POS-050/EFS-050

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO:	FOR COURT USE ONLY
NAME: John N. Vega SBN 86662 FIRM NAME: Law Office of John N. Vega STREET ADDRESS: 306 West Second Street, Suite 300 CITY: San Bernardino STATE: CA ZIP CODE: 92401 TELEPHONE NO.: (909) 889-0485 FAX NO.: (909) 384-0952 E-MAIL ADDRESS: vegalaw00@yahoo.com ATTORNEY FOR (name): Rebecca Lohman	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Bernardino County STREET ADDRESS: 351 North Arrowhead Avenue MAILING ADDRESS: CITY AND ZIP CODE: San Bernardino, CA 92415 BRANCH NAME: Old Historic Courthouse	
PLAINTIFF/PETITIONER: Rebecca S. Lohman DEFENDANT/RESPONDENT: Corey C. Lohman	CASE NUMBER: FAMSB-2207189 JUDICIAL OFFICER:
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: S-43

1. I am at least 18 years old.
   a. My residence or business address is *(specify)*:
      306 West Second Street, Suite 300
      San Bernardino, CA 92401
   b. My electronic service address is *(specify)*:
      rm@johnvegaattorney.com
2. I electronically served the following documents *(exact titles)*:
   Responsive Declaration of Rebecca Lohman,
   ☐ The documents served are listed in an attachment. *(Form POS-050(D)/EFS-050(D) may be used for this purpose.)*
3. I electronically served the documents listed in 2 as follows:
   a. Name of person served: **Corey C. Lohman**
      On behalf of *(name or names of parties represented, if person served is an attorney)*:
      In Pro per
   b. Electronic service address of person served: **coreyclohman@gmail.com**
   c. On *(date)*: **March 18, 2024**
   ☐ The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment. *(Form POS-050(P)/EFS-050(P) may be used for this purpose.)*

Date: **March 18, 2024**

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

Rosalinda Medel _____
(TYPE OR PRINT NAME OF DECLARANT) (SIGNATURE OF DECLARANT)

Form Approved for Optional Use
Judicial Council of California
POS-050/EFS-050 [Rev. February 1, 2017]
CCB | Essential Forms

PROOF OF ELECTRONIC SERVICE
(Proof of Service/Electronic Filing and Service)

Cal. Rules of Court, rule 2.251
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I have not reviewed the filings for the March 19, 2024 hearing filed by Respondent, however I believe that Respondent is likely accusing me of violating court orders and allowing our daughter Addison to be left alone with my boyfriend, Joseph Barrell, given that this is what he has reported to Civil Court when he filed a restraining order against Mr. Barrell approximately one week ago, along with what I believe he told law enforcement.

Since approximately summer of 2023, I have become concerned that Respondent is speaking about the family law court case with our daughter, as well as speaking negatively about myself to her. Respondent has admitted to doing so on Talking Parents messages as well as left a card for Addison regarding the court hearings.

Our daughter was interviewed by Family Court Services to try to ascertain whether or not she was being spoken to about the court case. The FCS report indicates that ***"Without prompting, Addison remarked "I don't really feel comfortable with my mom's boyfriend, Joe Barelle. The child proceeded to spell his last name."***

This information was disturbing to me because it seemed odd that Addison would bring up Mr. Barrell without being asked and also proceeded to attempt to spell his name, without being asked. This seems consistent with a child who knows she is supposed to say something to a particular person, so they quickly state it at the first opportunity in order to not forget mentioning it. Additionally, this statement was in complete contrast to the behavior Addison has demonstrated on the occasions we have spent with Mr. Barrell.

Addison frequently asks me to invite Mr. Barrell to come along with us to dinner or other outings. The week prior to this interview she asked me if Mr. Barrell was going to attend her school Christmas performances. I explained that I had not invited him but I could if she wanted me too. Addison asked that I ask Mr. Barrell if he could attend.

Of additional concern regarding Addison's FCS interview, is that this language regarding *not feeling comfortable* was consistent with what Respondent told me in summer of 2023. He stated, ***"From here on out. I don't care to meet Joe. He knows my boundaries. I made them clear. And I will continue to ask Addison if anyone has made her feel uncomfortable just like any prudent dad would so you will never hear me mention his name again if he wants to live second if he wants to be in the house that I was at every day to watch it get billed and made sure everything was done correctly if he wants to sit on the couches that I picked out and sleep in the bed that was mine and never show his face that actually flatters me."***

This is also the same language regarding being "uncomfortable" that Respondent has put in a letter to Mr. Barrell, indicating that he continues to ask Addison if there is anyone that makes her feel uncomfortable. I believe that Respondent was likely continuously asking Addison whether or not she feels comfortable around Mr. Barrell, as he has indicated he would do in his communication to me and Mr. Barrell.

Last summer, Respondent left a letter at Mr. Barrell's home indicating that Addison seemed to like him, however it appears after being asked repeatedly by her father over the course of months whether or not she is comfortable around Mr. Barrell, Addison now is stating the opposite. I strongly believe that our daughter feels conflicted because while she enjoys spending time with myself and Mr. Barrell, I imagine it is concerning to her that her father keeps asking her if she is comfortable with him. I believe that our daughter very much wants to keep her father happy, so she gave her father the answer she believed he was looking for after he continuously asked her about feeling comfortable around Mr. Barrell. I believe he likely told Addison that she needed to report how she felt to the Family Court Services therapist, which is why she stated it completely unprompted.

I think that our daughter is typically a truthful child, but feels torn now because she reported not feeling comfortable and does not have the ability to navigate her feelings around whether or not she actually feels that way nor does she not want to feel like she "lied", by changing what she says now.

In Addison's FCS interview she confirmed that she was never left alone with Mr. Barrell and did not want to be left alone with him, but could not explain why she feels uncomfortable with him. Addison's interview was concerning because it read as a young girl who is being isolated by her father as it indicated that she did not trust her grandmother, her school counselor and her best friend. Addison's statements confirmed my concerns regarding Respondent's attempts to alienate her from me, but also that he was also trying to alienate her from those I have a relationship with including neutral individuals like her school counselor and best friend.

On December 26, 2023, based on Addison's statements to the FCS mediator that she did not want to be alone with Mr. Barrell, the Court ordered that Addison is not to be left alone with him for the time being. There is no issue following this order, since I have never left Addison alone with Mr. Barrell. I have always had concerns that Respondent would attempt to coach or suggestions that Mr. Barrell has abused or hurt Addison in some way, given Respondent's obsessive hatred towards Mr. Barrell, whom he blames for the end of our marriage. Respondent essentially warned me of this within the first year that I started dating Mr. Barrell. He texted me stating, ***"and u can tell your pussy whipped boyfriend he has no idea what he got himself into, you don't fuck w a Lohman" and "your new lover will eventually leave you because your ex <-- 'x me calls him to many hurtful names and doesn't let Addison ever get near him he'll get tired of it", trust me this guy will leave you...."***

After the December 26, 2023 Court hearing, Respondent messaged me, ***"Addison is writing a new letter to the judge as she is extremely emotionally***

disturbed at yours and your families actions. Joe should not be brought up to her per the judges ruling to keep her away from him... If u continue to violate the court order I will file criminal charges against you." Respondent's message is not truthful regarding the Court's order. It was an attempt to scare me into limiting the amount of time Addison is around Mr. Barrell. Respondent engaged in the same sort of dishonest threatening behavior in his February 9, 2024 letter to Mr. Barrell, where he states, ***"Per the judge you will be held in contempt if you are ever alone with Addison. Addison will inform me if this occurs and I will have you arrested. Seems like Rebecca keeps a lot from you."*** This mistruth is just another attempt by Respondent to dissuade Mr. Barrell from remaining in a relationship with me and to try to draw a wedge in our relationship.

Since December 2023, Mr. Barrell has not spent time with Addison and myself without there being other people present. Mr. Barrell exchanged Christmas gifts with myself and my daughter in mid-January while my mother and a family friend where present. Mr. Barrell attended a family function at my sister's home for Superbowl Sunday in February. He drove a separate car to this event. My daughter and myself have spent time with Mr. Barrell on two other occasions in public, once to have dinner and another time for ice cream. This last weekend, we met up with my family at a restaurant to celebrate my mother's birthday. Mr. Barrell drove his own separate vehicle to meet us at these locations.

Throughout the years that I have known Mr. Barrell, he is always an appropriate, fun and caring person for my daughter to be around. I have never had a single concern about Mr. Barrell being around my daughter. In fact, I think he is a positive influence in her life. This last summer we took a trip to Massachusetts because Addison specifically asked Mr. Barrell when she could meet his parents, who live in Massachusetts. I believe

that Addison likes spending time with Mr. Barrell, but feels conflicted due to her father's obsessive hatred and jealousy of Mr. Barrell.

I have no reason or need to violate the Court's orders and leave Addison alone with Mr. Barrell. Not only do I want to follow every order of the Court but I have numerous family and friends that could watch my daughter should I need to do something where she cannot be with me. I have chosen, even prior to the Court order, never to put Addison or Mr. Barrell in that situation because of my concern of how Mr. Lohman would distort it or use it as an opportunity to make false allegations.

I want to make the Court aware that the week leading up to Respondent not returning our daughter to me, he tried opening up a child support case. I recently received a letter in the mail regarding Respondent starting a child support case on February 27, 2024, a few days prior to Respondent not returning Addison to me. I believe it shows that Respondent's motivation regarding concocting allegations stems from his need to obtain money from me and not about protecting our daughter.

Since the Court Order on March 5, 2024, was issued, Respondent has called in two welfare checks on me. Addison has had to be interviewed by law enforcement officers and a social worker. The social worker who met with both Addison and myself individually on March 8, 2024, told me that she had no concerns regarding Addison in my care. Karla stated both Addison And I had the same story called on a Saturday. So concerned

On or around March 7, 2024, Respondent changed all the emergency contacts at Addison's school, so that my family and friends were no longer listed, but only his own, out of state family, and his girlfriend who has had listed as "Other Parent" and "Step Mother", were able to sign Addison out in case of emergency.

On or around March 7, 2024, he also filed a civil harassment restraining order against my boyfriend, Mr. Barrell, which was ultimately dismissed. Respondent continues to use the court process, law enforcement and social services as a weapon to

No custody of Addison

continue to harass me. He does not seem to care that our daughter is being put in the middle of his toxic feelings towards me, my family and my boyfriend.

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

Date: 3/18/2024

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Rebecca Lohman, Declarant