think im stupid. ive just found out what youve been up to." (*See Exhibit*
12 21.)

13 22. On August 19, 2010, I contacted Mr. Lutfi for the last time and once again told
14 him via text messages and in the plainest terms possible to stop contacting me and those around
15 me: "Please stop contacting me, my family, and any of my friends." (*See Exhibit 22.*) On
16 August 20, 2010, I changed my cell phone number and carrier. Within 24 hours, however, Mr.
17 Lutfi had somehow managed to locate my new number and the unwanted communications via
18 telephone and text message resumed. As a result, on August 23, 2010, I again changed my
19 phone number and carrier. On September 7, 2010, however, Mr. Lutfi sent an email to my new
20 email account in which he suggested that he had located my number yet again:

21 dont make me call or text you now hahaha.. nah i wont. i honestly dont want any
22 contact ever again. yeah i know 571.....70 lol.. anyhow, its really retarded to
23 keep changing crap when all you had to do was say you didnt want contact... (*See*
24 Exhibit 23.)

25 Later that same day, Mr. Lutfi sent a series of text message to my newest cell phone. The last of
26 these messages, sent at 11:04 PM, stated: "oh nevermind youre a pathetic miserable waste of
27 human flesh that no one gives a shit. go die you worthless piece of shit. do the world a favor you
28 scum." (Exhibit 24.)

29 23. Even as he has disturbed, frightened, and threatened my family and me, Mr. Lutfi
30 has repeatedly insisted that all I "had to do was say [I] didnt want contact" with him and he would
31 end the harassment. (Exhibit 23.) As detailed throughout this declaration, however, I have in fact
32 repeatedly and consistently told Mr. Lutfi to stop contacting me and have gone to great lengths to
33 avoid that contact, changing my cell phone number and carrier multiple times within a handful of

1 weeks. My family too has repeatedly told Mr. Lutfi in no uncertain terms to stop any and all
2 contact. And still, Mr. Lutfi has continued in his obsessive, stalking, and harassing behavior.
3 Therefore, we now respectfully ask this court to tell Mr. Lutfi to stop.

4 24. Although my family and I currently reside in Virginia, I am scared to give advance
5 notice of this application to Mr. Lutfi prior to a temporary restraining order being put in place to
6 protect us. Mr. Lutfi has repeatedly made threats and/or threatening statements expressing his
7 desire that my family members and I die, even going so far as to wish "the most evil and painful
8 death possible" on my mother and aunt. He has also evidenced a willingness to go to extreme
9 lengths to contact and/or harass us, illegally hacking into and taking control of my online
10 accounts and stealing my mother's emails. It is my belief that Mr. Lutfi has the means to easily
11 travel to the East Coast and the ability to locate my family, and I am frightened that he might
12 choose to do so if he is informed of this application before a temporary restraining order is issued.

12 CONCLUSION

13 25. For months now, Mr. Lutfi's obsessive, stalking, and harassing behavior has
14 disrupted, disturbed, and frightened my entire family. He has refused to cease communication,
15 threatened me and my loved ones, broken into my online accounts, obtained access to my
16 mother's emails, and even attempted to ruin my minor sister's relationship with her high school
17 friend. Given his apparent obsession with me and my family and his delusion that I need his help,
18 I am fearful that Mr. Lutfi's behavior will continue to escalate. This is particularly troubling
19 given his communications in which he has hoped for my death and the death of my loved ones. I
20 believe that a restraining order is now necessary to ensure that law enforcement has the proper
21 tools and legal mechanisms to protect me and my family.

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

23 Executed this 09 day of September, 2010, in Mclean, Virginia.

24 

Samuel Barth