

1 I, Zoe Simmons, come before the court to declare and say:

2 1. I am 30 years old and live at Address: 615 N. Pastry St. Paris,
3 France 0-110938

4 2. I am a pastry chef and met Emily Rodriguez while attending
5 Seattle Central Culinary School. She agreed to have a few
6 interns from the school, and I was selected as one. She
7 quickly found that my skills were very advanced, so she
8 hired me full-time.

9 3. Emily and I were great friends before the accident, but
10 since then, I have moved to Paris shortly afterward to
11 accept a job offer I couldn't refuse. I had gotten the
12 offer before the accident but hadn't told Emily yet as I
13 wasn't sure we would have the chance to talk much.

14 4. I was with Emily the night of the accident. We were having
15 a couple of drinks at The Spice Route and arrived at around
16 9:00 p.m. Emily had heard rumors that the owner was
17 interested in selling and that he had a backdoor business
18 of selling recreational drugs. Emily had a substance
19 problem with Adderall that I had helped support her through
20 for many years.

21 5. David Sullivan, the owner, stopped by our table to say
22 hello. David and I knew each other because we had long been
23

1 dating. David was in love with me and wanted to marry me,
2 but I wasn't ready and we broke before I moved to Paris.

3 6. After having a couple of cocktails, Emily and I left around midnight. I
4 was driving my Tesla. Just as we got in the car, a red Dodge Charger
5 came screaming around the corner and hit us straight on.

6 7. Emily was knocked unconscious. I am not sure if she was wearing her
7 seatbelt, as she often did not when we were driving together. I was
8 conscious as the driver-side airbag deployed.

9 8. I immediately got out of the car to call 911.

10 9. The red Dodge Charger backed up and left the scene. I noticed it had a
11 California license plate.

12 10. I saw two men in the car. I heard one of them say, "I can't believe
13 this! I don't need any more trouble with insurance. You are going to
14 pay for this! Why is this parking lot so dark?" I heard the other man
15 yell, "Stop panicking, just get us out of here. I don't want her to see
16 us." Then they drove off.

17 11. After calling 911, I waited for emergency services to arrive. Dave had
18 offered me a ride home. After the police officer told me it would take
19 about an hour, I decided to take Dave up on his offer.

20 12. I was very nervous that night because I was pretty sure the man in the
21 back of the car was my ex-husband, Billy Nihursky. We married in Los
22 Angeles, but then I divorced him before moving to Seattle because he
23 was abusive and extremely jealous.

24 13. I believe the car's driver was Travis Jackson, a full-time private
25 detective that Billy had hired to keep tabs on me. He followed me

1 everywhere. I once saw him sitting in the corner at The Spice Route,
2 taking photos of me and Dave together. I was very afraid of both.

3 14. Dave did not think Mr. Jackson was there for her. He jokingly told me
4 he thought Travis was a part of the local drug enforcement task force.
5 I thought he was joking, of course, but then, about a month later, I
6 discovered Dave was selling drugs out of his restaurant and did have an
7 addiction problem. That's when we broke up.

8 15. Since I moved to Paris, I haven't spoken to Emily much, and I believe
9 Billy has moved on. I'm terrified that if he finds out I've moved to
10 Paris, he will try to find me.