

DECLARATION OF MELANIE JANINE BROWN

I, MELANIE JANINE BROWN, declare as follows:

1. I am the Petitioner in this action. I have firsthand, personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would competently testify hereto under oath.

2. Except as to such facts as stated from my information and belief, which I believe to be true, the following facts are stated from my personal knowledge and if called upon herein to testify, I would and could do so competently thereto under oath. I offer this declaration in lieu of personal testimony pursuant to §§2009 and 2015.5 of the *Code of Civil Procedure*, Rule 1225 of the *California Rules of Court*; *Reifler vs. Superior* (1974) 39 Cal.App.3d 479 and *Marriage of Stevenot* (1984) 154 Cal.App.2d 1051.

3. I submit this Declaration in support of my request for Temporary and Permanent Restraining Orders.

NO NOTICE REQUEST

4. I am a recording artist, actress, and television host. In the 1990s, I was a member of the Spice Girls, and later went on to become a solo recording artist. In 2007, I was runner-up on the fifth season of *Dancing with the Stars*, and since then, I have worked steadily hosting a variety of television shows both in America and abroad. I was a judge on the United Kingdom and Australian versions of *X Factor*, the co-host for *Dancing with the Stars Australia*, a coach on *The Voice Kids* in Australia, and currently, I am a judge on *America's Got Talent*.

5. Respondent and I were married on June 6, 2007, in Las Vegas, Nevada, after a very brief (2 month) courtship. We separated on December 28, 2016. We have one (1) daughter together, Madison Belafonte Brown, (currently age 5). I have two other children from previous

1 relationships. Respondent is a large, extremely aggressive, hostile and violent individual. I  
2 am in fear for my safety and that of my children. As such, I have chosen to seek temporary  
3 orders of protection given the following:

4           6.     *During my relationship with Respondent I was subjected to multiple physical*  
5 *beatings which are documented in photographs.* I have tried to leave Respondent many times.  
6 Every time I tried, Respondent threatened me with violence and threatened to destroy my life in  
7 every possible way. He said he would destroy my career and take my kids from me. He  
8 threatened to release sexually explicit videotapes claiming I would never again work in the  
9 entertainment industry. These threats were made so as to allow Respondent to gain and keep  
10 control over me and my finances.

11           7.     Respondent has an extensive criminal history consisting of the following: 1)  
12 He was arrested on October 12, 1993 by the Point Pleasant Police Department. He pled  
13 Guilty to Simple Assault on June 9, 1994; 2) He was arrested on July 2, 1994 by Point  
14 Pleasant Police Department for Burglary and Theft. He pled Guilty to "Unlawful Taking"  
15 on August 8, 1994; 3) He was arrested on February 9, 2001 by Ocean County Sheriff's  
16 Office and was indicted in the Ocean County Superior Court. Respondent pled Guilty to  
17 "Computer Crimes" on April 23, 2001; 4) He was arrested in 2000 for assault against two  
18 men which was later reduced to vandalism; 5) He was convicted in 2003 in Los Angeles  
19 County for Domestic Violence against the mother of his first child; 6) In 2007, he admitted  
20 that he beat a Mallard (bird) to death with a brick; 7) In 2010, he assaulted and battered  
21 three men in London; no charges were brought but photos of the brawl were released in the  
22 media.  
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1           8.     Respondent is in possession of a handgun. I believe the weapon is either a .38  
2 special and/or a .357 magnum. I have seen the gun in Respondent's possession on multiple  
3 occasions. Respondent kept the weapon in a lock box in the bedroom closet. Respondent is a  
4 convicted Domestic Violence misdemeanor. Respondent suffered a domestic violence  
5 conviction in 2003 in Los Angeles County case number 3HLO1349 and is therefore unable  
6 to legally possess a firearm as it is a violation of Title 18 U.S.C. 922(g)(8). Despite this  
7 prohibition, Respondent has maintained possession of the gun at the family residence. On  
8 Friday, March 31, 2017, Federal Law Enforcement executed a Federal search warrant in  
9 order to seize Respondent's handgun. After making entry and conducting a search of the  
10 residence, it was my understanding that Federal authorities failed to locate the weapon. My  
11 fear of Respondent is greater than it was prior to the search as I know Respondent will take  
12 this out upon me and the children.  
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16           9.     I fear that with Respondent's character trait for violence, my prior physical  
17 beatings by him, his willingness to violate both federal and state law by possessing a handgun- he  
18 knows no bounds. I believe Respondent still has possession of the weapon but has it hidden such  
19 that the authorities cannot locate and therefore prosecute him.  
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21           10.    Given my fear of Respondent, his possession of a firearm and his violent nature, I  
22 have decided not to give *ex parte* notice of this request.  
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24           11.    Were I to provide notice of this request for Protective orders, I believe Respondent  
25 could and would hurt me. I believe Respondent will undoubtedly blame me for the search of the  
26 residence and the fact that he was handcuffed and detained by law enforcement. I further believe  
27 that Respondent will lie to this Court on a DV-800 form claiming he had neither control nor  
28 possession of the handgun I have clearly seen him with. Lastly I believe he is extremely dangerous  
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1 and a threat towards my safety and the safety of the children. Providing him notice without  
2 protective orders in place would only serve to infuriate him and increase the risk of physical harm  
3 to either me or the children.

#### 4 RELATIONSHIP HISTORY

5  
6 12. Respondent's name is Stephan Stansbury, but he often goes by the alias Stephan  
7 Belafonte. At the time of our marriage, I was unaware that "Belafonte" was not Respondent's  
8 legal surname, nor was I aware that he had been previously married. Throughout the marriage, I  
9 was the primary income earner. Respondent held neither steady nor gainful employment.  
10 Respondent has held himself out to be the son of singer Harry Belafonte, when in reality he is not  
11 related.  
12

13 13. At the time of our marriage, in June 2007, I was exactly two (2) months from the  
14 birth of my second child (not a child of Respondent's). At the time, I was vulnerable. I was  
15 giving birth as a single mother, my self-esteem was very low, and my hormones were out of  
16 balance due to the pregnancy. Respondent rushed in to help me in every way. He appeared at  
17 first to be someone who was very much there for me and my newborn. However, Respondent's  
18 kindness quickly turned sour as he became controlling, manipulative and abusive as further  
19 discussed below. He proposed to me after a very short relationship. In hindsight, I believe his  
20 kindness was in essence his way of "grooming" me given his recognition of my vulnerability  
21 stemming from my recent pregnancy.  
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25 14. Immediately after marriage, Respondent became emotionally and verbally abusive.  
26 He would tell me that I am worthless, that he made me "who I am," that no one knows how really  
27 stupid I am, and that he was responsible for making me look intelligent to the outside world. His  
28 denigrating and demeaning comments were made to belittle me. Ultimately they took their toll in  
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1 undermining my self-confidence and my self-esteem. Respondent would go from being extremely  
2 nice to extremely mean. His comments were not limited to my intellect. He would demean my  
3 physical appearance by calling me fat, ugly, and old. It particularly hurt considering that I had just  
4 given birth to my daughter and I felt ungainly and self-conscious because I had not lost the weight  
5 from the pregnancy. Respondent would tell me, "Thank God I'm with you - no one else would  
6 want you." It was not only the things Respondent said to me but the way in which he said them.  
7 His tone was nasty and loud. When making these vulgar comments, he would put his face inches  
8 in front of mine and scream the insults at me.  
9

#### 10 RESPONDENT'S EMOTIONAL ABUSE

##### 11 BECAME MORE EGREGIOUS THROUGH THE USE OF THREATS

12  
13 15. For the next three and a half (3.5) years, Respondent continued to be emotionally  
14 and verbally abusive towards me.  
15

16 16. I desperately wanted to leave the relationship and tried to do so during our first  
17 year of marriage and every year thereafter. When I threatened to leave, Respondent informed me  
18 that he has videos of our sex life and other private moments. Respondent would threaten that if I  
19 left, he would release the videos to the tabloids. I have lived the past decade in fear that  
20 Respondent would release intimate videos of me that would embarrass me and damage my  
21 reputation and my career. Once Respondent made the threat of releasing videos, it became  
22 impossible to say no to him, giving him complete control. I also learned that Respondent  
23 threatened to release the videos to DCFS in an attempt to have the children taken away from me.  
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26 17. Respondent often times demanded that I participate in sexual intercourse with him  
27 and random women that he brought back to our hotel rooms. If I objected to participating, he  
28 would threaten to release compromising videos of me. He would often times surreptitiously  
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1 videotape these encounters, and, if I discovered the recordings, I would beg him to delete them.  
2 These tapes represent yet another hallmark in Respondent's scheme to manipulate and control in  
3 that these tapes and others became the subject of his threats in the event I should ever leave the  
4 relationship.  
5

#### 6 RESPONDENT'S EMOTIONAL ABUSE TURNS PHYSICAL

7 18. In November 2007, Respondent and I held a party at my former residence in the  
8 Mt. Olympus neighborhood after the *Dancing with the Stars* finale. There was to be a live  
9 interview with me from our house the following morning. Prior to the appearance, I went  
10 downstairs to get into hair and make-up for the television appearance. When I went back upstairs,  
11 Respondent approached me in the bedroom. He was in a rage and I had no idea why. He placed  
12 both of his hands around my neck and began choking me. He then slammed me down onto the  
13 hardwood floor. When this happened, the children were asleep in their beds and thankfully they  
14 did not wake up. I was injured as a result of his actions. I had red marks around my neck that  
15 needed to be covered up by the makeup artist. This was the first instance of physical violence in  
16 our marriage. Later, I would come to realize that Respondent's beatings and abuse would coincide  
17 with my career success. When something good would happen for me, he would beat me down to  
18 let me know that he was in charge.  
19

20 19. Between 2008 and 2010, Respondent continued with his constant stream of verbal  
21 and emotional abuse. Respondent's behavior changed in that when he became angry, the verbal  
22 onslaught was accompanied by physical contact. Respondent would often shove me or physically  
23 restrain me such that I could not escape from "rants".  
24

25 20. In 2010, Respondent's abusive conduct once again escalated once again after he  
26 hired Lorraine Gilles, an exchange student from a small town in Germany, claiming she would  
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1 become a Nanny for our daughter. Lorraine was some 20 years old and was quite beautiful.  
2 Respondent would degrade me **in front of her** by comparing me to Lorraine telling me how much  
3 younger and better looking she was. I later discovered that Respondent was having sex with  
4 Lorraine and was paying her inordinate amounts of money. Over the course of some three years, I  
5 recently learned that Respondent paid Lorraine in excess of \$300,000.00 for alleged nanny  
6 services. Respondent immediately began setting Lorraine up as my rival. She answered to, and  
7 reported to Respondent.  
8

9  
10 21. In 2010, Respondent and I were at a bar and he became involved in a brawl and  
11 beat up two men. Someone in the bar took pictures of the brawl and the pictures hit the media.  
12 True and correct copies of the foregoing photographs are attached as **Exhibit "1."** Respondent  
13 later claimed that he got into this fight to protect me; however, his claim was false. In actuality,  
14 the men had just attempted to speak with me and Respondent became enraged that they wanted to  
15 talk to "his" wife. A verbal altercation ensued. One of the men insulted Respondent at which time  
16 Respondent challenged the man to "come over and say that to my face." Respondent then  
17 proceeded to beat up both men. One of the men was beaten bloody.  
18

19  
20 22. In July 2012, while I was taping the *X Factor* in Sydney, Australia, I was sent by  
21 the show to New York to do what was called a "Home Visit" segment. Usher, the recording  
22 artist/producer, was to appear in the segment with me. On the evening of the taping, **Respondent**  
23 **flew into a rage claiming that I had been flirting with Usher all day. Respondent was clearly**  
24 **jealous without reason. Respondent punched me with a closed fist in the face causing my lip**  
25 **to split and then swell.** I asked Respondent how I was supposed to work with a swollen lip, and  
26 he told me that I should have thought of that before I decided I wanted to "flirt with and fuck"  
27 Usher.  
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1           23.     When I showed up on set with a swollen lip, people began asking questions. I lied  
2 in order to cover for Respondent and told everyone that I had an allergic reaction to shellfish. My  
3 lip and lower portion of my face was swollen to the point that I had to be filmed from a particular  
4 angle so that the injury would not show up on tape. The producers called a doctor for me because  
5 my face was so bad. The doctor gave me a steroid injection in order to treat what I told him was  
6 an allergic reaction. I risked my own health by taking a medically unnecessary injection because  
7 of my fear of Respondent and what he would do if I did not cover for him.  
8

9           24.     After the beating, Respondent threatened that if told anyone what had happened, he  
10 would release the tapes and damage my career, take the children and destroy my life. He told me  
11 that no one would believe me because everyone thinks I'm crazy. He called me a "fucking  
12 monkey," told me that I was dumb, and said that I was a "derelict".  
13

14           25.     In August 2012, I performed with the Spice Girls at the closing ceremony for the  
15 London Olympics. The following day, Respondent and I went to Prague and joined two friends.  
16 During that trip, Respondent and I got into an argument. Respondent once again punched me in  
17 the face with a closed fist. He then pushed me down on the carpet. I was forced to seek  
18 medical attention while in Prague given my face hurt so badly. Respondent made me pay for  
19 the medical treatment in cash so that it could not be traced. My face swelled from the punch  
20 and my skin was burned from being pushed against the carpet. My face actually scabbed  
21 over the rug burns. Because the injuries were so obvious, and because the media had  
22 snapped pictures of me with the facial injury, Respondent forced me to "tweet" out that I  
23 injured myself by running on 7 inch Christian Louboutin heels. Collectively attached as  
24 Exhibit "2" are true and correct copies of photographs of me reflecting the injury I sustained in  
25 Prague.  
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RESPONDENT DISRUPTS MY ABILITY TO WORK

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2       26.     Respondent constantly disrupts and interferes with my ability to work. He becomes  
3 irrationally jealous when I attempt to interact with others on set. Respondent projects hostility and  
4 an aura of intimidation on set such that producers, assistant producers and co-stars have expressed  
5 concern. Respondent's actions are both embarrassing and disruptive of my emotional calm. After  
6 tapings, I would constantly hear Respondent complain about how much happier I appear to be on  
7 set than at home. I am terribly uncomfortable with Respondent being around me while on set.  
8 Given his volatility, I made the decision to have him banned from the set.  
9

10  
11       27.     Following the Usher incident and the Prague incident, I was committed  
12 contractually to appear on the Australian version of *X Factor*. I had to return to Australia to film  
13 the show while I was still bruised. Respondent insisted that he accompany me to Sydney and  
14 demanded that I ask for two first-class tickets for us. He demanded that he be allowed to be on set  
15 during filming. **Given the fact that he had on two separate occasions punched me with a**  
16 **closed fist, I was unwilling to let him anywhere near the set so as to risk his disruptions, his**  
17 **anger and his abuse.** As a result of my fear, I had Respondent banned from the X Factor set in  
18 Sydney.  
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21       28.     Banning Respondent from the set did not stop the harassment or the intimidation.  
22 Respondent would call and text my phone incessantly. On the occasions he could not reach me he  
23 would call the people in my inner circle and harass them through the use of multiple annoying  
24 phone calls and hostile conversations wherein he demanded that they attempt to reach me.  
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26       29.     Respondent refused to allow me to have an assistant. He would force me to make  
27 business arrangements for myself so that he could monitor everything. He demanded to see my  
28 contracts. He demanded to speak to my agent. He demanded to make changes to my contracts, i.e.,  
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1 styling budget, hair and makeup, travel and hotel. He would become verbally abusive with all  
2 those around me such that my business relationships if not outright "soured" were ultimately  
3 "chilled".

#### 4 RECENT HISTORY

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6 30. In late April or early May 2014, Respondent and the "nanny", Lorraine, told me  
7 that Lorraine was pregnant with Respondent's child. Respondent told me he wanted her to have  
8 the baby and all three of us live together. I was shocked and in disbelief. Respondent later  
9 demanded that Lorraine have an abortion. Respondent used money earned by me to pay for  
10 Lorraine's abortion, and he used money earned by me to pay for Lorraine's hotel stay while she  
11 recuperated from the procedure.  
12

13 31. In 2014, I travelled to England with the kids and Lorraine to film *X Factor-UK*. By  
14 this time, there was no pretense that Lorraine was anything but an agent for Respondent and that  
15 she there to keep tabs on me for Respondent.  
16

17 32. In December 2014, Respondent came to the UK. Respondent's abuse, coupled with  
18 the mind-games became overwhelming. In a moment of emotional and physical exhaustion, I took  
19 an entire bottle of Aspirin. I immediately regretted the action, and tried to call 999 (England's  
20 version of 911), and Respondent blocked me from calling for help. He threw me in the bedroom  
21 (without a phone) and locked the door, telling me to "die, bitch!" I tried to break down the door,  
22 and eventually I was able to break the lock as it was very old. Seeing that I opened the door,  
23 Respondent pushed it shut. Each time I would pry the door open and try to squeeze out,  
24 Respondent would slam the door on my head. I kept telling him that I wanted to get my stomach  
25 pumped and I begged him to let me out. At some point, my friend Randy came over, but forced  
26 him to leave. Randy apparently called an ambulance for me, but Respondent turned it away. The  
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1 next morning, my driver came to take me to work. Upon seeing me, the driver told me he was  
2 taking me to a hospital and that I would not be taken to work. I was in the hospital for two days. I  
3 was badly hurt. During that time, Respondent was not allowed near me. I had security standing  
4 outside my hospital door with a picture of him so they knew to keep him out.  
5

6 33. While I was in the hospital, Respondent was making plans to slip out of the  
7 country. Respondent had Lorraine bring the children to Germany without my permission or  
8 consent while I was recovering from my physical injuries. The authorities were called. It is my  
9 understanding that Respondent had Lorraine take the children back to London. It is my further  
10 understanding that London authorities issued a warrant for Respondent's arrest. In order to evade  
11 law enforcement, Respondent and Lorraine flew back to Los Angeles with our daughter Madison,  
12 using my money to purchase first class air travel from London to Los Angeles without any  
13 advance notice.  
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15  
16 34. I am informed and believe and thereon allege that due to a warrant being issued  
17 against Respondent by UK authorities he was ultimately banned from England. My injuries  
18 caused me to miss filming for the *X Factor-UK* and it became a major media storm in England.  
19 Upon being able to return to work, I still had visible facial and body wounds from Respondent's  
20 abuse. These injuries could not be concealed, even with heavy theatrical make-up. The media  
21 picked up on my injuries that were clearly visible when I returned to *X Factor-UK*. Still frames of  
22 my performance with visible injuries flooded the internet. True and correct copies of some of the  
23 still frames are collectively attached hereto as **Exhibit "3."**  
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25  
26 35. During that performance, in defiance of Respondent's continued abuse, I stood on  
27 the stage with my hands up so that it was clear that I was no longer wearing my wedding ring. I  
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1 wanted to send a message to Respondent that I was no longer going to let him abuse me. A true  
2 and correct copy of a still frame is attached hereto as **Exhibit "4."**

3 36. Respondent then took matters in his own hands. He asked my therapist Dr.  
4 Charles Sophy to fly to London to "check up" on me and offered Dr. Sophy payment for his air  
5 travel. In an extraordinary example of Respondent's manipulation and cunning, I believe  
6 Respondent failed to tell Dr. Sophy that he had "tipped off" the London Paparazzi that Dr. Sophy  
7 was arriving to check up on me so as to "spin" the story away from the spousal abuse towards a  
8 potential suicide attempt. Hindsight makes apparent that Respondent deceived Dr. Sophy into  
9 flying to London so as to provide a pretextual story to mitigate the negative legal attention and  
10 press issued against him. Dr. Sophy and I spent a significant amount of time together in London  
11 and he was able to see the extent of my emotional pain. By the time Dr. Sophy came, my physical  
12 injuries had healed (and I was wearing make-up). I didn't tell Dr. Sophy about the injuries. I was  
13 still protecting my abuser. I told Dr. Sophy I felt better given Respondent was back in Los  
14 Angeles and Dr. Sophy told me that he had seen Madison and that she was fine. I was enormously  
15 relieved to hear that.

16 37. After that episode, Respondent began to press me and Dr. Sophy, in an effort to  
17 "take the heat off of him in the British Press" (as they were all reporting that he had beaten me).  
18 Respondent demanded that I release a press statement that I had attempted suicide while in  
19 London, and I refused.

20 38. Upon my return to Los Angeles, Respondent continued in his effort to paint me as  
21 crazy. Respondent continued in his efforts to pressure me into releasing a press statement that I  
22 had attempted suicide. He would tell Dr. Sophy that I was crazy without admitting to his abuse.  
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1           39.     Now that I was back in Los Angeles, Respondent wasted no time in issuing threats.  
2 He threatened that he would tell *X Factor* and the press that I tried to kill myself so I would lose  
3 my job. He berated me and called me stupid. Given his threat, I felt compelled to tell my  
4 employers myself that I had attempted suicide in an effort to “escape” from my husband and his  
5 abusive conduct. My employers understood and were genuinely empathetic and supportive. They  
6 offered to assist me to get as far away as possible from Respondent.  
7

8           40.     In January 2015, I finally worked up the courage to fire Lorraine. When I did,  
9 Respondent went ballistic. He screamed and yelled at me for some three straight hours. He told  
10 me that Lorraine raised our children far better than I ever could. He told me that she was his “ride  
11 or die bitch” and the only woman in his life that completely had his back. Respondent stated to  
12 me, “No matter what she will always be in my life. How dare you fire her.” When he finally  
13 calmed down he told me to shut up and listen – instructing and demanding that I call Lorraine,  
14 apologize profusely, beg her to come back, re-hire her, and give her a raise. He then threatened,  
15 “You do realize that Lorraine could be a witness against you and give a story to the press and tell  
16 Child services. Your career will be ruined.” This was just another threat in a long line of threats  
17 made by Respondent.  
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21           41.     Despite wanting to leave the marriage and obtain my independence, the old fears  
22 reemerged and I conceded to Respondent’s demands. I rehired Lorraine and fell back into the  
23 same old pattern. This time however, Respondent treated Lorraine as if she was his wife and I was  
24 second rate. His demeaning comments towards me made in Lorraine’s presence became worse.  
25 Lorraine felt empowered by this and became manipulative and demanding of me, knowing that I  
26 could not fire her.  
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RESPONDENT'S USE OF MY INCOME

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2           42.    Respondent has taken millions of dollars from me during our marriage. There was  
3 one joint account in which all of my income was deposited. Respondent demanded that he be the  
4 main signatory. He would take money from this account and invest in whatever entity or project  
5 that interested him. He would constantly represent to me that the money was safe, taxes were paid,  
6 and that he "has it covered." Despite these representations I later learned that he had taken money  
7 earned by me so as to benefit Lorraine and others without my knowledge and consent.  
8

9  
10           43.    Without my knowledge and consent, Respondent used \$325,000 of my money to  
11 pay for the support of his child from a prior relationship.

12           44.    As mentioned previously, Respondent also paid Lorraine in excess of \$300,000  
13 over a three-year period of time for alleged "nanny services."  
14

15           45.    When I finally fired Lorraine for good, Respondent turned around and paid a  
16 company called Events Locker some \$60,000.00. Lorraine was designated a "promotions  
17 manager" for this company.  
18

19           46.    After having made these discoveries, I contacted my accountant's assistant,  
20 Fabiola, and informed her that any expenditures by Respondent in excess of \$5,000.00 from our  
21 joint account would require my approval. Upon learning of this, Respondent went ballistic. He  
22 screamed and yelled at me stating, "You are disrespecting me and I don't trust you." He repeated  
23 over and over how he "made me," how, "how I am the only one who is there for you." He told me  
24 how "No one gives a 'fuck' about Mel B," other than him.  
25

26           47.    I later learned that Respondent would invade my email account without my  
27 knowledge and consent so as to review the approval requests sent by Fabiola, falsely using my  
28 identity and email account to respond and approve the expenditure requests.  
29

1 48. Other times Respondent would simply scream and yell at me to approve Fabiola's  
2 requests, cornering me and demanding that I send an approval email for the expenditure. He  
3 would demand immediate approval without allowing me the opportunity to read Fabiola's email.  
4 This occurred at least 20 times.

5  
6 49. Denying Respondent unlimited access to our joint account really "set him off". The  
7 verbal abuse continued. The name-calling continued. The insults continued. In an effort to stave  
8 off his behavior, I simply agreed with him - that yes I was fat. Yes I had saggy arms. Yes I was in  
9 my forty's, Yes Lorraine was younger and better looking than me. My acquiescence became my  
10 new defense to his abuse.

11  
12 **CONTINUED ABUSE THROUGHOUT 2016**

13 50. Respondent's abuse of me expanded to include those around me. Though this was  
14 not new, it became extremely distressing to me. Respondent became abusive to my talent agency  
15 and would treat my agents as if they were working for him rather than me. He would use my name  
16 in an effort to obtain meetings and/or to "pitch" shows. My agents constantly complained to me  
17 that they did not want to have contact with him. They complained to me that he was abusive and  
18 demanding. I found all of this extremely disruptive and distressing in that his conduct was  
19 adversely affecting my business and my business relationships.  
20

21  
22 51. On March 3, 2016, I began working again with *America's Got Talent*. On or about  
23 March 29<sup>th</sup>, I went to London on business. Part and parcel of the trip was a meeting with the other  
24 members of the Spice Girls so as to discuss the possibility of a reunion tour. Respondent insisted  
25 upon going with me. While I was there, Respondent became angry and began screaming at me. He  
26 called me a "derelict" and threatened to send the other Spice Girls compromising videos of me.  
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1           52.     On June 30, 2016, Respondent informed me that we are all taking a vacation on a  
2 boat with Lorraine to Ibiza. I was mortified in that I only wanted a quiet holiday with Respondent  
3 and the kids. While on the trip Respondent resorted to the same name calling, screaming, yelling  
4 and demeaning conduct again done in the presence of Lorraine. I would leave the boat daily to go  
5 to the gym in an effort to get away from Respondent and Lorraine.  
6

7           53.     After the trip I gave Lorraine a six-week termination notice. I told her she would be  
8 terminated effective September 1, 2016. She actually laughed at me. Respondent again went off  
9 on me saying that she is not "fired" and that Lorraine is "the only person in my life that I trust."  
10 As the September 1<sup>st</sup> termination date drew closer, Lorraine married her best friend, Michael  
11 Bleau, on August 14, 2016. I soon learned that Respondent had wire transferred \$60,000.00  
12 without my knowledge or consent to Michael Bleau's business, "Events Locker" wherein  
13 Respondent was designated Vice President of Business Development, and Lorraine wore the title  
14 of Promotions Manager.  
15

16           54.     On or about October 17, 2016, I flew to Australia with the two kids, Angel and  
17 Madison, in order to film *X Factor* in Sydney. I did not want Respondent to come. While there  
18 and away from Respondent, I was constantly harassed by his repeated annoying phone calls and  
19 texts in an effort to reach me. When Respondent was unable to reach me, he harassed my nanny,  
20 Lauren, by repeatedly calling and texting her phone in an effort to locate and/or connect with me.  
21 When Lauren didn't respond, Respondent harassed my security with the same constant annoying  
22 telephone calls and texts in an effort to reach me. On one particular occasion, I had taken off  
23 several hours to spend time with friends on a boat. While out, Respondent somehow got hold of  
24 the Captain's phone number and dialed it repeatedly to the point where the Captain became so  
25 annoyed, he took us all back into shore.  
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1           55.     On or about November 9, 2016, I attended a dinner party with friends. Respondent  
2 found out and again went ballistic, yelling and screaming at me for two days straight.

3           56.     I came back from Australia on November 24, 2016. On that particular night,  
4 Stephan placed my empty luggage bags in the rear of the nanny's vehicle after I had asked him to  
5 put them in the garage. The following night I went to the gym to work out. Respondent told me I  
6 shouldn't be driving around at night because "dangerous things can happen." Later, Respondent  
7 came to me with video from our home's security system. It just so happened that within a short  
8 period of time after our conversation, an individual in a mask broke the rear glass of our nanny's  
9 vehicle and stole my empty luggage that Respondent had just left in the trunk. The nanny car had  
10 been parked in the perfect place to capture the break-in and the man in the mask. The coincidence  
11 was not lost upon me. I believe Respondent orchestrated the incident and had someone break into  
12 the car in an effort to scare me. Respondent claims he filed a police report but I have been unable  
13 to locate any such report being made to law enforcement.  
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17           57.     On November 29, 2016, I left for London to tape *lip sync battle*. I went with the  
18 kids and my friend Randy. Respondent stayed home. True to form, Respondent harassed me  
19 throughout my entire trip by making multiple annoying phone calls and texts. When he was  
20 unable to reach me he would harass Randy by making repeated phone calls and texts to Randy's  
21 phone. Additionally, because I was in London for ten days, it was very important to me to bring  
22 the children to visit with my mother. Respondent had a huge resentment against my family,  
23 especially my mother, and would do anything to keep them away from me. They had expressed  
24 concern about Respondent's physical and emotional abuse of me and they had seen the bruises in  
25 the media. When Respondent found out through one of this "sources" that I had taken the  
26 children to see their grandmother, he called and went ballistic. He was screaming and shouting  
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1 profanity. He said if I take the children to see my mother, then he will take them to see the former  
2 nanny, Lorraine. I had told Respondent that I did not want to hear anything more about Lorraine  
3 after I fired her.

4 58. On December 15, 2016, I flew to New York. I was contracted to play in the  
5 Broadway musical "Chicago". Respondent did not come to New York. Once again, as in my past  
6 travels without Respondent, his harassment continued from afar. Respondent would repeatedly  
7 call and text my cell phone numerous times per day. He would call and text me during the  
8 performance knowing I was on stage. He would ask people to conduct surveillance upon me. He  
9 would call and text telling me he had people watching me and informing him as to when I left the  
10 hotel, when I arrived at the theatre, when I left the theatre. While away and while I was working  
11 Respondent made sure that he caused me grief, anguish and stress.

12 59. While in the UK I took the children to see the Lion King. I received multiple  
13 telephone calls from Respondent ranting and raving at me that I intentionally waited to take the  
14 kids to see the play without him. He told me that he had seen a picture of me in the media taking  
15 the kids to Lion King and that his absence made him look bad.

16 **RESPONDENT'S ABUSE AND INSENSITIVITY IS BOUNDLESS –**

17 **INCLUDES COMMENTS AND CONDUCT CONCERNING MY FATHER'S PASSING**

18 60. In November of 2016 I learned that my father's health was rapidly deteriorating.  
19 He was dying from cancer. I wanted to travel to the UK to spend time with my father prior to his  
20 passing but was unable to do so due to contractual obligations keeping me in New York. I  
21 expressed to Respondent my feelings and emotions over the fact that I could not leave for England  
22 until the end of February so as to see my father. Respondent's response to me after sharing an  
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1 isolated moment of intimacy with him was quite simple - "suck it up." "If he's going to die he's  
2 going to die."

3 61. Upon completing my contract, I contacted Respondent in Los Angeles asking him  
4 to send me my passport such that I could travel directly from New York to the UK to see my  
5 father. I told Respondent precisely where my passport was. Respondent claimed he could not find  
6 it; he claimed that it was nowhere in the house.  
7

8 62. I was forced to delay my travel to the UK. I had to return to Los Angeles to retrieve  
9 my passport. I was unable to find my passport despite specific recall as to where I had left it in the  
10 house. **I believe Respondent took my passport so as to intentionally delay my travel such  
11 that I would not see my father prior to his death.**  
12

13 63. I was forced to apply for an emergency passport to allow my travel to the UK. I  
14 flew to London from Los Angeles on February 28<sup>th</sup>. I arrived in Leeds, England late February 28<sup>th</sup>.  
15 My father died on March 4, 2017.  
16

#### 17 RESPONDENT'S LAST EFFORTS TO HARASS AND INTIMIDATE ME

18 64. After my father's passing, I made the decision to separate and divorce Respondent.  
19 After informing him of my decision and after having moved out of the family house on March 18,  
20 2017, Respondent again threatened that if I did not separate in a manner acceptable to him, he  
21 would ruin me by releasing the videotapes he claims to have made of me.  
22

#### 23 IDENTITY THEFT

24 65. In February 2017, I had arranged for a meeting between my daughter, Angel, and  
25 her biological father to take place in mid-March. Up to this point they had not had a relationship.  
26 Respondent became aware of this meeting and in an effort to "derail" the meet, took my phone  
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1 without my knowledge or consent and texted Angel's father's assistant at 4:30 a.m.  
2 impersonating/claiming to be me.

3 66. I don't know the content of Respondent's text, but I do know that Angel's father  
4 canceled the meeting with Angel as a result.  
5

6 **ABUSE IN FRONT OF THE CHILDREN**

7 67. Respondent's name-calling, yelling, screaming, demeaning and demoralizing  
8 conduct towards me has occurred in front of all three of the children. When this occurs in front of  
9 the children, I repeatedly ask him to stop, or take it upstairs, and he repeatedly refused to do.  
10 Sometimes he would even get louder until I capitulated to his particular demands.  
11

12 **CONCLUSION**

13 68. I am in fear of my safety and I am in fear of being irreparably harmed as a result of  
14 Respondent's threats. That absence the Court's issuance of Temporary Protective Orders I fear  
15 Respondent will carry out his threats against me which will collaterally harm the children. As  
16 such, I am requesting that the Court issue the requested orders pending hearing on the allegations  
17 contained herein such that Permanent Protective Orders can be sought.  
18

19 69. I am asking that the Restraining Orders issued include a prohibition against  
20 Respondent's use, dissemination, transfer or sale of any videotaped or electronic media in which I  
21 am portrayed pending hearing on my request for Permanent Orders.  
22  
23

24 I declare under penalty of perjury pursuant to the laws of the State of California that the  
25 foregoing is true and correct. Executed this 2<sup>nd</sup> of April, 2017 at Los Angeles, California.  
26

27  
28   
29 MELANIE BROWN