

Laura Owens
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Scottsdale, AZ 85254
415-810-0604
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Representing Self, without a Lawyer

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

In the Matter of:

LAURA OWENS
Plaintiff

Case Number.: CV2021-052893

and

***DECLARATION OF FRAUD, PERJURY,
IMPERSONATION, EXTORTION, AND
ADDITIONAL ILLEGAL ACTIONS
TAKEN BY THE DEFENDANT
AND HIS COUNSEL***

GREGORY GILLESPIE
Defendant

1) The Plaintiff, Laura Owens, wishes to alert the court to fraudulent activity by the Defendant, Gregory Gillespie, and his attorney, Gregg Woodnick, in emails sent directly to the Plaintiff throughout the case, as well as in the Motion to Dismiss, which was signed under oath by the Defendant and docketed on 9/28/21. There were also serious charges of fraud against the Plaintiff that she wishes to address beyond her brief statement in the Response to the Motion to Dismiss that need to be addressed regardless of whether their Motion is being considered, given that the Application for Default was docketed on 9/27/21, or granted in the future.

2) On 8/11/21, the Plaintiff filed CV2021-052893 as a self-represented litigant. On 8/23/21, when the Defendant's attorney accepted service on behalf of his client, he asked if she was represented and who to contact going forward in the case. The Plaintiff answered, "pro se" and to communicate with her.

3) On 8/24/21, Mr. Woodnick contacted Mr. Joseph Cotchett, a trial litigator in California who the Defendant knew to be a family friend of the Plaintiff's, to ask if he was representing her in the case. Mr. Cotchett's office explained that they were not, and alerted Ms. Owens to Mr. Woodnick's inquiry. She then contacted Mr. Woodnick directly to reiterate that she was a pro se litigant and was confused as to why he had contacted Mr. Cotchett's office.

Even with this knowledge, the Defendant's attorney sent two more emails on 8/25/21 to Mr. Cotchett of alleged correspondences between Ms. Owens, Mr. Cotchett, and his former employee, Ms. Alison Cordova. The emails were titled, 'RE: SENT ON BEHALF OF JOE COTCHETT RE: LAURA OWENS PREGNANCY'. In the Motion to Dismiss, the Defendant reports that Mr. Woodnick's requests "to speak with Joseph Cotchett about the seemingly fraudulent emails purportedly authored by Joseph Cotchett and lawyers who have not worked at the firm for quite some time, went without any substantive response."

These letters, still not shared in their entirety with the Plaintiff by the Defendant, were NOT drafted by the Defendant and would have served no purpose to further her case, which had been filed twelve days prior. They were undoubtedly **fraudulently drafted by the Defendant with the intention of framing the Plaintiff for CRIMINAL FRAUD with Mr. Cotchett**, as well as to embarrass her by disclosing confidential medical information (pregnancy) to a known family friend.

4) Please refer to number 12 in the Defendant's Motion to Dismiss, where he stated that, 'Plaintiff has refused to take a non-invasive prenatal paternity test despite undersigned counsel informing her on August 27, 2021 that they had scheduled the test for her.'

On 8/27/21, the Plaintiff received an email from Sara Seeburg, a paralegal with Woodnick Law, PLLC., informing her that she, "should receive an email from ARCPoin Labs of Scottsdale later today setting your [the] appointment for non-invasive prenatal paternity testing for next week." **(EXHIBIT 1)**

On 9/1, the Plaintiff received an email from Mr. Woodnick saying that she, "should have received the confirmation data from ARCPoin regarding the prenatal paternity testing." **(EXHIBIT 2)**

The Plaintiff contacted ARCPPoint Labs and learned that the Defendant's undersigned counsel never had communication with them regarding Ms. Owens' pregnancy (**EXHIBIT 3**), despite claiming that they. Both the Defendant and his attorney have **both committed perjury** (ARS §13-2702) **by writing statements known to be false on his Motion to Dismiss**, which included an Affidavit. In addition, not only is a prenatal paternity test unrelated test for a case related to abortion coercion, but the Defendant would have no right to schedule medical testing for the Plaintiff.

5) In an email written on 9/1/21 (**refer back to EXHIBIT 1**) by the Defendant's attorney, he wrote:

"You can avoid both litigation expenses and exposure to a sizable civil judgment by promptly filing to dismiss your civil suit. Please be advised, as I am sure your Uncle Joe [a nickname for Joe Cotchett that was meant to be condescending] warned you was forthcoming, the counter petition will contain a Fraud allegation as the images you sent to Mr. Gillespie were confirmed to be a recycled ultrasound from 2015."

6) Mr. Woodnick, ON BEHALF OF THE DEFENDANT, IMPERSONATED Mr Cotchett (A.R.S. 13-2006) & THREATENED THE PLAINTIFF WITH FRAUD CHARGES IF SHE DID NOT DISMISS WITH PREJUDICE THE CHARGES AGAINST Mr. Gillespie (A.R.S. 13-1804) ON THE BASIS OF A FABRICATED CONVERSATION WITH Mr. Cotchett AND ULTRASOUND PHOTOS THAT HE HAD NO KNOWLEDGE OF.

It should be noted that Ms. Owens does know anything about these ultrasound photos, which have yet to be produced by the Defendant, despite threats of charges based on their existence.

7) On 9/30/21, the Plaintiff received an email from Mr. Cotchett (**EXHIBIT 4**), shared with his permission, regarding the actions of the Mr. Gillespie and Mr. Woodnick:

SUBJECT: RE: Gregg Woodnick

SENT ON BEHALF OF JOSEPH W. COTCHETT

Dear Laura,

Thank you for the note – it is an extraordinary story with GILLESPIE. I am glad you are pursuing charges as they [typo] conduct is outrageous – if we can help in any way, do not hesitate to call.

Best regards,

Joe

8) In regards to the serious fraudulent allegations by the Defendant in his Motion to Dismiss, specifically numbers:

- 1) where he claimed that he believed the pregnancy to be false, so all claims must fail,
- 5) where he called her pregnancy 'fictitious',
- 13) where he claimed that the Plaintiff 'fabricated the abortion coercion charges'

FOUR DOCUMENTS FROM ONE MEDICAL CONFIRMING THE PREGNANCY WERE SENT TO THE DEFENDANT ON 7/16/21 AND ALSO ATTACHED TO THE COMPLAINT.

The Defendant signed an Affidavit with his Motion to Dismiss and has perjured by making these claims when he knows the pregnancy to be true (ARS 13-2702). The following information is known by the Defendant:

On 7/16/21, the Plaintiff went to One Medical's Kierland location at the request of the Defendant, who did not believe the tests that she had taken at home, and saw Dr. John Jones to take a pregnancy test.

The Defendant asked the Plaintiff to give him her login information for her One Medical Patient Portal (**EXHIBIT 5**) so he could view her health information on his own. He claimed to not trust her being pregnant despite (a) sending him positive urine pregnancy test results (**EXHIBIT 6**), (b) receiving a note written by the doctor that Mr. Gillespie had requested to confirm it (**EXHIBIT 7**), (c) reading her after visit summary (**EXHIBIT 8**). The Plaintiff references Mr. Gillespie's skepticism in a message to the physician who she saw that day, Dr. John Jones, who attached the same letter confirming the pregnancy (**EXHIBIT 9**).

9) In addition, the Defendant forced the Plaintiff to have a video call to verify the test results, saying that he said he would not believe her otherwise despite the abundance of proof given. The call was with Julie Ahlrich, NP, of One Medical. After confirming the result with Mr. Gillespie present (virtually), Ms. Ahlrich asked to speak to the Plaintiff alone to ask screening questions for a potential abuse victim based on the Defendant's controlling behavior displayed on the call.

10) On 9/28/21, the Plaintiff received an email (EXHIBIT 10) from Nicole Russell with the Phoenix One Medical medical records department, indicating suspicious activity on her account. She was concerned for Ms. Owens' safety given the concerns documented by Ms. Ahlrich about Mr. Gillespie's behavior in the video call on 9/16/21:

"We take steps to protect your personal information here and take that job seriously, however we completely understand that sometimes we need to take extra care to protect a patient in this scenario." "I do recommend making sure your online calendars are not linked to the ex-boyfriend's email (such as google calendars, or icloud calendar, etc.) to keep doctor appointment times/dates private. And also logging out of your One Medical account from the app and website after each use if you are still meeting or visiting with him.

Very importantly, if you do feel unsafe or in a crisis please without hesitation call or text 911 (If you are in Scottsdale or anywhere in Maricopa County and cannot call, they are text enabled). We are of course always here 24/7 to assist you as well by phone or video chat with some wait time for non-emergency concerns.

Wishing you lots of support and strength during this time,

Nicole"

11) The Defendant has had the login information, including the password, for her One Medical Patient Portal (refer again to EXHIBIT 6) since 7/16/21. He knew that her computer, email (personal and work), and social media accounts were tied to the same email address and password, as Ms. Owens gave him that information on a call that they had immediately after their text exchange.

He was also aware of Mr. Cotchett's firm representing Ms. Owens in a civil case in 2017, as well as his current representation of her father, talk show host Ronn Owens, in an ongoing case. The Plaintiff has not deleted any correspondence with his firm from that case and suspects that the Defendant has accessed and altered emails and documents in an effort to embarrass her with Mr. Cotchett. In addition, she suspects that he has attempted to access her more recent medical records through One Medical recently as noted in allegation 10.

12) The Plaintiff would like the Court take into account the provably fraudulent and perjured statements, as well as unethical actions, by the Defendant and his attorney when considering their Motion to Dismiss. The Complaint has not been addressed whatsoever and any further charges would be an abuse of process.

14) Secondly, the Plaintiff would ask that the Defendant and his attorney immediately stop 1) threatening criminal action based on fraudulent actions and 2) suspend further allegations in this case done with the sole purpose of harassing, embarrassing, and defaming her in an effort to intimidate her into dropping the charges and abuse the Court by delaying the case unnecessarily. Ms. Owens requests that the Defendant and his attorney stop making statements considered to be libel, defamation, and slander done to damage her reputation as a podcaster and as a speaker on domestic violence issues. This includes not acting out on his threat to contact the coordinators of TEDxWomen in an effort to replace her as a speaker in their December event.

15) The Plaintiff has stated that she will donate any and all relief stemming from this action to charity and asks the Court to take this into consideration when considering the integrity of this case.

**This page must be completed and attached
to the LAST page of your Motion/Request**

I filed the ORIGINAL of the attached document(s) with the Clerk of the Superior Court in Maricopa County on: October 4, 2021.
Month Date Year

I mailed/delivered a COPY of the attached document(s) to the Judicial Officer assigned to my case, Judge (or Commissioner): Judge Bachus / Commissioner Gary Popham, on October 4, 2021 (Judicial Officer assigned to your case)
Month Date Year

I mailed/delivered a COPY of the attached document(s) on this date:
October 4, 2021 To: Woodnick Law, PLLC & Gregory Gillespie
Month Date Year

(You must mail a copy of all documents to the other side and his/her lawyer)

<u>Gregory Gillespie</u> Name of Other Side	<u>Gregg Woodnick & Kaci Bowman</u> Name of Other Side's Lawyer
<u>3930 E. Shangri La Road</u> Address	<u>1747 E. Morten Avenue, Suite 205</u> Lawyer's Address
<u>Phoenix, AZ 85028</u> City, State, Zip	<u>Phoenix, AZ 85020</u> City, State, Zip

By signing below, I state to the Court, under penalty of law, that the information stated on these pages is true and correct to the best of my knowledge and belief.

I further state that I have filed/mailed the attached document(s) as shown above. I understand that if I do not file/mail the attached document(s) as shown above, the judge in my case will not read my request/motion.



Your signature

Laura Owens
11440 N. 69th Street
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415-810-0604
lauramichelleowens@gmail.com
Representing Self, without a Lawyer

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In the Matter of:

LAURA OWENS
Plaintiff

Case Number.: CV2021-052893

URGENT!

and

***DECLARATION OF FRAUD,
PERJURY, IMPERSONATION, EXTORTION,
AND ADDITIONAL ILLEGAL ACTIONS
TAKEN BY THE DEFENDANT
AND HIS COUNSEL (EXHIBITS)***

Gillespie/Owens > Inbox x



Gregg Woodnick <Gregg@woodnicklaw.com>
to me, Sara, Kaci ▾

Wed, Sep 1, 10:10 AM ☆ ↶ ⋮

Laura,

You should have received the confirmation data from **ARCpoint** regarding the prenatal paternity testing. As I trust you will be advised by counsel, it is your choice to participate in the testing *at this point*. As litigation proceeds that will not be the case as the court will order the same pursuant to ARS 25-814 and relevant case law.

You should be in receipt of our Notice of Appearance. The Court issued permission for alternate service but that is not necessary as we have notified the court that we represent Mr. Gillespie. We are in the process of drafting a Response to your Complaint and a Counter Petition.

You can avoid both litigation expenses and exposure to a sizable civil judgment by promptly filing to dismiss your civil suit. Please be advised, as I am sure your Uncle Joe warned you was forthcoming, the counter petition will contain a Fraud allegation as the images you sent to Mr. Gillespie were confirmed to be a recycled ultrasound from 2015.

Greg has advised that he will suspend his counter claim and related litigation once you promptly file to dismiss your civil suit and confirm that you are not pregnant.

Gregg

WOODNICK LAW, PLLC
1747 E. Morten Ave., Suite 205
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Phone: (602) 449-7980
Fax: (602) 396-5850
www.woodnicklaw.com

GREGORY GILLESPIE
Defendant

EXHIBIT 1



Laura Owens <lauramichelleowens@gmail.com>
to ARCpoint ▾

Mon, Sep 27, 7:06 PM (7 days ago) ☆ ↶ ⋮

Hi! I am self represented. I know the opposing attorney said that it would be under my name and they have lied about several things, so I just wanted to confirm that there were no orders. I don't believe there are and I am the plaintiff. Thanks!

Laura

Sent from my iPhone

On Sep 27, 2021, at 6:22 PM, ARCpoint Labs of Scottsdale Administration <Scottsdaleadmin@arcpointlabs.com> wrote:



ARCpoint Labs of Scottsdale Administration
to me ▾

Tue, Sep 28, 10:41 AM (6 days ago) ☆ ↶ ⋮

I don't see anything pending with your name on it. Sorry

Cheryl Jimson
Lab Administrator

Please excuse any typos, this phone has a mind off its own! 😊

EXHIBIT 3

RE: Gregg Woodnick External Inbox x



Patrice Omalley

to me, Ronn ▾

Thu, Sep 30, 2:58 PM (4 days ago)



SENT ON BEHALF OF JOSEPH W. COTCHETT

Dear Laura,

Thank you for the note – it is an extraordinary story with **GILLESPIE**. I am glad you are pursuing charges as they conduct is outrageous – if we can help in any way, do not hesitate to call.

Best regards,

Joe

Joseph W. Cotchett

COTCHETT PITRE & McCARTHY LLP

A LITIGATION LAW FIRM – SAN FRANCISCO, LOS ANGELES, NEW YORK

840 Malcolm Road, Suite 200 | Burlingame, CA 94010

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EXHIBIT 4





Greg Gillespie on 2021-07-17 at 10.21.32

7/16/21, 9:34 AM

Pregnant

 IMG_6653 

 IMG_6651 

7/16/21, 10:51 AM

Can you send me the portal access just to see :)

Sorry I could make it there! Work is nuts today

Putting out fires

Portal access? I can just call them and give them permission to talk to you if you want? Not sure what you mean

EXHIBIT 5

Procedure Performed at One Medical

Date: Jul 16, 2021

Patient

Legal Name: Laura Owens

Goes By: Laura

Birth Date: 05/14/1990

Phone: 415-810-0604

Is patient pregnant:

See attached for complete demographic and insurance information.

Procedure

Urine pregnancy test, 81025

Indication

Amenorrhea (ICD-10CM: N91.2)

Procedure Summary

Result: 2 lines - positive

Thank you,



John Jones
(NPI: 1760826796)
johnjones@onemedical.com



15210 N Scottsdale Road · Suite 275 · Scottsdale, AZ 85254
ph: 888-663-6331 · fax: 602-218-4076

July 16, 2021

Laura Owens, DOB: 05/14/1990

To Whom It May Concern:

Patient was evaluated in the office today and was determined to be in early stages of pregnancy.
Patient was on seizure medication that decreased the effectiveness of her oral contraceptives. Please
contact our office for any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Jones', is placed on a light gray rectangular background.

John Jones, DO
NPI: 1760826796

EXHIBIT 7

Notes

BEGIN - Office Visit

Chief Complaint	OV: amenorrhea
Note Type	Office Visit
Date of Service	Fri Jul 16 2021 @ 09:00 AM
Created By	John Jones, DO (NPI: 1760826796)
Signed By	John Jones, DO (NPI: 1760826796)
Date Signed	Fri Jul 16 2021 @ 01:06 PM

Subjective

Pt stated that she thinks her LMP was about 4-6 weeks ago. Pt stated that she had been taking Minastrin OCP daily but that she didn't realize Lamictal interacted with OCP decreasing the effectiveness. She stated that her Lamictal was increased in 2020. Pt stated that she is in a relationship with her bf.

Pt stated that she has generalized epilepsy that was dx in 2017 at which point patient was started on Lamictal.

Vitals

sys dia HR RR temp wt ht BMI
102 68 68 16 — 113 lb 64.5 in 19.1

Exam

Gen: Awake and alert, in NAD

HEENT: normocephalic, atraumatic. Trachea midline, no scleral icterus, EOM intact, clear conjunctiva, nares normal

Cardio: RRR with no murmurs, rubs, or gallops

Resp: CTA b/l with no wheezing, rhonchi, or crackles

Neuro: no gross focal deficits, answering questions appropriately

Extremities: No significant edema

Psy: appropriate mood and affect

Skin: warm to touch with no erythema or rash

Procedures & Services

Urine pregnancy test - N91.2 - 81025

Result: 2 lines - positive

Assessment & Plan

Pregnancy - Z33.1

Urine pregnancy test positive. Pt advised to start taking prenatal vitamin and to establish care with an obgyn for prenatal care.

After Visit Guidance To Patient

My visit

 You ▸ John Jones, DO
Jul 16, 2021 at 10:55 AM

Hey, thanks so much for seeing me today! Was wondering if you could message or e-mail me (lauramichelleowens@gmail.com) the letter and the visit summary/my health info from this last visit? My boyfriend wanted me to send it to him even though I did take a pic of your letter. Thank you so much!

 John Jones, DO
Jul 16, 2021 at 1:12 PM

Hi Laura,

Attached is the office visit note from today. Please let me know if you need anything else. Hope you have a great weekend!

 Office Visit Note.pdf



EXHIBIT 9

We take steps to protect your personal information here and take that job seriously, however we completely understand that sometimes we need to take extra care to protect a patient in this scenario. I have notated your account to take additional steps to verify any release of information request before sending, including contacting you each time we receive a request.

I do recommend making sure your online calendars are not linked to the ex-boyfriend's email (such as google calendars, or icloud calendar, etc.) to keep doctor appointment times/dates private. And also logging out of your One Medical account from the app and website after each use if you are still meeting or visiting with him.

Very importantly, if you do feel unsafe or in a crisis please without hesitation call or text 911 (If you are in Scottsdale or anywhere in Maricopa County and cannot call, they are text enabled). We are of course always here 24/7 to assist you as well by phone or video chat with some wait time for non-emergency concerns.

Wishing you lots of support and strength during this time,

Nicole

EXHIBIT 10