

Robin E. Pinelle, Circuit Clerk  
NH Circuit Court  
10<sup>th</sup> Circuit – District Division – Derry  
10 Courthouse Lane  
Derry, NH 03038

July 16<sup>th</sup>, 2018

Paul Maravelias  
34 Mockingbird Hill Rd  
Windham, NH 03087

**RE: Christina DePamphilis vs. Paul Maravelias**  
**Docket No. 473-2016-CV-00124**

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Dear Clerk Pinelle,

Enclosed please find Respondent's *Reply to Petitioner's Reply to Respondent's Objection to Petitioner's Motion for Modification of Stalking Final Order of Protection to Include Further Conditions* to be filed in the above-referenced case.

Thank you for your attention to this matter.

Sincerely,

Paul J. Maravelias



CC: Simon R. Brown, Esq.

I, Paul Maravelias, certify that a copy of the present *Reply to Petitioner's Reply to Respondent's Objection to Petitioner's Motion for Modification of Stalking Final Order of Protection to Include Further Conditions* was forwarded on this day through USPS Certified Mail to Simon R. Brown, Esq., counsel for the Petitioner, P.O. Box 1318, Concord, NH, 03302-1318.



THE STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS

10<sup>TH</sup> CIRCUIT – DISTRICT DIVISION – DERRY

Docket No. 473-2016-CV-00124

Christina DePamphilis

v.

Paul Maravelias

**REPLY TO PETITIONER’S REPLY TO RESPONDENT’S OBJECTION TO PETITIONER’S  
MOTION FOR MODIFICATION OF STALKING FINAL ORDER OF PROTECTION**

NOW COMES the Respondent, Paul Maravelias, and replies to Petitioner’s *Reply to Respondent’s Objection to Motion for Modification of Stalking Final Order of Protection to Include Further Conditions* dated 7/12/18. In support thereof, he represents as follows:

**A. CHRISTINA DEPAMPHILIS COMMITTED A CLASS B FELONY UNDER RSA 641:5 I. (B) WHEN SHE FILED THE AFORECIATED MOTION; THE COURT WOULD BE COMPLICIT IN THE CRIME OF WITNESS AND INFORMANT TAMPERING TO GRANT SAID MOTION**

1. As documented in a criminal complaint filed on this date with the Derry Police Department (*see Exhibit A*), Christina DePamphilis committed a class B felony of “Tampering With Witnesses and Informants” when she filed the instant motion in this Court on 7/2/18 to prevent Maravelias from “possessing” her “social media communications”, parts of which she knows constitute highly relevant legal exhibits that Maravelias is using in his defense both inside this case and inside the recently-appealed decision of this Court to grant attorney’s fees against him in *Paul Maravelias v. David DePamphilis* (473-2017-CV-150).

2. Therefore, by filing said motion, she “attempt[ed] to induce or otherwise cause [Maravelias] to ...withhold any testimony, information, document or thing” [certain social media posts already entered as evidence exhibits] while “believing” and “knowing” that an “official proceeding” was underway. *See* RSA 641:5 I.

3. Thus, if the Court were to grant her outrageous motion for modification of stalking order terms, the individual judicial actor carrying out such wrongful granting would likewise commit a count of class B felony 641:5 misconduct, as the Petitioner’s “social media communications” are supremely relevant in indicating she had no fear of the Respondent (*e.g.*, while cruelly deriding him with her and her boyfriend’s middle fingers in an attempt to provoke an inflamed jealousy response and/or stalking order violation), and are therefore material to this Court’s pending ruling on Maravelias’s Motion for Reconsideration as well as to any appeal which may follow.

**B. PETITIONER’S REPLY GRANTS MEANINGLESS CONCESSIONS IN A DECEPTIVE PLOY TO MAKE HER REQUESTED FURTHER STALKING ORDER TERMS SEEM REMOTELY REASONABLE**

4. In unsatisfactory response to Respondent’s constitutional case law exposition of her requested terms’ rampant violation of overbreadth and vagueness doctrines, she reassures that her terms may be amended with additional “knowingly” and “about her” qualifications. With this adjustment, she alleges her final proposed terms are reasonable requests having little to no impact on Maravelias’s legitimate activities and having solely a valid protective function for her.

5. In reality, these seeming concessions are vapid and meaningless, as “knowing” willfulness is already a necessary element to any violation of protective order terms. *See* RSA 633:3-a I. (c), which states, “knowingly ... engages in a single act of conduct that both violates the provisions of the order and is listed in paragraph II(a)”.

6. Further, the Petitioner seeks injunctive prohibition of legitimate acts which are listed nowhere in the enumerations of “paragraph II(a)” in 633:3-a constituting a “course of conduct”.

7. Thus, even if the Court did illegally grant the requested terms in part or in whole, Maravelias could never be prosecuted for violating them, due to the “and is listed in paragraph II(a)” stipulation of 633:3-a I. (c), supra.

8. Maravelias’s public speech “about” the Petitioner’s demonstrable acts of falsification and restraining order abuse against him could be construed to be loosely “about her” yet are nonetheless legitimate acts of First Amendment-protected speech made for purposes independent of contacting the Petitioner or her academic providers or employers. However, as Respondent already showed in his 7/5/18 objection filing, the Petitioner seeks these terms as a broad “catch-all” injunction against Maravelias’s legitimate public speech, since said acts of speech could be visible to anyone, including to “academic providers” or to “employers”.

9. Unsurprisingly, Petitioner entirely neglects to address this critical issue in her 7/12/18 filing, likely hoping the Court will overlook it.

10. Maravelias reiterates and incorporates by reference all arguments – most of which are still uncontested by Petitioner – from his 7/5/18 objection filing which speak to the illegality and unconstitutionality of the requested further stalking order provisions.

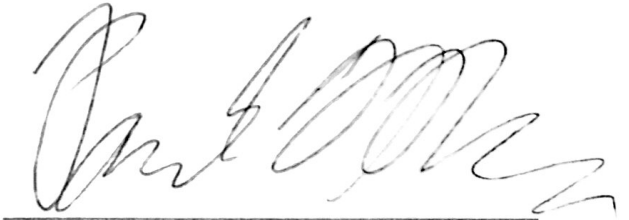
WHEREFORE, the foregoing compels the Respondent, Paul Maravelias, to pray this Court:

- I. Grant this Motion;
- II. Grant Respondent's 6/25/18 *Motion for Reconsideration*, terminating the Stalking Final Order of Protection,
- III. Deny Petitioner's *Motion for Modification of Stalking Final Order of Protection to Include Further Conditions*; and
- IV. Hold a Hearing, if necessary, on this matter.

Respectfully submitted,

PAUL J. MARAVELIAS,

*in propria persona*



A handwritten signature in black ink, appearing to read 'Paul J. Maravelias', is written over a horizontal line.

July 16<sup>th</sup>, 2018

## Exhibit A

July 16<sup>th</sup>, 2018

To: Derry, NH Police Department

Paul J. Maravelias

34 Mockingbird Hill Rd  
Windham, NH 03087

Re: **Christina DePamphilis Criminal Complaint** (Falsification in Official Matters and other crimes)

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Dear public servants of New Hampshire,

I am the victim of numerous falsification-related crimes performed by Christina DePamphilis and orchestrated by herself and her father David. After a December 2016 telephone argument David had with me, he became inflamed in anger and ultimately conspired with his daughter to file a false, bad-faith “Stalking Petition” against me containing willful lies.

This happened once I angered David by asking him on 12/23/16 to “stop harassing my parents” over text. Then he said, “that’s the last straw”, meaning he would seek legal retaliation against me. His daughter’s retributive, bad-faith “stalking petition” followed his “last straw” comment 5 days later.

When they filed this stalking petition on 12/28/16 containing numerous lies, I hadn’t ever spoken a word to Christina DePamphilis since the day she politely romantically rejected me (12/12/16), over two weeks prior. It was an unlawful, malicious retaliation-act birthed from her father’s frustration and documented “last straw” quote. I am a victim of demonstrable protective order abuse.

Due to their subsequent acts of falsification and perjury, I have had a false stalking order issued against me (which I’ve complied with), I was falsely arrested once (baseless charges were later dropped), and I have had my name wrongly defamed as a “stalker”, including numerous other severe damages to me.

During the pendency of her fraudulent “stalking” order, Christina has made incitative, vulgar posts directed towards me on public social media with her boyfriend. She identified me and was hoping to get me to violate the “stalking order” so I’d be arrested and further abused/humiliated.

This was after lying about having “fear” of me; therefore, these posts were highly material to a recent series of hearings in Derry for renewing the stalking order. In these recent 5/3/18, 5/4/18, and 6/8/18 stalking order extension hearings at Derry District Court, undeniable documentation of Christina’s falsification crimes came to light. This forms the basis of the herein criminal complaint to Derry, NH Police Department.

I am desperate for justice. The court has repeatedly failed to hold this false accuser accountable. Judge John J. Coughlin recently granted Christina’s stalking extension against me in an act of blatant judicial misconduct. Judge Coughlin retires on 9/5/18, so his surreal fact-amnestic abuse of discretion was necessarily a dismissive CYA-act done with the assurance of no professional consequences.

Therefore, I now turn to the police for objective, unbiased law enforcing.

During the 5/3/18 court hearing, Christina informed me of her “independency”. She insisted herself as the original and free-will author of all these acts. She denied her father David “made” her do any of it.

Given her “independency” and personal culpability in these acts by her own insistence, I highlight Christina DePamphilis’s specific crimes as follows for which I request prosecution.

### **COUNT #1: PERJURY (641:1) AND FALSE SWEARING (641:2)**

**Summary:** As discovered on 6/8/18 at the Derry District Court hearing, Christina DePamphilis committed Perjury and False Swearing in her original 12/28/16 stalking petition form. It is an “official proceeding”, and the court notarizes the “oath” or “affirmation” of the petitioner.

**Statute of limitations:** The statute of limitation for Perjury (class B felony) is 6 years. Further, since these crimes only came into legal documentation last month, the statute of limitations starts then (5/4/18). *See* RSA 625:8 III. (e) Further, DePamphilis’s acts of falsification are part of an ongoing course of conduct whose most recent offense was on 5/4/18 at the Derry District Court stalking order hearing. *See* RSA 625:8 IV.

#### **Specifics:**

- Christina asserted in her petition that Maravelias had stated a certain weird, creepy comment to her: that Maravelias said she would “learn to love me [him, Maravelias]”.
- On 6/8/18 in Derry, Maravelias documented for the court that on the 1/5/17 hearing, he had asked DePamphilis if he had truly said the word “learn” to her (the alleged disturbing quote). She said “no”. Then Maravelias said, “I’m just curious because it says in your [petition] I did”. Then she said, “same idea”.
- The fact that Maravelias has been stripped of his rights and branded a stalker because a false accuser chose to make up things he never said and excused herself by saying “same idea” is unacceptable. The stalking petition form states, “I understand that making a false statement on this petition will subject me to criminal penalties”. Christina’s own admission under oath proves her act of willful perjury.
- This was a material misrepresentation, as the court erroneously found Maravelias had an “obsession” with the false accuser, and wrongly issued the false stalking order on this finding.
- Even if not “material”, this statement was still a misdemeanor count of False Swearing (641:2).

#### **Evidence and Proof (see enclosed USB drive and “Evidentiary Appendix” below):**

- A. 12/28/16 Stalking Petition in *Christina DePamphilis vs. Paul Maravelias*, (473-2016-CV-124) “122816StalkingPetitionScan.pdf” in USB drive and hereinafter referenced multiple times
- B. Page 30 and 31 of transcript of 1/5/17 hearing (Salem District Court, 473-2016-CV-124)
- C. Transcript/recording of 6/8/18 hearing (Derry District Court, 473-2016-CV-124)

### **COUNT #2: PERJURY (641:1) OR FALSE SWEARING (641:2)**

**Summary:** At the 5/3/18 hearing, Maravelias cross-examined Christina DePamphilis asking why she

cruelly bullied him by directing vulgar middle-finger posts against him on her public social media page with her boyfriend (6/21/17), while she had a “stalking” order against Maravelias and after falsely claiming she was fearful of him in order to obtain said “stalking” order. She then intentionally lied under oath about her purpose and intention with this 6/21/17 post, which was a crucially relevant, material issue in this stalking order extension hearing on 5/3-4/18 and 6/8/18. Stalking orders are supposed to be predicated upon a valid fear the petitioner has for their physical safety.

### **Specifics:**

- DePamphilis first excused her behavior with the 6/21/17 post by claiming her purpose was solely to “let you [Maravelias] know” she knew he was “stalking” [viewing] it.<sup>1</sup>
- The perjury was proven when Maravelias pulled out another exhibit a few minutes later she didn’t know he had had: a different post she had made on 6/19/17.
- This 6/19/17 of hers had already directly identified Maravelias two days before her 6/21/17 middle-finger post did.
- This 6/19/17 post pictured her boyfriend making a provocative statement directed towards Maravelias, calling him out by initials. After nervously trying to skirt the issue, she did not deny during cross-examination this was directed towards him.
- Therefore, Christina DePamphilis lied under oath on 5/3/18 about her purpose for the 6/21/17 middle-fingers post being just to “let [Maravelias] know” she knew he was looking at her public account, as she had already “let [him] know” with the 6/19/17 post. Her purpose for the 6/21/17 middle-fingers post was actually to further bait Maravelias to violate her falsified “stalking” order.
- These misrepresentations were “material”, because the court went on to wrongly extend the stalking order based on the absurd notion that DePamphilis had “reasonable fear for her personal safety” [ostensibly, because Maravelias invited her to dinner two years prior, never spoke to her again, and then dared to defend his defamed name in public contexts during the stalking order]. Demonstrating the sole purpose of harassment behind her posts countered the false claim that DePamphilis was still “fearful”. Therefore, her intentional misrepresentations were material.
- Even if they were not material, she is still guilty of misdemeanor False Swearing (641:2).

### **Evidence and Proof:**

A. 5/3/18 and 6/8/18 hearing audio recording/transcript

B. DePamphilis’s 6/21/17 and 6/19/17 social media posts

“2018POExtensionCaseExhibits.pdf” in USB drive and hereinafter referenced multiple times

## **COUNT #3: PERJURY (641:1) OR FALSE SWEARING (641:2)**

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<sup>1</sup> Maravelias was of course monitoring her online activity, correctly anticipating defamatory content to appear thereon, and documenting the said for legal purposes.



**Summary:** On 5/3/18, Christina DePamphilis committed another act of perjury in relation to the same highly relevant legal topic of her bullying posts against Maravelias on social media. She knowingly lied about who “knew” about what the posts were for, and to whom they were directed [Maravelias].

**Specifics:**

- In her 6/21/17 vulgar harassment post against Maravelias, she included her father David DePamphilis and boyfriend Matthew LaLiberte beside her, both middle-fingering the camera [Maravelias, as the intended viewer].
- On cross-examination, Maravelias asked Christina DePamphilis “whose idea” this post was.
- To try to insulate her father<sup>2</sup> and boyfriend, she first said “[she] was the only one who knew” that the rehearsed picture was going to be directed to Maravelias. In other words, Christina dishonestly alleged she alone knew what the circumstances of the picture even were, as if the two other men she involved were just willingly cooperating with her rehearsed picture totally unaware of why.
- But then, when Maravelias revealed the earlier 6/19/17 post she didn’t know he had had, she admitted that “between me and my boyfriend we understood who [sic] it was for”.
- Therefore, she willfully lied when she first said she was the “only one” knowing the intention of these posts. She later contradicted her first statement admitting that “[her] boyfriend” also knew. This specific area of factual questioning was absolutely critical and material in the stalking extension hearing to prove that she actually did not have any “fear” of Maravelias.
- For the same reasons as in Count #2, these misrepresentations were “material”. Further, even if they were not material, she is still guilty of misdemeanor False Swearing (641:2).

**Evidence and Proof:**

- A. 5/3/18 and 6/8/18 hearing audio recording/transcript
- B. DePamphilis’s 6/21/17 and 6/19/17 social media posts

**COUNT #4: TAMPERING WITH WITNESSES AND INFORMANTS (641:5)**

**Summary:** Two weeks ago, on 7/2/18 at Derry District Court, Christina DePamphilis filed a motion to attempt to cause Maravelias (“a person”) to “withhold ... testimony, information, document or [a] thing”, while knowing and “believing that an official proceeding” is “instituted”. This is a class B felony under RSA 641:5.

**Specifics:**

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<sup>2</sup> David DePamphilis, against whom Maravelias had filed a *truthful* stalking petition for his separate behaviors against him not addressed herewith, which was wrongly not granted by the court.

- Under the false guise of “protectivism” and using her false stalking order as a weapon against Maravelias’s speech, Christina DePamphilis petitioned the Derry District Court on 7/2/18 to expand the stalking order terms to prevent Maravelias from:
  - “gain[ing] access to or possess[ing] any of Petitioner’s social media communications either directly or through a third party” (See DePamphilis 7/2/18 motion)
- DePamphilis knows that her social media posts documenting her wild bullying of Maravelias are material exhibits to the ongoing restraining order litigation in Derry District Court.
- Furthermore, DePamphilis knows Maravelias’s intentions to appeal this case to the Supreme Court.
- She also attended the hearings on Maravelias’s stalking petition against David DePamphilis, wherein the same social media posts were relevant given David’s participation therein.
- DePamphilis knows this other case is also ongoing litigation, as Maravelias has appealed to the Supreme Court over the trial court’s outrageous act of granting David DePamphilis attorney’s fees.
- Thus, Christina DePamphilis’s abusive, bad-faith stalking order modification motion is an attempt to illegalize Maravelias’s mere “possession” and legal use of relevant exhibits from her social media account, already part of the public record in both stalking court cases, and crucially relevant to ongoing and upcoming litigation.
- This is both a blatant violation of RSA 641:5 I. (b) and an act of supreme cowardice.
- Further, after being informed of the impropriety of her censorship-attempt-act in Maravelias’s 7/5/18 court objection to her motion, she filed a reply on 7/12/18 which reasserted her unlawful attempt to have Maravelias barred from defending himself with said public legal exhibits picturing her social media communications. Thus, Christina DePamphilis is guilty of two separate counts.

### **Evidence and Proof:**

*Nota bene:* A and B alone should suffice, but C through G are included for further corroboration that Christina knows about the supreme relevance of these same social media artifacts to both ongoing official proceedings.

- A. DePamphilis’s 7/2/18 “Motion for Modification of Stalking Final Order of Protection to Include Further Terms” filed in 473-2016-CV-124, and her 7/12/18 follow-up reply
- B. Maravelias’s exhibits from DePamphilis’s social media account, entered as evidence at the stalking hearing (see “2018POExtensionCaseExhibits.pdf”)
- C. The court’s order extending the stalking order and Maravelias’s Motion for Reconsideration in the matter, indicating ongoing “official proceedings” and foreshadowing appeal
- D. Transcript/audio recording of 6/8/18 stalking order extension hearing at Derry District Court where Maravelias indicates intentions to appeal if wrong outcome perpetuates stalking order
- F. A “Rule 7 Notice of Mandatory Appeal” which Maravelias filed with Supreme Court in the simultaneous case against Christina’s father David regarding an improper award of attorney’s fees (473-2017-CV-150), a case which Christina knows about and which also contains the referenced social media exhibits she seeks to illegally censor
- G. Transcript/audio recording from 5/3-4/18 hearing where Christina affirms she was present to

witness the stalking case against her father where the same social media posts were entered as exhibits H. Maravelias's 7/5/18 objection court filing which called-out this misconduct before Christina willfully reaffirmed her unlawful informant tampering attempt in her subsequent 7/12/18 legal reply

### **COUNT #5: FALSIFYING PHYSICAL EVIDENCE (641:6)**

**Summary:** Christina DePamphilis deleted certain social media accounts of hers immediately prior to court hearings in which she knew the content of said deleted accounts to be factually relevant and material. Under oath at 5/3/18 and 5/4/18 hearings, DePamphilis did not deny deleting these accounts.

**Statute of limitations:** These deletions occurred in late 2017 (December) or the first days of 2018. Thus, this crime occurred well-under 1 year ago.

#### **Specifics:**

- In 2017, Christina DePamphilis maintained two social media accounts online at <http://christinamamaria.vSCO.co> and <http://www.instagram.com/tipsytina69/>
- As admitted under oath on 5/3/18 and evidenced by her acts of bullying/harassment in June 2017, she knew Maravelias was “viewing” the vSCO account. She also stated she knew he was gathering her exhibits to “use against [her]” in the legal matters.
- Paul Maravelias filed a stalking petition against David DePamphilis on 12/8/17. A hearing was scheduled for 1/3/18.
- Christina DePamphilis motioned the court to extend her existing stalking order against Maravelias for another year on 1/5/18.
- Immediately prior to the 1/3/18 hearing on the petition against her father and to her 1/5/18 extension motion on her stalking order against Maravelias, she deleted the accounts.
- The timing of the deletion is corroborated by DePamphilis's 5/3-4/18 admissions under oath and by the attached screenshots of the deleted account(s).
- Although Maravelias possessed screenshots of these social media exhibits, DePamphilis's willful deletion act prevented these posts from being objectively verified at the web link. Indeed, Christina DePamphilis attempted to advance the absurd notion at the 5/4/18 hearing that Maravelias had digitally manipulated his screenshot exhibits of her postings. Had she not deleted the actual internet resources (her posts) in question, these false accusations could be disproved before the court.
- Therefore, it is proven beyond doubt that Christina DePamphilis “destroy[ed], conceal[ed] or remove[d] any thing with a purpose to impair its verity or availability in such proceeding or investigation”, while knowing and believing that an “official proceeding” was underway.

#### **Evidence and Proof:**

A. Transcript/audio recording of 5/3/18 and 5/4/18 Derry District Court hearings on stalking extension

B. All of Maravelias's exhibits from both stalking cases involving DePamphilis's social media posts (such as her 6/19/17 boyfriend post or her 6/21/17 middle-fingers post against Maravelias) (see "2018POExtensionCaseExhibits.pdf" in USB drive enclosed)

C. Screenshots indicating the deletion of these accounts, independently verifiable by accessing the aforementioned links

### **COUNT #6: PERJURY (641:1)**

**Summary:** Christina DePamphilis willfully perjured at the 1/5/17 hearing that Maravelias had mentioned her "age of consent" in his 12/12/16 conversation with her. On 2/7/17, Judge Robert S. Stephen wrongly issued the false restraining order against Maravelias citing this specific lie: that Maravelias had the said creepy, weird comment to Ms. DePamphilis. Further, she reaffirmed this fallacy on 5/3/18 at Derry District Court.

#### **Statute of Limitations:**

6 years for class B felony Perjury under 641:1

#### **Specifics:**

- The Windham Police possess an audio recording of the very same verbal exchange proving Maravelias had never mentioned anything remotely close to the phrase "age of consent".
- Maravelias had been taking a sentimental audio recording of the exchange (a romantic dinner invitation) due to its personal significance to him. He intended to share it with Ms. DePamphilis afterwards; he didn't know she and her father would victimize him as they later did.
- When Maravelias tried to use the recording to disprove Christina DePamphilis's false, manufactured "stalking" accusations against him, he was forbidden from playing it in court under RSA 570. Maravelias's abusers then had *him* arrested for merely recording his own conversation – all the while the DePamphilis family got off with felony perjury and restraining order abuse against Maravelias. This is a sick, warped injustice and must be rectified.
- Further, this shocking lie that Maravelias had spoken something as discomforting and awkward as sexualizing reference was found nowhere in Christina DePamphilis's stalking petition, which did fully describe the same 12/12/16 verbal exchange. This stalking "buzz-word" lie was only concocted later-on, for the hearing, in order to obtain the falsified stalking order.
- The materiality of this "age of consent" quote lie is beyond dispute, as Judge Stephen specifically cited it in his finding of fact for the final stalking order against Maravelias.

#### **Evidence/proof:**

A. Transcript of 1/5/17 hearing

B. Final stalking order issued by Judge Stephen in 473-2016-CV-124

C. Maravelias's 12/12/16 cell-phone audio recording file, possessed by Windham Police

D. Attached letters from Maravelias's parents, who lawfully listened to the same recording in Vermont

## **COUNT #7: HARASSMENT (644:4) AND DISORDERLY CONDUCT (644:2)**

The facts rehearsed in Counts #2 and #3 also document beyond probable cause that Christina DePamphilis has “insulted, taunted, or bullied” someone “in a manner likely to provoke a violent response”, which is criminal Harassment in New Hampshire. Furthermore, her same vulgar incitation social media posts against Maravelias constitute Disorderly Conduct under 644:2 II. (a).

However, these content-oriented infractions are trivial compared to the severity of Christina’s social media posts when viewed in their falsification context of 1) lying about having “fear” of Maravelias to obtain a false stalking order, and of 2) her deceitful perjuries under oath to excuse these posts in her attempt to extend the stalking order, as formerly discussed in Counts #2 and #3.

## **COUNT #8: FRAUD BY ATTEMPT (629:1) OF THEFT BY DECEPTION (637:4) AND FALSE SWEARING (641:2) AND/OR UNSWORN FALSIFICATION (641:3)**

**Summary:** In Christina DePamphilis’s 12/28/16 stalking petition, she petitioned the court to order Maravelias to pay her for “surveillance [sic] camera[s]” her father had installed outside their home. The installation of these cameras had absolutely nothing to do with Maravelias’s lawful conduct of appearing at his former-friends’ house on 12/12/16 to invite Christina to dinner, and then never appear there again. As evidence shows, there was actually a separate and valid security incident at the DePamphilis home not involving Maravelias whatsoever which motivated the installation of the security cameras. At the hearing, DePamphilis mendaciously denied that this separate incident ever happened.

### **Statute of limitations:**

6 years for Attempt of Theft by Deception per RSA 625:8 (a) and/or (b), as “theft” is either a Class A or B felony under 637:11, and as “the penalty for attempt is the same as that authorized for the crime that was attempted”. *See* RSA 629:1 IV.

1 year for misdemeanor Unsworn Falsification, but starting on 4/13/18, the date of “discovery of the offense”. *See* RSA 625:8 III. (e)

### **Specifics:**

- In December 2016 text messages between Maravelias’s parents and DePamphilis’s parents, Christina’s mother confessed that there had been an October 2016 security “incident” at night outside the DePamphilis home.
- Christina DePamphilis independently documented the security “incident”, having nothing to do with Maravelias, by posting on her “tipsytina69” account. On 10/20/16, she made a post with the following text:

“im so fucking tired and annoyed theres people banging on my house at 1am and now tonight and my mom walks out trying to be cool and scare them by saying shes calling the cops and dad goes out with a fake gun OK i have so much american hw i dont have time for any of this and now my parents think these people are

targeting me lol no but SICK COOL FUN ALRIGHT (:”

-Christina DePamphilis’s 10/20/16 post on “tipsytina69” Instagram account documenting security incident

- At the 1/5/17 hearing on her stalking petition, Judge Robert S. Stephen declared his confusion as to why he would force Maravelias to pay for DePamphilis’s security camera expenses as part of her petition. The judge also commented, “especially since he’s [Maravelias] alleging another incident [the October 2016 security incident – the actual cause of the security camera installation]”
- DePamphilis, by her counsel Jerome Blanchard, then replied “yeah, well, there’s no evidence – we contest that”.<sup>3</sup>
- DePamphilis therefore attempted to have Maravelias court-ordered to pay absolutely unrelated expenses relating to security camera installation at her house, when none of his lawful, polite conduct had caused the said installation, but rather a valid October 2016 security incident had.
- DePamphilis perjuriously denied that this incident ever happened and/or intentionally failed to correct her misrepresentations.
- With her 10/20/16 social media post and false statement in court denying the incident taken in conjunction, it is undeniable that Christina DePamphilis created or reinforced “an impression which is false and which that person does not believe to be true” *See* RSA 637:4 II. (a)
- She also “fail[ed] to correct a false impression which [s]he previously had created or reinforced” *See* RSA 637:4 II. (b)
- These false impressions were attempts to obtain or exercise “control over property of another [Maravelias’s funds] by deception and with a purpose to deprive him thereof”. *See* RSA 637:4 I.
- Judge Stephen denied DePamphilis’s extortionary request; but, “a person commits theft under this section notwithstanding that the victim has suffered no actual or net pecuniary loss.” *See* RSA 637:4 IV.

### **Evidence and Proof:**

A. Pages 1-4 of a 4/13/18 post-trial filing Maravelias made in the *Paul Maravelias v. David*

*DePamphilis* stalking case entitled “Plaintiff’s Reply to Respondent’s Brief on Motion for Award of Attorney’s Fees”, when that case had devolved solely into litigation over award of attorney’s fees

B. Christina DePamphilis’s 10/20/16 social media post on her “tipsytina69” Instagram account (exhibit within 4/13/18 document)

C. Christina DePamphilis’s 12/28/16 stalking petition (in particular, Page 2 requesting ordered financial compensation for the security equipment)

D. Transcripts of the 2/1/17 court hearing at Salem District Court, where DePamphilis raised her request for “costs” to the court and perjuriously denied the existence of the ulterior motivating incident

E. Laurie DePamphilis’s 12/13/16 text message to Maravelias’s parents further corroborating the falsely-denied October 2016 security incident (exhibit within the 4/13/18 document)

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<sup>3</sup> Note scrivener’s error in Page 209 of 2/1/17 transcript.

## **COUNT #9: DEFAMATION (644:11) AND FALSE SWEARING (641:2)**

**Summary:** Maravelias recognizes that, unfortunately, the vast majority of Christina DePamphilis's reckless defamatory conduct against him with her absurd "stalking" allegations may be insulated from criminal prosecution due to the civil trial court's error in issuing the falsified stalking order, thus arguably forming a legal finding of "stalking", however incorrect. Therefore, Maravelias limits his criminal complaint for DePamphilis's defamation to the following outrageous and unsubstantiated additional claim she made in her 12/28/16 stalking petition, likely crafted solely to increase chance of obtaining the temporary protective order pre-hearing for a strategic upper-hand.

### **Statute of limitations:**

1 year for class B misdemeanor; however, beginning on 5/3/18, whereupon Christina DePamphilis reasserted the same baseless defamatory comments at Derry District Court when questioned thereabout. *See* RSA 625:8 IV.

### **Specifics:**

- Christina DePamphilis claimed that there were "rumors of a knife incident" regarding Maravelias when responding to a question on the court's prewritten form asking if the Respondent had a history of violence.
- Maravelias has never been party to a "knife incident", nor has ever before been accused of being party to any "knife incident".
- When Maravelias asked DePamphilis about this outrageous comment in 5/3/18 cross-examination, she was not able to tell the court any basis she had for making this written statement.
- She said "a friend" had told her, but she refused to name the supposed informant individual
- Christina DePamphilis made these comments while knowing they were false; further, they were comments in a public court record which she knew would "tend to expose" Maravelias "to public hatred, contempt or ridicule" (an accusation of violence).
- Furthermore, DePamphilis reinforced her accusation on 5/3/18, claiming anew that Maravelias had "threatened someone with a knife", which exceeds even her original defamatory comment that there were "rumors of a knife incident".

### **Evidence and Proof:**

- A. DePamphilis's 12/28/16 stalking petition
- B. Transcripts/audio recording of 5/3/18 hearing at Derry District Court

## **COUNT #10: UNLAWFUL INTOXICATION (179:10), UNLAWFUL POSSESSION OF ALCOHOL (179:10), TRANSPORTING ALCOHOL BY A MINOR (265-A:45), AND/OR POSSESSION OF CONTROLLED SUBSTANCE/INTOXICATION (318-B)**

*Nota bene:* Unlike the foregoing counts, Maravelias was not a victim in these crimes committed by Christina DePamphilis.

**Summary and Specifics:** Christina DePamphilis pictured herself on social media on 7/30/17 with a bottle of vodka in her left hand, her purse in her right, standing in a parking lot at “4:43am” with her Jeep in the background, with a caption of “gn [goodnight]”, clearly suggesting intoxicated vehicular departure from an overnight party and driving under the influence. Her underage possession is patently undeniably from the image, as she was 16 years old at this time. This posting was admitted as an exhibit in the stalking order extension hearing to contradict her claim for the protective order that Maravelias’s acts of public speech made her fear for her “safety and well-being” (if she is of a character to recklessly disregard the same).

**Statute of limitations:** This event occurred within the past year.

**Evidence and Proof:**

A. Christina DePamphilis’s 7/30/17 post on her “tipsytina69” account, admitted as Exhibit J in *Christina DePamphilis v. Paul Maravelias* stalking order extension hearing at Derry District Court on 6/8/18.

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Thank you for your attention to detached, objective law enforcement, as was done with me when I was arrested for recording my own conversation and for unsuccessfully attempting to use it in court to disprove malicious stalking false accusations which should have never been given the light of day in court.

Sincerely,

Paul J. Maravelias

7/16/2018

Cell: 603-475-3305



A handwritten signature in cursive script, appearing to read "Paul J. Maravelias", is written over a horizontal line. The signature is fluid and somewhat stylized, with a long horizontal stroke at the end.