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EN PRO PER

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SONOMA**

Case No. 26FL02487

Petitioner,

LUCIA RAMIREZ

and

Respondent,

JASON CARTER

**PETITIONER OPPOSES
RESPONDENT'S REQUEST FOR A
DOMESTIC VIOLENCE RESTRAINING
ORDER, REQUESTS A RESTRAINING
ORDER AGAINST RESPONDENT, AND
SUBMITS DECLARATION IN SUPPORT
OF PETITIONER'S POSITION AND
CUSTODY OF THE MINOR CHILD.**

DECLARATION OF LUCIA RAMIREZ

IN SUPPORT OF DOMESTIC VIOLENCE RESTRAINING ORDER

AND CHILD CUSTODY ORDERS

(Detailed Chronological Declaration)

I, LUCIA RAMIREZ, declare as follows:

I. PARTIES AND COMPETENCY

1. I am the Petitioner in this matter and the biological mother of the following minor children:

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- a. Sofia Elena Ramirez, female, date of birth: March 18, 2013;
- b. Ethan Miguel Ramirez, male, date of birth: July 9, 2014; and
- c. Mateo Julian Ramirez, male, date of birth: September 14, 2022.

2. The Respondent is Jason Carter, the biological father of Mateo Julian Ramirez and a parental figure to Sofia Elena Ramirez and Ethan Miguel Ramirez.
3. I am over the age of eighteen and competent to testify to the matters stated herein. I have personal knowledge of the facts described below and, if called as a witness, would testify truthfully.
4. I make this declaration under oath and under penalty of perjury under the laws of the State of California.

II. RELATIONSHIP HISTORY (2016–2021)

5. I met Jason Carter in approximately 2016 while living in Santa Rosa, California.
6. We entered into a romantic relationship and later lived together in Rohnert Park and Cotati, California.
7. Over time, Mr. Carter became increasingly controlling, verbally aggressive, and intimidating.
8. He frequently escalated disagreements by yelling, standing over me, and refusing to allow conversations to end.

III. ALCOHOL ABUSE AND ESCALATION

9. Throughout our relationship, Mr. Carter regularly consumed alcohol.
10. His abusive behavior escalated when he was drinking, including loss of temper, impaired judgment, and physical intimidation.

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1 11. Mr. Carter repeatedly denied that alcohol contributed to his behavior and blamed me for
2 his reactions.

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4 **IV. CHILDREN AND CARETAKING HISTORY**

5 12. Sofia Elena Ramirez and Ethan Miguel Ramirez are my children from a prior relationship
6 and have resided with me full-time.

7 13. Mateo Julian Ramirez was born on September 14, 2022, in Sonoma County, California.

8 14. I have been the primary caretaker for all three children since Mateo Julian Ramirez's
9 birth.

10 15. Mr. Carter worked full-time and did not regularly participate in daily childcare
11 responsibilities.

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14 **V. FIRST PHYSICAL INCIDENT — DECEMBER 2022 (ROHNERT PARK)**

15 16. In or about December 2022, while living in Rohnert Park, Mr. Carter and I argued after
16 he had been drinking.

17 17. During the argument, Mr. Carter grabbed my wrist and pulled me toward him.

18 18. He then forcefully pulled my hair, causing immediate pain and fear.

19 19. Sofia Elena Ramirez and Ethan Miguel Ramirez were present in the home and heard me
20 crying.

21 20. Mr. Carter told me not to tell anyone about the incident and stated that I was "trying to
22 cause problems."

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24 **VI. CONTINUED CONTROL AND INTIMIDATION (2023–2024)**

25 21. After the December 2022 incident, Mr. Carter's behavior became more frequent and
26 unpredictable.

27 **RESPONDENT OPPOSES PETITIONER'S REQUEST FOR A DOMESTIC VIOLENCE**
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1 22. He controlled access to household money and transportation.

2 23. He threatened that if I left him, he would take Mateo Julian Ramirez from me.

3 24. He regularly consumed alcohol in the home while the children were present.

4 25. The children became increasingly fearful of his anger and mood changes.

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7 **VII. GROCERY STORE INCIDENT — FEBRUARY 2025 (PETALUMA)**

8 26. In February 2025, Mr. Carter and I went to a grocery store in Petaluma, California with
9 Mateo Julian Ramirez.

10 27. Mr. Carter appeared irritated and had been drinking earlier in the day.

11 28. While standing outside the store near the parking area, an argument occurred.

12 29. Mr. Carter grabbed my hair near the back of my head and pulled it downward.

13 30. He spoke aggressively and refused to let go when I asked him to stop.

14 31. I was frightened and looked around to see if anyone was watching.

15 32. Mateo Julian Ramirez was in a stroller and began crying.

16 33. Mr. Carter released me and accused me of “embarrassing him.”

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19 **VIII. RESIDENTIAL INCIDENT — APRIL 2025 (SANTA ROSA)**

20 34. In April 2025, while living in Santa Rosa, another argument occurred after Mr. Carter
21 had been drinking.

22 35. Mr. Carter shoved me backward into a doorframe.

23 36. He blocked my path and again pulled my hair as I tried to leave the room.

24 37. Sofia Elena Ramirez and Ethan Miguel Ramirez witnessed this incident and began
25 crying.

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27 **RESPONDENT OPPOSES PETITIONER’S REQUEST FOR A DOMESTIC VIOLENCE**
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1 **38.** I feared further physical harm and felt trapped.

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3 **IX. DENIAL AND MINIMIZATION**

4 **39.** After each incident, Mr. Carter denied that anything abusive had occurred.

5 **40.** He told me I was “dramatic” and “unstable.”

6 **41.** He discouraged me from telling family or friends what was happening.

7 **42.** This pattern of denial and minimization caused me to fear retaliation if I sought help.

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10 **X. IMPACT ON CHILDREN**

11 **43.** The children have been repeatedly exposed to yelling, physical aggression, and alcohol-
12 fueled outbursts.

13 **44.** Sofia Elena Ramirez and Ethan Miguel Ramirez have expressed fear of Mr. Carter.

14 **45.** Mateo Julian Ramirez has been present during multiple incidents of physical
15 intimidation.

16 **46.** I believe continued exposure places all three children at risk of emotional and physical
17 harm.

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20 **XI. LEGAL BASIS FOR REQUESTED ORDERS**

21 **47.** Under Family Code § 3020, the health, safety, and welfare of children are the Court’s
22 primary concern.

23 **48.** Under Family Code § 3044, there is a rebuttable presumption that awarding custody to a
24 parent who has committed domestic violence is detrimental to the children’s best
25 interests.

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27 **RESPONDENT OPPOSES PETITIONER’S REQUEST FOR A DOMESTIC VIOLENCE**
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1 **XII. REQUESTED ORDERS**

2 **49.** I respectfully request that the Court issue a Domestic Violence Restraining Order
3 protecting me and my minor children: Sofia Elena Ramirez, Ethan Miguel Ramirez, and
4 Mateo Julian Ramirez, against Jason Carter.

5 **50.** I request sole legal custody of Sofia Elena Ramirez, Ethan Miguel Ramirez, and Mateo
6 Julian Ramirez.

7 **51.** I request sole physical custody of Sofia Elena Ramirez, Ethan Miguel Ramirez, and
8 Mateo Julian Ramirez.

9 =Any visitation by Mr. Carter should be denied or professionally supervised pending further
10 order of the Court.

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12 **I declare under penalty of perjury under the laws of the State of California that the**
13 **foregoing is true and correct.**

14 **Executed on:** _____

15 **At:** _____, California

16 **LUCIA RAMIREZ**

17 **Signature:** _____

18 **Date:** _____

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27 **RESPONDENT OPPOSES PETITIONER'S REQUEST FOR A DOMESTIC VIOLENCE**
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