

1 F. Julian told me that he put a curse on Respondent because Respondent
2 had been mean to Julian. If Respondent smoked, he would get a bad cough, if he drank
3 more than five drinks, he would throw up, and if he was mean to people, others would tell
4 him he was being mean. Julian said this was not a forever curse, but that he needed to teach
5 his dad a lesson.

6 12. I do not know if all of these allegations by Julian are truthful and accurate but
7 I believe them to be. I observe how Julian behaves, how his demeanor changes and I have
8 noted his reluctance to see Respondent. Clearly, the school felt strongly enough to call
9 DCFS after speaking with Julian and hearing similar accounts from Julian.

10 13. I have witnessed Respondent's anger on a number of occasions, specifically
11 since our divorce was finalized. For example:

12 A. in December 2016, Julian was sick and stayed home from school. I was
13 getting Julian ready to transition to Respondent's house, and Julian told me he did not want
14 to go if Respondent was going to make him play basketball while he was sick. When
15 Respondent arrived to pick up Julian, I asked him to please promise that he would not make
16 Julian play basketball while he was sick. Respondent became angry that I was interfering
17 in his custodial time, and he began shouting that he could do what he wanted during his
18 custodial time and at his house. Julian was still in his room, and Respondent began yelling
19 at Julian to come to him. Julian did, Respondent sent him to get his stuff, which Julian did.
20 Respondent then screamed to him to stay in the house, and he left the house and slammed
21 the door. I went outside to reason with him, and he told me that he wanted to speak with
22 Julian alone. I then went into Julian's room. Julian was frightened and begged me not to go
23 with Respondent. He said he would go with Respondent tomorrow when Respondent had
24 calmed down. Respondent went back in the house and yelled to Julian that he was never
25 going to make Julian play basketball. Julian then agreed to talk to Respondent alone, and
26 came out a few minutes later saying he would go with Respondent.

27 B. On a few occasions I have tried to talk to Respondent about other
28 concerns I have had. For example, I understand that Respondent does not shield Julian

1 from certain things, i.e., inappropriate movies, sexual situations, and cigarette smoking. In
2 the past, when I have raised these issues, Respondent's reaction is to scream at me and tell
3 me that it is none of my business. He says he can do what he wants during his time and in
4 his house. As a result, I have stopped raising issues with Respondent.

5 **Concerns re: Respondent's Alcohol and Drug Abuse**

6 14. I am also concerned that Respondent is engaging in alcohol and drug use
7 while Julian is in his custody. I am aware that Respondent has a history of drug use, which
8 existed during our marriage. In the summer of 2014, after we separated, Respondent
9 admitted to me that he had done and had been doing a lot of drugs. During this
10 conversation, Respondent looked ill. He was pale, clammy, and shaky. It was very
11 uncharacteristic and I was worried about him.

12 15. Respondent came to Julian's kindergarten graduation, on June 10, 2016,
13 clearly intoxicated. It was 8:30 a.m. While in the Catholic Church where the ceremony was
14 held, Respondent was hooting and hollering and making inappropriate jokes that the entire
15 room could hear. He was calling attention to himself and behaving in an inappropriate
16 manner. I was very concerned about this behavior and recall being relieved that Julian was
17 not old enough to understand what was happening.

18 16. I have witnessed Respondent's behavior become very unstable and erratic at
19 times. Respondent attends Julian's soccer games, and at some games he is very excited,
20 running around with the kids and trying to coach the team. Other times, Respondent seems
21 very somber and does not participate in the games at all. He sits on the sidelines barely
22 paying attention. This behavior, coupled with the reports of marijuana use as outlined in the
23 Declaration of Isabela Garcia, have me concerned about what activities Respondent is
24 partaking in when Julian is in his custody.

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IN RE THE MARRIAGE OF PATTON & THICKE (POST-DISSOLUTION)
DECLARATION


CASE NO. BD 605292
PAGE 5

DECLARATION OF PAULA M. PATTON

17. We made various proposals to Respondent's attorney on January 10, 2017,
but there has been no response. Therefore, all of the facts set forth herein and in the
concurrently filed declarations has left me with no alternative but to seek the Court's
assistance to insure Julian's safety.

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

Executed on January 11, 2017, at Los Angeles, California.


PAULA M. PATTON

DECLARATION OF VEERA MAHAJAN

I, VEERA MAHAJAN, declare as follows:

I know the following of my own knowledge and could testify competently thereto if called upon as a witness to do so. I make this Declaration in support of Petitioner's *Ex Parte* Request for Order filed herewith.

1. I am an employee of [REDACTED] as a mediator. When there are disputes between children, I am brought in to meet with the children and help them resolve the issues through conversation. I teach them to not fight and to discuss their concerns without violence. Additionally, I am a Board Member of Safe Passage, a not for profit organization that works with victims of domestic violence, and I have volunteered at domestic violence call centers in the past.

2. I first met with Julian Thicke in October or November 2016. He was having a dispute with another child, and I met with both children to help resolve the dispute. I have observed Julian to be a very intelligent and expressive child.

3. During our meeting, Julian asked me if his parents would find out about the meeting. I told him that our meeting was confidential, unless I found out that someone was being hurt, and then I would have to share what we discussed with the principal.

4. During our meetings in December 2016, Julian made the following comments, which were unrelated to the conflict between him and the other child:

A. It would be okay if we told his mother about the meeting but not his father. He can be punished by mom, but not by dad, because dad hits him hard.

B. Dad punches him so hard, but never where someone can see. If they are in a public place, like the beach, dad will take him to the bathroom. Dad will never hit him in public because someone would ask what he was doing and tell him he was hurting a child. If they are home, dad will take him to his bedroom.

C. Dad grabbed him by the back of the neck and it hurt him. He asked dad to stop, but dad would not stop, and instead took Julian into the bathroom and hit him really hard.

1 D. Julian told mom that he does not want to live with dad anymore and he
2 wants to live with her. He told me that mom promised him she would see what she could do.

3 5. When I returned to school from Winter Break, I had a meeting with the principal
4 of [REDACTED] Michael Smith. I told Principal Smith that I felt we needed to
5 do something and discuss the issue. On January 3, 2016, Principal Smith and I called
6 Julian's mother, Paula Patton. Principal Smith told her what Julian had said during our
7 meetings, and asked Ms. Patton to come in for a meeting on January 4th, without Julian. We
8 discussed our concerns with her, and she indicated that Julian had been making similar
9 comments to her in recent weeks. After Ms. Patton left our meeting on January 4th, Principal
10 Smith and I called Department of Child and Family Services to report our concerns that
11 abuse may be occurring. Ms. Patton knew that we were going to make the call.

12 6. Principal Smith and I asked Ms. Patton to bring Julian to the office on January
13 5th. DCFS participated in the meeting via telephone. At that time Julian confirmed that his
14 father hits him on the bottom, with his pants and underpants down, and his face down in the
15 chair seat.

16 7. During the January 5th meeting, I noticed several changes in Julian's behavior
17 that concerned me. He acted in a manner that suggested he was scared. For example:

18 A. I noticed that Julian had developed a stutter. He was crying
19 uncontrollably and hyperventilating.

20 B. Julian was clinging to Ms. Patton as they both sat on the couch in the
21 Principal's office. When Ms. Patton had to leave the office to talk to DCFS on the phone, I
22 offered to sit with him while she was gone. Julian jumped onto my lap, which he has never
23 done before, and continued to cry while clinging to me and biting his own clothes until Ms.
24 Patton returned.

25 C. Julian cried a lot while in the meeting and he begged us several times
26 to forget everything he had said, not to tell anyone, and not to make his dad mad.

27 D. We had to reassure Julian that it was wrong for anyone to hit him and
28 that he did not do anything wrong by telling me. Eventually Julian calmed down. Julian

1 knew that it was technically his dad's custody day, and he was relieved to know that he could
2 go home with mom instead of going to dad's house that day.

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

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6 Executed on January 11, 2017, at Los Angeles, California.

7 **SEE FACSIMILE SIGNATURE**
8 **ON ATTACHED PAGE**

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VEERA MAHAJAN

1 he keeps being mean, Julian does not want to see him.

2 11. After that initial conversation, Julian began to open up to me about what had
3 been happening at Respondent's home during Respondent's custodial time. Throughout
4 November and December 2016, Julian shared the following incidents with me.

5 A. In 2014, after Respondent and I separated, Julian was in bed at
6 Respondent's home, and was yelling down the hallway asking for one more hug.
7 Respondent came into the room, and Julian was excited that he was going to get another
8 hug. Instead, Respondent spanked Julian. When I asked Julian to describe the spaking, he
9 said, "hot, fire lava, but worse".

10 B. Respondent took Julian on a trip to the Bahamas, and while in the
11 airport, Respondent grabbed him by the neck and Julian told me that it hurt.

12 C. I asked Julian on one occasion if Respondent has ever hit him in the
13 face, and Julian said yes, once, but then backtracked, appeared scared and uncomfortable,
14 and refused to discuss anymore.

15 D. When Julian is spanked at Respondent's home, Julian has disclosed
16 that Respondent takes him to his room, pushes his head and chest over a white chair, pulls
17 down his pants and underpants, and hits him on the bottom. When describing the act to me,
18 Julian gets very tense and angry. His body gets tight and his face becomes pained. He
19 shows me how angry Respondent is when he is spanking Julian. Every time he described
20 an incident to me, he would get very concerned about telling Respondent, and would beg
21 me not to say anything to Respondent. He became very scared that Respondent would find
22 out and would punish him more or retaliate against him.

23 E. Over the past few months, Julian has begun attempting to negotiate his
24 visitations with Respondent. On days before he knows he is going to Respondent's home,
25 he will try to negotiate with me, asking to stay with me for one more day, or come home one
26 day early. His requests always came with a request to not tell Respondent he was asking
27 for these things. I promised Julian that we would always have open communication and I
28 would never betray his confidence.