

# ORIGINAL

**CH-120**

## Notice of Hearing and Temporary Restraining Order

Clerk stamps date here when form is filed.

**FILED**  
LOS ANGELES SUPERIOR COURT

JAN 19 2010

JOHN A. CLARKE, CLERK  
*[Signature]*  
BY WENDY DELGADO, DEPUTY

1 Name of person asking for protection:  
Kimberly Kardashian  
Address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):  
\_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Your telephone number (optional): ( ) \_\_\_\_\_

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number): Jeremiah Reynolds (223554)

Kinsella Weitzman Iser Kump & Aldisert, LLP

808 Wilshire Blvd., 3rd Floor

Santa Monica, CA 90401 (310) 566-9800

Fill in court name and street address:

Superior Court of California, County of  
Los Angeles  
Van Nuys Courthouse - East  
6230 Sylmar Avenue  
Van Nuys, CA 91401

Court fills in case number when form is filed.

Case Number:  
**LS019624**

2 Name of person to be restrained:  
Dennis Shaun Bowman  
Description of that person:

Sex:  M  F Height: 5'10 Weight: 125 Race: White  
Hair Color: Blonde Eye Color: Blue Age: 26 Date of Birth: 6/29/84  
Home Address (if known): \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Work Address (if known): 5661 Virgenes Road  
City: Calabasas State: CA Zip: 91302

To the person in 2: Dennis Shaun Bowman

3 **Notice of Hearing**  
A court hearing is scheduled on the request for orders against you to stop harassment:

Hearing Date: **FEB 03 2010** Time: 9:00 Name and address of court if different from above:  
Dept.: NW-C Rm.: \_\_\_\_\_

If you do not want the court to make orders against you, file Form CH-110. Then go to the hearing and tell the court why you disagree. You may bring witnesses and other evidence. If you do not go to this hearing, the court may make restraining orders against you that could last up to 3 years.

4 **Court Orders**

The court (check a or b):

- a.  Has scheduled the hearing stated in 3. No orders are issued against you at this time.
- b.  Has scheduled the hearing stated in 3 and has issued the temporary orders against you specified on page 2. If you do not obey these orders, you can be arrested and charged with a crime. And you may have to go to jail, pay a fine of up to \$1,000, or both.

**This is a Court Order.**



Your name: Kimberly Kardashian

### Temporary Orders Against the Restrained Person

(Write the name of the person in ②): Dennis Shaun Bowman

The court has made the temporary orders indicated below against you. You must obey all these orders. These orders will expire on the date of the hearing listed in ③ unless they are extended by the court.

⑤  **Personal Conduct Orders**

You must **not** do the following things to the people listed in ① and ⑩ :

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
- b. Contact (directly or indirectly), telephone, send messages, mail, or e-mail, or twitter
- c. Take any action, directly or through others, to obtain the addresses or locations of the persons in ① and ⑩ . (If item c is not checked, the court has found good cause not to make this order.)

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this Order.

⑥  **Stay-Away Order**

You **must** stay at least (specify): 500 yards away from:

- a.  The person listed in ①
- b.  The people listed in ⑩
- c.  The home of the persons in ① and ⑩
- d.  Jobs or workplaces of the persons in ① and ⑩
- e.  Vehicle of person in ①  Vehicles of persons in ⑩
- f.  The protected children's school or child care
- g.  Other (specify): \_\_\_\_\_

This stay-away order does not prevent the person in ② from going to or from that person's home or place of employment.

⑦ **No Guns or Other Firearms**

You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get a gun or firearm.

⑧ **Turn In or Sell Guns or Firearms**

You must:

- Sell to a licensed gun dealer or turn in to police any guns or firearms that you possess or control. This must be done within 24 hours of being served with this order.
- File a receipt with the court within 48 hours of receiving this order that proves guns have been turned in or sold. (You may use Form CH-145 for this.)

⑨  **Other Orders** (specify): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**This is a Court Order.**

Case Number:

LS019624

Your name: Kimberly Kardashian

10  Other Protected Persons

List of the full names of all family or household members protected by these orders:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Instructions for the Protected Person

To the person in 1 : (Write the name of the person in 1): Kimberly Kardashian

11 Service of Order on Law Enforcement

If the court issues temporary restraining orders, by the close of business on the date the orders are made, you or your lawyer should deliver a copy of this Order and any proof of service forms to each law enforcement agency listed below.

Name of Law Enforcement Agency:

Address (City, State, Zip)

Los Angeles Police Department,  
Threat Management Unit

150 W. Los Angeles St.  
Los Angeles CA 90012

12 Service of Documents

You must have someone personally deliver to the person in 2 a copy of all the documents checked below:

- a.  CH-120, Notice of Hearing and Temporary Restraining Order (CLETS) (completed and file-stamped)
- b.  CH-100, Request for Orders to Stop Harassment (completed and file-stamped)
- c.  CH-110, Answer to Request for Orders to Stop Harassment (blank form)
- d.  CH-145, Proof of Firearms Turned In or Sold (blank form)
- e.  CH-151, How Can I Answer a Request for Orders to Stop Harassment?
- f.  Other (specify): \_\_\_\_\_

You must file with the court before the hearing a proof of service of these documents on the person in 2 .

13 Time for Service (check a, b, or c)

- a.  A copy of the documents listed in 12 must be served in person to the person in 2 at least 5 days before the hearing.
- b.  A copy of the documents listed in 12 must be served in person to the person in 2 at least 2 days before the hearing.
- c.  A copy of the documents listed in 12 must be served in person to the person in 2 at least \_\_\_\_\_ days before the hearing.

14  No Fee for Filing

Filing fees are waived.

*fees paid*

*(M)*

**This is a Court Order.**



Your name: Kimberly Kardashian

**15**  **No Fee for Service of Order by Law Enforcement**

The sheriff or marshal will serve this Order without charge because:

- a.  The Order is based on stalking.
- b.  The Order is based on a credible threat of violence.
- c.  The person in **1** is entitled to a fee waiver.

Date: 1-19-10

  
 \_\_\_\_\_  
 Judicial Officer **MICHAEL A. LATIN**

**Warnings and Notices to the Restrained Person in 2**

**You Cannot Have Guns or Firearms**

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get a gun while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to a licensed gun dealer or turn in to police any guns or firearms that you have or control in accordance with item **8** above. The court will require you to prove that you did so. If you do not obey this Order, you can be charged with a crime.

**Instructions for Law Enforcement**

This Order is effective when made. It is enforceable anywhere in all 50 states, the District of Columbia, all tribal lands, and all U.S. territories and shall be enforced as if it were an order of that jurisdiction by any law enforcement agency that has received the Order, is shown a copy of the Order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the Order and then shall enforce it. Violations of this Order are subject to criminal penalties.



**Requests for Accommodations**

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least 5 days before the hearing. Contact the clerk's office or go to [www.courtinfo.ca.gov/forms](http://www.courtinfo.ca.gov/forms) for *Request for Accommodations by Persons With Disabilities and Order* (Form MC-410). (Civil Code, § 54.8.)

*(Clerk will fill out this part.)*

**—Clerk's Certificate—**

*Clerk's Certificate*  
*[seal]*

I certify that this *Notice of Hearing and Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Date: \_\_\_\_\_ Clerk, by \_\_\_\_\_, Deputy

**This is a Court Order.**

ORIGINAL

① Your name (person asking for protection):

Kimberly Kardashian

Your address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Your telephone number (optional): (\_\_\_\_\_) \_\_\_\_\_

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number):

Jeremiah Reynolds (SBN 223554)

Kinsella Weitzman, et al. 808 Wilshire Blvd.

3rd Fl. Santa Monica CA 90403 (310) 566-9800

② Name of person you want protection from:

Dennis Shaun Bowman

Describe the person: Sex:  M  F Weight: 125

Height: 5-10 Race: White Hair Color: Blonde

Eye Color: Blue Age: 25 Date of Birth: 6/29/1984

Home Address (if you know): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Work Address (if you know): \_\_\_\_\_

City: Calabasas State: CA Zip: 91302

③ Besides you, who needs protection? (Family or household members)

Full name	Sex	Age	Lives with you?	How are they related to you?
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 3—Describe Protected Persons" at the top of the page.

④ Why are you filing in this court? (Check all that apply):

- The person in ② lives in this county.
- I was hurt (physically or emotionally) by the person in ② here.
- Other (specify): \_\_\_\_\_

⑤ How do you know the person in ②? (Describe):

Kimberly Kardashian does not know Mr. Bowman. Mr. Bowman is a delusional fan who has been stalking and harassing Ms. Kardashian since at least October 2009. He has refused to cease contacting her despite demands from the LAPD and Ms. Kardashian's attorneys.

Clerk stamps date here when form is filed.

**FILED**  
LOS ANGELES SUPERIOR COURT

JAN 19 2010

JOHN A. CLARKE, CLERK

BY S. SKORICH, DEPUTY

Fill in court name and street address:

**Superior Court of California, County of**

Los Angeles

Van Nuys Courthouse - East

6230 Sylmar Avenue

Van Nuys, CA 91401

Court fills in case number when form is filed.

Case Number:

LS019624

**This is not a Court Order.**



Your name: Kimberly Kardashian

- 6 Describe how the person in 2 has harassed you:
- a. Date of most recent harassment: 1/11/2010
  - b. Who was there? Kimberly Kardashian
- c. Did the person in 2 commit any acts of violence or threaten to commit any acts of violence against you?  
 Yes  No  
 If yes, describe those acts or threats: \_\_\_\_\_
- d. Did the person in 2 engage in a course of conduct that harassed you and caused substantial emotional distress?  Yes  No  
 If yes, describe: See Attachment A hereto and attached declarations. Respondent has stalked and attempted to contact Ms. Kardashian on numerous occasions and has continued to contact her via his twitter account.
- e. Did the conduct of the person in 2 described above seriously alarm, annoy, or harass you?  Yes  No  
 Check here if you need more space. Attach a sheet of paper and write "CH-100, item 6—Describe Harassment" at the top of the page.

Check the orders you want

- 7  **Personal Conduct Orders**
- I ask the court to order the person in 2 to not do the following things to me or anyone listed in 3:
- a.  Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, destroy personal property, keep under surveillance, or block movements.
  - b.  Contact (either directly or indirectly), or telephone, or send messages or mail or e-mail.
- The person in 2 will also be ordered not to take any action to get the addresses or locations of any protected persons, their family members, or their caretakers unless the court finds good cause not to make the order.

- 8  **Stay-Away Orders**
- I ask the court to order the person in 2 to stay at least (specify): 100 yards away from me and the people listed in 3 and the places listed below: (Check all that apply):
- a.  My home
  - b.  My job or workplace
  - c.  My children's school or child care
  - d.  My vehicle
  - e.  Other (specify): \_\_\_\_\_

If the court orders the person in 2 to stay away from all the places listed above, will that person still be able to get to his or her home, school, or job?  Yes  No

If no, explain: \_\_\_\_\_

**This is not a Court Order.**

Your name: Kimberly Kardashian

**9**  **Others to Be Protected**

Should the other people listed in **(3)** also be covered by the orders described above?

Yes  No  Does not apply

If yes, explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**10** **Order About Guns or Other Firearms**

I ask the court to order the person in **(2)** to be prohibited from owning, possessing, purchasing, or receiving, or attempting to purchase or receive firearms **and** to sell or turn in any guns or firearms that he or she controls.

**11**  **Other Orders**

I ask the court to order the person in **(2)** to (specify): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**12**  **Temporary Orders**

Do you want the court to make orders now on the matters listed in **(7)**, through **(11)** that will last until the hearing?  Yes  No

If yes, explain why you need these orders right now: Ms. Kardashian believes that Respondent poses an immediate threat to her and that he will attempt to contact her in person at his first opportunity.

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 12—Temporary Orders" at the top of the page.

**13** **Delivery of Orders to Law Enforcement**

My lawyer or I will give copies of the orders to the following law enforcement agencies:

a. Name of Agency: Los Angeles Police Department, Threat Management Unit

Address: 150 North Los Angeles Street

City: Los Angeles State: CA Zip: 90012

b. Name of Agency: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

**14**  **Other Court Cases**

Have you ever asked any court for other restraining orders against the person in **(2)**?  Yes  No

If yes, specify the counties and case numbers if you know them: \_\_\_\_\_  
\_\_\_\_\_

**This is not a Court Order.**



Your name: Kimberly Kardashian**15**  **Time for Service**

You must have your papers personally served on (notify) the person in **2** at least 5 days before the hearing, unless the court orders a different time for service. (*Form CH-135 explains "What Is Proof of Service?" Form CH-130 may be used to show the court that the papers have been served.*) If your papers cannot be served at least 5 days before the hearing and you need more time, explain why:

**16**  **No Fee for Filing**

I ask the court to waive the filing fee because the person in **2** has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence. I am asking for a restraining order to stop this conduct.

**17**  **No Fee to Serve Orders**

I ask the court to order the sheriff or marshal to serve (notify) the person in **2** about the orders for free because:

- a.  My request for orders is based on stalking; or  
 b.  My request for orders is based on a credible threat of violence; or  
 c.  I am entitled to a fee waiver.

(*If you are requesting free service of the orders based on a fee waiver, you must complete and file the Application for Waiver of Court Fees and Costs (Form FW-001).*)

**18**  **Lawyer's Fees and Costs**

I ask the court to order payment of my:

- a.  Lawyer's fees  
 b.  Out-of-pocket expenses

The amounts requested are:

Item	Amount	Item	Amount
	\$ 0.00		\$ 0.00
	\$ 0.00		\$ 0.00
	\$ 0.00		\$ 0.00

Check here if you need more space. Attach a sheet of paper and write "CH-100, item 18—Lawyer's Fees and Costs" at the top of the page.

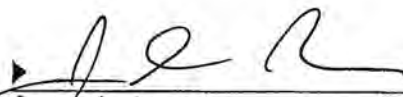
**19** **Additional Relief**

I ask the court for additional relief as may be proper.

**20** Number of pages attached to this form, if any: \_\_\_\_\_

Date: January 19, 2010


Jeremiah Reynolds  
 Lawyer's name

  
 Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: January 19, 2010

Kimberly Kardashian  
 Type or print your name

  
 Sign your name

**This is not a Court Order.**

1           **ATTACHMENT A IN SUPPORT OF REQUEST FOR RESTRAINING ORDER**  
2           **AGAINST DENNIS SHAUN BOWMAN**

3   **I. INTRODUCTION**

4           Kimberly Kardashian is a well-known actress, model, and television personality. She is  
5 being stalked and harassed by respondent Dennis Shaun Bowman, a delusional individual who  
6 believes that he is in a romantic relationship with Kardashian. Kardashian does not know  
7 Bowman and does not desire any contact with him. Bowman has been told by the Los Angeles  
8 Police Department, Threat Management Unit, that Kardashian does not want any contact with him  
9 and to stop attempting to contact her. Despite the order from the LAPD, Bowman has persisted in  
10 contacting Kardashian. Bowman has also been sent a cease and desist letter by Kardashian's  
11 attorneys but he continues to contact her. Kardashian is extremely frightened by Bowman because  
12 he is obsessed with her and is extremely delusional. The LAPD had advised Kardashian to obtain  
13 a restraining order because they believe that Bowman potentially poses a threat. Accordingly, an  
14 immediate temporary restraining order should be issued against Bowman. This request is  
15 supported by the attached declarations of Kimberly Kardashian, Detective John Gregozek, and  
16 Jeremiah Reynolds.

17   **II. FACTUAL SUMMARY**

18           A. Bowman has Been Harassing and Stalking Kardashian

19           Beginning in or around late-September 2009, Kardashian began receiving messages from  
20 Bowman via her Twitter account. (Declaration of Kimberly Kardashian attached hereto  
21 ("Kardashian Decl."), ¶ 3.) Kardashian had never met Bowman. (*See id.*) She does not know  
22 who he is. (*See id.*) Bowman is apparently under the delusion that she was and is interested in  
23 some sort of romantic relationship with him. (*See id.*) Bowman would send her numerous  
24 messages each day telling her, for example, that they are in love, that they will go to dinner  
25 together, and that he is going to marry her. (*See id.*)

26           Beginning in September 2009, Bowman began to make numerous attempts to meet  
27 Kardashian in person. (Kardashian Decl., ¶ 4.) For example, in late September 2009, Kardashian  
28 made a promotional appearance at "Famous Cupcakes" in Beverly Hills, California. (*See id.*)

1 Bowman attempted to meet with her at the promotional appearance but arrived after Kardashian  
2 had already left the location. (*See id.*) The staff of Famous Cupcakes informed her that Bowman  
3 acted in an extremely bizarre manner and they were frightened by his actions. (*See id.*)  
4 Kardashian was informed by the staff of Famous Cupcakes that Bowman returned on three  
5 separate occasions looking for her and each time acted in a very bizarre manner. (*See id.*) On at  
6 least one of those occasions, Bowman was in the face paint worn by the "Joker" in the Batman  
7 comic books. (*See id.*) The staff informed her that Bowman acted in such a bizarre and hostile  
8 manner when told that Kardashian was not at the location that they were forced to call the police  
9 department. (*See id.*)

10 Sometime in October 2009, Bowman sent Kardashian a video of himself in "Joker" face  
11 paint. (Kardashian Decl., ¶ 5.) He explained in the video that he had moved from Georgia to  
12 Calabasas, California to attempt to make contact with her. (*See id.*) He said in the video that he  
13 thought that Kardashian had traveled from Los Angeles to Atlanta, Georgia to have dinner with  
14 him, but that he had arrived late at the restaurant and was under the delusion that he had stood her  
15 up. (*See id.*) None of this was true and Bowman was clearly suffering from delusions. (*See id.*)  
16 Bowman also said in the video that he had attempted to make contact with her at a night club in  
17 Atlanta where Kardashian was making a promotional appearance, but that the size of the crowd  
18 prevented him from contacting her. (*See id.*) He said in the video that they were in love and that  
19 they should be together. (*See id.*) The video was extremely disturbing to Kardashian and caused  
20 her to be extremely frightened and concerned for her safety. (*See id.*)

21 In October 2009, Kardashian made a promotional appearance at the Beverly Center mall in  
22 Los Angeles, California. (Kardashian Decl., ¶ 6.) Kardashian was informed by security that Mr.  
23 Bowman had attempted to make contact with her at the mall and that he was acting in an  
24 extremely bizarre manner. (*See id.*) The security at the Beverly Center informed her that they  
25 had ejected Mr. Bowman from the mall because they believed he presented a security threat to her.  
26 (*See id.*)

27 In November 2009, Kardashian announced on her Twitter page that Kardashian had just  
28 gotten a smoothie drink at the Body Factory in Santa Monica, California. (Kardashian Decl., ¶ 7.)

1 Kardashian was informed by the staff that Bowman had arrived at the Body Factory sometime  
2 thereafter and demanded that he be allowed to see her. (*See id.*)

3 In November 2009, Kardashian made a promotional appearance at the Westfield Mall in  
4 Culver City, California. (Kardashian Decl., ¶ 8.) Given Bowman's strange actions and his  
5 numerous previous attempts to contact her, Kardashian had informed security at the mall to be  
6 aware that Bowman might attempt to make contact with her. (*See id.*) Security at the mall  
7 informed her that Mr. Bowman had arrived at the appearance and demanded to speak with her.  
8 (*See id.*) However, he was not allowed to do so.

9 B. The LAPD Interviews Bowman and Tells Him to Stop Contacting Kardashian but  
10 He Continues to Contact Her

11 Kardashian filed a police report with the Los Angeles Police Department following Mr.  
12 Bowman's attempt to contact her at the Westfield Mall. (Kardashian Decl., ¶ 8.) On November  
13 17, 2009, in response to the report filed by Kardashian, Detective John Gregozek, Serial No.  
14 34087, along with Detective Hoffman, Serial No. 30708 of the LAPD's Threat Management Unit,  
15 located and interviewed Bowman at a Laundromat where he lived and worked in the city of  
16 Calabasas. (Declaration of Detective John Gregozek ("Gregozek Decl.") ¶ 2.) Bowman told the  
17 Detectives that he moved from Georgia about 2 months ago to pursue a career in acting and  
18 performing. (*See id.*) Prior to moving from Georgia, Bowman signed up for Twitter and was  
19 automatically signed up as a follower to Kardashian. (*See id.*) Bowman later saw a posting on  
20 Kardashian's Twitter page stating that she wanted to have "sweet dreams." (*See id.*) Bowman  
21 videotaped himself singing a song to Kardashian and sent her the link in a Twitter message. (*See*  
22 *id.*)

23 Sometime after Bowman sent the video, it was reported in the media that Kardashian had  
24 broken up with her boyfriend, Reggie Bush. (Gregozek Decl. ¶ 3.) Bowman told the Detectives  
25 that he believed Kardashian had broken up with Bush because of his song to her. (*See id.*)

26 Bowman informed the Detectives that Kardashian later made a promotional appearance at  
27 a nightclub in Atlanta, Georgia, and Bowman stated that he thought that Kardashian was going to  
28 Atlanta to have dinner with him. (Gregozek Decl. ¶ 4.) When Kardashian did not show up at the

1 restaurant where Bowman was, Bowman became concerned that he was at the wrong restaurant  
2 and had stood-up Kardashian. (*See id.*) Bowman attempted to make contact with Kardashian at  
3 the night club, but could not get close to her due to the size of the crowd. (*See id.*)

4 Bowman told the Detectives that he moved from Georgia to Calabasas, California because  
5 he knew that Kardashian's family lived in Calabasas and hoped to see Kardashian around town.  
6 (Gregozek Decl. ¶ 5.) Bowman admitted to the Detectives he made numerous attempts to contact  
7 Kardashian, including at her family clothing store located in the city of Calabasas in September, at  
8 Famous Cupcakes in North Hollywood in September, at the Beverly Center in October, and the  
9 Westfield mall in Culver City in November. (*See id.*) Bowman told the Detectives he attempted  
10 to contact Kardashian because she was not replying to his postings and he wanted to apologize to  
11 her for missing their dinner date. (*See id.*) Bowman felt Kardashian was offended by him and that  
12 he would not get work as an actor as long as she felt this way. (*See id.*)

13 The Detectives explained to Bowman that Kardashian did not know him or desire any  
14 contact from him. (Gregozek Decl. ¶ 6.) The Detectives further explained to Bowman that his  
15 messages and attempts to approach Kardashian in person caused her to be fearful for her safety.  
16 (*See id.*) Bowman apologized for causing concern and stated he would not contact Kardashian  
17 through Twitter or any other means. (*See id.*)

18 C. Bowman Refuses to Abide by a Cease and Desist Letter from Kardashian's  
19 Attorneys and Sends Bizarre Emails in Response

20 Kardashian was informed by the Threat Management Unit of the LAPD that they had  
21 interviewed Mr. Bowman on November 17, 2009 and had told Mr. Bowman that Kardashian did  
22 not want to have any contact with him. (Kardashian Decl., ¶ 9.) Despite the order from the LAPD  
23 to not contact her, Bowman continued to send her bizarre messages via her Twitter account  
24 throughout December 2009 and January 2010. (*See id.*, Ex. A.)

25 On January 3, 2010, Kardashian instructed her attorneys to send Bowman a letter  
26 demanding that he cease and desist contacting her through any means, including Twitter, email or  
27 personal contact. (Kardashian Decl., ¶ 10.) On Monday, January 4, 2010, her attorneys emailed  
28 Bowman to demand that he "cease and desist all further attempts to make contact with Kimberly

1 Kardashian.” (Declaration of Jeremiah Reynolds (“Reynolds Decl.”) ¶ 2, Ex. A.) Her attorneys  
2 informed Bowman that they would seek a restraining order against him if he persisted in  
3 contacting Kardashian. (*See id.*) Bowman has sent multiple email responses to Kardashian’s  
4 attorneys which contain bizarre statements and accusations. (*See Reynolds Decl., Exs. B - E.*) For  
5 example, on Wednesday, January 6, 2010, Kardashian’s attorneys received an email from  
6 Bowman wherein he stated that he wanted to play the Joker in the next Batman film but that he  
7 was “being followed and watched VIA Twitter by Warner Brothers, and personally.” Mr.  
8 Bowman stated that “[a]fter watching Govenner Schwarzeneggers (sic.) state of address (sic.) it  
9 further clarifies im correct. I made Warner a offer of two million dollars for me to play the Joker,  
10 but theres more information I have for another Batman movie.” (*See Reynolds Decl., Ex. D.*)

11 D. Kardashian Fears for Her Safety and the LAPD has Advised Her to Obtain a  
12 Temporary Restraining Order

13 Despite the cease and desist letter from Kardashian’s attorneys, Bowman has continued to  
14 send her messages via her Twitter account. (Kardashian Decl., ¶ 10.) True and correct copies of  
15 an examples of Bowman’s numerous twitter messages to Kardashian are attached to the  
16 Kardashian Declaration as Exhibit A.

17 Kardashian is extremely frightened by Bowman because he appears to be obsessed with  
18 her and is extremely delusional. (Kardashian Decl., ¶ 11.) He persists in contacting her despite  
19 repeated demands that he never contact her again. (*See id.*) She believes she is being harassed by  
20 Bowman. (*See id.*) In addition, the LAPD has recommended to Kardashian and her attorneys that  
21 they obtain a restraining order against Bowman because he potentially poses a threat to her. (*See*  
22 *id.*)

23 **III. A RESTRAINING ORDER SHOULD BE IMMEDIATELY ENTERED AGAINST**  
24 **BOWMAN**

25 Code of Civil Procedure (“C.C.P.”) section 527.6(a) provides that “[a] person who has  
26 suffered harassment as defined in subdivision (b) may seek a temporary restraining order and an  
27 injunction prohibiting harassment as provided in this section.” “Harassment” is defined by  
28 subsection (b) as including a “a knowing and willful course of conduct directed at a specific  
person that seriously alarms, annoys, or harasses the person, and that serves no legitimate purpose.

1 The course of conduct must be such as would cause a reasonable person to suffer substantial  
2 emotional distress, and must actually cause substantial emotional distress to the plaintiff.”  
3 “Course of conduct” is defined as “a pattern of conduct composed of a series of acts over a period  
4 of time, however short, evidencing a continuity of purpose, including following or stalking an  
5 individual, making harassing telephone calls to an individual, or sending harassing correspondence  
6 to an individual by any means, including, but not limited to, the use of public or private mails,  
7 interoffice mail, fax, or computer e-mail.” C.C.P. § 527.6(b)(3).

8 The evidence presented in the attached declarations of Kardashian, Detective Gregozek,  
9 and Jeremiah Reynolds clearly demonstrates that Kardashian is entitled to a temporary and  
10 permanent restraining order against Bowman pursuant to C.C.P. § 526.7. Bowman has engaged in  
11 a “course of conduct” that “seriously alarms, annoys, [and] harasses” Kardashian and serves “no  
12 legitimate purpose.” Despite attempts by the LAPD and Kardashian’s attorneys to get Bowman to  
13 stop contacting Kardashian, he has continued to contact her. Kardashian is extremely frightened  
14 by Bowman because he is obsessed with her and is extremely delusional. The LAPD had advised  
15 Kardashian to obtain a restraining order against Bowman because he poses a threat. Accordingly,  
16 a temporary and permanent restraining order should be issued against Bowman.

17 DATED: January 19, 2010

KINSELLA WEITZMAN ISER KUMP &  
ALDISERT LLP

18  
19  
20 By: 

Jeremiah T. Reynolds

Attorneys for Petitioner Kimberly Kardashian

1                                    **CH-100 – ITEM 6 – DESCRIBE HARASSMENT**  
2                                    **DECLARATION OF KIMBERLY KARDASHIAN**

3                    I, KIMBERLY KARDASHIAN, declare:

4  
5                    1.        I make this Declaration in support of the Request for Orders to Stop Harassment  
6                    against respondent Dennis Shaun Bowman (“Bowman”). Each of the facts stated herein is within  
7                    my own personal knowledge and if called as a witness, I could and would testify competently  
8                    thereto.

9                    2.        I am a model, actress and television personality. I am perhaps best known for my  
10                    role on the *E!* reality show “Keeping Up with the Kardashians.” I am frequently featured in the  
11                    tabloids and online media.

12                    3.        Beginning in or around late-September 2009, I began receiving messages from Mr.  
13                    Bowman via my Twitter account. I have never met Mr. Bowman. I do not know who he is. Mr.  
14                    Bowman is apparently under the delusion that I was and am interested in some sort of romantic  
15                    relationship with him. Mr. Bowman sends me numerous messages each day telling me, for  
16                    example, that we are in love, that we will go to dinner together, and that he is going to marry me.

17                    4.        Mr. Bowman has made numerous attempts to contact me in person. For example,  
18                    in late September 2009, I made a promotional appearance at “Famous Cupcakes” in Beverly Hills,  
19                    California. Mr. Bowman attempted to meet with me at the promotional appearance but arrived  
20                    after I had already left the location. The staff of Famous Cupcakes informed me that Mr. Bowman  
21                    acted in an extremely bizarre manner and they were frightened by his actions. I was informed by  
22                    the staff of Famous Cupcakes that Mr. Bowman returned on three separate occasions looking for  
23                    me and each time acted in a very bizarre manner. On at least one of those occasions, Mr. Bowman  
24                    was in the face paint worn by the “Joker” in the Batman comic books. The staff informed me that  
25                    Mr. Bowman acted in such a bizarre and hostile manner when told that I was not at the location  
26                    that they were forced to call the police department.

27                    5.        Sometime in October 2009, Bowman sent me video of himself in “Joker” face  
28                    paint. He explained in the video that he had moved from Georgia to Calabasas, California to

1 attempt to make contact with me. He said in the video that he thought that I had traveled from Los  
2 Angeles to Atlanta, Georgia to have dinner with him, but that he had arrived late at the restaurant  
3 and was under the delusion that he had stood me up. None of this was true and Mr. Bowman was  
4 clearly suffering from delusions. Mr. Bowman said in the video that he had attempted to make  
5 contact with me at a night club in Atlanta where I was making a promotional appearance, but that  
6 the size of the crowd prevented him from contacting me. He said in the video that we were in love  
7 and that we should be together. The video was extremely disturbing and caused me to be  
8 extremely frightened and concerned for my safety.

9 6. In October 2009, I made a promotional appearance at the Beverly Center mall in  
10 Los Angeles, California. I was informed by security that Mr. Bowman had attempted to make  
11 contact with me at the mall and that he was acting in an extremely bizarre manner. The security  
12 at the Beverly Center informed me that they had ejected Mr. Bowman from the mall because they  
13 believed he presented a security threat to me.

14 7. In November 2009, I announced on my Twitter page that I had just gotten a  
15 smoothie drink at the Body Factory in Santa Monica, California. I was informed by the staff that  
16 Mr. Bowman had arrived at the Body Factory sometime thereafter and demanded that he be  
17 allowed to see me.

18 8. In November 2009, I made a promotional appearance at the Westfield Mall in  
19 Culver City, California. Given Mr. Bowman's strange actions and his numerous previous  
20 attempts to contact me, I had informed security at the mall to be aware that Mr. Bowman might  
21 attempt to make contact with me. Security at the mall informed me that Mr. Bowman had arrived  
22 at the appearance and demanded to speak with me.

23 9. I filed a police report with the Los Angeles Police Department following Mr.  
24 Bowman's attempt to contact me at the Westfield Mall. I was informed by the Threat  
25 Management Unit of the LAPD that they had interviewed Mr. Bowman on November 17, 2009  
26 and had told Mr. Bowman that I did not want to have any contact with him. Despite the order  
27 from the LAPD to not contact me, Mr. Bowman continued to send me bizarre messages via my  
28 Twitter account throughout December 2009 and January 2010.

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10. On January 3, 2010, I instructed my attorneys to send Mr. Bowman a letter demanding that he cease and desist contacting me through any means, including Twitter, email or personal contact. Despite the cease and desist letter from my attorneys, Mr. Bowman has continued to send me messages via my Twitter account. True and correct copies of an examples of Mr. Bowman's numerous twitter messages to me are attached hereto as Exhibit A.

11. I am extremely frightened by Mr. Bowman because he appears to be obsessed with me and is extremely delusional. He persists in contacting me despite repeated demands that he never contact me again. I believe I am being harassed by Mr. Bowman. The LAPD has recommended to my me and my attorneys that we obtain a restraining order against Mr. Bowman because he potentially poses a threat to me.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed this 13 day of January 2010 at Los Angeles, California.

*Kim Kardashian*  
KIMBERLY KARDASHIAN



**DECLARATION OF DETECTIVE JOHN GREGOZEK**

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I, John Gregozek, declare as follows:

1. I am a Detective in the Los Angeles Police Department, Threat Management Unit, Serial No. 34087. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. On November 17, 2009, in response to a police report filed by Kimberly Kardashian, I, along with Detective Hoffman, Serial No. 30708, located and interviewed Dennis Shaun Bowman ("Bowman") at a Laundromat where he lived and worked in the city of Calabasas. Bowman stated he moved from Georgia about 2 months ago to pursue a career in acting and performing. Prior to moving from Georgia, Bowman signed up for Twitter and was automatically signed up as a follower to Kim Kardashian ("Kardashian"). Bowman later saw a posting on Kardashian's Twitter page stating that she wanted to have "sweet dreams." Bowman videotaped himself singing a song to Kardashian and sent her the link in a Twitter message.

3. The next day, it was reported in the media that Kardashian had broken up with her boyfriend, Reggie Bush. Bowman told me that he believed Kardashian had broken up with Bush because of his song to her.

4. Kardashian later made a promotional appearance at a nightclub in Atlanta, Georgia, and Bowman he thought that Kardashian was going to Atlanta to have dinner with him. When Kardashian did not show up at the restaurant where Bowman was, Bowman became concerned that he was at the wrong restaurant and had stood-up Kardashian. Bowman attempted to make contact with Kardashian at the night club, but could not get close to her due to the crowd.

5. Bowman stated he moved from Georgia to Calabasas, California because he knew that Kardashian's family lived in Calabasas and hoped to see Kardashian around town. Bowman admitted he made numerous attempts to contact Kardashian, including at her family clothing store located in the city of Calabasas in September, at Famous Cupcakes in North Hollywood in September, at the Beverly Center in October, and the Westfield mall in Culver City in November.

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1 Bowman told me he attempted to contact Kardashian because she was not replying to his postings  
 2 and he wanted to apologize to her for missing their dinner date. Bowman felt Kardashian was  
 3 offended by him and that he would not get work as an actor as long as she felt this way.

4 6. I explained to Bowman that Kardashian did not know him or desire any contact  
 5 from him. I further explained to Bowman that his messages and attempts to approach Kardashian  
 6 in person caused her to be fearful for her safety. Bowman apologized for causing concern and  
 7 stated he would not contact Kardashian through Twitter or any other means.

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

10 Executed January 12, 2010, at Santa Monica, California.

11 \_\_\_\_\_  
 12 John Gregozek

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1 the next Batman film but that he was "being followed and watched VIA Twitter by Warner  
 2 Brothers, and personally." Mr. Bowman stated that "[a]fter watching Governor Schwarzeneggers  
 3 (sic.) state of address (sic.) it further clarifies im correct. I made Warner a offer of two million  
 4 dollars for me to play the Joker, but theres more information I have for another Batman movie." A  
 5 true and correct copy of Mr. Bowman's email to me on January 6, 2010 is attached hereto as  
 6 Exhibit D. Other examples of bizarre emails I have received from Mr. Bowman are attached  
 7 hereto as Exhibit E.

8 6. On Tuesday, January 12, 2010, I spoke with Detective John Gregozek of the Los  
 9 Angeles Police Department, Threat Management Unit, regarding Mr. Bowman. Detective  
 10 Gregozek recommended that Ms. Kardashian obtain a civil restraining order against Mr. Bowman  
 11 because he believed that Mr. Bowman would attempt to contact her again in person.

12 7. On January 14, 2010, I provided notice to Bowman that Kardashian would be  
 13 seeking a temporary restraining order against him on January 19, 2010 in this Court. A true and  
 14 correct copy of my letter to Bowman is attached hereto as Exhibit F. On January 14, 2010,  
 15 Bowman responded to my letter with multiple emails containing odd statements and accusations.  
 16 True and correct copies of Bowman's emails to me are attached hereto as Exhibit G.

17  
 18 I declare under penalty of perjury that the foregoing is true and correct and that this  
 19 Declaration was executed this 19th day of January 2010 at Santa Monica, California.

20  
 21   
 22 JEREMIAH REYNOLDS