

HEIDI PERCY
COUNTY CLERK
SNOHOMISH CO. WASH

Superior Court of Washington, County of Snohomish

JENNA BULIS

Petitioner, DOB: _____

vs.

KATHERINE ROSE MCNAMARA

Respondent DOB: _____

Case No.

Temporary Protection Order and Hearing Notice (TMO-)

☐ Domestic Violence (RPRT) ☒ Harassment (RAH) ☐ Stalking (STKH)
☐ Sexual Assault (RSXP) ☐ Vulnerable Adult (RVA)

Clerk's action required: 5.B, 10, 11, 12

Next Hearing Date: **04/01/25** **at 9:00 am**

Interpreter: _____

☒ **Snohomish County Superior Court**
3000 Rockefeller Ave, Everett Wa 98201

Tuesday: Courtroom 1C or 1D as assigned

☐ **Denny Juvenile Justice Center**
2801 10th St, Everett Wa 98201

See **How to Attend your Hearing** at the end of this order

Temporary Protection Order and Hearing Notice

1. **This order is effective until the end of the hearing listed above.**
This protection order complies with the Violence Against Women Act and shall be enforced throughout the United States. See last page.

2. **This order restrains (name):** KATHERINE ROSE MCNAMARA
also known as (list any known aliases) _____
The restrained person must obey the restraints ordered in section 8.

Gender	Race	Height	Weight	Eye Color	Hair Color	Skin Tone	Build
F	W	5'09"	130	UNK	BLOND	WHITE	SLIM

Noticeable features (Ex.: tattoos, scars, birthmarks): _____

Has ☐ access to or ☐ possession of ☐ firearms ☐ other weapons ☐ unknown

Surrender weapons ordered: ☐ Yes ☐ No

3. **This order protects (name):** JENNA BULIS
and the following children who are under 18 (if any) ☐ no minors

Child's name	Age	Child's name	Age
1. _____	_____	2. _____	_____
3. _____	_____	4. _____	_____
5. _____	_____	6. _____	_____

SCSO

ENTRY:

There is a rebuttable presumption to include the protected person's minor children.

☐ For good cause, the court is **not** including the protected person's minor children in this order because: _____

Warnings to the Restrained Person



You can be arrested even if the protected person or persons invite or allow you to violate the order. You alone are responsible for following the order. **Only the court may change the order.** Requests for changes must be made in writing.

If you do not obey this order, you can be arrested and charged with a crime.

- The crime may be a misdemeanor, gross misdemeanor, or felony depending on the circumstances. You may also be found in contempt of court.
- You can go to jail or prison, lose your right to possess a firearm or ammunition, and/or pay a fine.
- It is a felony to take or hide a child in violation of this order.
- If you travel to another state or to tribal lands or make the protected person do so with the intention of disobeying this order, you can be charged with a federal crime.



Firearms and Weapons. If the court approves a full protection order, you may not be able to get or have a gun, firearm, other dangerous weapon, ammunition, or concealed pistol license for as long as the protection order is in place.



Go to the court hearing scheduled on page 1. If you do not, the court may:

- Make this temporary order effective for 1 year or longer
- Order weapons restrictions, even if that was not requested
- Order other relief requested in the petition
- Order electronic monitoring, payment of costs, and treatment
- Issue a final order that you are required to follow and you may not be served with the order if it is substantially the same as this temporary order

If you are under age 18, your parent/s or legal guardian/s will also be served with this order and should also go to the hearing. The court will decide if someone should be appointed to represent you.

Findings

4. Ex Parte Hearing

☒ The court issues this temporary order without a hearing.

☐ The court held a hearing before issuing this temporary order. These people attended:

☐ Protected Person

☐ in person ☐ by phone ☐ by video

☐ Restrained Person

☐ in person ☐ by phone ☐ by video

☐ Other: _____

☐ in person ☐ by phone ☐ by video

5. **Basis**

A. **The court finds:** Based upon the petition, testimony, and case record, it appears that the restrained person engaged in conduct against the protected person/s that would be a basis for a protection order under chapter 7.105 RCW. This *Temporary Protection Order* should be issued without notice to the restrained person to avoid serious immediate harm or irreparable injury.

B. **Antiharassment Temporary Protection Order**

☐ No fee required (stalking, hate crime, single act of violence, or threat of violence including malicious and intentional threat, or presence of firearm/weapon causing substantial emotional distress, family or household member engaged in domestic violence, or nonconsensual sexual conduct or penetration or a sex offense. RCW 7.105.105(9)).

6. **Jurisdiction**

The court has jurisdiction over the parties and the subject matter.

☒ **Minors:** Washington state ☒ has exclusive continuing jurisdiction ☐ is the home state ☐ has temporary emergency jurisdiction over the children.

☐ **Temporary Emergency Jurisdiction:** The petitioner has until (date) _____ to return to (state/court with jurisdiction over the minors) _____ to seek any court orders about these minors:

The Washington order will terminate on that date for the minors. RCW 26.27.231.

☐ **The person who filed is not a parent** of one or more children listed above. (*Important! Complete Protection Order Attachment A: Non-Parent (ICWA), PO 030A/PO 040A.*)

7. **Other Findings (if any)**

Temporary Restraints (Check all that apply):

8. **The Court Orders: To the restrained person:**

General Restraints

A. ☒ **No Harm:** Do not cause any physical harm, bodily injury, assault, nonconsensual sexual conduct or nonconsensual sexual penetration, and do not harass, threaten, or stalk:

☒ the protected person ☒ the minors named in section 3 above

☐ these minors only: _____

B. ☒ **No Contact:** Do not attempt or have any contact, including nonphysical contact, directly, indirectly, or through third parties, regardless of whether those third parties know of the order, except for service of court documents with:

- ☒ the protected person ☒ the minors named in section 3 above
☐ these minors only: _____
☐ these members of the protected person's household: _____

☐ **Exception** (if any): Only this type of contact is allowed: _____

Exceptions about minors only, if any, provided in **P** below.

- C. ☒ **Stalking Behavior:** Do not harass, follow, monitor, keep under physical or electronic surveillance, cyber harass (as defined in RCW 9A.90.120), or use phone, video, audio or other electronic means to record, photograph, or track locations or communication, including digital, wire, or electronic communication, of:

- ☒ the protected ☒ the minors named in section 3 above
☐ these minors only: _____
☐ these members of the protected person's household: _____

- D. ☒ **Exclude and Stay Away:** Do not enter, return to, knowingly come within, or knowingly remain within 1,000 feet or other distance (*specify*) _____ of:

- | | |
|--|---|
| ☒ the protected person | ☒ protected person's vehicle |
| ☐ protected person's school | ☒ protected person's workplace: |
| ☒ protected person's residence | ☐ protected person's adult day program |
| ☐ the shared residence | |
| ☒ the residence, daycare, or school of | ☒ the minors named in section 3 above |
| ☐ these minors only: _____ | |
| ☐ other: _____ | |

Address: The protected person chooses to (*check one*):

- ☒ keep their address confidential ☐ list their address here: _____

- E. ☐ **Vacate Shared Residence:** The protected person has exclusive right to the residence that the protected person and restrained person share. The restrained person must immediately vacate the residence.

- F. ☒ **Intimate Images:** Do not possess or distribute intimate images of a protected person, as defined in RCW 9A.86.010. The restrained person must take down and delete all intimate images and recordings of a protected person in the restrained person's possession or control and cease any and all disclosure of those intimate images.

- G. ☐ **Electronic Monitoring:** You must submit to electronic monitoring. (*Restrained person must be age 18 or older.*)

Monitoring by (*specify*): _____

Term (*if different from expiration of temporary order*): _____

- ☐ Restrained Person must pay cost of electronic monitoring.

H. ☐ **Evaluation:** ☐ To be decided at the full hearing. ☐ Ordered now.

The restrained person shall get an evaluation for: ☐ mental health ☐ chemical dependency (drugs or alcohol) at: _____

The evaluation shall answer the following question/s:

An evaluation is necessary and it is feasible and appropriate to order an evaluation in this temporary order because:

I. ☐ **Treatment:** ☐ To be decided at the hearing. ☐ Ordered now.

The restrained person shall participate in state-certified treatment as follows:

☐ domestic violence perpetrator treatment program approved under RCW 43.20A.735 at: _____

☐ sex offender treatment program approved under RCW 18.155.070 at: _____

It is feasible and appropriate to order treatment in this temporary order because:

J. ☐ **Personal Belongings:** The protected person shall have possession of essential personal belongings, including the following:

K. ☐ **Transfer of Assets:** Do not transfer jointly owned assets.

☐ **Finances:** The following financial relief is ordered: _____

L. ☐ **Vehicle:** The protected person shall have use of the following vehicle:

Year, Make & Model _____ License No. _____

M. **Restrict Abusive Litigation:** To be decided at the hearing, if requested.

N. **Pay Fees and Costs:** To be decided at the hearing, if requested.

Firearms and Other Dangerous Weapons

O. ☐ **Surrender Weapons:**

Important! Also use form *Order to Surrender and Prohibit Weapons*, WS 001.

The court finds that (check all that apply):

☐ Irreparable injury could result if the *Order to Surrender and Prohibit Weapons* is not issued.

☐ The restrained person's possession of a firearm or other dangerous weapon presents a serious and imminent threat to public health or safety or the health or safety of any individual.

- ☐ Irreparable injury could result if the restrained person is allowed to access, obtain, or possess any firearms or other dangerous weapons, or obtains or possesses a concealed pistol license.

The restrained person must:

- Immediately surrender to law enforcement and not access, possess, have in their custody or control, purchase, receive, or attempt to purchase or receive firearms, other dangerous weapons, or concealed pistol licenses; and
- Comply with the **Order to Surrender and Prohibit Weapons**, filed separately.

Minors

P. ☐ **Custody:** The protected person is granted temporary care, custody, and control of:

☐ the minors named in section 3 above.

☐ these minors only: _____

Exceptions for Visitation and Transportation, if any (including exchanges, meeting location, pickup and dropoff): _____

Visitation listed here is an exception only to No Contact and Stay Away provisions about the children in **B** and **D** above.

(Only for children the protected and restrained person have together.)

To comply with the Child Relocation Act, anyone with majority or substantially equal residential time (at least 45 percent) who wants to move with the child must notify every other person who has court-ordered time with the child. Specific exemptions from notification may be available if the court finds unreasonable risk to health or safety. Persons entitled to time with the child under a court order may object to the proposed relocation. See RCW 26.09.405 - .560 for more information.

Q. ☐ **Interference:** Do not interfere with the protected person's physical or legal custody of:

☐ the minors named in section 3 above

☐ these minors only: _____

R. ☐ **Removal from State:** Do not remove from the state:

☐ the minors named in section 3 above

☐ these minors only: _____

S. ☐ **School Enrollment:** Do not enroll or continue attending the elementary, middle, or high school that a protected person attends (*name of school*) _____.

(Only if both the restrained person and a protected person are students at the same school. Can apply to students 18 or older. Includes public and private schools.)

Complete form Attachment B School Transfer - PO 040B)

Pets

T. ☐ **Custody:** The protected person shall have exclusive custody and control of the following pet/s owned, possessed, leased, kept, or held by the protected person, restrained person, or a minor child who lives with either the protected or restrained person. (*Specify name of pet and type of animal.*): _____

- U. ☐ **Interference:** Do not interfere with the protected person's efforts to get the pet/s named above.
- V. ☐ **Stay Away:** Do not knowingly come within, or knowingly remain within (distance) _____ of the following locations where the pet/s are regularly found:
- ☐ Protected person's residence (home address may be kept confidential) Other
- ☐ (specify) _____

Vulnerable Adult

- W. ☐ **Safety:** Do not commit or threaten to commit acts of abandonment, neglect, financial exploitation, or abuse, including sexual abuse, mental abuse, physical abuse, personal exploitation, and improper use of restraints against the vulnerable adult.
- X. ☐ **Accounting:** You must provide an accounting of the disposition of the vulnerable adult's income or other resources by (date) _____
- Y. ☐ **Property Transfer:** Do not transfer the property of ☐ the vulnerable adult ☐ the restrained person. This restraint is valid for up to 90 days.

Other

2. In issuing this order, the Court specifically reviewed and considered RCW 7.105.010 (36(a)) as well as the definition related to attempts to exert 'versive control' in 7.105.010(4) and RCW 7.105.010 (2)(a).

Other Orders (Check all that apply):

9. **Law enforcement must help the protected person with (RCW 7.105.320(1))**
- ☐ Possession of the protected person's residence.
- ☐ Possession of the vehicle listed in section L above.
- ☐ Possession of the protected person's essential personal belongings located at:
- ☐ the shared residence
- ☐ the restrained person's residence
- ☐ other location _____
- ☐ Custody of ☐ the minors named in section 3 above
- ☐ these minors only _____
- ☐ Other: _____
- ☐ **Law enforcement must be present while the restrained person collects** personal clothing, personal items needed during the duration of this order, and these other items (specify) _____
- from the shared residence that restrained person has been ordered to vacate in D or E above (RCW 7.105.320(3)).

10. **Washington Crime Information Center (WACIC) and Other Data Entry Clerk's Action.** The court clerk shall forward a copy of this order immediately to the following law enforcement agency (county or city) SCSO
(check only one): ☒ Sheriff's Office or ☐ Police Department
This agency shall enter this order into WACIC and National Crime Info. Center (NCIC).

11. **Service on the Restrained Person**

- ☒ Required. The restrained person must be served with a service packet, including a copy of this order, petition, and any supporting materials filed.

- ☒ The **law enforcement agency** where the restrained person lives or can be served shall serve the restrained person with the service packet and shall promptly complete and return proof of service to this court.

Law enforcement agency: (county or city) _____

LOS ANGELES

(check only one): ☒ Sheriff's Office or ☐ Police Department

- ☐ The **protected person** (or person filing on their behalf) shall make private arrangements for service and have proof of service returned to this court. (This is not an option if this order requires: weapon surrender, vacating a shared residence, transfer of child custody, or if the restrained person is incarcerated. In these circumstances, law enforcement must serve unless the court allows alternative service.)

Clerk's Action. The court clerk shall forward a service packet on or before the next judicial day to the agency and/or party checked above. The court clerk shall also provide a copy of the service packet to the protected person.

- ☐ **Alternative Service Allowed.** The court authorizes alternative service by separate order (specify): _____

- ☐ **Not required.** The restrained person appeared at the hearing, in person or remotely, and received notice of the order. No further service is required. See section 4 above for appearances. (May apply even if the restrained person left before a final ruling is issued or signed.)

12. ☐ **Service on Others (Vulnerable Adult or Restrained Person under age 18)**

Service on the ☐ vulnerable adult ☐ adult's guardian/conservator ☐ Restrained Person's parent/s or legal guardian/s (name/s) _____ is:

- ☐ **Required.**

- ☐ The **law enforcement agency** where the person to be served lives or can be served shall serve a copy of this order and shall promptly complete and return proof of service to this court.

Law enforcement agency: (county or city) _____

(check only one): ☐ Sheriff's Office or ☐ Police Department

- ☐ The **protected person** or person filing on their behalf shall make private arrangements for service and have proof of service returned to this court.

Clerk's Action. The court clerk shall forward a copy of this order on or before the next judicial day to the agency and/or party checked above.

- ☐ **Not required.** They appeared at the hearing where this order was issued and received a copy.

13. **Other Orders (if any):** The restrained person shall not engage in electronically posting disparaging remarks or information about the Petitioner or her family.

Ordered. **MAR 18 2025**

Dated: _____ at 9:53 a.m./p.m. [Signature]
Judge/Court Commissioner

Print Judge/Court Commissioner Name

I received a copy of this Order or attended the hearing remotely and have actual notice of this order. It was explained to me on the record:

▶ _____ Signature of Respondent	_____ Print Name	_____ Date
▶ _____ Signature of Respondent's Lawyer WSBA No.	_____ Print Name	_____ Date
▶ _____ Signature of Petitioner	_____ Print Name	_____ Date
▶ _____ Signature of Petitioner's Lawyer WSBA No.	_____ Print Name	_____ Date

Important! Protected Person: Law enforcement must notify you before firearms are returned to the Restrained Person. Keep your contact information up to date with the law enforcement agency. The *Proof of Surrender* in the court file should say which agency has the firearms. RCW 9A.41.340.

Certificate of Compliance With VAWA. This protection order meets all "full faith and credit" requirements of the Violence Against Women Act, 18 U.S.C. § 2265 (1994) (VAWA) upon notice to the restrained person. This court has jurisdiction over the parties and the subject matter; the restrained person has been or will be given notice and a timely opportunity to be heard as provided by the laws of this jurisdiction. This order is enforceable in all 50 states, Indian tribal lands, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, American Samoa, the Northern Mariana Islands, and Guam, as if it were an order of that jurisdiction.

2025 MAR 17 PM 3:39

HEIDI PERCY
COUNTY CLERK
SNOHOMISH CO. WASH

Superior Court of Washington, County of Snohomish

Jenna Bulis
Petitioner (*Person starting this case*)

DOB

vs.

Katherine Rose McNamara
Respondent (*Person responding to this case*)

DOB

No. _____

Petition for Protection Order
Clerk's Action Required: 1

Petition for Protection Order

What kind of protection order do you want? There are different orders based on the type of harm and how the parties know each other. **See definitions in Attachments A and B.**

1. Choose the type of protection order that best fits your situation. Check only one.

- ☐ Domestic Violence – Protection from an intimate partner or family or household member who has committed domestic violence, nonconsensual sexual conduct or penetration, unlawful harassment, or stalking. (PTORPRT)
- ☐ Sexual Assault – Protection from someone who has committed sexual assault. (PTORSXP)
- ☐ Stalking – Protection from someone who has committed stalking. (PTORSTK)
- ☐ Vulnerable Adult – Protection from someone who has abandoned, abused, financially exploited, or neglected a vulnerable adult (or threatened to do so). (PTORVA)

Important! If you are asking for a Vulnerable Adult Protection Order, you must complete **Attachment B: Vulnerable Adult** as part of this Petition.

- ☒ Anti-Harassment – Protection from someone who has committed unlawful harassment. (PTORAH) (*fee may be required*)

Conduct also includes (*check all that apply*): ☒ stalking ☐ hate crime ☐ single act of violence ☐ threat of violence including malicious and intentional threat or presence of firearm/weapon causing substantial emotional distress
☐ family or household member engaged in domestic violence
☐ nonconsensual sexual conduct or penetration or a sex offense.

2. If more than one of the protection order types listed above fits your situation, list any additional order types here: PTORSTK

3. Who should the order restrain? ("Restrained Person")

Name: Katherine Rose McNamara

Restrained Person's age: ☐ Under 13 ☐ 13 to 17 ☒ 18 or over ☐ unknown

Who should be protected? Check all that apply. Depending on the type of order, you can protect yourself and/or children, or you can file on behalf of a vulnerable adult, or another adult who cannot file for themselves.

4. Who should the order protect? ("Protected Person") (*Check all that apply.*)

☒ **Me.** My name is Jenna Bulis
(*You must be age 15 or older.*)

☒ **Minor Children.**

☒ I am the minor's ☒ parent ☐ legal guardian ☐ custodian.

☐ I am age 18 or older and the minor is a member of my family or household.
(*For domestic violence petitions only.*)

☐ I am age 15 to 17. The minor is a member of my family or household. I have been chosen by the minor and am capable of pursuing their stated interest in this case.

Child's Name	Age	Gender	Race	Lives With	How related to you	How related to Restrained Person
				Jenna Bulis		
				Jenna Bulis		

Important! If the restrained person is a parent of any of the children, complete **Attachment C: Child Custody**.

If you are **not** a parent of any of the children, complete **Attachment D: Non-parents protecting children (ICWA)**. You must include these Attachment/s with your Petition if they apply.

☐ **Someone else.** (List your name as Petitioner at the beginning of this form. Describe who you are filing for here.)

5. **Service address.** What is your address for receiving legal documents? You have the right to keep your residential address private. You may use a different mailing address for receiving legal documents.

Mail: Consent for email service

Email (if you agree to receive legal documents by email): _____

6. **Interpreter.**

Do you need an interpreter? ☒ No ☐ Yes, Language: _____

Important! You may need to request an interpreter separately. You will get instructions with an order setting your hearing.

How do the parties know each other?

7. Check all the ways the protected person is connected or related to the restrained person:

☐ **Intimate Partners** – Protected person and restrained person are intimate partners

☐ **Family or household members** - Protected person and restrained person are family or household members

☒ **Other** - (examples: **coworker**, neighbor, acquaintance, stranger)

Chelsea, a third co-founder, and I founded Breaking Code Silence as a social movement against institutional child abuse. Katherine McNamara was involved early on, but tensions grew when she attempted to take control, leading to a leadership split. This resulted in four years of litigation across multiple cases, ongoing harassment, and significant personal and financial hardships for me and my family.

Connection to Washington State. This helps decide if the court has authority (jurisdiction).

8. **Why are you filing in this county and state?** Check *all* that apply.

☒ The protected person lives in this county now, **or** used to live in this county but left because of abuse, **or** this is the nearest court to where I live or used to live.

☒ An incident that made me want this protection order happened in this county or state.

9. **Restrained Person's residence.** Where does the restrained person live?

☐ In Washington State in (city or county): _____

☒ Outside of Washington State

☐ Unknown

Are there other court cases involving the parties or any children?

10. **Other court cases.** Have there been any other court cases between any of the people involved in this case, or about any children? Include court cases happening now and in the

past and requests for protection that were denied or have expired. (Examples: criminal no contact order, civil protection order, family law restraining order, protection order from another state, tribal order, military orders, parenting plans, divorce, landlord-tenant, employment, property, assault, police investigations. File copies in this court case of everything you want the court to review.)

☐ No ☒ Yes. If yes, fill out below.

Type of Case (see examples)	Court Location (City or County and State)	Court Type (Superior/District/Municipal/Tribal/Military)	Case Number (if known)	Status (active/dismis s d/pending/expir e d/ unknown)
Intellectual Property Infringement	United States District Court for the Southern District of California	Federal District Court	21-cv-0918-BAS-DEB	Dismissed
TMORAH-Bulis v McNamara	Evergreen Snohomish County District Court	District Court	U21-101	Temporary granted and expired. Permanent dismissed.
Protection Order- McNamara v Bulis	California	Unknown	Unknown	Dismissed on petition
Seal Request	Snohomish County	Superior Court		See Judge transcript

Other details: In addition to the above, I received a cease-and-desist letter demanding a public apology and retraction of what I reported to law enforcement, despite no corresponding legal action being filed (see June 15, 2021, cease-and-desist letter attached as prior court case 4). I have also received legal correspondence requesting data preservation, indicating an intention to involve me in future litigation, though no action has been filed (see June 4, 2024, evidence preservation letter attached as prior court case 5).

Do you need immediate protection? If needed, you can ask for a *Temporary Protection Order* that starts now, before the restrained person gets notice. This protection can last up to 14 days or until the court hearing (whichever comes first).

If the court determines there is not a reason for an immediate order, you have the ability to request the court to withdraw your petition.

11. Immediate Protection: Do you need a Temporary Protection Order to start immediately, without prior notice to the restrained person? ☒ Yes ☐ No

12. Immediate Weapons Surrender: Do you want a temporary order that requires the restrained person to give up all firearms, other dangerous weapons, and concealed pistol licenses, and prohibits the restrained person from getting more? ☐ Yes ☒ No

If Yes to 11 or 12, explain why: What serious immediate harm or irreparable injury could occur if an order is not issued immediately without prior notice to the restrained person?
(Briefly explain how you or anyone else might be harmed if you do not get protection now.)

I require immediate protection because Katherine McNamara's ongoing and escalating behavior presents an imminent threat to my safety and that of my family. Her pervasive and severe cyberstalking, doxxing, and defamatory campaigns have already resulted in targeted harassment, direct threats, and harm. Given her history, notifying her of this filing would likely provoke further escalation, increasing the risk of violence or other serious harm

Without immediate protection, I face irreparable harm and an unsafe environment, making a Temporary Protection Order crucial.

What protections do you need? Check **everything** you want the court to order.

13. I ask for a protection order with these restraints against the Restrained Person:

General Restraints

- A. ☒ No Harm:** Do not cause any physical harm, bodily injury, assault, nonconsensual sexual conduct or nonconsensual sexual penetration, and do not harass, threaten, or stalk:

☒ protected person ☒
the minors named in section 4 above

☐ these minors only: _____

- B. ☒ No Contact:** Do not make any attempts or have any contact, including nonphysical contact, directly, indirectly, or through third parties, regardless of whether those third parties know of the order, except for service of court documents with:

☒ protected person ☒
the minors named in section 4 above

☐ these minors only: _____

☐ these members of the protected person's household: _____

☐ **Exception** (if any). Only this type of contact is allowed: _____

Exceptions about minors, if any, provided in **P** below.

- C. ☒ Stalking Behavior:** Do not harass, follow, monitor, keep under physical or electronic surveillance, cyber harass (as defined in RCW 9A.90.120), or use phone, video, audio or other electronic means to record, photograph, or track locations or communication, including digital, wire, or electronic communication of:

☒ the protected person ☒
the minors named in section 4 above

☐ these minors only: _____

L. ☐ **Vehicle:** The protected person shall have use of the following vehicle:

Year, Make & Model _____

License No. _____

M. ☒ **Restrict Abusive Litigation:** Do not engage in abusive litigation as set forth in chapter 26.51 RCW or in frivolous filings against the protected person, making harassing or libelous communications about the protected person to third parties, or making false reports to investigative agencies.

N. ☒ **Pay Fees and Costs:** The restrained person must pay fees and costs of this action. This may include administrative court costs, service fees, and the protected person's costs including lawyer fees.

Firearms and Other Dangerous Weapons

O. ☐ **Surrender Weapons:** The restrained person must immediately surrender any firearms, other dangerous weapons, or concealed pistol licenses to law enforcement and not access, possess, have in their custody or control, purchase, receive, or attempt to purchase or receive any of those items.

Important! *The court may be required to order the restrained person to surrender firearms, other dangerous weapons, or concealed pistol licenses even if you do not request it.*

Does the restrained person ☐ own or ☐ have access to firearms?

☐ Yes ☐ No ☒ I don't know

Complete **Attachment E: Firearms Identification** if Yes.

Would the restrained person's use of firearms or other dangerous weapons be a serious and immediate threat to anyone's health or safety?

☐ Yes ☐ No ☒ I don't know

Even if the restrained person does not have firearms now, has the restrained person ever used firearms, other weapons, or objects to threaten or harm you?

☐ Yes ☒ No

Is the restrained person already not allowed to have firearms?

☐ Yes ☐ No ☒ I don't know

Minors

P. ☐ **Custody:** *(If the parties have children together.)*

The protected person is granted temporary care, custody, and control of

☐ the minors named in section 4 above.

☐ these minors only: _____

Q. ☒ **Interference:** Do not interfere with the protected person's physical or legal custody of:

☒ the minors named in section 4 above.

☐ these minors only: _____

Other

- Z. Do not publish any documents referencing or pertaining to Jenna Bulis, her minor children, or her business, on the internet or other public format.

Do you need help from law enforcement? They may help you get the things you asked for.

14. Law Enforcement Help: Do you want the court to order the appropriate law enforcement agency to help you with any of the things listed below? (*Check all that apply*).

☐ Possession of my residence.

☐ Possession of the vehicle I asked for in section L above.

☐ Possession of my essential personal belongings that are located at:

☐ the shared residence

☐ the restrained person's residence

☐ other location: _____

☐ Custody of: ☐ the minors named in section 4 above

☐ these minors only: _____

☒

ther: Service of protection order petition and supplemental evidence

O

How long do you need this order to last?

15. Length of Order

(*The order will last for **at least 1 year** unless you ask for something different. Orders restraining a parent from contacting their own children may not exceed 1 year.*)

I need this order to last for: ☐ 1 year ☒ more than 1 year ☐ less than 1 year (*specify how long*): 5 years

If you checked more or less than one year, briefly explain why.

I request a 5-year term due to Katherine McNamara's ongoing pattern of harassment, cyberstalking, and defamation, which shows that her behavior is unlikely to stop without long-term intervention. Given her history of escalating actions, particularly her tendency to intensify harassment when informed of legal actions, sustained protection is necessary to ensure the safety of myself and my family.

Do you want to be notified if the restrained person petitions for the restoration of firearms in the future?

16. Firearms Restoration Notice

(*This only applies if there is an existing or future criminal case that prohibits firearm ownership or possession.*)

- [] **Notify.** I want the prosecutor to notify me if the restrained person petitions for restoration of firearms and of the court's decision.
- [] **Do not notify.** I do not want the prosecutor to notify me if the restrained person petitions for restoration of firearms or of the court's decision.

Why do you need a protection order? What happened? This is your statement where you tell your experience.

If you need more space to answer any of the questions below, use form PO 010 *Statement* or attach additional pages.

Privacy Warning! The restrained person will see this Petition and any other evidence you file with the court. This information is also available in a public court file. You should file healthcare records, financial documents, and confidential reports under seal. Use form All Civil 040 *Sealed Cover*. If you want to seal explicit or intimate images, you must file a separate motion asking the court to seal these images. Use form PO 005, *Motion to Redact or Seal*.

17. Most Recent Incident. What happened most recently that made you want a protection order? This could include violent acts, fear or threats of violence, coercive control, nonconsensual sexual conduct or penetration, sexual abuse, harassment, stalking, hate crimes. For a vulnerable adult, include incidents or threats of abandonment, abuse, neglect, and/or financial exploitation. Include specific date/s and details of the incident.

January 14th, 2025, I discovered that Katherine McNamara had published multiple webpages under wwaspsurvivorstruth.com, including wwaspsurvivorstruth.com/jenna-bulis-part-1/ and [part-2/](http://wwaspsurvivorstruth.com/jenna-bulis-part-2/) (See attached image exhibit D and exhibit E). These pages contain false, misleading, and defamatory statements about me, as well as private records that were never intended for public disclosure. Among the documents she published are my custody case files, including a Guardian Ad Litem report, and an arbitration decision that was never filed with the court. The site also features a private video of me, recorded without my consent, obtained from

Additionally, McNamara's website highlights an arrest record of mine, despite the charge being dismissed with prejudice. The publication of this dismissed charge serves no legitimate purpose and is intended to defame me and cause reputational harm. Her use of my dismissed arrest record, along with her pattern of publishing misleading and out-of-context legal information, demonstrates a deliberate intent to harass and intimidate me.

January 15, 2025, I contacted the Lake Stevens Police Department and spoke with Officer J. Marshall regarding these ongoing incidents of harassment and cyberstalking. Officer Marshall advised me to file for a protection order against McNamara, recognizing her actions as an ongoing threat to my safety and privacy (See January 29, 2025, Incident attached as exhibit F). The website's publication of my private legal records has directly led to threats, harassment, abusive online comments, and false reports, all with the stated intent of interfering with my custody case and having my children removed from my care (See C. declaration attached as exhibit A).

January 27, 2024, McNamara's defamatory campaign led to mine and _____'s non-profit, _____, losing its fiscal sponsorship, resulting in the loss of approximately \$8,000 in

promised donations and blocking access to future grants. This significantly hindered our ability to continue our advocacy work (See Gmail- Termination of Fiscal Sponsorship attached as exhibit G).

On February 26, 2025, McNamara published www.waspsurvivorstruth.com/jenna-bulis-3/ in direct response to my efforts to report her to law enforcement and seek a seal on my court records. The page includes additional legal documents, further demonstrating her pattern of cyberstalking and harassment. Its publication shortly before the court hearing regarding the motion to seal suggests a deliberate attempt to interfere with my legal proceedings and intimidate me. Her misuse of court records in this manner violates my right to privacy and further demonstrates her ongoing efforts to monitor and weaponize legal matters against me as a form of harassment

McNamara continues to track my court proceedings and social media activity, despite my repeated efforts to block her access (See www.waspsurvivorstruth.com/jenna-bulis-3/ attached as exhibit H). Her ongoing publication of my records is part of a sustained pattern intended to damage my reputation and interfere with my personal and professional life. Given her history of purchasing domains to target and discredit individuals, I also suspect she has acquired jennabulis.com with the intent of further undermining my reputation.

18. Past Incidents. What happened in the past that makes you want a protection order? This could include violent acts, fear or threats of violence, coercive control, nonconsensual sexual conduct or penetration, sexual abuse, harassment, stalking, or hate crimes. For a vulnerable adult, include incidents or threats of abandonment, abuse, neglect, and/or financial exploitation. Include specific date/s and details of the incidents.

Since 2020, Katherine McNamara's actions have caused me significant emotional distress, financial hardship, and fear for my safety (See TMORAH U21-101 attached court case 2). Her severe and pervasive stalking and harassment have disrupted both my personal and professional life. This behavior follows a clear pattern in which she targets individuals who disagree with her or challenge her actions.

In March 2021, McNamara attempted to take sole control of the organization that originally connected us. When her efforts failed, she locked the founders, including myself, out of our accounts, cutting off access to critical resources. In response, I reported her actions to the FBI and local law enforcement, leading to the FBI opening a Guardian case. After learning of my report, McNamara escalated her harassment, increasing her retaliatory efforts against me.

In April and June 2021, McNamara sent two cease-and-desist letters. The first was included in a later dismissed federal lawsuit, while the second was sent separately. The second letter demanded that I publicly absolve her of any wrongdoing or face additional legal action. However, no lawsuit followed, indicating that the letter's primary intent was to intimidate and pressure me into compliance with her demands rather than pursue a legitimate legal claim (See June 15, 2021, cease-and-desist attached as legal action 4).

In the spring of 2021, McNamara sought a protection order against me, but her request was denied the same day due to a lack of evidence. She never served me with the petition, making the filing legally ineffective. However, she shared the documents to create the false impression that legal action had been taken against me, further contributing to her pattern of harassment and defamation.

In May 2021, McNamara filed a trademark infringement lawsuit against me and three others in the United States District Court for the Southern District of California (Case No. 21-cv-0918-BAS-DEB). The case was ultimately dismissed, with no findings of liability against me (see *attached court case 1*). Despite this, McNamara has continued to publicly misrepresent the outcome, using the lawsuit to falsely imply wrongdoing on my part.

Following ongoing harassment and the recommendations of the Lake Stevens Police Department and the FBI, I sought a protection order against McNamara in August 2021. The court granted a temporary protection order, which included protections for my minor children. Although the court later ruled that the evidence did not meet the threshold for a permanent order, the judge confirmed that my request was not frivolous and acknowledged that I had grounds for a defamation claim if pursued (*See Non-frivolous order attached as court case 2*). Since then, law enforcement has advised that I now have substantial evidence to support a renewed request for a protection order

Following the lawsuit dismissal, McNamara had another falling out with the board of the Breaking Code Silence organization. She allegedly repeated the same pattern of misconduct, taking unauthorized control of social media accounts and intellectual property. Shortly after, the organization sued her for computer fraud and de-indexing its websites. During this legal process, McNamara attempted to subpoena my private conversations from a third party, despite my lack of involvement in the lawsuit, organization, or the allegations against her. While she obtained little data, her actions reflect a continued effort to misuse the legal system to invade my privacy and harass me through legal actions.

McNamara has directly interfered in my family court dispute by accessing case records and spreading false and damaging claims to manipulate the outcome. This behavior is part of a broader pattern of targeting individuals involved in litigation or disputes with her. After I was sued by McNamara, she later became involved in litigation with _____. During that time, McNamara accessed Ms. _____ court records and provided her ex-husband with "evidence" obtained through discovery to help him oppose a motion to modify a coercive parenting plan. She then used her platforms to attack Ms. _____ mental stability and parental fitness, ultimately targeting her custody rights. Even after shifting her focus to Ms. _____, McNamara has continued her ongoing efforts to spread false claims and interfere in my custody case (*See*

McNamara also created *breakingcodesilencelawsuit.com* to distort the details of two lawsuits and falsely attribute claims to me in a case I am not involved with. This website is part of her

ongoing effort to manipulate public perception and spread misinformation. McNamara has a pattern of creating defamatory websites targeting those who challenge her behavior, using these platforms to incite harassment and spread false claims. This behavior constitutes cyberstalking and has caused fear and distress for myself and those affected

In June 2024, McNamara attempted to involve me in another legal matter by sending a data preservation request related to a case that had no connection to me. This action continues her pattern of using legal threats and harassment to destabilize my personal and professional life (See June 4, 2024, evidence preservation letter attached as legal action 5).

Considering the prolonged and persistent nature of McNamara's actions over the past 4.5 years, it is evident that she is unlikely to cease this conduct on her own. Without court intervention, I am deeply concerned that this behavior will continue indefinitely. I respectfully request the court to take appropriate action to prevent further harassment and cyberstalking, and to prohibit McNamara from using legal disputes and personal matters to cause further harm.

19. Medical Treatment. Describe any medical treatment you received for issues related to your request for protection.

To address the prolonged abuse and harassment, I have sought mental healthcare to help process the emotional and psychological impacts. This treatment has focused on addressing trauma related to the harassment, including the doxxing campaign, false public accusations, and ongoing defamation. As a result of the ongoing stress, I have had to increase medical doctor appointments due to the physical toll it has taken on my physical body. I have a diagnosis of PTSD and additional stress impacts my physical health.

20. Suicidal Behavior. Describe any threats of self-harm or suicide attempts by the restrained person.

Unknown.

21. Restrained Person's Substance Abuse

Is substance abuse involved? ☒ Yes ☐ No ☐ Unknown

If yes, what type of substance abuse? ☐ Alcohol ☐ Drugs ☒ Other:

22. Minors Needing Protection, if any (If the information is not already included above.)

Has there been any violence or threats towards children? How have the children been affected by the restrained person's behavior? Were the children present during any of the incidents described above? Describe and give details.

Although McNamara has not directly committed acts of physical violence against my children, her ongoing harassment and doxxing campaign have created a hostile and

unsafe online environment. By publicly sharing personal information and spreading false accusations, McNamara has caused significant emotional distress to my family. The exposure of our private lives has left my children feeling
Additionally, the financial burden of multiple legal actions has further harmed our family's stability and well-being.

23. Supporting Evidence (Include anything else you want the court to see that helps prove what you are saying is true. You are responsible for filing your supporting evidence, including police reports, if any. Before you file any attachments, you can black out (redact) any sensitive information. Examples: your home address and account numbers (leave last 4 digits). If you have audio or video evidence, contact the court for how to submit.)

☒ I am submitting the following evidence with this Petition (check all that apply):

☐ Pictures

☐ Text/email/social media messages

☐ Voice messages (written transcript)

☐ Written notes/letters/mail

☒ Police report

☒ Declaration or statement from witness (name/s): Chelsea

☒ Other (describe): Prior Court Cases, June 15, 2021, Cease-and-Desist; June 4, 2024 Evidence Preservation Letter; Website screen captures

Privacy Warning! The restrained person will see this Petition and any other evidence you file with the court. This information is also available in a public court file. You should file healthcare records, financial documents, and confidential reports under seal. Use All Civil 040 Sealed Cover. If you want to seal explicit or intimate images, you must file a separate motion asking the court to seal these images. Use form PO 005, *Motion to Redact or Seal*.

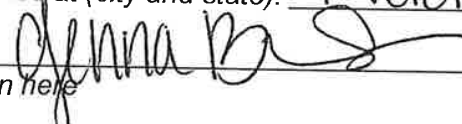
Before you file any attachments, you can **black out** (redact) any sensitive information. Examples: your home address, account numbers (leave last 4 digits), minor's names (leave minor's initials). Do **not** list your address in this petition or any supporting evidence if you want it to remain confidential.

Hope Card: A Hope Card is a small card you can easily carry that has some details of your protection order. It's one way to show you have a full protection order. You can request one at www.courts.wa.gov/hopecard.

I certify, under penalty of perjury under the laws of the state of Washington, that all the information provided in this petition and any attachments is true and correct.

☒ I have attached (number): 185 pages. (including 1-15 petition)

Signed at (city and state): Everett, Washington Date: 3/17/25

Sign here 

Jenna Bulis
Print name

Attachment A: Definitions (*Always include with petition.*)

"Domestic violence" means:

- (a) Physical harm, bodily injury, assault, or the infliction of fear of physical harm, bodily injury, or assault; nonconsensual sexual conduct or nonconsensual sexual penetration; coercive control; unlawful harassment; or stalking of one intimate partner by another intimate partner; or
- (b) Physical harm, bodily injury, assault, or the infliction of fear of physical harm, bodily injury, or assault; nonconsensual sexual conduct or nonconsensual sexual penetration; coercive control; unlawful harassment; or stalking of one family or household member by another family or household member.

"Sexual conduct" means any of the following:

- (a) Any intentional or knowing touching or fondling of the genitals, anus, or breasts, directly or indirectly, including through clothing;
- (b) Any intentional or knowing display of the genitals, anus, or breasts for the purposes of arousal or sexual gratification of the respondent;
- (c) Any intentional or knowing touching or fondling of the genitals, anus, or breasts, directly or indirectly, including through clothing, that the petitioner is forced to perform by another person or the respondent;
- (d) Any forced display of the petitioner's genitals, anus, or breasts for the purposes of arousal or sexual gratification of the respondent or others;
- (e) Any intentional or knowing touching of the clothed or unclothed body of a child under the age of 16, if done for the purpose of sexual gratification or arousal of the respondent or others; or any coerced or forced touching or fondling by a child under the age of 16, directly or indirectly, including through clothing, of the genitals, anus, or breasts of the respondent or others.

"Sexual penetration" means any contact, however slight, between the sex organ or anus of one person by an object, the sex organ, mouth, or anus of another person, or any intrusion, however slight, of any part of the body of one person or of any animal or object into the sex organ or anus of another person including, but not limited to, cunnilingus, fellatio, or anal penetration.

Evidence of emission of semen is not required to prove sexual penetration.

"Stalking" means any of the following:

- (a) Any act of stalking as defined under RCW 9A.46.110;
- (b) Any act of cyber harassment as defined under RCW 9A.90.120; or
- (c) Any course of conduct involving repeated or continuing contacts, attempts to contact, monitoring, tracking, surveillance, keeping under observation, disrupting activities in a harassing manner, or following of another person that:
 - (i) Would cause a reasonable person to feel intimidated, frightened, under duress, significantly disrupted, or threatened and that actually causes such a feeling;
 - (ii) Serves no lawful purpose; and
 - (iii) The respondent knows, or reasonably should know, threatens, frightens, or intimidates the person, even if the respondent did not intend to intimidate, frighten, or threaten the person.

"Unlawful harassment" means:

- (a) A knowing and willful course of conduct directed at a specific person that seriously alarms, annoys, harasses, or is detrimental to such person, and that serves no legitimate or lawful purpose. The course of conduct must be such as would cause a reasonable person to suffer substantial emotional distress, and must actually cause substantial emotional distress to the petitioner; or
- (b) A single act of violence or threat of violence directed at a specific person that seriously alarms, annoys, harasses, or is detrimental to such person, and that serves no legitimate or lawful purpose, which would cause a reasonable person to suffer substantial emotional distress, and must actually cause substantial emotional distress to the petitioner. A single threat of violence must include:
 - (i) A malicious and intentional threat as described in RCW 9A.36.080(1)(c); or
 - (ii) the presence of a firearm or other weapon.

Superior Court of Washington, County of Snohomish

<u>Jenna Bulis</u> Petitioner (<i>Person starting this case</i>)	DOB _____	No. _____
vs.		Petition for Protection Order Evidence List
<u>Katherine Rose McNamara</u> Respondent (<i>Person responding to this case</i>)	DOB _____	

Evidence List

- A. C. declaration page 17-60
- B.
- C.
- D. <https://wwaspsurvivorstruth.com/jenna-bulis-part-1/> screen capture page 74-95
- E. <https://wwaspsurvivorstruth.com/jenna-bulis-part-2/> screen capture page 96-108
- F. January 29, 2025, LSPD Incident page 109-111
- G. Gmail- Termination of Fiscal Sponsorship page 112-114
- H. <https://wwaspsurvivorstruth.com/jenna-bulis-3/> screen capture page 115-120

Superior Court of Washington, County of Snohomish

Jenna Bulis
Petitioner DOB

v.

Katherine McNamara
Respondent DOB

No.

Declaration of
Chelsea (Name)
(DCLR)

This declaration is made by:

Name: Chelsea

Age: 39

Relationship to the parties in this action: Friend and co-worker of Jenna Bulis

I declare,

See Attached: DECLARATION OF CHELSEA
IN SUPPORT OF PETITION FOR PROTECTION ORDE

I, Chelsea, declare as follows:

I am a close friend and co-worker of Jenna Bulis, as we have both been involved in legislative advocacy for the protection of youth for many years. I am the Founder of WWASP Survivors and CEO and Co-Founder with Jenna Bulis of ICAPA Network. I also co-founded Breaking Code Silence (BCS) with Jenna Bulis and others. I submit this declaration in support of Jenna Bulis' petition for a protection order against Katherine McNamara.

Katherine McNamara is a cybersecurity expert and a fellow advocate in the institutional child abuse survivor community. We were once aligned as co-workers, but due to a split in our working group, we have found ourselves embroiled in a conflict that has become quite contentious and has led to several legal disputes. As a result of this conflict, Katherine has specifically directed her aggression at Jenna Bulis and I—both as individuals and toward our organizations. Her smear campaign appears to be designed to disrupt our work, tarnish our reputations, and harm our personal lives. This dispute has dragged on for at least four years, and we are pleading with the court to help bring it to an end.

HISTORY

1. Katherine McNamara, Jenna Bulis, and I were previously co-founders of the Breaking Code Silence Movement in its infancy. On March 9, 2021, Katherine initiated a dispute within leadership, which led to her resignation. However, just days later, on March 14, 2021 she and others she had convinced to follow her removed our access to our accounts and absconded with our intellectual property.
2. After years of hard work, networking, research, building our database, and earning trust within the community, Katherine and her associates took unauthorized control of Breaking Code Silence's website, email, and social media accounts and downloaded all of our shared drives, including the program map database and federal legislation we had written and were actively campaigning for to protect children from institutional abuse. We genuinely believed that despite Katherine's resignation, we still held our positions within the organization and could move forward, continuing the work under the Breaking Code Silence banner. We made several attempts to negotiate the return of our property with Katherine. Although she gave the impression that she was open to negotiating a fair "divorce" of the assets, she ultimately refused to engage in any meaningful discussions.
3. The theft of our intellectual property was reported to the FBI Cyber Crimes Unit, and an investigation was conducted into her actions: Guardian Case #
4. While we were still attempting to negotiate for the return of our accounts, Katherine incorporated Breaking Code Silence under her name, despite knowing we were already

in the process of filing for 501(c)(3) status. She filed three competing trademarks, one in her name and two others in the name of the organization. As she maintained control of our original trademark filings, where myself, Bulis, and four other individuals were named as trademark owners, she purposefully failed to respond to a simple office action by the USPTO and forced our trademarks to become abandoned so that her competing trademarks would prevail.

5. Her first action as the self-appointed leader of Breaking Code Silence was to initiate a lawsuit against the original founders—including Jenna and I—in an attempt to gain access to the accounts that we created, and which still belonged to the original Breaking Code Silence Movement Working Group. The lawsuit falsely claimed that we were committing trademark infringement, even though we were named as trademark owners in our original application. The primary justification for this claim was that we had not immediately changed our LinkedIn profiles to reflect their false claims that we had been removed from our positions. One of the parties, Defendant Thompson, was sued with no real claims against her, their only claim was that she attempted to change her email password. Katherine McNamara donated \$100,000 to BCS to carry out this lawsuit against us.
6. This lawsuit was entirely frivolous and appeared to be a means to intimidate, cause undue stress, and ruin us financially. She used the lawsuit as an opportunity to launch a malicious smear campaign, which resulted in months of harassment from individuals within our community who had been misled by her false claims. The defamation significantly harmed our reputations, caused severe emotional distress, and led both Jenna and I to seek therapy for stress and anxiety management.
7. The lawsuit was ultimately dismissed after we won our motion to dismiss. [See *21-cv-0918-BAS-DEB Dismissal*] The case was based on false claims that another individual had used the Breaking Code Silence trademark before us and had assigned it to Katherine's organization. However, this individual provided a sworn declaration that he never used the mark before us, did not have a claim to the trademark, and had previously informed Katherine's attorneys of this fact. Despite this knowledge, McNamara proceeded with the meritless lawsuit because she believed she could simply outspend us with extensive and expensive legal proceedings. On several occasions, she stated to third parties that her intent was to "take our houses" and force us to "bend the knee" to her.
8. During this litigation, Katherine filed yet another baseless claim against me, accusing me of "weaponizing" someone to text her wife. I did no such thing. Her petition was dismissed on the same day it was filed. She then hired an attorney to threaten me with a defamation lawsuit if I didn't publicly absolve her of stealing our organization's intellectual property, which was the basis of the open FBI investigation.

9. In December 2022, Katherine resigned from the Breaking Code Silence Organization 501c3 and reportedly either directly or indirectly locked the remaining leadership of the organization out of their social media accounts and other assets, while also taking the organization's intellectual property and using it to establish another organization. I personally observed that several accounts, many of which we created, were either destroyed or rebranded, including the Twitter, Facebook Group, and Instagram. Interestingly, neither we, BCS, nor McNamara had access to the Instagram account due to the 2FA number being associated with the former CEO's phone number. However, during this time, the account was accessed without authorization, taken over, a significant amount of content was deleted, and a linktree was set up that redirected to the other organization McNamara began working with after leaving BCS. This account was one of the contested pieces of intellectual property in the lawsuit.
10. Soon after, BCS alleged that Katie had deindexed the Breaking Code Silence website, effectively erasing the organization's online presence. The organization allegedly gathered cyber forensic evidence of the alleged unauthorized access and, in 2022, Breaking Code Silence filed a federal lawsuit against Katherine McNamara, case # 2:22-cv-02052, Breaking Code Silence v. McNamara et al., for computer fraud and abuse, as well as other claims of stolen property and harm to the organization.
11. This repeated pattern of organizational sabotage demonstrates a deliberate effort to seize control, remove leadership, exploit access to organizational assets, and ultimately dismantle the organization once conflict arises.

VEXATIOUS LITIGATION

11. Katherine abuses the legal system—through legal threats, false allegations in pleadings, and public dissemination of these legal documents—to silence victims and discredit them. Her use of the legal system is not to resolve disputes, but to inflict harm. After filing and losing several baseless lawsuits, Katherine has continued to weaponize the legal system solely to intimidate, financially drain, and harass us. This includes excessive and invasive discovery requests, even when we were not parties to the actions, and threats of dragging us into further litigation.
 - a. Katherine is now threatening a Malicious Prosecution lawsuit against BCS, but she has strongly implied that Jenna and I would also be included, despite the fact that neither of us were plaintiffs in the original case. This is yet another attempt to drag us through costly and time-consuming legal proceedings, even though her claims have no merit and are destined to fail. She will undoubtedly use this as yet another opportunity to publicly accuse us of wrongdoing—claims that are entirely fabricated and have no basis in reality.

- b. After nearly ten different lawsuits, most of them filed by Katherine McNamara, ***she has become the very definition of a vexatious litigant.***
 - i. It's important to note that Katherine was not victorious in the lawsuit BCS filed against her. The case was voluntarily dismissed due to issues in the discovery process, not because she prevailed on the merits. For a Malicious Prosecution claim to succeed, she would need to meet specific legal thresholds, *which she clearly does not meet any.*

DEFAMATION AND HARASSMENT

- 12. In her consistent effort to enact vengeance upon those who would dare hold her accountable for her actions, Katherine launched at least two public websites expressly designed to harass and defame:

- a. **BreakingCodeSilenceLawsuit.com**

- i. On this website, Katherine falsely claims that Jenna Bulis and I conspired to sue her [see "A Plot to Sue," page 10] and accuses us of orchestrating a scheme to deindex the site to frame her for hacking BCS's website [see "Plot to De-Index," page 22]. She takes snippets from my deposition out of context, alleging that our initial settlement discussions with BCS constituted a "plot to sue." In reality, these discussions were about a potential counter-suit to recover attorneys' fees from a previous case. Ultimately, I chose not to pursue litigation and had no involvement in the Computer Fraud lawsuit against her.
- ii. Katherine subpoenaed me in that case, and as a witness, I provided truthful testimony about what BCS had told me. My only role was as a witness—I had no participation beyond that. This website distorts the facts, portraying us as part of a fabricated scheme to suggest criminal wrongdoing where none exists.

- b. **Wwaspsurvivorstruth.com**

- i. This website serves as a repository of defamatory content, including unauthorized personal information, selective legal records, and manipulated material designed to cast us in a negative light. It displays screenshots of statements made by other individuals, falsely attributing them to Jenna and I, and claims these statements justify the creation of the website. Neither Jenna nor I made the statements Katherine alleges, and she provides no evidence to support her claims. Aside from one statement, which I have openly redacted and apologized for after being misinformed. The website publishes knowingly false statements about our

actions and character, and completely omits or unreasonably justifies her own involvement in the discord between us.

- ii. Jenna has been the primary target of this smear campaign with entire sections of the website dedicated to her, including pages titled: *wwaspsurvivorstruth.com/jenna-part-1* [See Exhibit D], *wwaspsurvivorstruth.com/jenna-part-2* [See Exhibit E], *wwaspsurvivorstruth.com/jenna-part-3* [See Exhibit H]. This website appears among the top search results when you Google Jenna Bulis, posing a direct threat to her professional reputation.
 - iii. Katherine has falsely claimed that Jenna and I accused her of calling the police on Jenna and of convincing to do so. These accusations are untrue; we have never made such statements. What we have stated is that Katherine had involvement in the situation that ultimately led to Jenna's institutionalization, as evidenced by the numerous messages between Katherine, Jenna's estranged stepmother, and her ex-boyfriend. Additionally, Katherine coordinated several group chats and phone calls with me and Jenna's other co-workers, stating that Jenna was Bipolar and needed to be institutionalized until she accepted this unprofessional diagnosis and took heavy sedative medication. *Jenna has never been diagnosed with bipolar disorder by any mental health professional*, yet Katherine continues to insist that Jenna has bipolar disorder, using this website to justify her unqualified opinion about Jenna's mental health.
 - iv. *This website is a violation of Jenna's privacy and an unauthorized publication of her private medical history.*
13. The creation and maintenance of these websites are not neutral acts of free speech but calculated smear campaigns against the key witnesses to her unethical actions that have led to an FBI investigation and two lawsuits. Even though the lawsuit between us has long been resolved, she persists in her relentless campaign to discredit us and incite others to harass us. Both websites are part of a larger strategy to publicly shame and isolate anyone who challenges Katherine's behavior. By controlling the narrative on many social media and public facing platforms, she not only damages our reputations as advocates in the community but also turns what could be a private dispute into a public controversy. This has a profound impact on our lives outside of the survivor community, affecting our jobs, the companies we work for, our clients, and our families. Katherine's actions have consequences that extend far beyond legal disputes and cause real, measurable harm.

- a. Jenna is employed by _____, which has very strict requirements for its employees. As a result, Jenna has been forced to report the existence of this website to her employer.

FINANCIAL AND BUSINESS IMPACT

14. As a direct result of Katherine's defamatory website, our organization, _____, lost its fiscal sponsorship in January 2025, resulting in the loss of approximately \$8,000 in pledged donations, a \$2,000 returned donation, and access to critical future grants. These losses have severely hampered our ability to continue our advocacy work. See "Termination of Fiscal Sponsorship" [Exhibit G]
15. The defamatory content propagated by Katherine appears in top search results and continues to undermine our professional credibility. This ongoing public defamation makes it difficult to secure partnerships, funding, and professional support, ultimately jeopardizing the mission of our organization.
16. The relentless harassment has taken a significant emotional toll on both Jenna and I. The constant barrage of online defamation, coupled with the invasive nature of her legal harassment, has resulted in severe anxiety and emotional distress. This pervasive sense of being under siege forces us to divert energy away from our advocacy and personal well-being to address the ever escalating conflict between us.
17. Beyond causing personal harm, Katherine's behavior targets anyone who aligns with us professionally. Most recently, she targeted our fiscal sponsor [See "Defamation of Fiscal Sponsor" attached as page 23], which was a factor in the loss of our fiscal sponsorship. Her pattern of publicly defaming individuals and organizations has ruined careers, cost essential project funding, caused division within our community, and created an atmosphere of apprehension among potential volunteers. Many now fear that associating with _____ could make them a target for Katherine's harassment and damage their reputations. This deliberate effort to make an example of us only interferes with our ability to operate within our community and professional networks, hindering the important advocacy work of _____ mission.
18. Katherine has openly attacked other organizations within our community, most significantly, the Breaking Code Silence organization, their board members individually _____ and their supporters. She has also targeted other organizations and advocates who have tried to launch their own projects, only to abruptly leave our community due to alleged harassment by Katherine and her supporters. Those who continue to operate within our space of advocacy tend to remain a target of defamation and harassment and it deeply affects their abilities to engage with the community and carry out their advocacy projects.

SAFETY CONCERNS

18. The content on these websites has led to real-world consequences, including targeted harassment and threats to our families. As a direct result of Katherine McNamara's actions:

- a. A third party, who directly referenced this website and claimed to have received screenshots from Katherine, engaged in severe harassment against both Jenna and I, as well as others she had been led to believe tried to have her kids taken away. This included prank phone calls, abusive social media messages, and
- b. While the widespread gossip and false statements about our character are deeply distressing, our intent has always been to ignore them and focus on our advocacy work. However, when this rumor-mongering escalates into real-life harassment, it becomes something we can no longer ignore. *It must be stopped.*

PLEA FOR RELIEF

19. Jenna's children are of age to use the internet and would be distressed to see their family's privacy violated. They should not be exposed to the disputes, custody battles, or lawsuits their parents are engaged in, and they should not be posted so readily on the internet when these documents are usually not made so public. Jenna's children have already expressed being uncomfortable with Katherine's actions, particularly her constant attempts to contact their father/guardian.
20. Given the overwhelming evidence of her misconduct and the severe personal, financial, and professional harm we have suffered, I respectfully request that the court grant a protection order to prevent further harassment and to safeguard Jenna's well-being.

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

Chelsea

STATE OF WASHINGTON:
COUNTY OF SNOHOMISH: ss.

The undersigned Clerk of the Court does hereby certify that this instrument is a true and correct copy of the original on file in this court.

Dated this 28 day of Sept, 2021
Evergreen Division, Clerk of Court

By [Signature]
Snohomish County District Court Evergreen Division

State of Washington Snohomish County District Court ☐ Cascade ☒ Evergreen ☐ Everett ☐ South <u>JENNA ANN BULIS</u> Petitioners (Protected Persons) vs. <u>KATHERINE ROSE MCNAMARA</u> Respondent	No. U21-101 Denial Order ☐ Domestic Violence ☒ Antiharassment ☐ Sexual Assault ☐ Stalking (Optional Use) (ORDYMT) ☐ Clerk's Action Required Next Hearing Date/Time: at At:
--	--

This Matter having come on for hearing upon the request of ☒ Petitioner ☐ Respondent for a: _____

☐ Temporary Order ☒ Full Order ☐ Renewal Order
☐ Modification Order ☐ Termination Order

and the Court Finding:

- ☒ Petitioner ☒ Respondent *both appeared.*
☐ Petitioner requested dismissal of petition.
☐ The order submitted has not been completed or certified upon penalty of perjury.
☐ This order materially changes an existing order. A hearing after notice is necessary.
☐ No notice of this request has been made or attempted to the opposing party.
☐ The petitioner has failed to demonstrate that there is sufficient basis to enter a temporary order without notice to the opposing party.

Stalking:

- ☐ The stalking protection order petition does not list specific incidents and approximate dates of stalking conduct.
☐ A preponderance of the evidence has not established that there has been stalking conduct.
☐ The respondent proved by a preponderance of the evidence that the respondent will not resume acts of stalking conduct against the petitioner or the petitioner's children or family or household members when the protection order expires.

Harassment:

- ☐ The harassment protection order petition does not list specific incidents and approximate dates of harassment.

REISS OF TEMP ORD FOR PROTECTION/NT HRG (HARASSMENT) (ORRTPO) - Page 5 of 1
UH-03.0300 (9/2000) - RCW 10.14.080 (3), (5)

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- ☒ A preponderance of the evidence has not established that there has been harassment.
- ☐ The respondent proved by a preponderance of the evidence that the respondent will not resume harassment of the petitioner when the protection order expires.
- ☒ Other: The court does not find the Petitioner's filing to be frivolous and the court denies Respondent's request for attorney fees.

The court orders that:

- ☐ The request to waive the filing fee is denied.
- ☐ The request for a temporary order is denied and the case is dismissed.
- ☒ The request for a full order is denied, and the petition is dismissed. Any previously entered temporary order expires at forthwith today.
- ☐ The request for a temporary order is denied and the clerk is directed to set a hearing on the petition.
- ☐ The request before the court is denied, provided that it may be renewed after notice has been provided to the opposing party according to the Civil Rules.
- ☐ The request to modify, terminate, or renew the order dated _____ is denied.
- ☐ The request for a temporary/final Order to Surrender Weapons is denied.
- ☐ If any firearms or dangerous weapons have been surrendered under this cause number, they shall be released to the respondent, absent some other legal reason that may exist prohibiting the respondent from possessing them.
- ☐ The parties are directed to appear for a hearing as shown on page one (1).
- The requesting party shall make arrangements for service of the petition/motion and this order on (name) _____ by law enforcement, professional process server, a person who is 18 or older, competent to be a witness, and not a party to the case. A Return of Service shall be filed with the clerk at or before the hearing.

Failure to Appear at the Hearing May Result in the Court Granting All of the Relief Requested in the Petition or Motion.

This order is dated and signed [☒] in open court [] off the record after reviewing Petition.

Date: 9.28.2021 Time: 11:04 A.M. [Signature]
Judge/Commissioner

I acknowledge receipt of a copy of this order:

<u>Appeared Zoom</u>			
Signature of Respondent/Lawyer	WSBA No.	Print Name	Date
<u>[Signature]</u>		<u>Jenna Bulis</u>	
Signature of Petitioner/Lawyer	WSBA No.	Print Name	Date

The undersigned Clerk of the Court does hereby certify that this instrument is a true and correct copy of the original on file in this court.
Dated this 31st day of August, 20 21

By [Signature]
Evergreen Division, Clerk of Court
Snohomish County District Court Evergreen Division

State of Washington

Snohomish County District Court

☐ Cascade ☒ Evergreen ☐ Everett ☐ South

No. U21-101

JENNA ANN BULIS

Petitioner,

vs.

KATHERINE ROSE MCNAMARA

38-39 YOA?

Respondent.

Temporary Protection Order and Notice of Hearing – Harassment (TMORAH)

(Clerk's action required)

Next Hearing Date and Time: 9-14-21
at 1:30 pm

Snohomish County District Court –
Evergreen Division
14414 – 179th Ave SE
Monroe, WA 98272

Warning to the Respondent: Violation of the provisions of this order with actual notice of its terms is a criminal offense under chapter 10.14 RCW and will subject a violator to arrest. Willful disobedience of the terms of this order may also be contempt of court and subject you to penalties under chapter 7.21 RCW.

Minors addressed in this order:

Name (First, Middle Initial, Last)	Age	Race	Sex

Based upon the petition, testimony, and case record, the court finds that the respondent committed unlawful harassment as defined in RCW 10.14.080, and that great or irreparable injury to the protected person/s will result if this order is not granted. **It is therefore ordered that:**

☒ **No Contact:** Respondent is **restrained** from making any attempts to contact petitioner and any minors named in the above table.

☒ **Surveillance:** Respondent is **restrained** from making any attempts to keep under surveillance petitioner and any minors named in the above table.

☒ **Stay-Away:** Respondent is **restrained** from entering or being within 750 yards (distance) of petitioner's ☒ residence ☒ place of employment ☒ school minors

☐ ☐ The address is confidential ☒ Petitioner waives confidentiality of the address which is:
Res

☒ Respondent is restrained from being upon the property of the Petitioner.

☒ **Other:** Respondent shall not use any social media to contact petitioner or her minor children.

☐ **Surrender and Prohibition of Weapons Order**

The court finds that:

- ☐ Irreparable injury could result if the order to surrender weapons is not issued.
- ☐ Respondent's possession of a firearm or other dangerous weapon presents a serious and imminent threat to public health or safety or the health or safety of any individual.
- ☐ Irreparable injury could result if the Respondent is allowed to access, obtain, or possess any firearms or other dangerous weapons, or obtaining or possessing a concealed pistol license.
- ☐ _____

The Respondent must comply with the **Order to Surrender Weapons (and Prohibit Weapons if checked below) Issued Without Notice**, filed separately, which states:

Respondent shall immediately surrender all firearms, other dangerous weapons, and any concealed pistol licenses.

- ☐ Respondent is prohibited from accessing, obtaining, or possessing any firearms or other dangerous weapons, or obtaining or possessing a concealed pistol license.

(Note: Also use form number All Cases 02-030.)

Washington Crime Information Center (WACIC) Data Entry

It is ordered that the clerk of the court shall forward a copy of this order, and any order to surrender and prohibit weapons, on or before the next judicial day to: LAKE STEVENS PD ☒ County Sheriff's Office ☐ Police Department where petitioner lives which shall enter it into WACIC.

Service

- ☐ The clerk of the court shall also electronically forward a copy of this order, and any order to surrender and prohibit weapons, on or before the next judicial day to: LA COUNTY SHERIFF ☒ County Sheriff's Office ☐ Police Department where Respondent lives which shall personally

serve the Respondent with a copy of this order and shall promptly complete and return to this court proof of service.

Or

☐ (Only if surrender of weapons not ordered) Petitioner shall make private arrangements for service of this order.

The Respondent is directed to appear and show cause why the court should not enter an order for protection effective for one year or more and order the relief requested by the petitioner or other relief the court deems proper, which may include payment of costs.

Failure to appear at the hearing or to otherwise respond will result in the court issuing an order for protection pursuant to RCW 10.14 effective for a minimum of one year from the date of the hearing. The next hearing date and time is shown below the caption on page one.

A copy of this Temporary Protection Order and Notice of Hearing - Harassment has been filed with the clerk of the court.

This Temporary Order for Protection is effective until the next hearing date and time shown below the caption on page one.

Dated 8/31/2021 at 9:04

am / pm

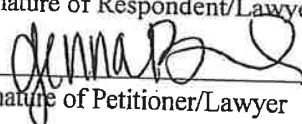

Judge / Court Commissioner

I acknowledge receipt of a copy of this Order:

> _____
Signature of Respondent/Lawyer WSBA No.

Print Name

Date

> 
Signature of Petitioner/Lawyer WSBA No.

Jenna Bulis
Print Name

8/31/21
Date

Petitioner or Petitioner's Lawyer must complete a Law Enforcement Information Sheet (LEIS).

Mail To Upland Office: 367 N. 2nd Avenue • Upland, CA 91786 • Phone (909) 608-0466
Los Angeles Office: 606 S. Olive St. Ste. 1140 • Los Angeles, CA 90014 • Phone (800)
265-4280

Mission Viejo: 26522 La Alameda Ste. 285 • Mission Viejo, CA 92691 • Phone (800)
265-4280

Fax To: (909) 608-0477

www.estellekennedylaw.com

SENT VIA U.S. MAIL AND ELECTRONIC MAIL

June 15, 2021

Jennifer B.

Chelsea

Jenna Bulis

RE: Defamatory Statements Against Katherine McNamara

Dear _____ and Ms. Bulis:

Please be advised that Estelle & Kennedy, A Professional Law Corporation has been retained by Katherine McNamara ("Our Client") to assist her in attempting to settle this matter. Accordingly please direct all future communication regarding this matter to my office.

THE LAW ON DEFAMATION

The tort of defamation involves "1) a publication that is 2) false, 3) defamatory, 4) unprivileged, and 5) has a natural tendency to injure or causes special damages." *Sanders v. Walsh* (2013) 219 Cal.App.4th 855, 862. With minor exceptions, the torts of libel and slander have essentially the same elements. The primary difference between them is that libel involves a defamatory statement by writing or other "fixed representation to the eye" while slander involves a defamatory statement uttered orally. California Civil Code §§ 45-46.

"Defamation is an invasion of the interest in reputation." *Smith v. Maldonado* (1999) 72 Cal.App.4th 637, 645. "In defamation actions generally, factual truth is a

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defending party's negligence an element of libel if the injured party is a private figure. Carney v. Santa Cruz Women Against Rape (1990) 221 Cal.App.3d 1009, 1016.

"The burden is normally on the defendant to prove the truth of the allegedly defamatory communications." Stolz v. KSFM 102 FM (1994) 30 Cal.App.4th 195, 202. Furthermore, statement of private concern communicated between private individuals have been found to not raise First Amendment issues. Savage v. Pacific Gas & Electric Co. (1993) 21 Cal.App.4th 434, 445. However, if the speech involves a private figure party and a matter of public concern, then the injured party has the burden of proving the falsity of the defamation. Brown v. Kelly Broadcasting Co. (1989) 48 Cal.3d 711, 747.

Libel and slander actions have a statute of limitations of one year. Hopper v. Allen (1968) 266 Cal.App.2d 797, 801-803.

Here, Our Client was part of the formation of a non-profit organization, now called Breaking Code Silence. The group created the non-profit without you, and the problems facing Our Client all sprang from your reaction to not being part of the team. While there is a Trademark case being litigated between you and the non-profit Breaking Code Silence, the issues here were brought about when you spread false, vile, and defamatory statements against Our Client on social media and to various individuals with whom Our Client has a working relationship. These statements have continued on a consistent basis and your behavior in this matter is unacceptable and it must stop immediately.

On March 15, 2021 Chelsea claimed that the Our Client structured a grant for Vanessa Hughes made you "liable for laundering money into her personal non-profit." This is an accusation of criminal behavior that has no merit. Money laundering requires the "specific intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of any criminal activity." California Penal Code § 186.10(a). The notion that any criminal activity took place in the formation of a non-profit for there to be money-laundering involved is an unfounded accusation that must stop. A true and correct copy of the money-laundering accusation is attached as Exhibit "A" and incorporated herein by reference.

On April 4, 2021 Chelsea then admitted that there was nothing wrong with the grant and that the issue you had was with Our Client. Specifically, Chelsea wrote "BCS would have continued without Katie [Our Client]. And Vanessa would have gotten her grant." In your own words you confirm that there was no money-laundering and that the grant would have been acceptable. A true and correct copy of the valid grant statement is attached as Exhibit "B" and incorporated herein by reference.

The defamatory statements were not limited to just this grant and money-laundering. You covered a wide range of falsities against Our Client. For instance, on March 15, 2021 Chelsea claimed that Our Client "got Jenna involuntarily committed and her kids taken away." A true and correct copy of the false claims against Jenna Bulis is attached as Exhibit "C" and incorporated herein by reference. This statement is

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statements to other individuals on March 26, 2021 to Mr. Bill Boyles that Our Client "had Jenna [Bulis] committed. She called her ex and told him she was doing drugs and was bipolar and had a huge hand in having her kids taken away." Chelsea continued here, "Imagine that for a minute. One person having the hubris to armchair diagnose someone, have them sent somewhere they would be retraumatized and have their whole life taken away from them..." A true and correct copy of the continuing statements about Jenna Bulis is attached as Exhibit "D" and incorporated herein by reference.

You then admitted to an individual that you made these statements to outside organizations and politicians. Chelsea wrote "because every other outside organization I have worked with and politicians and alliances and the RISE justice labs... they all were extremely impressed with me and still are, and stand by my side on this because they clearly recognize her actions were wrong." This is an open admission of making false, defamatory accusations about Our Client to individuals whom she has, or will seek, a professional relationship! A true and correct copy of Chelsea's admission to defaming Our Client is attached as Exhibit "E" and incorporated herein by reference.

Eventually, other individuals started defaming Our Client for situations they were never privy to. Sarah D... states there are "unethical things happening currently: theft, manipulation, lies, doxxing/witch hunts/bullying... people are being threatened... etc." A true and correct copy of D...'s statement defaming Our Client by implication is attached as Exhibit "F" and incorporated herein by reference. Sarah D... is only stating what she was told by you because none of these crimes happened. The misinformation spread rapidly as your other friends started posting about theft and stealing as well. A true and correct copy of ... implying Our Client has shut down voices is attached as Exhibit "G" and incorporated herein by reference. Mr. ... continued in the comments to his post "they were pushed out while the other team stole everything." See Exhibit "G." These statements are proof that defamation was committed against Our Client.

On April 12, 2021, Jennifer Barr threatened to sue Our Client, claiming that she owned Breaking Code Silence. A true and correct copy of Barr's statement is attached as Exhibit "H" and incorporated herein by reference. Additionally, on April 12, 2021, Our Client received harassing messages from your friends, like the one from

when she called Our Client saying that she has heard many things about Our Client and "even if they are only half true you're a stone cold gangster & if not true you still achieved what every gangster aspires for ... people fear you deeply." A true and correct copy of said statement is attached as Exhibit "I" and incorporated herein by reference.

On April 13, 2021, Chelsea falsely claims that Our Client "literally committed a crime." Whatever the alleged crime was thought to be, false statements of this sort are clearly defamatory and serve only to damage Our Client's reputation. A true and correct copy of Chelsea's "literally" statement is attached as Exhibit "J" and incorporated herein by reference.

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feel are happening are only imagined because Our Client has never attacked you nor will she attack you. A true and correct copy of Jennifer's false claims of attacks is attached as Exhibit "K" and incorporated herein by reference. In the same comments, someone posts Our Client's full legal name. See Exhibit "K."

On May 25, 2021, Jennifer posted a list of names that included Our Client and wrote, "Every single person on this list is a criminal and will be charged accordingly." A true and correct copy of Barr's defamatory list is attached as Exhibit "L" and incorporated herein by reference. Barr continued, "This is becoming a terrorist organization and I will not be silent," seemingly confirming that you will continue to make defamatory statements. On that same day, Jennifer suggested that Our Client contacted the police and Department of Children and Family Services ("DCFS") on her and wrote "y'all will be facing criminal charges. AND I KNOW WHO YOU ARE!" A true and correct copy of Jennifer's accusations against Our Client is attached as Exhibit "M" and incorporated herein by reference. Our Client never contacted the police or the DCFS. These are blatant lies and false accusations that serve only to defame Our Client.

The accusations about Our Client calling the police continued to the point that Jenna Bulis suggested Our Client called the police in an incident that killed a man. A true and correct copy of said statement is attached as Exhibit "N" and incorporated herein by reference. Not only did Jenna insinuate Our Client was responsible for the death of a man, but members of the community have expressed that both Jenna and Chelsea have told them this, and the members are willing to sign affidavits affirming this. These statements need to stop and be retracted because they are dangerous and inflammatory.

On May 26, 2021, Jenna Bulis posted publicly that the police were "weaponized" against you. A true and correct copy of Jenna Bulis' public post is attached as Exhibit "O" and incorporated herein by reference. This escalated to the point that moderators in the group brought it to every member's attention that these were criminal acts. Once again, it bears repeating, Our Client never contacted the police or weaponized them against anyone. See Exhibit "G."

The defamation and abuse continued towards Our Client's friends and accused them of being criminals. Jennifer wrote "I will blast you because you've spent months behind the scenes helping others orchestrate criminal activity." A true and correct copy of Jennifer's post accusing Our Client and her friend of being criminals is attached as Exhibit "P" and incorporated herein by reference. The following day, on May 27, 2021 Jennifer sends a message to Our Client that reads in its entirety, "Hey Katie. I have searched you back from some texts, this is Jen. Fuck with my family or my friends again I will take you to the circus." The pattern of harassing behavior and false statements should be clear by all of these messages. Our Client does not interact with you, but you continue to defame and harass her. A true and correct copy of Jennifer's threatening text message is attached as Exhibit "Q" and incorporated herein by reference.

The amount of instances of defamation against Our Client is simply astounding and too voluminous to list all of it in one letter. The activities listed here are all within a brief two month window and do not encompass everything from that period. Our Client is a highly educated cybersecurity professional and has her professional and personal reputations at stake. The idea that she would sacrifice that reputation by committing any of the alleged acts is absurd, delusional, and irrational. The defamatory statements made by you about her serve only as a way to attack and damage her reputation, and it must end immediately.

This correspondence shall serve as a formal cease and desist of all false statements regarding Our Client, Ms. Katherine McNamara. We demand a full retraction of all statements made about Our Client personally and about her involvement with Breaking Code Silence. Furthermore, we demand that a truthful statement be posted to all forums and FaceBook group pages where you made false statements against Our Client. This statement must specify that all criminal accusations made about Our Client were false. We demand you pay all attorney's fees associated with this action, as Our Client would have never retained us if you had not made these statements. If you do not comply with these demands by June 30, 2021, Our Client will have no choice but to file a civil lawsuit for defamation.

Please be advised that all communications herein are protected under the California Evidence Code §§ 1152 and 1154.

We thank you for your time, efforts, and anticipated cooperation.

Very truly yours,

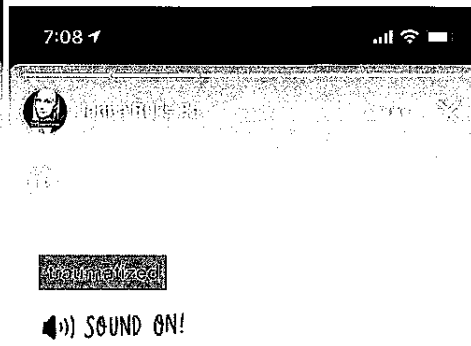
ESTELLE & KENNEDY
A Professional Law Corporation



Aram Kuredjian, Esq.
Brandy Estelle, Esq.

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EXHIBIT O



Weaponizing the police
against our mental health
labels???

Because a Facebook post...

99

#NOMORESURVIVORS

1:02



5



Program Legislative Change

Active now



Who got shot?

10:43 AM

I don't know the details but
was sent this
[https://vancouver.sun.com/
news/local-news/shots-fired-
in-chilliwack-saturday-night-
during-standoff-with-
distraught-man/?
fbclid=IwAR1JW51PFy0CPCfM
HKf2FnSr1ryMmHTIspEdlByNJ
aLAyxO3xw3oLHYnwsK](https://vancouver.sun.com/news/local-news/shots-fired-in-chilliwack-saturday-night-during-standoff-with-distraught-man/?fbclid=IwAR1JW51PFy0CPCfM_HKf2FnSr1ryMmHTIspEdlByNJaLAyxO3xw3oLHYnwsK)



**Independent agency to probe
Chilliwack police incident that
left 'distraught man' dead**

vancouver.sun.com



10:43 AM

His name was



5



Program Legislative Change

Program Legislative Change

Business

Business addresses are public record - if it's home addresses id delete ...



Food Files: AL, MS, FL

The person who filed the trademark won't speak to me. So I guess it's her risk. I'll delete them this afternoon but I'd like anyone that wants it to have a chance to download them.

They certainly didn't have a issue sending the police to a survivors house which resulted in a shot out leading to his death.



agreed

Wait what?!



Who got shot?

Food Files: Washington

I don't know the details but was sent this
<https://www.washingtonpost.com/>



Aa

12/11/2019

1:02



5



Program Legislative Change

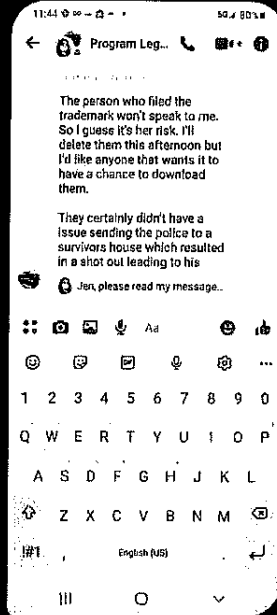
Active now

this out legally. The truth will
always hold more weight.



3

Jan Shaw- Montana



That post insinuated or
was Katie..



It was.

Jan Shaw



I wouldn't of known that

Jan Shaw- Montana

It was shared , documents
with her name on it



Aa





**JULANDER BROWN
— & BOLLARD —**

FILE NUMBER:
3MCW01-03

June 4, 2024

Via Electronic Mail

Jenna Bulis
E-Mail:

Re: Evidence Preservation
McNamara, et al. v. Breaking Code Silence, et al.

Dear Ms. Bulis,

I am writing to notify you that my clients, Katherine McNamara and Jeremy Whiteley, intend to file an action for malicious prosecution (hereinafter the "Litigation") in connection with the now-dismissed federal action styled *Breaking Code Silence v. McNamara, et al.*, Central District of California Case No. 2:22-cv-002052 (the "BCS Action"). If you are receiving this letter, you may either be named as a defendant in the Litigation, be a material witness in the Litigation, or possess relevant documents and electronically stored information related to the Litigation.

Please regard this letter as notice to you to preserve all electronically stored information, copies, and backups, along with any paper files which you maintain, relevant to the initiation and maintenance of the BCS Action, including privileged materials. Under both California and Federal law, you are required to preserve all electronically stored information ("ESI") in your custody and control that is relevant.

You Must Consider ESI Broadly

ESI should be afforded the broadest possible definition and includes (by way of example and not as an exclusive list) potentially relevant information electronically, magnetically or optically stored as:

- Digital communications (e.g., e-mail, voice mail, instant messaging);
- Word processed documents (e.g., Word or WordPerfect documents and drafts);
- Spreadsheets and tables (e.g., Excel or Lotus 123 worksheets);

9110 Irvine Center Drive
Irvine, CA 92618

☎ 949-350-8527
☎ 949-477-2100

✉ Adam@jbbllaw.com
🌐 www.JBBLaw.com

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- Accounting Application Data (e.g., QuickBooks, Money, Peachtree data files);
- Image and Facsimile Files (e.g., .PDF, .TIFF, .JPG, .GIF images);
- Sound Recordings (e.g., .WAV and .MP3 files);
- Video and Animation (e.g., .AVI and .MOV files);
- Databases (e.g., Access, Oracle, SQL Server data, SAP);
- Contact and Relationship Management Data (e.g., Outlook, ACT!);
- Calendar and Diary Application Data (e.g., Outlook PST, Yahoo, blog tools);
- Online Access Data (e.g., Temporary Internet Files, History, Cookies);
- Presentations (e.g., PowerPoint, Corel Presentations)
- Network Access and Server Activity Logs;
- Project Management Application Data;
- Computer Aided Design/Drawing Files; and,
- Back Up and Archival Files (e.g., Zip, .GHO).

Preservation Requires Immediate Intervention

You must act immediately to preserve potentially relevant ESI. Adequate preservation of ESI requires more than simply refraining from efforts to destroy or dispose of such evidence. You must also intervene to prevent loss due to routine operations and employ proper techniques and protocols suited to the protection of ESI. Be advised that sources of ESI are altered and erased by continued use of your computers and other devices. Booting a drive, examining its contents or running any application will irretrievably alter the evidence it contains and may constitute unlawful spoliation of evidence. Consequently, alteration and erasure may result from your failure to act diligently and responsibly to prevent loss or corruption of ESI. Nothing in this demand for preservation of ESI should be understood to diminish your concurrent obligation to preserve documents, tangible things, and other potentially relevant evidence.

Suspension of Routine Destruction

You are directed to immediately initiate a litigation hold for potentially relevant ESI, documents, and tangible things, and to act diligently and in good faith to secure and audit compliance with such litigation hold. You are further directed to immediately identify and modify or suspend features of your information systems and devices that, in routine operation, operate to cause the loss of potentially relevant ESI. Examples of such features and operations include:

- Purging the contents of e-mail repositories by age, capacity or other criteria;
- Using data or media wiping, disposal, erasure or encryption utilities or devices;
- Overwriting, erasing, destroying or discarding back up media;
- Re-assigning, re-imaging or disposing of systems, servers, devices or media;
- Running antivirus or other programs affecting wholesale metadata alteration;
- Releasing or purging online storage repositories;
- Using metadata stripper utilities;
- Disabling server or IM logging;
- Executing drive or file defragmentation or compression programs;
- Turning on or failing to turn off disappearing messages in Signal;
- Uninstalling/Deleting the Signal application from your devices;
- Deleting chats, emails, etc. under the belief or assumption it is “privileged;”
- Deleting Facebook chats; and
- Deleting Facebook accounts.

Guard Against Deletion

For law firms and other businesses, you should anticipate that your clients and employees, and other persons or entities with access to the ESI may seek to hide, destroy or alter ESI. You must act to prevent or guard against such actions. This concern is not one unique to you or those associated with you. It’s simply an event that occurs with such regularity in electronic discovery efforts that any custodian of ESI and their counsel are obliged to anticipate and guard against its occurrence.

Preservation in Native Form

You should anticipate that certain ESI, including but not limited to spreadsheets and databases, will be sought in the form or forms in which it is ordinarily maintained. Accordingly, you should preserve ESI in such native forms, and you should not select methods to preserve ESI that remove or degrade the ability to search your ESI by electronic means or make it difficult or burdensome to access or use the information efficiently in the litigation. You should additionally refrain from actions that shift ESI from reasonably accessible media and forms to less accessible media and forms if the effect of such actions is to make such ESI not reasonably accessible.

Metadata

You should further anticipate the need to disclose and produce system and application metadata and act to preserve it. System metadata is information describing the history and characteristics of other ESI. This information is typically associated with tracking or managing an electronic file and often includes data reflecting a file's name, size, custodian, location and dates of creation and last modification or access. Application metadata is information automatically included or embedded in electronic files but which may not be apparent to a user, including deleted content, draft language, commentary, collaboration and distribution data and dates of creation and printing. Be advised that metadata may be overwritten or corrupted by careless handling or improper steps to preserve ESI.

Servers

With respect to servers like those used to manage electronic mail (e.g., Microsoft Exchange, Lotus Domino) or network storage (often called a user's "network share"), the complete contents of each user's network share and e-mail account should be preserved. There are several ways to preserve the contents of a server depending upon, e.g., its RAID configuration and whether it can be downed or must be online 24/7. If you question whether the preservation method you pursue is one that we will accept as sufficient, please call to discuss it.

Ancillary Preservation

You must preserve documents and other tangible items that may be required to access, interpret or search potentially relevant ESI, including logs, control sheets, specifications, indices, naming protocols, file lists, network diagrams, flow charts, instruction sheets, data entry forms, abbreviation keys, user ID and password rosters or the like.

You must preserve any passwords, keys or other authenticators required to access encrypted files or run applications, along with the installation disks, user manuals and license keys for applications required to access the ESI.

You must preserve any cabling, drivers, and hardware if needed to access or interpret media on which ESI is stored.

Do Not Delay Preservation

You should not defer preservation steps if ESI may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Duration of Preservation Obligation

Your obligation to preserve documents and ESI will continue through the conclusion of the Litigation, including the exhaustion of all appeals. You will receive a written notice when the preservation obligation has ended.

Consequences of Non-Compliance

Failure to comply with this preservation notice may result in the imposition of sanctions by the court presiding over the Litigation. These sanctions may include adverse jury instructions, dismissal of claims or defenses, civil contempt, and monetary sanctions.

Confirmation of Compliance

Please confirm by June 14, 2024, that you have taken the steps outlined in this letter to preserve potentially relevant ESI and tangible documents.

If you have any questions about the scope of your preservation obligations, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Adam Tate", written over a horizontal line.

M. Adam Tate
JULANDER, BROWN & BOLLARD

EXHIBIT N