

1 JENNIFER T. IRVINE, ESQ.
State Bar No. 239744
2 Attorney at Law
600 B Street, Suite 2210
3 San Diego, CA 92101
Tel: (619) 537-6432
4 Fax: (619) 255-8900
Email: irvine@JTILaw.com

5 Attorney for Petitioner, DORINNA HIRSCH
6
7

CLERK OF COURT OFFICE
CLERK DIVISION

17 MAY -3 AM 10: 48

CLERK-SUPERIOR COURT
SAN DIEGO COUNTY, CA

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SAN DIEGO
10 HALL OF JUSTICE

11
12 DORINNA HIRSCH
13 Petitioner,
14 and
15 DAVID ARAMBULA
16 Respondent.
17
18

Case No.: 37-2017-00015930-CU-HR-CTL

**DECLARATION OF DORINNA HIRSCH
IN SUPPORT OF HER REQUEST FOR
RESTRAINING ORDER**

Date:
Time:
Dept:
Judge:

19 1. I am the Petitioner party in the above-referenced matter. I have personal knowledge
20 of the facts recited herein unless stated otherwise. All references herein to Arambula are to
21 Respondent, DAVID ARAMBULA.

22 1. Arambula has worked for me in the position of paralegal/assistant for over 4 years
23 doing contracted work. I would meet with Arambula and the other staff and professionals located at
24 3008 1st Ave, San Diego, CA 92103 and get my mail at that location. We would meet at various
25 other locations as necessary, including my home as well as his.

26 2. In approximately April of 2016, Arambula's performance began to deteriorate
27 dramatically, and I warned him that I would not be able to keep him aboard unless he pulled things
28 together. Although he appeared to cooperate for a while, sometime thereafter he began systematic

1 harassment in the form of tampering with my business. The tampering took the form of deliberately
2 filing legal documents under my signature of which I had no knowledge and to which I had given
3 no consent, deliberately concealing court calendar dates, tampering with my mail and sometimes
4 removing it all together, and filing legal papers outside the required deadline.

5 3. On or about Feb 20, 2017, I became aware of his behavior and confronted him about
6 it. He reacted with rage and began telling me that he would "fuck me up" if I messed with him. He
7 screamed that he would destroy my business and "mess me up" if I crossed him. Thereafter I
8 attempted to break off all contact with him due to my anxiety over his behavior.

9 4. Once he realized that our relationship was over, he began to contact my business
10 associate Thomas Slattery, and stated that if I did not agree to pay him (Arambula) large sums of
11 money to which he was not entitled he would destroy my business. He stated he would file
12 complaints with various agencies, cash company checks which had been given to him to pay
13 company expenses, and he refused to return essential legal documents in his possession and he
14 threatened would have criminal charges filed against me.

15 5. Mr. Slattery also had dealings with Arambula and had knowledge of my problems
16 with him. However, Mr. Slattery was extremely confused about Arambula's rambling statements
17 and obvious rage. Mr. Slattery attempted to help calm the situation.

18 6. Sometime around March 21st or 22nd, 2017, I answered a call on my office line from
19 an unknown number. It was Arambula and he was extremely irrational, agitated and borderline
20 incoherent. He was rambling saying "I'm always having to save you from yourself" and repeating
21 the threat "you don't want to fuck with me". During the time I have known him, Arambula has
22 personally told me extensively about his problems with PTSD and the temper outbursts he claims
23 are associated with it. He has told me he has a severe drinking problem due to some of the things
24 he did to people while in Military counter-intelligence. I was extremely frightened, disturbed, and
25 intimidated by his level of intensity. I got off the phone with him and went to my friend Leticia
26 Gamboa's house to spend the night because I was afraid to be home alone.

27 7. On March 23, 2017 Arambula withdrew \$8,500 from the operating account of my
28 business. Although he was an authorized signatory, he had absolutely no legitimate right or reason

1 to completely deplete the account. Arambula transferred the money directly into his personal
2 checking account. (I subsequently contacted the Economic Crimes Task Force at San Diego Police
3 Department and made a report of the incident. The investigation is ongoing.)

4 8. The following day, Friday March 24, 2017 Arambula met with Mr. Slattery at Sushi
5 Time in Lemon Grove. The meeting was at Mr. Arambula's insistence. He told Mr. Slattery the
6 purpose was to discuss a pending case.

7 9. Instead, Arambula informed Slattery of his (Arambula's) long-term and ongoing
8 invasions of my personal and business privacy. Arambula made direct statements concerning how
9 he would "fuck up" my business if he was not paid off, stated that he would "make sure she finds
10 out what happens to people if they cross me" and that he had "fucked up other people" who "messed"
11 with him., including another attorney by whom he was previously employed He concluded by
12 issuing an ultimatum that if I was to "test" him by not complying with his financial demands by
13 Sunday 26 March, he would make good on his threats and I would "see what fucking happens."

14 10. Mr. Slattery was deeply concerned by Arambula's statements and demeanor and
15 told me that he thought the problem was serious.

16 11. I was completely terrified, so it was at this point I called the San Diego Police
17 Department to report the theft of the money from my account, and to express my concerns about
18 Arambula in light of the situation.

19 12. When no payment or response to his ultimatum was forthcoming from me,
20 Arambula began sending emails offering to extend his deadline. On March, 29, 2017, Arambula
21 sent a settlement demand letter.

22 13. On March 30, 2017, I sent Arambula an email reiterating the fact that I wished to
23 completely end our association.

24 14. He responded with a rambling and disjointed letter the same day. The letter is
25 frightening in its delusional and distorted statements concerning the things to which he claims to be
26 entitled and the wrongs he claims to have suffered. It appears to be the statement of a truly paranoid
27 person who believes I am out to get him. (He also appears to harbor similar ideas about Mr. Slattery.)
28 I felt absolutely threatened by its contents, especially in light of what had been said to Slattery.

1 15. Over the next six days Arambula continued to email me with threats and demands,
2 despite my total lack of response. He finally ceased emailing me after April 5th 2017.

3 16. Although he has not contacted me since, on April 21, 2017, I went into Wells Fargo
4 Bank in Fashion Valley to make a deposit. That location is less than a mile from my home. While
5 I was there I spoke with a banker who mentioned that Arambula had been in the branch some days
6 prior seeking information on my business accounts. The banker stated that Arambula had been in
7 the branch twice on the same day with an interval of around an hour between his visits.

8 17. I was especially troubled and disturbed because I had noticed some days earlier that
9 a number of items had disappeared from my garage/office. The items were not valuable, but had
10 deep personal significance. They included a photo album of my recently deceased mother, and some
11 other cherished effects.

12 18. Arambula had previously been informed of my mother's passing by Mr. Slattery,
13 and had attempted to contact me in order to find out where the service was being held. He was not
14 welcome. He was not wanted. And he was absolutely not invited.

15 19. Nonetheless on March 21, 2017 Arambula went to Tijuana in attempt to learn the
16 location of my mother's funeral. He contacted other individuals and made sustained efforts to find
17 the funeral home despite the situation between us, and despite the fact that he knew I did not want
18 him anywhere near me.

19 20. On Friday April 28th, 2017 I received a text from Arambula which read:
20 "Dorinna, I just received (X's) settlement check for \$109,500. Let me know when you will pick up
21 the check." Obviously, Arambula is intercepting and opening mail which is clearly addressed to me
22 and which pertains not only to my business, but to the confidential affairs of my clients. I texted
23 Arambula's colleague Karla Cardenas to the effect that Arambula should NOT have any interaction
24 or contact with any correspondence or documentation with any Hirsch Law Firm case materials of
25 any kind. I heard nothing form Cardenas, but instead received a reply from Arambula. In that text
26 he made sweeping statements and threats about my mail being sent to the law firm of Shackleford
27 and Rivera (with whom I have some ongoing cases and where mail for Hirsch Law Firm is
28 occasionally sent with the full knowledge of the owners). Since he is aware of my fear and

1 apprehension of him personally, it is impossible to regard his desire to know when I plan to collect
2 the check as anything other than menacing. I also consider the fact that he replied on behalf of
3 Cardenas to be intended to threaten and intimidate me. I do not believe he will stop with his intrusive
4 and threatening conduct without a court order.

5 21. For the above reasons, I remain afraid and fearful of Arambula, and have no doubt
6 that his statements to me and others are meant sincerely.

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

9 Date: 5/3/17


Petitioner, DORINNA HIRSCH

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28