

32. Upon information and belief, Respondent never returned with the children George and Michael.

33. Upon information and belief Respondent sometime thereafter telephoned petitioner and indicated that he was keeping the children and would not return them.

34. Respondent further stated that he would take the children Michael and George to Abu Dabi and would never see her children again if Petitioner attempted to contact her attorneys at Sanctuary For Families, Center for Battered Women's Legal Services.

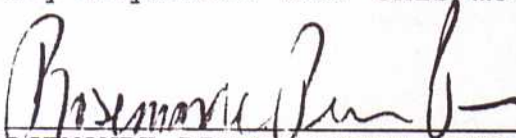
35. Parole Authorities in Virginia have advised Petitioner's counsel that Respondent was convicted of attempted abduction, a felony in the State of Virginia and on January 13, 1993, was sentenced to five years in prison. Respondent was subsequently released on parole. In February, 1995, Respondent's parole was transferred from the State of Virginia to California Department of Probation.

36. Upon information and belief, Respondent resides at 2550 Webster Street, San Francisco, California.

37. Upon information and belief, Respondent is wanted internationally in several countries in connection with the illegal trafficking of women.

38. Respondent has advised counsel, that it is her belief that respondent's kidnapping of the two children was calculated in order to force petitioner to come to California, whereby petitioner could resume his physical and sexual abuse of petitioner.

WHEREFORE, it is respectfully requested that this motion be granted in its entirety.


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