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FILED
TULARE COUNTY

MAY - 5 1997

Stephen Konisni, Clerk
By: _____

Attorneys for Petitioner, SCOTT LOELIGER

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF TULARE

FILED VIA FACSIMILE

11 In re the Marriage of:

Case No. 93-159947

12 Petitioner: SCOTT LOELIGER

DECLARATION OF DORIS NAVA
ARELLANO

13 - and -

14 Respondent: SADIA ALI-
15 LOELIGER

DATE: 5/5/97
DEPT: 8
TIME: 8:00 a.m.

16 I, DORIS NAVA ARELLANO, declare as follows:

17 1.

18 Until mid-April 1997 I babysat for the Respondent, SADIA
19 ALI-LOELIGER. I had been employed by Ms. Ali-Loeliger for
20 approximately one and a half years. Through the course of my
21 employment I spent numerous hours in Ms. Ali-Loeliger's home and
22 have personal knowledge of the household, its contents, and the
23 interactions of the people living there.

24 2.

25 I was hired to babysit Ms. Ali-Loeliger's two children,
26 Fatima who is seven years old and Fatuma who is two years old. In
27 addition to Ms. Ali-Loeliger's two children, Ms. Ali-Loeliger's
28 niece, Sara who is 15 years old, resides in the home.

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2 3.

3 The Ali-Loeliger home is not a happy or healthy home for
4 the children. Ms. Ali-Loeliger constantly yells and screams at all
5 three of the children and has, in my presence, physically abused
6 Sara. Sara actually has scars on the back of her legs and on the
7 left side of her head from Ms. Ali-Loeliger's attacks on her. Ms.
8 Ali-Loeliger most often uses a plastic covered wire to hit Sara but
9 she will also pick up anything near her to hit Sara if she is angry
10 enough.

11 4.

12 I have heard Ms. Ali-Loeliger tell Sara that she is just
13 a servant. Sara is required to provide all of the cleaning in the
14 house and babysitting services if I am not available. Sara is of
15 African descent and is in America to obtain her education. Ms.
16 Ali-Loeliger not only physically abuses Sara but also emotionally
17 abuses her calling her "stupid," "fat," "an ignorant bitch" etc.

18 5.

19 Although I have not personally witnessed Ms. Ali-Loeliger
20 physically abuse the two younger children I fear that she is doing
21 so. I know that every child in the house is afraid of her. I also
22 know that she is verbally abusive to all three of the children and
23 that she is emotionally abusive as well. She will not allow any of
24 the children to participate in any extra-curricular activities but
25 requires them to return home immediately after school lets out.

26 6.

27 Ms. Ali-Loeliger rations out food and if the children eat
28 something that she has not authorized or if they drink to much

1
2 juice she makes them kneel down for an extended period of time.
3 Ms. Ali-Loeliger actually counts the food, for example counting the
4 eggs and if they have eaten more than 1 egg they are in trouble.
5 The juice she buys is to last fifteen (15) days and if it does not,
6 then the children must go without.

7 7.

8 I worked from approximately 6:30 a.m. until 4:00 p.m.
9 Monday through Fridays but I was often required to work later and
10 on weekends if Ms. Ali-Loeliger did not come home or had other
11 things to do. If I was not available to stay late with the
12 children, then Ms. Ali-Loeliger would leave Sara in charge. She
13 would actually leave the children overnight with only Sara, who is
14 only 15, to supervise.

15 8.

16 I was allowed to give the children only a small
17 breakfast, they ate lunch at school, and they were not allowed to
18 eat dinner until Ms. Ali-Loeliger came home - even if she did not
19 return home until 11:00 p.m.

20 8.

21 Although there is very little food in the house, Ms. Ali-
22 Loeliger has plenty of alcohol. Ms. Ali-Loeliger drinks too much
23 and I believe she has a drinking problem.

24 9.

25 Even when Ms. Ali-Loeliger came home she did not spend
26 time with the girls. Upon returning home from work she would often
27 tell the girls to get away from her, she's tired, leave her alone.

28 ///

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2 10.

3 I believe that all three (3) of the children are in
4 danger. Not only does Ms. Ali-Loeliger drink too much, she has
5 some sort of nervous or mental problem which does not allow her to
6 remain calm. The smallest thing makes her extremely angry
7 resulting in her screaming and yelling at everyone around and often
8 times physical abuse of Sara. On March 31, 1997 Sara was told not
9 to use the telephone. Sara used the telephone and was caught. Ms.
10 Ali-Loeliger beat Sara severely. At that time, I intervened to
11 stop the beating and by doing so angered Ms. Ali-Loeliger.

12 11.

13 Just recently the baby was in the hospital in Lindsey for
14 some type of virus. Ms. Ali-Loeliger told me that I had to spend
15 the night at the hospital with the child. I told her that I could
16 not do so as I have a second job that I had to go to. Ms. Ali-
17 Loeliger physically attacked me after I told her I could not stay
18 and told me "if you want trouble, you'll get trouble."

19 12.

20 Ms. Ali-Loeliger has threatened me with immigration a
21 number of times and such threats have made me afraid of her and
22 afraid of crossing her. In the past she has made me lie about the
23 amount of money she pays me for my services. Although I have
24 previously stated that she pays me \$320.00 she actually only paid
25 me \$220.00. I had to give her \$100.00 back after I cashed the
26 checks. Ms. Ali-Loeliger told me that if I did not lie about this
27 she would turn me in to immigration.

28 ///

1
2 13.

3 Due to Ms. Ali-Loeliger's attack of me at the hospital, I
4 am afraid to go back into the house. I have quit my job. Since I
5 quit I have been contacted by a man representing himself to be a
6 detective who questioned me about my immigration status. I believe
7 that Ms. Ali-Loeliger acted on her threat to "give me trouble."

8 14.

9 I previously thought that by staying in the household
10 that I could protect the children from at least some of Ms. Ali-
11 Loeliger's anger. I now understand that there is nothing that I
12 can do to protect the children. I now feel that I must protect
13 myself. I am afraid for the children and I am afraid for my life,
14 I hope that the court can do something to protect the children.

15
16 I declare under penalty of perjury under the laws of the
17 State of California that the foregoing is true and correct dated
18 this 2nd day of May, 1997.

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20 DORIS NAVA ARELLANO
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