

Exhibit “B”

DECLARATION OF DR. LEKHA TULL, DDS.

I, Dr. Lekha Tull, DDS., declare:

1. I am over eighteen years of age, and have personal knowledge of the matters stated herein, and, if called as a witness, I could and would testify competently as to the matters stated below.

2. I am making this declaration in support of the Complaint filed on behalf myself and my husband, Dr. Herman Tull, Ph.D.

3. I am a 63-year-old woman who resides with my husband Dr. Herman Tull, Ph.D. in Princeton, New Jersey. My husband and I have been married for forty-three (43) years, and we have lived in Princeton, New Jersey for over thirty-five (35) years. During our marriage we have raised two sons, Jasha Tull, and Dr. Janak Tull, DMD.

4. My eldest son, Jasha Tull, is a performing artist and producer of electronic music, who performs regularly under the stage name "Space Jesus."

5. I have been a practicing general dentist for over three decades, and own and operate a practice named DenTull with my younger son, Dr. Janak Tull, DMD.

6. On or about the week of July 3, 2016, Michaela Higgins was invited to visit our family's homes in Princeton, New Jersey, and Harvey Cedars, New Jersey by my son, Jasha Tull. Jasha told me that he and Michaela Higgins, who I am informed and believe also goes by the name Caeli La, had recently become romantically involved. I first met Michaela Higgins/Caeli at our family home in Princeton before travelling to our vacation home in Harvey Cedars. My interactions and conversations with her were limited.

7. On or about the week of September 4, 2016, Michaela Higgins/Caeli arrived uninvited to our vacation home in Harvey Cedars, New Jersey. I was present with Jasha, and my sister, Pua Lei Pilai, was on a FaceTime (video) call. Michaela Higgins/Caeli proceeded to stand on our property and begin shouting loudly at us while we remained in the house. Michaela Higgins/Caeli berated us that she and Jasha were meant to be together, and that if he did not renew their romantic relationship, she would seek to destroy him personally and professionally.

8. Despite my shock at her appearance and the content of her statements, I offered to assist her in leaving the area by securing a change to her airline ticket, facilitating her return to the

1 West Coast of the United States. Michaela accepted this assistance, and her ticket was changed.
2 Attached as part of **Exhibit “G”** to the Complaint and incorporated by this reference as though fully
3 set forth herein is a true and correct copy of emails between myself and Michaela Higgins/Caeli La
4 showing her flight reservation.

5 9. Numerous times in the months and years following the September 2016 incident,
6 neighbors would state to me that they remembered the event, ask if we had any future contact with her,
7 and describe with specificity aspects of the event in question. My sister, Pua Lei Pilai, also has stated
8 to me that she recalls the event in question vividly (a copy of her Declaration to this effect is attached
9 to the Complaint herein as **Exhibit “D”** and incorporated by this reference as though fully set forth
10 herein).

11 10. Michaela Higgins/Caeli has contacted me via text message/SMS, Instagram, Facebook,
12 and Twitter. These contacts have been to my personal phone and to personal and professional social
13 media accounts. Upon information and belief, some of these contacts were made by Michaela
14 Higgins/Caeli or those under her direction and/or in collusion with her via pseudonymous social media
15 accounts. Attached as part of **Exhibit “G”** to the Complaint and incorporated by this reference as
16 though fully set forth herein are copies of those messages thus far recovered.

17 11. In one instance, I received a barrage of text messages from her, at first claiming he
18 “violated” her in some unspecific way, and then later that he “raped” her in an incident she asserted
19 was witnessed by Sam Eckstein and Austin Fry. She urged me to contact those witnesses, whose
20 statements to me directly conflicted with her assertion of what had allegedly occurred.

21 12. After speaking with Sam and Austin, I contacted Michaela/Caeli, raising the conflicting
22 narratives they and she described. I also asked her why she wanted to supposedly re-establish a
23 relationship with someone she simultaneously accused of the acts against her. Rather than answer my
24 question, I began receiving text messages from Michaela expressing supposed concern over alleged
25 substance abuse and drug dependency and supposed mental health issues. She then demanded that my
26 husband and I secure rehabilitation treatment for Jasha.

27 13. In another instance, Michaela Higgins contacted me via text message, alluding to
28 various accusations she had made against our son Jasha Tull. Over the course of at least nineteen (19)

1 text messages sent at one time, she berated me for not “believe[ing]” her accusations against my son,
 2 claimed without evidence he had multiple concurrent substance issues, and further berated me by
 3 imploring that I secure some undefined “help” for Jasha and that I could or should “make him” get
 4 some undefined “help”. (See **Exhibit “G”**.)

5 14. Upon information and belief, in the summer of 2020, an Instagram account with the
 6 name and/or ‘handle’ “@evidenceagainstspacejesus” was created on the platform.

7 15. The “@evidenceagainstspacejesus” Instagram account admits that it is controlled by
 8 the Instagram account “@caelila” (now controlled by “@caelislaysdemons”), which is known to me as
 9 the personal Instagram page of Michaela Higgins. (See **Exhibit “H”** (Admissions of Control of Social
 10 Media Accounts & Objectionable Posts) to the Complaint, incorporated by this reference as though
 11 fully set forth herein.)

12 16. The Twitter account “@caelila”, which is known to me as the personal Twitter account
 13 of Michaela Higgins, has also admitted to controlling the “@evidenceagainstspacejesus” Instagram
 14 Account. (See **Exhibit “H”**.)

15 17. On or about September 12, 2020, the Instagram account “@evidenceagainstspacejesus”
 16 left a comment on a photograph posted to my personal Instagram account. This comment accused me,
 17 to my bewilderment and dismay, of “abuse” of my son Dr. Janak Tull, DMD’s fiancé Joyce. The
 18 comment continued to reference unprovided “texts and emails” stating that I “treated [Joyce] like dirt”
 19 because of her relative financial condition and that of her immediate family. The comment continued
 20 to state that I “don’t care about love” but only “power, status, hierarchy, and most of all money.” The
 21 comment then continued to accuse me of improperly charging patients and other individuals for testing
 22 for COVID-19 and stating that “COVID TESTS ARE FREE.” The comment further stated that I
 23 “never taught [Jasha] right from wrong”, “only taught him to dominate, manipulate, profit, and
 24 exploit.” The comment continues this beratement as depicted in **Exhibit “G”**.

25 18. The false accusation of improperly billing for COVID-19 testing or any other related
 26 medical services lead to substantial distress, worry, and anger on my part. My practice is a licensed
 27 COVID-19 testing facility, and follows all laws and regulations in accordance with its licensure.
 28 Patients and other individuals who receive tests are billed in accordance with the CARES Act and all

1 other applicable laws, and we further distribute tests to community members who are uninsured
2 without charging them, on our own volition.

3 19. I am informed and believe that the Instagram account “@xxeyesaxx” is, and at all times
4 during its existence was, under the control of Michaela Higgins.

5 20. On or about the summer of 2020, the Instagram account “@xxeyesaxx” posted a
6 comment on a photo posted on my personal Instagram account. The comment described Jasha Tull as
7 my “r*pist p*do son”, and further repeated the false assertion that I or my practice improperly charged
8 patients for a COVID test. The comment also falsely stated that I had “publicly attacked so many of”
9 alleged victims of Jasha, and also falsely stated that I had “publicly attacked every artist who spoke
10 out about the allegations.”

11 21. Upon information and belief, Michaela Higgins/Caeli acquired information pertaining
12 to my clients, then posted it publicly on the internet.

13 22. Each time an account which I know or have reason to believe belongs to or is
14 controlled by Michaela Higgins/Caeli attempts to contact me, I use whatever feature is available on a
15 given platform to disassociate or “block” the account. In each such instance, there is a later
16 communication from an account I later learn or have reason to believe belongs to or is controlled by
17 Michaela Higgins/Caeli.

18 23. Michaela Higgins/Caeli has publicly posted a photograph carrying a firearm, and later a
19 photograph with her location stated to be in Long Island, New York, approximately a hundred miles
20 from our home. (See **Exhibit “I”** (Social Media Posts in New York and With a Firearm) to the
21 Complaint, incorporated by this reference as though fully set forth herein.)

22 24. In speaking with my son and reading his emails and text messages, I have become
23 aware of the fact that Michaela Higgins/Caeli has both directly and indirectly threatened his life, and
24 admitted to threatening him numerous times. (See **Exhibit “E”** (Jasha and Michaela – Written
25 Communications).)

26 25. The aforementioned facts and circumstances have caused me severe emotional distress.
27 I am incessantly worried about the impact of her false statements on my family, my practice, and my
28 own personal reputation. Personally, her actions have instilled fear, worry, and anxiety that the

1 reputation I have built over decades in my community as a licensed medical professional, parent,
2 volunteer, and member of my community has and will continue to be tarnished.

3 26. I work regularly with my son Dr. Janak Tull who is my partner in my business, a legacy
4 he has helped to continue to build and which I hope to leave him. These ongoing acts have given me
5 anxiety that he will be targeted and tarnished through attacks towards our practice and myself, and he
6 is aware of the various aforementioned ways she has targeted DenTull and myself, and by extension
7 him, as well as our patients. Many of our patients are both longstanding and active on social media,
8 and I have regularly faced inquiries about the accusations made by Michaela Higgins/Caeli against
9 myself, my practice, and my son Jasha.

10 27. I have been active in my community for decades, volunteering in local educational
11 organizations, among others, and often do so alongside my husband Herman. In light of his recent
12 retirement and as we enter a new chapter of our lives, he and I were planning on pursuing additional
13 ways to contribute our time and effort to our community. Michaela's false accusations and harassment,
14 along with their spread through our close-knit social circles and community, have forced us to not
15 reenter and engage with community life. As we enter a world in which the pandemic subsides and life
16 returns to some sense of normalcy, particularly as our family is now vaccinated, the prospect for
17 renewal of this harassment and its further spread have severely hampered the likelihood that our lives
18 will also return to that sense of normalcy.

19 28. Michaela Higgins' threats and public postings have created serious and escalating fears
20 for the physical safety of myself and my family. Her knowledge of our home addresses as well as that
21 of my business, combined with her prior history of confronting my family and I unannounced, along
22 with her apparent recent public postings a short drive away and with a firearm, all create significant
23 anxiety that she can or will act violently against us. This fear also extends to individuals either under
24 her control or inspired by her, as comments to her social media posts have encouraged violence, at
25 least against my son. A true and correct copy of those threatening posts are attached to the Complaint
26 as **Exhibit "J"** (Threats of Violence from Third Parties.)

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

3 *Executed March 4, 2021 at Princeton, New Jersey*

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6 Dr. Lekha Tull, DDS.
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