

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TINA KUFNER, MARY SEGUIN, KATHY LEE SCHOLPP,
GLORIA JOHNSON *pro se*
Plaintiffs (More to be Added) :

VS. : Case No.: _____

PAUL SUTTELL, in his individual capacity as Chief Judge of the Rhode Island Supreme Court; JUDITH SAVAGE, in her individual capacity as Associate Judge of the Rhode Island Superior Court; JEREMIAH JEREMIAH, HAIGANUSH BEDROSIAN, in their individual capacities as former and current Chief Judge of the Rhode Island Family Court; RAYMOND SHAWCROSS, DEBRA DISEGNA, STEPHEN CAPINERI, JOHN E. McCANN III, MICHAEL FORTE, KATHLEEN VOCCOLA, in their individual capacities as Associate Justices of the Rhode Island Family Court; Estate of GILBERT ROCHA; LORI GIARRUSSO, DAVID TASSONI in their individual capacities as “Mediation Specialist” of the Rhode Island Family Court and Patronage-appointed Guardians Ad Litem; SHARON O’KEEFE in her individual capacity as Director of Intergovernmental Affairs and the patronage-appointed Guardian ad Litem; the HEIRS of JUDITH LUBINER, JOHN P. PARSONS, PETER KOSSEFF, BRIAN HAYDEN in their Individual capacities as patronage-appointed “Court Psychologist”; KERRY RAFANELLI, PATRICIA MURRAY-RAPOZA, in their individual capacities as patronage-appointed Guardians Ad Litem; LINCOLN CHAFEE, in his individual capacity as Governor of the State of Rhode Island; STEVEN M. CONSTANTINO, in His individual capacity as Secretary of The Executive Office of Health and Human Services of the State of Rhode Island; SHARON A. SANTILLI, in her Individual capacity as Director of Child Support Office of the State of Rhode Island; PRISCILLA GLUCKSMAN in her : individual capacity as in-house counsel of the Child Support Office of the State of Rhode Island; PETER F. KILMARTIN, REBECCA PARTINGTON, in their individual capacities as the Attorneys General of the State of Rhode Island; HUGH T. CLEMENTS, JR., in his Individual capacity as Chief of Providence Police; STEVEN G. O’DONNELL, in his individual capacity as Chief of Rhode Island State Police; The Rhode Island Family Court; GERO MEYERSIEK; McIntyre Tate LLP; Adler Pollock And Sheehan, P.C.; GINA RAIMONDO, in her individual capacity as R.I. Treasurer; TEXTRON, Inc.; GIFFORD & PERKINS, P.C.; HOLT, GRAZIANO & HEBERG, P.C.; Rhode Island Unlawful Practice of Law Committee; LYNCH & FRIEL, P.C., DOMINIK KUFNER; DR. JENNY; SOPHIA MEYERSIEK; KARL SCHOLPP; KATHLEEN SCHLOPP; MARIE E. LYONS, DAVID SACKS, in their individual capacities as Associate Justices of the Probate and Family Court Department of Massachusetts; ANABELA

FRANCISCO, LAURIE SULLIVAN, ERIC INDYK, and JEFFREY MCNAMARA in their individual capacities as Massachusetts Social Worker of Department of Social Services; MICHAEL GREENBERG, In his individual capacity as Judge Sack's patronage appointee "Children's Law Project Attorney"; JOHN JOHNSON, in his individual capacity as Chief of Probation; BRENDA DOUGLAS, in her individual capacity as Visitation Supervisor; MARY SOCHA; BARBARA GRADY; NEVILLE BEDFORD; BARRY POLLOCK; ROBERT PARKER, CHARLES TAMULIVEZ, CHRISTOPHER HELIUIT, BRAD MARTIN, GERALD NISSENBAUM, AND DR JENNY from Hasbro Hospital; MAUREEN DICRISTAFARO, in her individual capacity as Guardian Ad Litem; KAREN LYNCH BERNARD; LAUREEN D'AMBRA in her individual capacity as Associate judge of Rhode Island family court

Defendants (More to be added)

PLAINTIFFS' COMPLAINT FOR DAMAGES, JURY DEMAND AND SPECIAL GRAND JURY DEMAND

1. Plaintiffs who are mothers with no prior criminal, health, drug abuse or any prior public infraction records and whose children are trafficked and exploited for pecuniary gain, TINA KUFNER, MARY SEGUIN, KATHY LEE SCHOLPP and GLORIA JOHNSON, as their Complaint against the named Defendants, state as follows: (the suit in damages is brought against state officials in their individual capacities)

PRELIMINARY STATEMENT FOR DEMAND FOR MONETARY DAMAGES

INCORPORATING FACTUAL ALLEGATIONS

2. This is a civil rights, fraud, CIVIL RICO and HONEST SERVICES FRAUD action brought by mothers, whose children were criminally kidnapped from them for ransom, extortion and endangered by the defendants with probable cause of rape, child pornography, child trafficking, kidnapping, criminal ransom, against COURT CON, against an interstate pandemic of state actors raping mothers of their children, destroying the Natural Law's mother-child familial unit and depriving children of their mothers for pecuniary gain, invoking federal diversity jurisdiction, a substantive due process action in part, brought by the Rhode Island, Texas, Massachusetts and New York Plaintiffs, pro se, seeking **monetary** damages for the pre-agreed executive actions and inactions that include a scheme to maintain certain **extortionate** under-color-of-state-law state programs or facades without bona-fide chartered programs, through **fraud**, in a scheme and for the purposes of illegally procuring federal funding and defrauding the United States, in a scheme and for the purpose of maintaining insider state patronage network and organizations that is customary in Rhode

Island and Massachusetts, including lobbyist firms and participating firms, the pre-agreed RICO syndicate judicial status quo, the quasi-judicial actions through the Rhode Island Thomas Fay Institutionalized Insider Court Network Empire Patronage Appointed for Kick-Backs and Bribery, through the Rhode Island and Massachusetts' referrals of criminal investigations to civil family courts resulting in inactions that endanger minor-age child victims for pecuniary gain via procurement of federal funding for civil programs and kidnapping children in a scheme to charge, sanction, force, threaten, or hold mothers for ransom to pay absorbent amount of fees just to see one's children (herein named judges and their patronage-appointed "arms of the court" who pay them kick-backs), and impermissibly abusing patronage relationships and state committees purposely staffed with patronage appointees, including former lawyers violative of ethics rules and who were disciplined and fined, in a scheme to thwart, intimidate and subvert the Plaintiffs' exercise of their Constitutional rights to petition the courts and Federal Article III for redress, to thereby retaliate against the Plaintiffs for seeking redress through court con, and the professional standards that **shock the conscience** in frequent, routine, systemic and total due process violations which are against the interest of the Public and to our entire Judicial System, intentionally depriving the Plaintiffs of their intangible right to honest services and fundamental right to due process, brought pursuant to the Supremacy Clause of Article VI of the United States Constitution, the Commerce Clause (Article I, Section 8, Clause 3), the Necessary and Proper Clause (Article I, Section 8, Clause 18), 42 U.S.C. § 1983, §1985, §1986, §1982 and §2000d *et seq.*, 18 U.S.C. §1961 *et seq.* (Civil Rico), 28 U.S.C. § 1332, and 28 U.S.C. § 2201 *et seq.*, and 18 U.S.C. sec. 1346, **seeking monetary damages and tort damages** due to negligence and intentional negligence against the corrupt Rhode Island and Massachusetts defendants for decades' long and on-going scheme to deprive the Plaintiff mothers of their intangible right to honest services and fundamental due process rights; for discriminatory, fraudulent, extortionate, prima facie ransom demands; for retaliatory, conspiratorial, racketeering and facial unconstitutional human rights violation practices; for their policies and pattern of local public corruption customs, that are utterly devoid of requisite professional nor honest services standards or due process that **shock the conscience**. The predatory lawyer defendants preyed on victims of domestic violence and abuse.

PARTIES

A. Plaintiffs

Tina Kufner

3. Tina Kufner is the natural/biological mother of two sons, JK (14 years old) and MK (12 years old). The Plaintiff Tina Kufner raised her two sons since their birth. The Plaintiff Kufner had noticed signs of sexual molestation, rape, incest, pedophilia, assault and battery displayed by her sons by blood their stool for over one vweek swollen and redden anus, infections in and around their mouths such as herpes, pains when walking, strange bacteria's found in stomach and in thier mouth, since 2006 persistent eye-twitching, by 2005 ongoing bed-wetting (only at fathers) hyper activity, trauma, sticking objects in anis (2006), night terrors, adult language, imitating father pee pee games, genital, strange bruises on body and neck (2006), unexplained back hips injury, strange drawing of dragons with sticks in mouth, naked dolls tied together naked with belt found in playroom, drawings (red and black), invisible friend coming to visit them at night and having parties, sudden anger and fear of their father, and sudden fear of being kidnapped by the father (actually the father did kidnap the children for over 20 days in February 2006). In 2006, Mrs Kufner also discovered a series of photographs taken by her ex-husband of nude photographs of her sons bending over with their anus spread and displayed scrotums and penis. Living in Germany at the time and unable to speak or understand the language fluently, Tina traveled to Rhode Island in 2007 to report to the local Cumberland Police, the F.B.I. and to state police.

4. Tina's ex-husband Dominik Kufner, at their first meeting in Hong Kong during one of Tina's business trips, admitted to being sexually abused by his own father, and promised that he would never do to his own children what his father did to him and his sister. He initiated a malicious scheme to thwart Tina from pressing criminal charges of child molestation, sexual assault on a child and rape against him either in Germany or in the United States, and so filed a fraudulent ex-parte civil action pursuant the Hague Convention on International Child Abduction at the United States Federal District Court of Rhode Island to unlawfully interfere with the on-going criminal investigations into his actions against his own children. Owning a private international textile conglomerate that showed net profits of \$500,000 in 2007, Dominik Kufner first hacked and drained all of Tina's business bank accounts as soon as her first child had been born, including her previous fashion designing business accounts in the United States, so that Tina no longer had access to any funds or

money of her own to defend herself, and then initiated concurrently over 40 cases against Tina in both countries simultaneously non-stop for a total of 5 years , bribed judges and initiated 3 different proceedings to demand attorneys fees against Tina for the same Hague Convention legal fees proceeding in Rhode Island from 2007 -2010, and procured three different judgments from three different courts (2 in Germany, 2 at the Federal District court of RI on in May 2007 and another in 2010 that can be used as 2 separate Orders for legal fees as they had been so intentionally written as such by the United States Federal District Court of Rhode Island of over \$300,000, and all in violation of due process, no notification, no hearing, no ability to file a complaint or motion for Relief against the Orders, in fact Tina living in Germany and not in the United States at the time the Court granted these Orders. Tina accidentally stumbled upon these Orders first by calling the District Court and in 2013 happened to go there for a totally different reason after relocating back to the States in 2011, the United States Federal District Court denied Tina's Motion for Relief on both counts and continues to grant legal fees for the same team of lawyers that represent Dominik's bogus Hague Convention proceeding, by double dipping using the long arm law, cross border jurisdiction and countries, submitted legal fees not to Dominik, but to Kufner textile offices in Canada, Munich, and in South Carolina constituting TRIPPLE billing. The objective of the scheme and enterprise con was to thwart criminal investigations into his rape of Tina and her children, procure children through court con so that he can have unfettered access to his prey and molest the children, and bankrupt Tina through stealing her marital property, empty their accounts, bribe judges and the corrupt Rhode Island court con enterprise participants, so that Tina could not protect her children or interfere with his unfettered access to her children for grooming minor age child for child pornography, molestation, and all forms of abuse imaginable, while increasing the abuse onto Tina long after he acquired custody of the children in the US, after he could not manage to obtain it in Germany in 2007, by finding attorneys and Judges that not only intentionally and neglectfully violated due process, ex-parte chamber conferences were held without Tina's knowledge, ex-parte conferences held go on and off the record, Judges granting Orders based on no hearings held. Guardian at Liam's has been assigned without holding a hearing or the ability for Tina to object, including the ability to go against the Guardian at Litem's Reports, in fact the report itself the Judge Orally denied Tina to have a copy of including the report from Dr Jenny, also contracted by the GAL via Oral Orders and Gage Orders. The GAL, who had no subject

matter jurisdiction to issue orders, transferred custody from Tina to Dominik based on Tina staying in a hotel with her children. Tina had been denied court transcripts on Appeal by the United States Federal District because Tina just could not afford it, and she was denied in forma pauperis, alimony payments garnished by the GAL to pay the GAL without a court order and without subject matter jurisdiction, and all the attorneys. All this rape and pillage occurred replete with Procedural and Substantive Due Process Violations, holding Court hearings without adequate notice to Tina.

Denial of a right to a hearing or to present (significant) evidence, Admission of a GAL report without the opportunity to cross examine the GAL, or Dr Jenny report, Admission of a custody evaluation without the opportunity to cross examine the custody evaluator, Denial of access to the court as a sanction for nonpayment of fees/costs when the litigant could not pay them. advocacy by a child's representative on behalf of child which contradicts the children's express wishes to stay and live with their mother, the effective or functional termination of parental rights indefinite suspension based on bogus reasons of all contact and all without meeting the clear and convincing standard required in Stanley v. Illinois, 405 US. 645 (1972, and Functional deprivation of parental rights completely cut off of access to children for over 6 years without finding of unfitness as required under Stanley v. Illinois 405 U.S. 645 (1972) . In Violation of Tina's First Amendment rights by preventing Tina conditioning parental access to speak, see, or have access to the children and prevented by the court to abandon her beliefs about the abuse or expression the reality of the abuse to her or the children on the record, in fact threatened by the Court to be sanctioned if Tina filed motions and with prejudice if Tina speaks about domestic Violence, to present the criminal authorities as witnesses to the photographs being identified as child pornography. In effect, the family court enterprise and the Rhode Island federal court threatened Tina with sanctions and abduction of her children from exercising her right to report crimes of domestic assault, domestic rape, sexual molestation of her sons and altogether suppressed allegations and evidence of criminal acts from being admitted into evidence in court. Tina is filing herewith a notice of felony.

Mary Seguin

5. Mary Seguin is the natural/biological mother of two daughters, S.S. (14 years old) and J.M. (13 years old). The Plaintiff raised her two daughters since their birth. The Plaintiff has been blamed by the state family court judicial actors, R.I. family court enterprise participants Paul Suttell and Gero Meyersiek for causing the family court to be under federal justice department investigation and insurance fraud investigation since 2002. The Plaintiff has caused the Executive Office R.I. family court enterprise participants and the State of Rhode Island judiciary to be under U.S. Justice Department investigation when the Plaintiff reported the R.I. family court enterprise participants ' criminal violations of federal laws, defrauding federal programs and funds, and the Constitution in 2010, 2011 and 2012. The Rhode Island state actors were jailing children for status offenses in un-transcribed proceedings behind closed doors in a scheme of terror to fine the children's parents under color of law. Then, the Rhode Island state actors concealed these illegal jailings in order to turn around and apply for and receive federal funds under the federal Juvenile Justice Delinquency Prevention Act that served to provide funding to state programs aimed at DETERING states from jailing children for status offenses. This is a central enterprise con by Rhode Island: illegally terminate rights in terror proceedings in order to extort private payments of fines and fees and then turn around and double dip into federal funding for social programs originally aimed at providing social services to the citizenry which the state is tasked with administering. Punished by the R.I. family court enterprise participants in retaliation for reporting their court con and defrauding the United States, embezzlement and turning around to terrorize mothers and children to double dip through extortions of fines and fees in exchange for constitutional rights removed in sham proceedings, the Plaintiff Mary Seguin, who had physical placement and custody of her two daughters since their births until January 2010, had her custodial rights and physical placement of her children summarily removed by the R.I. family court enterprise participant Michael B. Forte, in ex-parte communication with Gero Meyersiek and his agent, Barbara E. Grady, esq., through an "emergency" ex-parte deprivation procedural framework routinely abused in the state family court, in violation of federal and state laws, pursuant to insufficiently pleaded facts or basis in law, on mere speculation by the children's fathers that the Plaintiff had traveled out-of-state for work on certain days. Removal of all of the Plaintiff's parental rights was additionally predicated on the allegation that because her children resided in their home under the care of their decade-long live-in maternal grandmother who, because she allegedly

“did not speak English.” In addition to being a victim of fraud and retaliation by the Executive actors and Chief Judge Paul Suttell in his administrative capacity as Chief Judge of the R.I. Supreme Court, the Plaintiff is additionally a victim of harassing and bad faith state family court proceedings conducted to retaliate against the Plaintiff for exercising her right since 2002 to report the Rhode Island State judicial and executive actors for criminal fraud, racketeering, extortion under color of state law, embezzlement and embezzlement of federal funds in violation of the Juvenile Justice Delinquency Prevention Act. The Plaintiff is further a victim of harassing and bad faith state court proceedings conducted based on facial racial and ethnic discriminatory animus against the Plaintiff because her mother allegedly does not speak English. A total of THIRTY-TWO (32) such ex-parte deprivations were issued by the R.I. family court enterprise participant against the Plaintiff for retaliatory and racketeering motives, facially predicated on nothing other than she is moving or moved out of the state and her mother allegedly does not speak English, in a matter of 36 months, averaging one ex-parte deprivation every 4 weeks. The state family court proceedings do not involve any coercive state initiated proceedings of abuse or neglect against the Plaintiff.

The Rhode Island Department of Children, Youth and Family Services is not involved in any of the proceedings. (emphasis added). The Plaintiff remarried in 2010. She is domiciled in the state of Texas. Because the Plaintiff remarried an out of state resident and is domiciled in Texas, the R.I. family court enterprise participant found it easy to fraudulently issue (30+) ex-parte facially fraud domestic violence orders forbidding any contact with her daughters, with hand-scrawled “*without findings of fact or admissions,*” and “Protect GAL Report” without basis in law or fact, for mere allegations that the Plaintiff made telephone calls, for the purpose of retaliating against the Plaintiff for reporting the R.I. family court enterprise participant ’ systemic judicial abuse and violation of federal laws and the Constitution, and causing the R.I. family court enterprise participant and the State of Rhode Island’s Executive Office to be investigated by the United States Department of Justice, including sending a delegation from Washington, D.C., on site to Rhode Island to investigate. The Plaintiff had physical placement and custody of her two daughters since their births until January 2010 when her custodial rights and physical placement of her children were summarily removed by the state family court justice Michael B. Forte, through an “emergency” ex-parte deprivation procedural framework routinely abused in the state family court, in violation of federal and state laws, pursuant to insufficiently pleaded facts or basis

in law, on mere speculation by the children's fathers that the Plaintiff had traveled out-of-state for work on certain days. Removal of all of the Plaintiff's parental rights was additionally predicated on the allegation that because her children resided in their home under the care of their decade-long live-in maternal grandmother who, because she allegedly "did not speak English," the children's best interests were jeopardized and therefore the Plaintiff's custody and parental rights should be removed on ex-parte. Because the Texas Plaintiff reported to federal law enforcement agencies acts of racketeering, fraud and retaliation against the family court justices in 2002, 2004, 2005- 2006, 2010, 2011 and 2012, the R.I. family court justices issued thirty-two (32) ex-parte deprivations without basis in law or fact, for mere allegations that the Plaintiff traveled out of state and that her mother does not speak English. The Plaintiff reported the family court justices' systemic practice of conducting deprivation proceedings without stenographic recording in family court to cover up illegal proceedings. The Plaintiff's tax returns show she was unemployed since 2008, received unemployment payments from 2008 to 2009, and did not work in 2010, 2011 or 2012 or 2013 either. The Plaintiff's tax returns further show she never earned \$150,000. The Plaintiff has never been employed by Bank of America. The Plaintiff has been, as a matter of record before the state family court, physician-certified to be medically disabled suffering from pregnancy complications, under-went emergency surgery, suffering from post-surgery complications that render her unable to travel or work, since June 2010 to 2012.

5a. Mary Seguin's case shows crystal clear that the Rhode Island family court enterprise is a RICO enterprise, that through fraud, schemed to and did abduct Seguin's daughters under color of law for ransom demands of \$50,000 by the GAL, who even wrote the demand within the GAL Report. The reason? Because the GAL speculated that Seguin took her children on a trip to Texas without telling the GAL. Since when do citizenry have to report their leisure trips to the state government for permission? The Constitution clearly states that the United States is not a Stalinist State. Because of this prima facie evidence of ransom demands written within the GAL report, defendant Bedrosian initiated a facially sham domestic violence ex-parte temporary restraining proceeding 8 months after Seguin moved out of Rhode Island to Texas, without personal jurisdiction, and renewing each 21-day "temporary" restraining order upon its expiration over thirty times from January 2011 to the present, as a way to "Protect GAL Report" that is hand scrawled on the sham orders from being forwarded to the F.B.I. and the U.S. Department of Justice as prima facie evidence of

criminal embezzlement, kidnapping, ransoms, obstruction of justice and extortion. The afore-described organized crime is clearly a RICO enterprise for pecuniary gain, as are the Plaintiff mothers cases described herein. In Rhode Island, supervised visitation has become a business enterprise, where mothers are shuttled often on ex-parte temporary orders without any stenographic transcription, into supervised visitation for nothing other than to charge them private fees to see their children, and then double dip into federal funding provided for supervised visitation under various federal programs. In Seguin's case, the family court RICO enterprise thought Seguin must be moving to Texas to marry a rich oil man, so the RICO enterprise demanded that Seguin pay \$50,000....! And the ransom demand for \$50,000 was written in the GAL report. After Seguin filed written criminal charges to the FBI and USDOJ, the family court enterprise initiated a sham DV proceeding against Seguin 8 months after Seguin moved out of Rhode Island, while Seguin was 8 months pregnant in Texas, on the verge of giving birth. Hand written on all the ex-parte 21-day temp restraining orders that were renewed upon the expiration of each, is "Protect GAL Report." This Court might ask why a DV order protects a THING, a GAL report. Of course, the GAL report contains the demand of \$50,000 if Seguin wanted to see her daughters, making the sham DV proceeding, that is also funded by federal dollars, motivated and showing proximate cause that it is intended to cover up evidence of their RICO extortion and violation of the Hobbs Act and to dissuade Seguin under color of law to forward the GAL report to the F.B.I., interfering with an on-going criminal investigation.

State and federal courts are complicit in perpetuating, aiding and abetting this enterprise pecuniary-interest driven terror against mothers and children. Seguin is filing herewith in this case a notice of felony.

Kathy Lee Scholpp

6. Plaintiff mother Scholpp is an Air Force Sergeant who was called into active duty in February 2003. While she was on active duty, she still took care of her son as the primary care provider, given she only went to training on the weekends, when she placed one and half year old, in the care of her own mother, who was also a former Department of Social Services employee. Her ex-husband's sister, Kathleen, was a registered sex-offender. In the spring, Karl, her ex-husband, had visitation with his two children ages 2 and 5 from his first marriage. Karl had been an altar boy and his priest Father Michael Devlin had sent him to a

private school. (Father Devlin often offered victims an education in exchange for sex and was defrocked for child molestation in 2004.) Karl told Kathy Lee that he had sex with a neighbor boy for four years from ages 8 to 12, but told her that he was “over it”. Karl brought 1½ year old H back from a visit at his paternal grandparents home, where Karl’s sister Kathleen resided. H was crying due to his painfully red and swollen genitals. The paternal family stated they did not know how the injury occurred.

7. On another occasion, Karl cocked his fist at Kathy Lee, shouting, “Come here, I’ll punch your f-cking teeth out.” H witnessed this outburst.

8. In 2004, on February 22, 2 ½ year old H climbed onto Kathy Lee’s head, pressed his diaper into her face and said, “Susck my cock, Mommy. Mommy, susck my cock.” Kathy Lee first believed that Karl's sister Kathleen had sexually molested H, since Kathleen had been previously documented as a sex offender by the Department of Social Services (DSS) after she bit Karl's daughter on the buttocks, leaving bruises. Karl’s first wife had a restraining order against Karl’s sister and revealed to Kathy Lee that Karl’s whole family is involved in incest.

9. On March 1, 2004 Kathy Lee reported H’s disclosure to the state police in Russell, Massachusetts. The trooper Eric Fairchild said, “These things are very hard to prove.” He made a mandated report to DSS, which refused to forward the case to the District Attorney.

10. Instead of investigating child rape, pedophilia, assault and battery by Karl’s family, DSS social worker Anabela Francisco charged Kathy Lee with 'neglect' for continuing to live with Karl and for being late with immunizing H. Immunizing is a parental choice and can never be mandated by the State. H’s maternal grandmother, former head of a state welfare department and an eye-witness to H's sexualized behavior, sent strongly-worded letters to DSS for failure to protect H. Her letters were ignored by social workers Laurie Sullivan, Eric Indyk, and Jeffrey McNamara among others. Kathy Lee’s attorney Greg Hession insisted that Kathy Lee meet with DSS only in his office. Attorney Michele Lucier-Lazuk also worked on the case and recommended that Kathy Lee not report the abuse.

11. Between March 17 and May 1, 2004 on advice from her attorney, Kathy Lee and H sought protection at a domestic violence shelter. While there, Kathy Lee had a psychological evaluation by Scott Andrews who gave her a clean bill of health. Astonishingly, social worker Jeffrey McNamara told Karl where Kathy Lee and H were

staying. Karl's sister Kathleen began calling the domestic violence shelter, eventually forcing Kathy and H to move from the shelter. Karl filed for divorce during this time.

12. In April, 2004 Karl agreed to supervised visits with H, monitored by H's maternal grandmother. Karl was ordered to undergo a psychological evaluation, which he refused to do.

13. On July 8, 2004 Judge Marie Lyons gave Karl overnight visits with H. H's disclosures escalated. He began to display increased aberrant sexual behaviors, such as masturbating on furniture, with his teddy bear, and on people. He continued to disclose what Karl, his aunt Kathleen, and his half-sister Lauren (then aged 9) were doing to him. Sobbing, he begged and pleaded not to be made to go to see Daddy. His maternal grandmother tape-recorded his pleas.

14. Between July 2004 and December 2005, H's disclosures and injuries were documented by his pediatrician David Steele MD, a forensic investigator David Myers, a child therapist Jason Ravizza, his maternal grandmother, a friend of the family school nurse Ellen Carvalho, his daycare provider Mary Cook, and his mother Kathy Lee. Injuries to his genitals were recorded three times by his pediatrician. Five suspected child abuse reports from H's therapist were 'screened out' by DSS. None were reported to criminal law authorities for criminal investigation.

15. A log was kept of the child H's disclosures, which numbered over 150 incidents and were submitted as evidence to the court. H said, "Daddy licks my butt." "Kaffy (Karl's sister Kathleen) puts sweet stuff on her pee-pee, I lick it." "Wauren sticks blocks up my butt. Lauren thinks it feels good. It does NOT feel good!" " and "Wauren won't swallow, I swallow." H would wake from sleep in terror shouting, "No! No, not my backdoor...Not me!"

16. H was mute during a Multi Interdisciplinary Team interview; upon its completion he told Social Worker Jennifer Lomelino, "If I talk, Daddy will kill Mommy."

17. On December 22, 2004 in a 2 day trial, Kathy Lee was called a "coacher" and "alienator" by Karl's attorney Mary Socha. Judge Lyons did not allow H's therapist to testify and gave Karl full physical and legal custody. On December 27, 2005 State police entered Kathy Lee's home through an unlocked cellar door as Karl waited outside putting a message

on her cell phone, “Bring him out, don’t make this any harder than it has to be.” Four and a half-year-old H was forced into Karl’s custody at gun point.

18. Kathy Lee had no contact with H for 18 days, and then received supervised visitation for 4 hours at \$300 per week with a court-mandated agency. She was required to submit 15 job applications per week even though she already was holding a job position as a letter carrier. She was ordered to undergo a psychological evaluation with a court-chosen psychologist Victor Carbone, and was told that no visitation would take place until she did so. While Karl had refused to have a psychological evaluation, Kathy Lee obeyed the order and had a clean bill of health.

19. In 2005 Judge Lyons continually denied Kathy Lee’s motions for unsupervised visits.

20. Kathy Lee filed an appeal in December 2005 through her attorney Jim Smith. Kathy Lee discovered that Judge Lyons was continuously disciplined by the Massachusetts Judicial Misconduct and Disciplinary Committee since 2001, placed on unpaid leave and prohibited from sitting as judge, but never properly and adequately disclosed to the public, akin to the Catholic Church’s continuous placement of sexual abuser priests among unsuspecting church communities.

21. In 2006, from April through September, H was separated from any contact with his mother for 6 months due to visitation fee demands. The visitation service took Kathy Lee to small claims court, for over \$600 owed.

22. On September 1, 2006 Judge Lyons was removed from the bench for her unethical behavior in the case after complaints to the Commission on Judicial Conduct. After Judge Lyons was removed, H was able to visit his mother supervised by the YWCA.

23. In 2007, Judge David Sacks continued to deny motions for unsupervised visits, ordered a guardian ad litem Linda Cavallero PhD chosen by Karl’s attorney, and ordered Kathy Lee to pay \$7,000 for the 64-page report. The GAL report stated, “give H back to mother immediately, four nights a week.”

24. Judge Sacks ignored the report that he himself had ordered and appointed a “Children’s Law Project” attorney, Michael Greenberg who refused to meet with Kathy Lee and stated “no unsupervised visits for mother.”

25. The appeals court affirmed Judge Lyon’s decision to place H with Karl.

26. In 2008, YWCA personnel reported H’s continued disclosures to Karl, rather than to DSS, and falsified records.

27. Chief of Probation John Johnson, who made reports to the court although Kathy Lee was not on probation nor ever accused of a crime, filed a motion to force her to seek work with a temporary agency.

28. Kathy Lee filed a complaint against him on the advice of advocate Armene Margosian.

29. Kathy Lee was told by an employee at the visitation center that the complaint angered her visitation supervisor Brenda Douglas, a friend of the Chief of Probation. On August 16, 2007, during a supervised visit, Kathy Lee read a note from H's maternal grandmother that said, “H, Grandma and Grandpa love and miss you and hope to see you soon.” This was the last time H saw his mother. The last thing H said to his mother was “Mommy, you can call me every day! I’ll say that it’s somebody else, I’ll say that it’s (one of his school friends)”. Visitation supervisor Brenda Douglas suspended Kathy Lee’s next visit and sent a letter of reprimand against her to the Chief of Probation.

29a. The Joint Stipulation, dated, December 1,2005, by reference is made a part hereof. Defendant Socha wrote this order, supposedly by Defendant Judge.Marie Lyons. It purposely does not say what the “stipulation” is. Then, Defendant Smith and Defendant Socha went into the file and wrote in: “Kathy Lee Scholpp shall not be left alone with the parties’ minor child, or participate in his child care.” instead of: “Kathleen Marie Scholpp shall not be left alone ...” This constitutes intentionally tampering with the record.

29b. The most startling aspect of the case is that the divorce proceedings is LISTED AS "UNCONTESTED On Feb 2, 2006, defendant Smith contacted defendant Socha requesting written confirmation of the terms of the stipulation, specifically, that Karl L. Scholpp's sister, Kathleen Marie Scholpp, would not be left alone with the parties' minor child, H Scholpp, and would not participate in the child care of H Scholpp. (See Exhibit B).

29c. On Feb 7, 2006, defendant Socha to Smith: I do acknowledge that clause #9 was added to the "Uncontested Facts" stating that Kathleen Marie Scholpp would not be left alone with the parties' minor child, H Scholpp, and would not participate in the child care of Holden Scholpp. This was a deal made in exchange for Plaintiff Kathy Lee Scholpp not calling Kathleen Marie Scholpp to the witness stand.

29d. Reference DSS Social Worker Aimee Arizmendi's report of 5/29/2003, investigation where same alleged perpetrator, Kathleen M. Scholpp was supported of neglect and physical abuse of Karl Scholpp's daughters, Kirsten and Lauren Scholpp.

29e. Concerns of physical abuse and neglect by paternal aunt Kathleen M. Scholpp were brought up and resulted in a support of these allegations. (YET, KATHLEEN IS RAISING HOLDEN) Mother (Lizbeth Scholpp) has secured a restraining order against Kathleen M. Scholpp and she will not be used as a caretaker for the children. Kathleen's teeth marks were found on Kirsten's rear end.

29f. The restraining order was in effect for a full year from 06/18/02 to 06/18/03.

29g. The GAL was provided with copies of all restraining orders, and yet did not call Kathleen on the lie that the R.O. was for "just one weekend..., perhaps it was a week, then she got an attorney and the charges were dismissed" (Ref. page 33)

29h. The defendant shall pay the plaintiff child support in the sum of eighteen and 46/100 (\$18.46) dollars each and every week.

29i. Fifteen job applications per week. Karl gets tax exemption for minor child. Karl maintains medical insurance for minor child (which according to his financial statement is now Blue Cross/ Blue Shield and no longer Connecticare).

29j. Psychological Assessment of Karl Scholpp. The Plaintiff Scholpp attempted to resurrect her motion for a psych-eval (sex offender evaluation) on Karl Scholpp, as agreed to by temporary order on 04/14/04 and recommended by David Meyers' report. This motion was stated by Socha as 'dismiss' but Smith stated 'pass' in front of Sacks' bench.

29k. The Plaintiff also sought enforcement of the court order on Kathleen M. Scholpp, requiring proof of compliance with the order for the protection of Holden Scholpp, as addressed in court order dated 09/19/06; "Presence of Kathleen M. Scholpp paternal aunt with minor child".

29l. The Plaintiff filed contempt for their violation of this order, but was advised by Smith to drop it as it "would make you look bad and you had no pictures of Holden alone with her as proof".

29m. H was cloistered with his abusers with no outside observation or exposure to the community at Kathleen's home and Karl's apartment for nine months before being plunked in daycare in September. That is called "Tampering With the Witness".

29n. Plaintiff has a list of witnesses that shall be called.

Karl L. Scholpp; Jay Sutter; Carol Lee Holmes; Barbara E. Lee; (Holden's teacher) Susan Goldstein; Kathleen M. Scholpp; Catherine F. Scholpp; Fred Scholpp; Christine Scholpp; Mark Lavoie, former colleague of Karl's whose numbers are in Karl's rolodex, busted for internet child porn and cocaine; Fr. Michael H. Devlin, defrocked in 2004 for past child molestation, under whom Karl became an Altar Boy; Freddy Alamed, Karl's boyhood sex partner for four years; Y.W.C.A.; Fund for Hope and Healing (A Catholic Organization involved in the investigation of Fr. Michael Devlin; Robert Stacey, Lizbeth's latest husband, about whom H said "She threw him out. He was teasing Lauren. He stuck his nose up her butt!" (quoting his father); Mrs. Wayne DeCillis, Karl's cousin's wife. Reserve the right to call more, of course. A list of all exhibits: GAL Report, DSS Record (showing Karl L. Scholpp supported of Neglect), Jason Ravizza's Records, H Scholpp's current Pediatric and School Records; Fair Hearing verdict, withheld by DSS since February 8, 2006, Y.W.C.A. record of Karl's failure to produce H for Plaintiff Scholpp's visitation. Meanwhile defendant Karl perjured about his income: his net weekly income according to line 6 is \$244.46. His total weekly expenses are \$363.00. That leaves him -\$118.54 in the hole per week. On top of that he has legal fees of potentially \$13,100 and credit card weekly payments of \$170 per week. How does he pay his credit card, lawyer, food, gas, uninsured medicals, if he's in the hole -\$118.54 each week?

Gloria Johnson

30. Gloria Johnson filed claims in the Rhode Island Superior Court against Kosseff, Rafannelli and Lubiner for the afore-described court con of quack state-coerced psychological treatment, with Rafanelli as opposing counsel throughout six years or more of her case threatened, with Kosseff and Lubiner to put Gloria's children in Rachel foundation in Texas for "deprogramming" through experimental treatment. This type of radical Stalinist

Gulag state coercion court con has NO place in American society and is horrifying. What does Superior Court Judge Judith Savage do? She accused Gloria Johnson of unlawful practice of law helping her children to file their claims in Superior Court and ordered Gloria to be investigated by the Unlawful Practice of Law Committee that is staffed with lawyers who were disbarred in other states for unlawful practice of law! Subjecting Johnson to court con fabricated charges of unlawful practice of law, of course nothing came of the “investigation” by a committee staffed with disbarred lawyers discarded by other states, Savage dismissed Johnson’s claims against Rafannelli under quasi-immunity theories. Savage retired from the bench in August 2013 leaving vacant a seat for which Rafannelli now seeks to fill. The allegedly quasi-immune Rafannelli had not just tried to refer Johnson’s children to out of state experimental treatments for a buck, he also brought his own mother to forcibly enter Livingston’s home under the guise of conducting a home study on Livingston, under false pretenses that his mother is a court personnel. Such is the caliber of candidates for the Rhode Island judiciary nowadays.

B. Defendants

PAUL SUTTELL

31. Paul Suttell is the Rhode Island Supreme Court Chief Judge. He is sued in his individual capacity as Chief Judge of the Rhode Island Supreme Court for damages. The defendant Paul Suttell is not sued in his judicial capacity, but is sued in his administrative and supervisory capacity, who is tasked, among other things, to supervise all lower courts, control lower courts’ budgets, supervise the administrative function of Haiganush Bedrosian, including her administrative function to supervise all court stenographers in Rhode Island family court to make accurate transcriptions of court proceedings, and the administrative function of ensuring that lower courts do no engage in unlawful activities, including acts by all R.I. court employees of shredding of documents for pending or impending litigation, demands of \$50,000 as a condition to see one’s children, demands of \$25,000 as a condition to see one’s children in Texas, impounding of litigants’ assets upfront calculated to award to patronage appointees with creative labels who allegedly “aid the court,” issuances of facially fraudulent court orders that facially steals \$10,000 from upfront-impounded litigants’ assets to counsels of adversaries in a case where the lawyers both allegedly represent the interests of the parties’ minor child, aiding and abetting of criminal insurance fraud, or maintaining facially fraudulent domestic violence proceedings using federal assistance funding against a

federal informant after she reported violations of federal law by state family court judges under his supervision, or conducting fraudulent child support proceedings, fraudulent parental right deprivation proceedings, or fraudulent domestic violence proceedings by any of the lower courts in retaliation against the Plaintiff for reporting federal law violations by the R.I. State judiciary agencies to federal law enforcement agencies. He is further sued in his individual capacity in non-judicial activities for conspiring and engaging in racketeering, fraud, money laundering and obstruction of justice acts under color of state law against the Plaintiff. He is further sued for his actions or inactions in leading the state court agency enterprise as it relates to the conspiracy and fraud allegations herein.

JUDITH SAVAGE

32. Judith Savage is a retired Associate justice of the Rhode Island Superior Court. She is sued in her individual capacity as Associate Judge of the Rhode Island Superior Court for damages.

JEREMIAH JEREMIAH

33. Jeremiah Jeremiah is the former Chief Judge of the Rhode Island Family Court. He is sued in his individual capacity for damages.

HAIGANUSH BEDROSIAN

34. Haiganush Bedrosian is the Chief Judge of the Rhode Island Family Court. She is sued in her individual capacity for damages.

RAYMOND SHAWCROSS

35. Raymond Shawcross is an Associate Judge of the Rhode Island Family Court. He is sued in his individual capacity for damages.

DEBRA DISEGNA

36. Debra DiSegna is an Associate Judge of the Rhode Island Family Court. She is sued in her individual capacity for damages.

STEPHEN CAPINERI

37. Stephen Capineri is an Associate Judge of Rhode Island Family Court. He is sued in his individual capacity for damages.

JOHN E. McCANN III

38. John McCann III is an Associate Judge of Rhode Island Family Court. He is sued in his individual capacity for damages.

MICHAEL FORTE

39. Michael Forte is an Associate Judge of Rhode Island Family Court. He is sued in his individual capacity for damages.

KATHLEEN VOCCOLA

40. Kathleen Voccola is an Associate Judge of Rhode Island Family Court. She is sued in her individual capacity for damages.

Estate of GILBERT ROCHA

41. Gilbert Rocha is deceased and a former Associate Judge of the Rhode Island Family Court. The Estate is sued for damages.

LORI GIARRUSSO

42. Lori Giarrusso is a mediator employed by the Rhode Island Family Court and patronage appointed supervised visitation supervisor and Guardian ad Litem. She is sued in her individual capacity for damages.

DAVID TASSONI

43. David Tassoni was a mediator employed by the Rhode Island Family Court and patronage appointed supervised visitation supervisor and Guardian ad Litem. He conned the Public by lying that he is a lawyer when he is not, from 1999 to 2011. He is sued in his individual capacity for damages.

SHARON O'KEEFE

44. Sharon O'Keefe is sued in her individual capacity as Director of Intergovernmental Affairs and the patronage-appointed Guardian ad Litem

HEIRS of JUDITH LUBINER

45. Judith Lubiner was the listed "Access and Visitation" of Rhode Island and its Federal Contract with the United States under the supervised visitation program under the Violence Against Women Act. She was the patronage-appointed court psychologist. Her heirs are sued in their individual capacity for damages.

JOHN P. PARSONS

46. John Parsons is the patronage-appointed court psychologist and is sued in his individual capacity for damages.

PETER KOSSEFF

47. Peter Kosseff is the patronage-appointed court psychologist and is sued in his individual capacity for damages.

LAUREEN D'AMBRA

37a. Laureen D'Ambra is sued in her individual capacity as the associate judge of the Rhode Island family court. She had forced Plaintiff Johnson's children to be placed in supervised visitation with their sexual abuser and sex offender under Defendant Kosseff causing them to be permanently harmed and the Plaintiff to be harmed and damaged emotionally.

BRIAN HAYDEN

48. Brian Hayden was the listed "Access and Visitation" of Rhode Island and its Federal Contract with the United States under the supervised visitation program under the Violence Against Women Act. He is the patronage-appointed court psychologist. He is sued in his individual capacity for damages.

KERRY RAFANELLI

49. Kerry Rafanelli is the patronage-appointed Guardian ad Litem and is sued in his individual capacity for damages.

PATRICIA MURRAY-RAPOZA

50. Patricia Murray Rapoza was the patronage appointed Guardian ad Litem and is sued in her individual capacity for damages.

LINCOLN D. CHAFEE

51. Lincoln D. Chafee is the Governor of the State of Rhode Island. He is sued in his individual capacity for damages.

STEVEN M. CONSTANTINO

52. Steven M. Constantino is the Secretary of the Executive Office of Human Health and Services of the State of Rhode Island. He is sued in individual capacity for damages.

SHARON A. SANTILLI

53. Sharon A. Santilli is the Director of Office of Child Support of the State of Rhode Island. She is sued in her individual capacity for damages.

PRISCILLA GLUCKSMAN

54. Priscilla Glucksman is the in-house counsel of the Child Support Office of the State of Rhode Island. She is a personal friend of Gero Meyersiek. She socializes with Gero Meyersiek at Lincoln School functions, in Providence, R.I. Her husband, Richard

Glucksman, is a former campaign aid and manager of R.I. Rep. Langevin. She is sued in her official capacity for prospective relief and individual capacity for damages.

PETER F. KILMARTIN

55. Peter F. Martin is the State Attorney General of the State of Rhode Island. Elected in 2010, Kilmartin had campaigned on an anti-corruption platform, acknowledging the pervasive corruption in all levels of the government in notoriously corrupt Rhode Island. He refuses to investigate the criminal enterprise alleged herein because of the policy “it is improper to investigate my friends, family and mistress.” He is sued in his individual capacity for damages.

PATRICK LYNCH

56. Patrick Lynch is the former State Attorney General of the State of Rhode Island. . He refused to investigate the criminal enterprise alleged herein because of the policy “it is improper to investigate my friends, family and mistress.” His brother William Lynch is a court enterprise syndicate member, a partner at defendant McIntyre Tate Lynch and Holt, and Adler Pollock & Sheehan. He is sued in his individual capacity for damages.

REBECCA PARTINGTON

57. Rebecca Partington is the State Assistant Attorney General of the State of Rhode Island. She refuses to investigate the criminal enterprise alleged herein because of the policy “it is improper to investigate my friends, family and mistress.” She is sued in her individual capacity for damages.

SUSAN URSO

58. Susan Urso is the State Special Assistant Attorney General of the State of Rhode Island. She refuses to investigate the criminal enterprise alleged herein because of the policy “it is improper to investigate my friends, family and mistress.” She is sued in her individual capacity for damages.

HUGH CLEMENTS, JR.

59. Hugh Clements, Jr. is sued in his individual capacity for damages. He deprived the Plaintiffs of their rights to honest services. He refuses to investigate the criminal

enterprise alleged herein because of the policy “it is improper to investigate my friends, family and mistress.”

STEVEN O’DONNELL

60. Steven O’Donnell is sued in his individual capacity for damages. He deprived the Plaintiffs of their rights to honest services. He refuses to investigate the criminal enterprise alleged herein because of the policy “it is improper to investigate my friends, family and mistress.”

GERO MEYERSIEK

61. Gero Meyersiek is sued for damages for his scheme with Textron and the R.I. state actors to deprive the Plaintiff Seguin of her constitutional rights, right to honest services, fraud, perjury, nondisclosure, and personal injury.

MCINTYRE TATE LLP

62. McIntyre Tate is sued for damages for its scheme with Gero Meyersiek, Textron and the R.I. state actors to deprive the Plaintiff Seguin of her constitutional rights, right to honest services, fraud, nondisclosure, and personal injury.

ADLER POLLOCK AND SHEEHAN, P.C.;

63. Adler Pollock and Sheehan PC is sued for damages for its scheme with Gero Meyersiek, Textron and the R.I. state actors to deprive the Plaintiff Seguin of her constitutional rights, right to honest services, fraud, nondisclosure, and personal injury.

TEXTRON, Inc.

64. Textron Inc is sued for damages for its scheme with Gero Meyersiek, Textron and the R.I. state actors to deprive the Plaintiff Seguin of her constitutional rights, right to honest services, fraud, nondisclosure, and personal injury.

GINA RAIMONDO

65. Gina Raimondo is the Treasurer for the State of Rhode Island. She is sued in her individual capacity as R.I. Treasurer for damages.

GIFFORD & PERKINS, P.C.

66. Gifford & Perkins is sued for damages for its scheme with the Rhode Island state actors to deprive the Plaintiffs of their constitutional rights and rights to honest services.

HOLT, GRAZIANO & HEBERG, P.C.

67. Holt, Graziano & Heberg, P.C. is sued for damages for its scheme with the Rhode Island state actors to deprive the Plaintiffs of their constitutional rights and rights to honest services, scheme to defraud and scheme to aid and abet criminal acts of child rape, child molestation and refusal to report said crimes to criminal law enforcement authorities.

Rhode Island Unlawful Practice of Law Committee

68. The Rhode Island state committee for unlawful practice of law is sued for its retaliation of Gloria Johnson and for its false investigation of Gloria Johnson under false pretenses to deter her civil prosecution of court con by Lubiner, Kosseff and Rafannelli.

LYNCH & FRIEL, P.C.,

69. Lynch and Friel is sued for damages for its scheme with the Cranston Cabal, Jeremiah Jeremiah, William Holt, Patricia Murray Rapoza and Gero Meyersiek, Textron and the R.I. state actors to deprive the Plaintiff Seguin of her constitutional rights, right to honest services, fraud, nondisclosure, and personal injury.

KAREN LYNCH BERNARD

69a. Karen Lynch Bernard is sued for damages for billing Plaintiff Gloria Johnson \$40,000 and then dropped her case. Lynch & Friel's partner John Lynch Sr. had the audacity to continue harassing the Plaintiff Johnson with bills sent in the mail of the \$40,000.

DOMINIK KUFNER

70. Domink Kufner is sued for damages for his scheme to defraud Tina Kufner through bribery of the Rhode Island state judicial defendants, child molestation, embezzlement, money laundering, deprivation of parental rights, perjury, conning Tina Kufner through court con by procuring \$300,000 three times in three different courts (one of which is the federal court in the First Circuit) and three separate cases for the same legal fees for his lawyers for the illegal Hague Convention proceeding in Rhode Island.

DR. JENNY

71. Dr Jenny is sued for damages for to deprive her parental rights, extort her under color of state law, aiding and abetting in hiding child abuse, child sexual abuse and child pornography and court con. aiding and abetting child molestation, child abuse all of kinds, including medical and child sexual abuse of Tina Kufner's children, perjury and fraud on her

report and failing to notify the State Police Cyber Crime Unit on Internet Crimes against Tina's children, and due process

SOPHIA MEYERSIEK

72. Sophia Meyersiek is sued for damages for her scheme with Gero Meyersiek, Textron and the R.I. state actors to deprive the Plaintiff Seguin of her constitutional rights, right to honest services, fraud, perjury, nondisclosure, and personal injury.

KARL SCHOLPP

73. Karl Scholpp is sued for damages for his scheme with his sister Kathleen Scholpp, a registered sexual offender and the Massachusetts state actors to molest and rape Plaintiff Kathy Lee Scholpp's son, and to deprive the Plaintiff Scholpp of her constitutional rights, right to honest services, fraud, perjury, nondisclosure, and personal injury.

KATHLEEN SCHLOPP

74. Kathleen Scholpp, a registered sexual offender, is sued for damages for her scheme with her brother Karl Scholpp, and the Massachusetts state actors to molest and rape Plaintiff Kathy Lee Scholpp's son, and to deprive the Plaintiff Scholpp of her constitutional rights, right to honest services, fraud, perjury, nondisclosure, and personal injury.

MARIE E. LYONS

75. Marie Lyons is a Massachusetts probate and family court associate judge. She is sued in her individual capacity for damages. She failed to disclose and intentionally concealed her disciplinary record of wrongfully applying the law and routinely violating the Judicial Canons. She endangered Plaintiff Scholpp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. She refused to refer the investigation of criminal activity to criminal law enforcement.

DAVID SACKS

76. David Sacks is a Massachusetts probate and family court associate judge. He is sued in his individual capacity for damages. He endangered Plaintiff Scholpp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. He refused to refer the investigation of criminal activity to criminal law enforcement.

ANABELA FRANCISCO

77. Anabela Francisco is a Massachusetts Social Worker of Department of Social Services and she is sued in her individual capacity for damages. She endangered Plaintiff Schlopp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. She refused to refer the investigation of criminal activity to criminal law enforcement.

LAURIE SULLIVAN

78. Laurie Sullivan is a Massachusetts Social Worker of Department of Social Services and she is sued in her individual capacity for damages. She endangered Plaintiff Schlopp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. She refused to refer the investigation of criminal activity to criminal law enforcement.

ERIC INDYK

79. Eric Indyk is a Massachusetts Social Worker of Department of Social Services and he is sued in his individual capacity for damages. He endangered Plaintiff Schlopp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. He refused to refer the investigation of criminal activity to criminal law enforcement.

JEFFREY MCNAMARA

80. Jeffrey McNamara is a Massachusetts Social Worker of Department of Social Services and he is sued in his individual capacity for damages. He endangered Plaintiff Schlopp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. He refused to refer the investigation of criminal activity to criminal law enforcement.

MICHAEL GREENBERG

81. Michael Greenberg is sued in his individual capacity as Judge Sack's patronage appointee "Children's Law Project Attorney". He endangered Plaintiff Schlopp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. He refused to refer the investigation of criminal activity to criminal law enforcement.

JOHN JOHNSON

82. John Johnson is sued in his individual capacity as Chief of Probation for damages. He endangered Plaintiff Schlopp's son by subjecting the child to continuous

torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. He refused to refer the investigation of criminal activity to criminal law enforcement. He kidnapped Plaintiff Scholpp's child for ransom to get paid under color of law if the Plaintiff mother wants to see her own child. Simultaneously he double dips into the federal funding for supervised visitation under Violence Against Women Act that provides free services to the Public for Supervised Visitation.

BRENDA DOUGLAS

83. Brenda Douglas is sued in her individual capacity as Visitation Supervisor for damages. She endangered Plaintiff Scholpp's son by subjecting the child to continuous torture of sexual molestation, rape, assault and battery and incest, despite clear and convincing evidence of criminal activity. She refused to refer the investigation of criminal activity to criminal law enforcement. She kidnapped Plaintiff Scholpp's child for ransom to get paid under color of law if the Plaintiff mother wants to see her own child. Simultaneously she double dips into the federal funding for supervised visitation under Violence Against Women Act that provides free services to the Public for Supervised Visitation.

MARY SOCHA

84. Mary Socha is sued for damages for aiding in the court con scheme of extorting the Plaintiff Scholpp for ransom to pay for the right to see her child, and for aiding and abetting the criminal acts of Karl Scholpp of child rape, molestation, assault and battery and incest.

BARBARA GRADY

85. Barbara Grady is sued for damages for scheme to commit fraud against the Plaintiff Seguin with Gero Meyersiek, deprive her parental rights, extort her under color of state law and court con.

ROBERT PARKER

86. Robert Parker is sued along with McIntyre Tate LLP for damages for scheme to commit fraud against the Plaintiff Tina Kufner with Defendant Domink Kufner, to deprive her parental rights, extort her under color of state law and court con.

JERRY NISSENBAUM

87. Jerry Nisssenbaum is sued for damages for scheme to commit fraud against the Plaintiff Tina Kufner with Defendant Domink Kufner, to deprive her parental rights, extort her under color of state law and court con.

BRAD MARTIN

88. Brad Martin is sued for damages for scheme to commit fraud against the Plaintiff Tina Kufner with Defendant Domink Kufner, to deprive her parental rights, extort her under color of state law and court con.

NEVILLE BEDFORD

89. Neville Bedford is sued for damages for scheme to commit fraud against the Plaintiff Tina Kufner with Defendant Domink Kufner, to deprive her parental rights, extort her under color of state law and court con. He refused to report the criminal acts of child rape, molestation and pornography to criminal law authorities, thereby aiding and abetting in aforesaid crimes.

BARRY POLLOCK

90. Barry Pollock is sued for damages for scheme to commit fraud against the Plaintiff Tina Kufner with Defendant Domink Kufner, to deprive her parental rights, extort her under color of state law and court con. He refused to report the criminal acts of child rape, molestation and pornography to criminal law authorities, thereby aiding and abetting in aforesaid crimes.

JURISDICTION AND VENUE

91. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343(3) and (4), 28 U.S.C. § 1332, and 42 U.S.C. §§§§ 1981, 1983, 1985, and 1986, and Civil RICO under 18 U.S.C. § 1961 *et seq.*.

92. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b).

FACTUAL ALLEGATIONS

ESTABLISHED RICO PATTERN

Timeframe

93. The time frame of the RICO enterprise activity, honest services fraud and fraud scheme starts at the very earliest in 1985 and spans to the present and is on-going. The RICO enterprise defrauds its victims and move on to the next as unknowing citizenry are sucked into the RICO enterprise via charges or ex-parte charges and terminations usually in unrecorded proceedings and transactions where all that remains on the record is the ex-parte termination of rights itself, at best accompanied by legally insufficient “emergency” ex-parte motions. Additionally, defendants kidnap under color of law the children of protective mothers who report criminal violations of child abuse, rape, assault and battery, and pedophilia and demand ransom payments if the mother wants to see her children. All Plaintiffs mothers were harmed and/or have knowledge of the pattern within this time frame and it is on-going.

Bribery and Kickbacks

94. The herein named Defendants in their individual capacities engage in a repugnant RICO enterprise through court con that pre-determines/pre-selects a losing victim before the commencement of court proceedings. Defendants kidnap the children of mothers who report criminal child abuse, assault and battery, rape, pedophilia, and child pornography under color of state law, interfere with and suppress criminal investigations, and demand mothers to pay ransom payments to defendants if they want to see their children under color of law. Judicial defendants solicit bribery and kickback agreements from participating lawyer and lobbyist defendants and individual parties for favorable litigation outcomes, who pre-pay and pre-agree to make payments. Judicial defendants solicit bribery and kickback agreements from participating patronage appointees, the herein named defendants, to “arm of the court” status, with fancy names like “Guardian Ad Litem,” or “Asset Conservator,” or “Visitation Supervisor,” or “Court-Appointed Psychologist,” or “Mediation Specialist,” who scheme to ensnare the victims into state-coerced medical treatments and proceedings with indefinite durations, that is violative of all court’s rules of procedures 1, that guarantees a just and SPEEDY trial, and prolongs under color of law state proceedings until the children turn 18 years old, and force on unnecessary under color of law state-ordered and coerced “psychological treatment” or “mental health treatment” that fraudulently apply discredited quack theories by the American Psychologist Association, or “supervised visitation” or

“home studies,” or “asset conservation,” or “court status checks,” in CIVIL proceedings, devoid of probable cause, devoid of warrants, devoid of affidavits from law enforcement demonstrating probable cause warranting issuance of warrants or the invasion of private homes or the turn over of protected confidential financial or medical or school or employment records, all coerced by abuse of the Office of the State family court or superior court judiciary, executive office, or joint state-federal programs under color of state law. These arms of the court patronage appointees defendants are awarded fees by the Judicial defendants, extortionately against their victims, such as the Plaintiffs, under color of law and under coercive threat of criminal contempt or loss of their children if the victims refuse to comply with the ordered conveyance of their personal properties to the judicial patronage appointees. The Patronage Appointee defendants then pay the judicial defendants kickbacks from the judicial awards to supplement the judges’ incomes. The Patronage Appointees “recover” these judicial kick back payments by then double-dipping and double-billing the same “services” by submitting for payments under state programs or facades of state programs that are sustained through procurement of federal funding, such as Title IV and the Supervised Visitation programs. Defendant Gina Raimondo readily pay these submitted vouchers by the court-patronage appointees.

Federal Funds Thus Defrauded

95. Federal funds thus defrauded pursuant to the aforesaid are those appropriated under, but not exclusive to or exhaustive to, Violence Against Women Act, Title IV of the Social Security Act, and the Juvenile Justice Delinquency Prevention Act. The Plaintiffs are categorically confident many more will be uncovered during discovery.

Ex-Parte Termination of Fundamental Constitutional Rights

96. Because there lacks probable cause, lacks legal sufficiency based on the facts, in a scheme to defraud, the Defendants’ RICO scheme abuses the statutory Ex-Parte Emergency provisions to terminate fundamental constitutional rights of parental rights and freedom of movement, in order to secure personal jurisdiction under color of law of its victims. Defendants’ RICO scheme further exploits the local law enforcement custom of evading criminal investigations of assault and battery by persons co-habiting under the same roof, pedophilia, rape, and child pornography, and funneling criminal cases to civil family court who subvert criminal investigations for pecuniary gain. Indeed, for example, the Rhode

Island Family Court habitually defrauds the court by exercising personal jurisdiction under color of law on persons and entities for which the inferior court of limited jurisdiction has no statutory right to exercise personal jurisdiction, in order to fraudulently ensnare them into the family court, in which the judges solicit bribes for favorable outcomes. For example, Massachusetts department of social services defendants categorically refused to refer the investigation of criminal acts of rape, pedophilia, assault and battery, threats of murder, conspiracy to murder, assault and battery to criminal authorities.

Law Firms and Lobbyist Firms

97. The herein scheme is executed by herein named Lobbyist firms and Law firms defendants that pay bribery, kick backs, free meals and other benefits of monetary value exceeding \$25 to the judiciary and executive defendants named herein, to get favorable outcomes for their clients, to prolong family court litigation, to cause to be fraudulently conveyed moneys belonging to the Plaintiffs to themselves, by pre-agreement with the Judicial actors named herein.

THE CRANSTON CABAL

98. Family Court Chief Judge Jeremiah spent fifteen years as assistant city solicitor and six more as solicitor while Edward DiPrete was mayor. It is generally known within Rhode Island and its legal community that after DiPrete became governor in 1985, Jeremiah advanced to the statehouse as his executive counsel. Two years later, when DiPrete's turn came to fill a vacancy on Family Court (before legislative reforms established the Judicial Nominating Commission), the governor tapped Jeremiah. Barely a year later, in 1987, DiPrete acknowledged Judge Jeremiah as his "closest friend" and made him chief of Family Court. It is general knowledge in Rhode Island that Kathleen A. Voccola, who became Cranston's first woman city lawyer when DiPrete named her to fill Jeremiah's former position as assistant city solicitor in 1979. Governor DiPrete made Voccola the first woman to serve as the state's liquor control administrator, saying the appointment was in line with his "continuing efforts to place qualified women in positions of authority and responsibility." It is general knowledge that an ethics complaint had been lodged against the governor for steering state contracts to campaign contributors. Nearly a decade passed before DiPrete made a plea deal to protect his son from prosecution and went to prison himself for bribery, extortion and racketeering in 1998. The whole truth has never emerged due to the plea deal.

It is general knowledge in Rhode Island that Jeremiah skated away from his own brush with the Ethics Commission. He and Voccola sat on the Governor's Juvenile Justice Commission, where she made, and he seconded, a 1997 motion that awarded \$56,000 in federal money to a police organization that sublet space from attorney Holt in Jeremiah's Cranston office building and paid some of that rent directly to Jeremiah. "Holy mackerel!" Jeremiah exclaimed to the press when his conflict of interest became public. "I never even thought of that." By the time a grievance against him reached the Commission on Judicial Tenure and Discipline in 1998, Voccola had been named to that body, and the Commission found no basis for the complaint. It is general knowledge and it can be easily looked up in Rhode Island that Rhode Island has a tradition of powerful families with modest headquarters, like the godfather, himself--Raymond Patriarca's mob headquarters at Coin-O-Matic, 168 Atwells Avenue, Providence. Jeremiah's unpretentious office building at 995 Park Avenue gave no clue to the power he wielded. His tenants, like Holt and attorney Patricia Murray-Rapoza, gained preferential treatment and prominence at Family Court, where lawyers jockey for rich litigants in custody cases that can provide oodles of billable hours until children turn 18. Holt joined as partner McIntyre Tate Lynch (William, Patrick Lynch's (Rhode Island Attorney General 2003-2010) brother) Holt, and then formed another firm, Holt, Graziano & Herberg.

Rhode Island's UnConstitutional Pettinatto Factors Enables Quack Psych Cabal

99. The Rhode Island Supreme Court decreed a set of "best interest of the child" factors in Pettinatto v Pettinatto that are all unconstitutional, because these "factors" do not meet any of the Strict Scrutiny Standards decreed by the U.S. Supreme Court if the State abridges any and all Fundamental Constitutional Rights, namely the First Amendment's Familial Integrity Right and Parental Rights. One of those "Pettinatto" factors is "the physical and mental health of all parties," which is suspect classification that is preempted by Federal Policy and the ADAA and any and all federal funded state programs receiving federal funding prohibiting any and all discrimination based on disability. The Pettinatto factors reek of discrimination prohibited by ADAA, are unconstitutional and are required to be stricken. The Rhode Island judiciary intentionally set up these factors to stimulate "cabal" pecuniary interests, where the state's family court judiciary quickly set up patronage appointed state clinics to coerce state-mental-health experimental treatments, diagnosis of

disorders and state-coerced enrollment of “patients” through CIVIL actions between private parties.

The Cabal’s Quack Psychologists, Lubiner, Kosseff, Parsons and GAL Raffanelli

100. Using state-coerced “experimental psychology to drug children and families” for billable hours to the state-coerced “patient” and reminiscent of Soviet Union’s Stalin Gulags, the RICO cabal also consists of herein named family court judges patronage appointing Raffanelli, Lubiner, Kosseff and Parsons. Lubiner, Kosseff and Parsons are among the quack psychologist staples. In CIVIL cases, where there is merely a domestic dispute between two private parties, wholesale state-coerced psychological treatments are ordered by the judicial cabal defendants named herein, even when there is no prior medical history of mental health disorders, under threat of criminal contempt and loss of custody of one’s child. Lubiner, Kosseff and Parsons are state doctors, because they are ordered as “arms of the court” and the citizenry is forced to submit to health treatment, reminiscent of Stalinist Gulags. Citizenry without prior mental health histories, holding down employment, and otherwise having no prior criminal or drug abuse history of any kind, are suddenly wholesale “diagnosed” with severe disorders, including PAS (Parental Alienation Syndrome), an utterly discredited theory by the APA that is intentionally applied by the named defendants herein to defraud the Public with unregulated quackery to extort the citizenry victims under color of law. In the event of pre-existing medical treatments, any and all prior personal doctors are court-removed so that these state-quacks take over exclusive unorthodox and unregulated quackery applying experimental treatments under duress and extortion under color of law coercing experimental drug taking on children under threats of incarceration, enforced by the judicial defendants herein with the threat of the gravel, ordering incarceration for non-compliance. This horrific nightmare is reminiscent of Stalinist Gulag, that the Plaintiffs are determined to eradicate in the Interest of the Public, this predatory state quackery preying on children is treasonous to the Constitution. These quack “experimental treatment” state-coerced schemes preying on children and families are Public Enemy Number One.

The Court Mediators-Supervised Visitation Double-Dip Cabal

101. The parents are deliberately diagnosed with disorders so that they are sent to “Supervised Visitation,” the next stage of the RICO assembly line. One of the concocted quack disorders is “parental alienation syndrome” (PAS) which is categorically discredited by the American Psychologists Association, which is heinously applied to mothers who

report criminal charges of rape, incest, pedophilia, child pornography and assault and battery. The defendants thus engage in the criminal felony offense of aiding and abetting crimes against humanity and children. Defendants Laurie Sullivan, Eric Indyk, and Jeffrey McNamara aided and abetting criminal child rape, pedophilia, assault and battery after they received such criminal reports and refused to refer to the state police's child exploitation criminal division for investigation. After parents are "diagnosed" with mental health disorders, including "PAS" for reporting criminal charges of child rape, pedophilia and assault and battery, and had custody rights removed on ex-parte or after diagnosis, supervised visitation ordered, the cabal judges order more patronage appointees who extort parents exorbitant fees for otherwise free state-provided services under color of law, and then turn around and double-dip into federal-funds procured by the State of Rhode Island for supervised visitation under the Violence Against Women Act. The named defendants all participate in this RICO, including defendants Giarrusso, Lubiner, O'Keefe, Tassoni and Kosseff, Brenda Douglas, John Johnson, in addition to individuals who refuse to give out their surnames, e.g., Jean George and Rose and who do not give their first names, e.g., Supervisor Lynch. If a mother refuses to shuttle the children to supervised or unsupervised visitation, the mother is threatened with losing custody of her children under color of law. Visitation supervisors are selected under patronage appointments in chambers, by the judge and the participating law firms, who receive kick backs from these patronage-appointed visitation "supervisors."

102. The cabal coerces people into supervised visitation under false pretenses - federal funding is buried in the Violence Against Women Act under the non-sequitur justification of rehabilitating and restoring abuser men with their children.

103. With Plaintiff mothers Kufner, Seguin, Livingston and Johnson, there is no abuse or history of violence. There is no DCYF involvement that caused supervised visitation. WOMEN/mothers are put under supervised visitation without any history of violence prior to embroilment in Family Court, often for PAS or some other quack, discredited or unproven allegations, devoid of strict scrutiny procedures. Giarrusso smugly threatened Plaintiff Seguin that she can see her daughters conditioned on Seguin paying Giarrusso \$50,000. Giarrusso supervised Tina and forced her to pay \$50.00 an hour or not be able to see the children. In Plaintiff Gloria's case, the judges, GALs and Psychological Quacks threatening her with losing custody under color of law to coerce her to bear the

burden and cost of shuttling her children to abuser father. The Supervised visitation Cabal commits blatant court con by ludicrously classifying children's tree climbing as "endangerment" - this is prima facie court con, because human sapiens are descended from primates who lived in trees. They demand private payment in cash or funds directly payable to them.

104. Defendants Lubiner and Hayden are both named on FEDERAL CONTRACT for "access and visitation." Defendant Hayden is a psychologist like Lubiner, Kosseff, and Parsons. Hayden and Lubiner were on court contractor payroll. The judicial cabal patronage-appointed Hayden who performed his quackery evaluations and treatments in Providence, Rhode Island.

105. With Plaintiff mother Scholpp, the Plaintiff mother reported criminal charges of rape, pedophilia, assault and battery of a child. Suppressing and interfering criminal investigations of criminal charges, endangering the Plaintiff Scholpp's child to further criminal rape, pedophilia and assault and battery, and aiding thereof, defendants Lyons, Sack, Laurie Sullivan, Eric Indyk, Jeffrey McNamara, Brenda Douglas and John Johnson kidnapped the Plaintiff's child and demanded extortionate ransom payments if the Plaintiff mother wanted to see her child. Couched by fraud as "supervised visitation," said defendants demanded the Plaintiff mother Scholpp to privately pay exorbitant fees in thousands of dollars while procuring from federal funds under the Violence Against Women Act for "access and visitation."

Court Con Coercing Paying GAL Patronage Appointees Who Bring Their Families To Invade the Home, Search and Seize Under False Pretenses, For Routine Fabrication of Inadmissible Evidence and The Routine Destruction of Evidence

106. The Judicial cabal routinely coerced the Plaintiffs and others similarly situated to pay its patronage-appointed "GALs" (Guardian Ad Litem) without probable cause to invade the Plaintiffs' homes, protected medical records, protected financial records, search and seize properties of the Plaintiffs, and wholesale invade, forcibly enter, barge in the privacy of the Plaintiffs' homes, without probable cause. The GALs further procure hearsays in gossip style from neighbors, people on the street, unrelated peoples, the children's schools, churches and the such, that interferes with, abridges, and chills the Plaintiffs' First Amendment protected fundamental right to freedom of association and freedom of religion. After such a

dog and pony show, the GALs routinely write up a “GAL Report” and before submitting the GAL Report, routinely destroys/shreds the underlying evidence, including interview notes, documents, and admissible evidence under the rules of evidence of the court, making the GAL Report categorically INADMISSIBLE by the Court. The Court routinely reject any and all objections to the GAL Report, which is INADMISSIBLE by the Court’s own rules, and then ADOPT the Report’s “Recommendations,” while order the victims to pay for the GAL Report that is INADMISSIBLE evidence under penalty of incarceration under criminal contempt. WHO HAS EVER HEARD OF SUCH EXTENSIVE and PERVASIVE COURT CON. In the Seguin proceedings, it is preposterous court con on an INTERSTATE basis, with Gilbert Rocha sending the patronage-appointed Cranston Cabal Patricia Murray-Rapoza interstate to the state of Tennessee to conduct a “homes study” invasion on the Plaintiff, in violation of Tennessee law that requires a Tennessee State certified personnel to conduct home studies. Murray-Rapoza had no Tennessee certification and knowingly engaged in interstate commerce fraud, and fraudulently billing the Plaintiff Seguin in Tennessee for illegal activity in Tennessee sent via the U.S. Mail.

107. In the Kufner proceedings, it is preposterous court con on an INTERNATIONAL basis, whereby there is Germany domicile of both parties, Tina Kufner, arrives in Rhode Island to visit her parents for 2 weeks, to obtain a medical operation for her and her son, and prevented from returning to Germany 6 days later, by not just one but 4 ex-parte Orders (without affording any hearings or representation by legal counsel) granted by Judge Smith of the United States Federal District Court of Rhode Island as then less than 3 weeks later placed on “supervised visitation” by Sharon O’Keefe (GAL) and Lori Giarrusso, who in violation of International Laws and Treaties, illegally changed, abridged and terminated Tina Kufner’s custody rights in the middle of the Hague Convention civil Proceeding in which she had been denied her first amendments and constitutional rights present her evidence and allegations that could of protected her and her American children from returning to Germany, after being so unlawfully retained in the United States and from returning to Germany by the Court itself, prevented from raising a defense under the Hague Convention pursuant to Article 13 (grave risk of harm by a foreigner and German father that engaged in sexual games and in child pornography with her (2) minor age children. Tassoni supervised the German father’s visitation outside the court house and received payment for services rendered, then extended his rights in violation of the Hague Convention by writing a

report in favor and on behalf of the father. Tassoni's report had been given to O Keefe and denied Tina a copy of the report by O Keefe. Tassoni and the Rhode Island family court had been criminally and unlawfully practicing law and defrauding the public since his patronage appointment in 1999 by Jeremiah, who both concealed from the public that Tassoni had neither a law degree, nor even the degrees he claimed he had via the internet and in the Court house. O Keefe even refers to Tassoni as esquire in her report. Under this Court Con, the Public had been lied to about his credentials and coerced to comply with his opinions, recommendations and ORDERS of matters of law under false pretenses, and under paying him legal fees at lawyer's rates. The Court con was reported to the State Police in 2011, and to date, no criminal charges have been filed, no indictments, nothing, the inaction is motivated by the patronage appointment patrons involved in this syndicate's scheme in over a decade of court con.

108. O Keefe even threatened that if Tina did not pay Giarrusso for her time, by charging Kufner almost \$5,000 to see her sons supervised by Giarrusso, or both at the same time Giarrusso and Tassoni visitation in violation of the Hague Convention and International laws, that strictly forbids the Convention to be used for International Commodity or according to the rules of the Hague Convention 42.U.S.C. S 11601 (a) (4). The Hague Convention promotes two important principles. The Appeals Court confirmed that the district court deciding a petition for return of a child has jurisdiction to decide the merits of the wrongful removal claims, but it may not decide the merits of the underlying custody dispute. *Whallon v. Lynn*, 230 F. 3d 450, 455 (1st Cir 2000). Secondly, the Hague is generally intended to restore the pre-removal status quo and to discourage a parent from engaging in international forum shopping. The status quo prior to Tina arriving in the US, on January 25, 2007 for a two weeks, had sole physical custody of the children and the father had the standard visitation rights, of every two weeks beginning in Germany on February 8, 2007.

The Rhode Island family court honored her pre-existing custody rights until Dominik Kufner's attorneys interfered via ex-parte communications to chief Judge Jeremiah Jeremiah by Judge Smith of the U.S. District Court of Rhode Island, by passing Judge D'Ambra who granted Tina Kufner's expedited Restraining Order and an Expedited Emergency Temporary Sole Custody Order, but that was quickly abrogated by Jeremiah, who ordered his patronage appointee David Tassoni to supervise the German father by an ex-parte agreement made by the attorneys and the Judges to prevent an entire series of nude photographs of Tina's young

sons' buttocks, scrotum, penis and the children bending over with the anus fully exposed from being entered into evidence, exposed or on the record, by alleging that the father had been previously investigated by the Germans. Judge Smith then ordered appointment of defendant Sharon O'Keefe, who quickly conned Tina into supervised visitation; O'Keefe had no statutory or jurisdiction to issue orders changing custody rights under the Hague Convention, but both Jeremiah and Smith behaved and duped Tina as if that is the norm, conning Tina into paying Giarrusso \$5,000 for supervised visitation to spend time with her own sons, refusing to give her receipts, copies of reports, given no prior notice, no hearing, all under the Hague Convention, in violation of International laws and treaties. Tina and the children had been prevented from raising Article 13(b) Grave risk of harm defense denied to have any contact to Dr Jenny and a full investigation by the Gaurdian at Liam, in fact she refused to include the children's vvishes because they repeated over 100 time that they vvant to stay with their mother. O Keefe called this an inflation to think that the courts care about the children wishes or to keep the American children in the United States raising allegations of child pornography, for which O'Keefe not only violated the Hague Convention treaty and illegally without any subject matter or jurisdiction, "ordered" Tina into supervised visitation and transferred custody from Tina to the german father. Threatening Tina not only losing her children, but if she did not pay then "it her fault she does not see the children and at the same time taking over three month of alimony away by pretending it vvas to cover the Mercy Mount bill for 2 children for three months to the Court, a total of 12,000.00 Euros. O Keefe requested this Order be granted ex-parte. O'Keefe forced Tina to pay and be supervised by Lori Giarusso \$5,000. As the Court will see, \$5,000 is a denomination rate for Giarrusso, who charged Tina Kufner \$50 an hour to supervise Tina's illegally "ordered" visitation in 2007, but only inside the Court House and on Easter Sunday that prevented the children from having the traditional Easter egg hunt at their grandparents house- like other normal children. and then later in 2010, Giarrusso demanded Plaintiff Mary Seguin to pay her \$50,000 if Seguin wanted to see her two daughters. Herein is court con par exemplar illegally herding mothers into supervised visitation in order to extort visitation supervision fees under color of state law; utterly appalling human trafficking funded by federal tax dollars that were collected from citizens from other states outside of Rhode Island. O'Keefe was an associate at McIntyre Tate Lynch prior to her GAL patronage appointments. The Plaintiffs discovered this pattern and court con syndicate members this year on or about mid-September 2013.

O'Keefe individually further violated the Hague Convention by "ordering," without subject matter jurisdiction, nor statutory authority, Tina's children's school tuition incurred in the United States to be deducted from Tina's alimony, for April, May, and June 2007 that lead to Tina being evicted in Germany from her home for failing to pay the rent upon her return, all without a court hearing, solely via e-mail notification to Tina and that she should be thankful. What court con.

The Fundamental Court Con Enterprise Model

109. The entire enterprise of Massachusetts and Rhode Island family court is unregulated, and pervasive duping of the Public into thinking the family court and its various "body parts" called "arms of the court" has subject matter jurisdiction when the "arms" lack subject matter jurisdiction and lack statutory authority, all lying to the unsuspecting victims, and extending their state-intrusion, invasion, search and seizure, without jurisdiction. In its issuances of impermissibly BROAD powers to the GAL, the family court lacks subject matter jurisdiction to issue a BLANKET warrant in a CIVIL PROCEEDING, to forcibly enter, intrude, invade and search and seize the privacy of the home without showing probable cause. The initiation of a civil dispute is never license for the state to order body parts "arms of the court" to search and seizure without a warrant. The Public is categorically protected from unwarranted search and seizure under the Fourth Amendment.

110. Family Court's orders appointing GAL's are all BLANKET search and seizure warrants, without any showing of probable cause, which the family court lacks subject matter jurisdiction to issue search and seizure warrants for the government and en mass investigates a person, his/her associations, his/her religion, chills all of his/her first amendment freedoms, with impunity, with ultimate infringement of all First Amendment rights to condition a person's retention of his or her fundamental parental rights. That is not application of strict scrutiny. That is utter institutional chill of civil liberties and reign of terror to tear away one's child under color of state law.

111. Rhode Island's Pettinatto is unconstitutional and is a set up for psych quack and state coerced treatment, like Stalinist Gulag Camp.

112. The entire family court unregulated industry lot fails to pass ANY common law or federal law or constitutional muster.

113. For example, in Tina's case, O'Keefe, the GAL actually "ordered" supervised visitation and "ordered" deduction of school tuition from her alimony check. How did she

order all of this? VIA EMAILS. She has no subject matter jurisdiction to "order" anything of the sort. She has no subject matter jurisdiction to "order" the payment of tuition or the deduction from any bank accounts, she has no subject matter jurisdiction other than being given a BLANKET broad SEARCH WARRANT in a civil action without showing any probable cause by the state. Why wasn't the issue of child pornography of a series of photographs of children bending over exposing their anus, scrotum and penis referred to actual criminal investigations of child porn under the Hague Convention, and instead the GAL is "ordering" supervised visitation of the mother who had custody of the children, discovered the photos and is trying to press criminal charges of child pornography? And O'Keefe knows or should have known that she, a mere GAL, is prohibited from changing custody or altering it in anyway under international law and treaties, and specifically under the HAGUE CONVENTION.

114. The fundamental issue of "probate's" practice of issuing BLANKET search warrants in the broad GAL appointments, admitting "GAL reports" that is inadmissible under the rules of evidence (report where all underlying documentary evidence are routinely destroyed and shredded) composed of "hearsay" that is never admissible in any court of law for consideration, coerced to PAY HIRED GUNS GAL for knowingly fabricating hearsay inadmissible evidence, peddled as a "arm of the court report" and conditioning fundamental constitutional rights on physical health and mental health when there is no prior history justification sufficient to now initiate mental health treatments and medical treatments simply because a CIVIL suit was initiated, for the purpose of DISSOLVING A DOMESTIC OR INTERNATIONAL CONTRACT between private parties.

115. That's all it is, basically a civil proceeding DISSOLVING A CONTRACTUAL AGREEMENT, partitioning accumulated properties and setting a declaratory judgment of rights relative to children; the judgments are being bought and sold to the highest bidder so that is what marriage/common law contract is defined in our legal system. When parental rights are declared fundamental constitutional rights, it means that the state does not have a superseding right to one's children. It means that whatever interests the state has to one's children comes secondary and the burden is on the state to demonstrate what interests those are. States do not enjoy any privileges that allow them to abridge fundamental human rights. The mother-child bond is a fundamental human right protected under NATURAL LAW that supersedes even the Constitution. This country is not a Stalinist Gulag, where the State

supersedes the private person. In this country, it is the inverse. The PEOPLE have rights that the State cannot abrogate and if the State seeks to abrogate the People's rights, the burden is on the State to demonstrate the compelling interest and that it is using the narrowest possible means so as not to trample more than necessary the PEOPLE's fundamental rights. That means the children's best interests are determined by the PEOPLE, not by the State, absent exigent neglect, abuse, rape, etc. The state does not have rights over our children, and until it shows compelling reasons that it does, the state cannot take over our children from their mothers like a Statlinist regime. The family court enterprise operates identically to a Stalinist regime. There is no compelling reason or interest shown ever that in a civil proceeding to dissolve a domestic contract the state has the unbridled power to automatically conduct broad search and seizure, subject anyone to medical treatment and evaluations and coerce payment to the state actors of exorbitant fees, just to retain fundamental constitutional rights. The family court does not enjoy that breadth of subject matter jurisdiction, absolutely not. They are wrong. And these Plaintiffs hereby through this claim challenge family court state oppression to free the bondage of the Stalinist State syndicate con that the family court created harming the Plaintiffs mothers and their children. Nothing else in this country extends this sort of terrorizing all encompassing infringement on all civil liberties under Natural Law as the Rhode Island and Massachusetts family court syndicate court con. Since when does contractual dissolution entail state-coerced medical treatment, supervision like house-arrests, criminal contempt, and paying government actors exorbitant fees in order to retain rights?!?!?! Since when does the state have the power to sanction pro se plaintiffs, and denied all access to the Court by having all motions returned via U.S. mail, such as in Tina Kufner's case, after having left with no money to pay government actors' ransom demands of exorbitant fees in order to see the Plaintiffs' children and retain fundamental mothers' rights?!?!?! Admission of a GAL report without the opportunity to cross-examine the GAL. Admission of a custody evaluation without the opportunity to cross-examine the custody evaluator, that denies children's testimonies which contradicts the child's expressed wishes, which are, pursuant to the Law of Nature, seeking the child's MOTHERS, their first HUMAN BOND, to intentionally lead to the de facto termination of one's parental rights (e.g., by indefinite suspension of all contact) without meeting the clear and convincing standard required in Stanley v. Illinois, 405 U.S. 645 (1972) and in violation of due process rights. The undeniable Law of Nature dictates that the first human bond of a child is that of

her/his MOTHER, and that bond and protected right is God given that no government actor is permitted to sever, abridge, and evilly trade for pecuniary gains in human trafficking.

116. That's the court con and the Plaintiff mothers hereby call for the depose of tyrants through the herewith filed notice of felony.

Private Actors in the Court Con

117. The herein named private law firms, lobbyist law firms and private parties co-run this criminal enterprise, conspiring to strike, sabotage, intimidate, stalk, harm, falsely incarcerate federal witnesses, committing wire fraud, distributing experimental controlled substances under the guise of “mental health medication,” and facilitating bribery, kickbacks, double-billing, falsified billing, mail fraud, honest services fraud, steering government fraud/waste work to friends, family and mistresses, and other crimes.

118. With the unexplained deaths of Judith Lubiner and Dr. Huntington, the FBI and the U.S. Attorney General is mandated to empanel a grand jury to investigate. The law offices and lobbyist firms are used as a cover to conduct illegal activities to protect their criminal clients, their bribery and kick backs and judicial patrons from prosecution and carry on their unlawful pursuits, such as \$2 million insurance fraud scheme by Textron and Meyersiek. The herein named law firms used their positions as lobbyists and attorneys to manipulate and disrupt court proceedings on behalf of themselves and their judicial patrons.

119. And of course, they were paid handsomely for all of it.

120. Among their criminal actions:

- Counseling, intimidating, and sometimes bribing witnesses and their clients to offer perjured testimony in favor of their clients and to destroy and tamper with court records that evidences back room deals;
- Conspiring with clients to identify, locate, stalk, cyber-stalk, hack, and harm witnesses who would testify against them;
- Using their law firms to launder and embezzle money for clients, associates, and themselves and to set up phony corporations or other legal entities to facilitate even more crimes;
- Running supervised visitation trafficking operations and a state-coerced “mental health referral” business for the purpose of trafficking children to out-of-state facilities for experimental psychological treatments.

121. Those entrusted with the guardianship of our legal system are not above the law.

Plaintiffs Report Crimes to Law Enforcement

122. The Plaintiffs reported crimes committed through court con and within the court afore-described to the following state and federal agencies, law enforcement agencies, and government bodies:

1. United States Department of Justice
2. 2. Federal Bureau of Investigation (Providence, Connecticut, Boston, Texas, New York, Washington, D.C., and Berlin every field office that publishes an email address for intake of reported crimes), including the Hotline and online take in reports. U.S. Attorney General Chief of the Criminal Division (Rhode Island Office)
3. U.S. Department of Justice Special Litigation Office
4. U.S. Department of State (Hague Convention)
5. U.S. Department of Homeland Security ICE
6. U.S. Department of Immigration Customs and Enforcement
7. Washington, D.C. Office of APA
8. U.S. Federal Court in the District of Rhode Island
9. U.S. Federal Appellate Court in the First Circuit
10. Providence Community Mediation Center
11. Rhode Island Disciplinary Board
12. Rhode Island State Supreme Court Administrative Appeal
13. Rhode Island State Supreme Court Mediation Office
14. Rhode Island State Supreme Court Judicial Appeal
15. Rhode Island Superior Court for Suit for Equity
16. Rhode Island Commission on Human Rights
17. Rhode Island United States Representative Langevin
18. Rhode Island United States Representative Cicilline
19. Rhode Island Attorneys General Patrick Lynch and Kilmartin

20. Paul Suttell in his administrative capacity overseeing the Rhode Island Judiciary
21. Rhode Island Governor's Ethics Executive Order
22. Rhode Island Ethics Commission
23. Rhode Island State Police
24. Rhode Island Board of Health
25. Rhode Island Judicial Nomination Commission
26. Rhode Island State Treasurer and Contracting Officer
27. Rhode Island General Assembly House Judiciary Committee
28. Rhode Island DCYF (Department of Youth, Children and Families)
29. Rhode Island Governor's Commission on Disability
30. Haiganush Bedrosian in her administrative capacity overseeing the Family Court judiciary of Rhode Island
33. Rhode Island State Police Internet Crimes Unit against Crimes against Children Cyber Task Force and Child Exploitation Division (RI ICAC)
34. The National Center for Missing and Exploited children since 2007.
35. CEOP, a UK Center for Missing and Exploited Children since 2010 the central authority of the Hague Convention prior to 2008.
36. The Department of Justice and the Offices on Violence Against Women (OVVV)
37. Department of Justice Department of Children's Issues the Central authority of the Hague Convention since 2008.

Retaliation Through Bad-Faith Harassment Proceedings in Family Court

123. After the Plaintiffs sought redress for the bad-faith harassment proceedings motivated by court con in Rhode Island family court, the Plaintiffs suffered from reprisals, retaliation and intensified bad-faith harassment in the family court or court proceedings located in the jurisdiction of Rhode Island.

Mary Seguin

124. Mary Seguin is the natural mother of two daughters whom she raised since their births. Her second daughter was born after her employer, Textron's Vice President Gero Meyersiek and serial "sexual predator" against whom Textron received numerous sexual harassment complaints complaining he was serially targeting female employees under his supervision but did nothing only trying to cover it up, had raped Seguin after she returned to work from maternity leave.

125. Textron terminated Meyersiek in 2001 and illicitly contracted with Meyersiek in a separate secret settlement agreement to set aside approximately \$500,000 from the exercise of Meyersiek's Textron stock options, deposited in escrow in Citizens Bank, to pay bribes, kick backs, in a scheme to influence and purchase a favorable outcome to Textron and Meyersiek of Seguin's family court proceedings. Textron and Meyersiek concealed this secret contractual settlement from Seguin, to dupe Seguin into entering a settlement agreement to release all claims against them, because Seguin would not have agreed to any settlement with them if she had knowledge of this heinous illicit settlement illegally and treasonously scheme to break down the machinery of justice in the courts to bribe the Rhode Island family court cabal. Textron also contracted with Meyersiek in this secret settlement to scheme to defraud Textron's disability insurance carrier UNUM Provident, by directly and helping Meyersiek to lie in disability insurance application to UNUM that Meyersiek was terminated for disability, so as to dupe UNUM Provident into paying out \$2 Million to Meyersiek in disability insurance fraud. To execute these two schemes, Textron and Meyersiek contracted with the infamous Rhode Island lobbyist firm, Adler Pollock and Sheehan, ranked top 10 lobbyist firms in Rhode Island, in part because its partner, Patricia K. Rocha, is the daughter of Gilbert Rocha, associate justice at the Rhode Island family court cabal. They schemed to contract with McIntyre Tate Lynch and Holt for Meyersiek to aid him in furthering the bribery and bad-faith proceedings in family court against Seguin for favorable outcomes for Meyersiek and Textron, as well as aiding Meyersiek to falsify court records through fabricating facially false records claiming that Meyersiek is BLIND and DISABLED. Factual evidence prove Meyersiek is FAR from blind and disabled, and penniless, falsely applying and defrauding the United States Social Security Disability Insurance claiming he is utterly blind and disabled, falsely applying for United States citizenship lying and perjuring he is utterly blind and disabled while committing insurance fraud worth \$2 Million and while traveling all over the country working for private equity

firms, operating an interior design closet business, and earning a high income of at least \$250,000 plus equity and profit sharing in the various private equity operations and investments that Holt concealed through perjury and a scheme to commit perjury, insurance fraud, court con and bribery.

126. More evidence is unearthed all the time on the extent of the scheme and the inaction of the authorities because of the lobbyist firm Adler Pollock and Sheehan's corrupt patronage pecuniary relationship with the three branches of government in this state and McIntyre Tate Lynch and Holt's corrupt patronage pecuniary relationship with the three branches of government in this state of Rhode Island. The audacity of acting with impunity is bolstered by the fact that the Rhode Island Attorney General Patrick Lynch openly adopts a policy of "it is improper to investigate my friends, my family and my mistress" whereby he went on public media interviews stating it is improper for him to investigate the now convicted corrupt Central Falls Mayor Charles Moreau because he is Lynch's friend, which constitutes prima facie honest services fraud against the Plaintiffs and the Public.

127. Additionally, the family court defendants impounded her assets of approximately \$250,000 upfront, identical to the RICO method documented in Cok v Family Court of Rhode Island, and awarded it all to the GAL and lawyers in the case, including an order awarding \$5,000 of the impounded assets to opposing counsel Lynch & Friel for "representing the interest of the minor S" and another \$5,000 to Seguin's own counsel also for "representing the interest of the minor S" and another "\$5,000 to the GAL Patricia Murray-Rapoza" also for representing the interest of the minor S.

128. The Plaintiff Mary Seguin started to report in 2002 the facial fraud, scheme to defraud disability insurance and the United States and court con to state and federal law enforcement authorities. In compliance with Rhode Island Attorney General's policy of "it is improper to investigate my friends and families" state law enforcement refused to investigate Textron or Meyersiek because that entailed investigating Adler Pollock and Sheehan and Lynch's own brother, William Lynch, who is a syndicate participant within McIntyre Tate Lynch and Holt. Meanwhile, the lobbyist firm Adler Pollock and Sheehan is Patrick Lynch's friend, having heavily paid campaign contributions to Patrick Lynch, with the intent to ensure they are not investigated by the Rhode Island Attorney General. For example, in

2008, both William Lynch and Patricia Rocha ranked the top 20 campaign contributors for Patrick Lynch \$2,000 from William Lynch and \$1,850 from Patricia Rocha.

129. This scheme constitutes facial honest services fraud, so as to monetarily influence the Rhode Island Attorney General and ensure that the Plaintiff Mary Seguin's criminal complaints against them would not be investigated by the Rhode Island Attorney General's office or the state police.

130. Nevertheless, by 2002, Plaintiff Seguin's broad reporting to the various state and federal agencies listed above of court con and insurance fraud caused local and national civil rights organization and government watchdog groups to court watch all of the court proceedings in family court, including the NAACP and the Urban League and Rev. Anne Grant, a local domestic violence family court watchdog advocate, namely because of the Textron connection, the blatant conflict of interest of Rocha presiding over the Plaintiff Seguin's cases, the impounding of \$250,000 of Seguin's assets upfront for patronage awards Rhode Island Thomas Fay and Paul Suttell style; local government watchdog groups have all seen this pattern before in the 1980s and 1990s with countless others, with Gladys Cok documenting it in federal court in this First Circuit that spans over a decade forming a trilogy. In a shameful display of judicial closing ranks to perpetuate court con in Rhode Island, for which Thomas Fay was concurrently indicted, convicted and pled guilty to, the First Circuit illegally prohibited Gladys Cok from filing further actions in federal court against the court con in 1995, which aided the continuing Rhode Island court RICO activity (for which Thomas Fay was convicted) to now harm another generation of families, mothers and children in Rhode Island. There is no record of anyone having dissented on the First Circuit's panel or to appoint counsel for Gladys Cok, who with all her wealth being impounded and thus stolen through court con, could not find an attorney brave enough to raise issues of court corruption and court con in Rhode Island nor afford an attorney to litigate court con in Rhode Island. Small wonder, during the same time the federal bench in Rhode Island led by Ronald Lagueux launched a military-style campaign assailing anyone who dared to raise issues of court con in Rhode Island, even outside of the courtroom in a BOOK (See Dershowitz affair), in staggering uncomely display of obstruction of justice from the pulpit of the bench implicating official institutional federal hostility towards federal claims of court con that implicates the legitimacy of the courts affecting the entire district! This pattern and relevant federal-state judicial relationships and implications utterly shocks

the conscience, defacto entrapping the population and the jurisdiction within Rhode Island and the federal district to predatory court con.¹

131. The Urban League and NAACP set up a meeting with Jeremiah Jeremiah in Jeremiah's office in Providence's Garrahy Building in Providence in 2004 attended by the civil rights groups, Jeremiah Jeremiah and Seguin, in which Jeremiah admitted to court con involving all the lawyers, judge Rocha and Textron, and promised to speak to William Holt, definitively identifying the Cranston Cabal. Seguin again reported this to federal and state law enforcement authorities, and again total inaction by the state authorities.

132. In 2005, Meyersiek was audacious enough to sue the United States for denying him his citizenship application in Meyersiek v U.S. Immigration. Mary Lisi, who herself came from family court, got this case to be assigned to her. Although there is a policy for random assignment of cases, this case was not randomly assigned, because the United States' defense included investigations and documentation of facial court perjury in Rhode Island family court proceedings where Rocha executed the Textron-Meyersiek scheme through bribes and rubble-stamped Meyersiek to be disabled and blind while he testified he was riding his bicycle at 50 MPH, looking for CEO jobs at mid-sized companies and traveled to Germany and Toronto, Canada for leisure. In July 2006, Lisi heard Meyersiek bring in his cadre of witnesses and himself testifying he is disabled and blind and utterly unable to work and did not commit disability insurance fraud. In the same month in July 2006, Meyersiek filed a separate lawsuit in federal court against an out-of-state private equity firm demanding \$1 Million in damages by alleging he had worked all over the country for the private equity firm, Meyersiek v Jean Paul Richards et al and Mary Lisi got herself assigned to this case as well. While reviewing Meyersiek's "I am blind and disabled claim" in Meyersiek v U.S. Immigration as well as the Meyersiek v Richards et al claiming he worked all over the country and demanded \$1 Million in damages, Lisi never let on to the defendants United

¹ See Young v. City of Providence, C.A. No. 01-288ML (Feb. 11, 2004); United States v. Cooper (In re Zalkind), 872 F.2d 1, 5 (1st Cir. 1989); Obert v. Republic W. Ins. Co., 264 F. Supp. 2d 106, 112 (D.R.I. 2003). See attached Exhibits 3 and e, New York Times news articles reporting the discipline of Rhode Island federal judge for promulgating Rhode Island's aforesaid-policy of punishing lawyers who dare raise in federal court federal constitutional challenges against state unconstitutional and corrupt issues Rhode Island state coziness interests, court corruption or conflict of interest. After federal judge Lagueux's **1989** discipline AND after R.I. Supreme Court Chief Judge Thomas Fay entered a **1994** guilty plea in which he admitted to steering court's legal work to his business partner for kickbacks, proving Prof Dershowitz's statements true of rampant court corruption in Rhode Island, Lagueux and Lisi still punish court critics who dare to raise it in federal court or citizenry critics

States or Richards that she had first hand knowledge of Meyersiek's perjury and a scheme to commit perjury by Meyersiek and the Rhode Island Family Court. In 2009, she approved a settlement of over \$400,000 in Meyersiek's favor, despite the knowledge of perjury, disability insurance fraud and termination from Textron for sexual harassment. FBI investigations show that William Holt had written letters to UNUM HOLT demanding disability payments claiming Meyersiek is blind and disabled, having full knowledge that Meyersiek was terminated for sexual harassment not disability after having fully participated in the Textron-Meyersiek settlement of the scheme to defraud, again attempting to aid Meyersiek to commit insurance fraud. Holt was never charged nor Meyersiek, nor Textron, because that would expose the Rhode Island Family Court.

133. In 2010, the Plaintiff Mary Seguin made plans to move to Texas with her daughters. Meyersiek and Textron schemed to preempt her, as Seguin exiting the jurisdiction with her daughters would jeopardize their favorable outcomes from their bribery of the local judiciary. Retaliating against Seguin for reporting them to the F.B.I., they schemed with the Rhode Island Family Court Capineri to terminate her rights. In ex-parte emergency proceedings devoid of transcriptions, that textually state "the grandmother does not speak English," Seguin's parental rights were terminated merely based on speculation that she traveled out of state for work. Capineri patronage appointed Giarrusso as GAL, who submitted in a "GAL Rreport" to place Seguin on supervised visitation because she had taken her beloved daughters on a trip to Texas without telling Giarrusso, and demanded \$50,000 if Seguin wanted to see her children. Giarrusso testified she routinely shreds all her notes, documents and evidence prior to submitting the report, and the report is all that she has. Capineri admitted the Report into evidence in outright violation of the court's own rules on evidence, immediately ADOPTED Giarrusso's demands and ordered payment to Giarrusso for this court con inadmissible evidence hearsay report. Giarrusso also ordered Seguin's children to see Judith Lubiner for the "trauma of being removed from their mother." This is prima facie intentionally harming Seguin's children for pecuniary gain. Plaintiff Seguin filed written criminal charges against Capineri, Giarrusso and Lubiner to the F.B.I. in October 2010, forwarded a copy to the Rhode Island Governor's Office, and the U.S. Department of Justice in November 2010, and forwarded a copy to Bedrosian in December 2010. Capineri immediately withdrew in December 2010. Lubiner immediately ceased involvement in the case. Giarrusso sought to be removed from the case. Bedrosian sat on the case during the

Christmas holidays of 2010, forbidding Seguin from contacting her beloved daughters and refusing to hold any hearings, for the first time since 2001 where routinely hearings were held twice a week just for “status checks” to milk billable hours. Seguin wrote to Suttell urging him to reform the court con in family court. On January 3, 2011, Seguin reported in a mass email and direct phone reports to F.B.I. and the U.S. Department of Justice Rhode Island’s procurement of federal funds to prevent incarceration of children for status offenses under the Juvenile Justice Delinquency Prevention Act by concealing all of their dastardly incarcerations in unrecorded proceedings targeting minority, sick and disabled children and their families for fine factories and keeping them illegally in the fine factory mill until they turn 18, including incarceration for not doing their homework, by comparing Rhode Island’s courts of terror against disadvantaged families to those of the regime of Saddam Hussein. This caused Rhode Island to be highly profiled investigated by a special delegation sent from Washington to Rhode Island, reported by the Providence Journal. Suttell and Bedrosian conferred on covering up the facially extortionate \$50,000 demands Giarrusso made in the GAL report and retaliating against the 8 month pregnant Seguin who submitted medical notes from her physician that she was on bed-rest unable to travel, by endangering her health with severe emotional distress by initiating on January 7, 2011 ex-parte outrageous sham domestic violence proceedings against Seguin in Texas, 8 months AFTER Seguin permanently EXITED Rhode Island for good, using the 21 day temporary emergency ex-parte restraining statute against the Texas Plaintiff 2,500 miles away from Rhode Island, for making “phone calls,” with hand-scrawled prominently on the restraining order “Protect GAL Report,” and forbidding contact with her beloved daughters. The 21 day temporary restraint is renewed upon each expiration for over 30 times since January 2011 and on-going.

135. Simultaneously, Chafee, counting on any and all federal funding to run a deficit-run balloon patronage government staffed by exorbitant unessential patronage employees and waste to benefit patronage relationships and rewards, schemed with Suttell to retaliate against Seguin, by scheming with Consentino and Santilli to procure fraudulent inflated child support against Seguin through court con, that also benefits the state as the federal government would pay Rhode Island \$4 for every \$1 collected under Title IV of the Social Security Act – Priscilla Glucksman, a personal friend of Meyersiek with whom she socializes at events at Lincoln School, retrieved Seguin’s tax returns from the state’s data base showing Seguin had not worked since 2008, and schemed with Barbara Grady and McCann to coach

Meyersiek to perjurally testify fabrication that Seguin worked for Bank of American earning \$280,000 plus bonuses, thus inflating child support debt of over \$160,000, which Seguin also reported to the U.S. Department of Justice, the F.B.I., the U.S. Department of Human Health Services, and other federal law enforcement agencies. The felony of interstate child support fraud, mail fraud, wire fraud and honest services fraud is proven by indisputable evidence that the Internal Revenue Service (IRS) never received any W-2 records reporting from Bank of America reporting that Seguin ever worked for Bank of America, never mind earning \$280,000 plus bonuses.

Retaliation Against United States Veteran for Reporting Criminal Charges of Child Rape, Pedophilia, Assault and Battery

136. Plaintiff mother Scholpp is an Air Force Sergeant who was called into active duty in February 2003. While she was on active duty, she placed her son, then one and half year old, in the care of her own mother, who was also a former Department of Social Services employee. Her ex-husband's sister, Kathleen, was a registered sex-offender. In the spring, Karl, her ex-husband, had visitation with his two children ages 2 and 5 from his first marriage. Karl had been an altar boy and his priest Father Michael Devlin had sent him to a private school. (Father Devlin often offered victims an education in exchange for sex and was defrocked for child molestation in 2004.) Karl told Kathy Lee that he had sex with a neighbor boy for four years from ages 8 to 12, but told her that he was "over it". Karl brought 1½ year old H back from a visit at his paternal grandparents home, where Karl's sister Kathleen resided. H was crying due to his painfully red and swollen genitals. The paternal family stated they did not know how the injury occurred.

137. On another occasion, Karl cocked his fist at Kathy Lee, shouting, "Come here, I'll punch your f-cking teeth out." H witnessed this outburst.

138. In 2004, on February 22, 2 ½ year old H climbed onto Kathy Lee's head, pressed his diaper into her face and said, "Susck my cock, Mommy. Mommy, susck my cock." Kathy Lee first believed that Karl's sister Kathleen had sexually molested H, since Kathleen had been previously documented as a sex offender by the Department of Social Services (DSS) after she bit Karl's daughter on the buttocks, leaving bruises. Karl's first wife had a restraining order against Karl's sister and revealed to Kathy Lee that Karl's whole family is involved in incest.

139. On March 1, 2004 Kathy Lee reported H's disclosure to the state police in Russell, Massachusetts. The trooper Eric Fairchild said, "These things are very hard to prove." He made a mandated report to DSS, which refused to forward the case to the District Attorney.

140. Instead of investigating child rape, pedophilia, assault and battery by Karl's family, DSS social worker Anabela Francisco charged Kathy Lee with 'neglect' for continuing to live with Karl and for being late with immunizing H. Immunizing is a parental choice and can never be mandated by the State. H's maternal grandmother, former head of a state welfare department and an eye-witness to H's sexualized behavior, sent strongly-worded letters to DSS for failure to protect H. Her letters were ignored by social workers Laurie Sullivan, Eric Indyk, and Jeffrey McNamara among others. Kathy Lee's attorney Greg Hession insisted that Kathy Lee meet with DSS only in his office. Attorney Michele Lucier-Lazuk also worked on the case and recommended that Kathy Lee not report the abuse.

141. Between March 17 and May 1, 2004 on advice from her attorney, Kathy Lee and H sought protection at a domestic violence shelter. While there, Kathy Lee had a psychological evaluation by Scott Andrews who gave her a clean bill of health. Astonishingly, social worker Jeffrey McNamara told Karl where Kathy Lee and H were staying. Karl's sister Kathleen began calling the domestic violence shelter, eventually forcing Kathy and H to move from the shelter. Karl filed for divorce during this time.

142. In April, 2004 Karl agreed to supervised visits with H, monitored by H's maternal grandmother. Karl was ordered to undergo a psychological evaluation, which he refused to do.

143. On July 8, 2004 Judge Marie Lyons gave Karl overnight visits with H. H's disclosures escalated. He began to display increased aberrant sexual behaviors, such as masturbating on furniture, with his teddy bear, and on people. He continued to disclose what Karl, his aunt Kathleen, and his half-sister Lauren (then aged 9) were doing to him. Sobbing, he begged and pleaded not to be made to go to see Daddy. His maternal grandmother tape-recorded his pleas.

144. Between July 2004 and December 2005, H's disclosures and injuries were documented by his pediatrician David Steele MD, a forensic investigator David Myers, a child therapist Jason Ravizza, his maternal grandmother, a friend of the family school nurse

Ellen Carvalho, his daycare provider Mary Cook, and his mother Kathy Lee. Injuries to his genitals were recorded three times by his pediatrician. Five suspected child abuse reports from H's therapist were 'screened out' by DSS. None were reported to criminal law authorities for criminal investigation.

145. A log was kept of the child H's disclosures, which numbered over 150 incidents and were submitted as evidence to the court. H said, "Daddy licks my butt." "Kaffy (Karl's sister Kathleen) puts sweet stuff on her pee-pee, I lick it." "Wauren sticks blocks up my butt. Lauren thinks it feels good. It does NOT feel good!" " , and "Wauren won't swallow, I swallow." H would wake from sleep in terror shouting, "No! No, not my backdoor...Not me!"

146. H was mute during a Multi Interdisciplinary Team interview; upon its completion he told Social Worker Jennifer Lomelino, "If I talk, Daddy will kill Mommy."

147. On December 22, 2004 in a 2 day trial, Kathy Lee was called a "coacher" and "alienator" by Karl's attorney Mary Socha. Judge Lyons did not allow H's therapist to testify and gave Karl full physical and legal custody. On December 27, 2005 State police entered Kathy Lee's home through an unlocked cellar door as Karl waited outside putting a message on her cell phone, "Bring him out, don't make this any harder than it has to be." Four and a half-year-old H was forced into Karl's custody at gun point.

148. Kathy Lee had no contact with H for 18 days, and then received supervised visitation for 4 hours at \$300 per week with a court-mandated agency. She was required to submit 15 job applications per week even though she already was holding a job position as a letter carrier. She was ordered to undergo a psychological evaluation with a court-chosen psychologist Victor Carbone, and was told that no visitation would take place until she did so. While Karl had refused to have a psychological evaluation, Kathy Lee obeyed the order and had a clean bill of health.

149. In 2005 Judge Lyons continually denied Kathy Lee's motions for unsupervised visits.

150. Kathy Lee filed an appeal in December 2005 through her attorney Jim Smith. Kathy Lee discovered that Judge Lyons was continuously disciplined by the Massachusetts Judicial Misconduct and Disciplinary Committee since 2001, placed on unpaid leave and

prohibited from sitting as judge, but never properly and adequately disclosed to the public, akin to the Catholic Church's continuous placement of sexual abuser priests among unsuspecting church communities.

151. In 2006, from April through September, H was separated from any contact with his mother for 6 months due to visitation fee demands. The visitation service took Kathy Lee to small claims court, for over \$600 owed.

152. On September 1, 2006 Judge Lyons was removed from the bench for her unethical behavior in the case after complaints to the Commission on Judicial Conduct. After Judge Lyons was removed, H was able to visit his mother supervised by the YWCA.

153. In 2007, Judge David Sacks continued to deny motions for unsupervised visits, ordered a guardian ad litem Linda Cavallero PhD chosen by Karl's attorney, and ordered Kathy Lee to pay \$7,000 for the 64-page report. The GAL report stated, "give H back to mother immediately, four nights a week."

154. Judge Sacks ignored the report that he himself had ordered and appointed a "Children's Law Project" attorney, Michael Greenberg who refused to meet with Kathy Lee and stated "no unsupervised visits for mother."

155. The appeals court affirmed Judge Lyon's decision to place H with Karl.

156. In 2008, YWCA personnel reported H's continued disclosures to Karl, rather than to DSS, and falsified records.

157. Chief of Probation John Johnson, who made reports to the court although Kathy Lee was not on probation nor ever accused of a crime, filed a motion to force her to seek work with a temporary agency.

158. Kathy Lee filed a complaint against him on the advice of advocate Armene Margosian.

159. Kathy Lee was told by an employee at the visitation center that the complaint angered her visitation supervisor Brenda Douglas, a friend of the Chief of Probation. On August 16, 2007, during a supervised visit, Kathy Lee read a note from H's maternal grandmother that said, "H, Grandma and Grandpa love and miss you and hope to see you

soon.” This was the last time H saw his mother. The last thing H said to his mother was “Mommy, you can call me every day! I’ll say that it’s somebody else, I’ll say that it’s (one of his school friends)”. Visitation supervisor Brenda Douglas suspended Kathy Lee’s next visit and sent a letter of reprimand against her to the Chief of Probation.

Retaliation Through Bad-Faith Harassment Proceedings Superior Court Including Subverting Claims

Gloria Johnson

160. Gloria Johnson filed claims in the Rhode Island Superior Court against Kosseff, Rafannelli and Lubiner for the afore-described court con of quack state-coerced psychological treatment, with Rafannelli as opposing counsel throughout six years or more of her case threatened, with Kosseff and Lubiner to put Gloria’s children in Rachel foundation in Texas for “deprogramming” through experimental treatment. This type of radical Stalinist Gulag state coercion court con has NO place in American society and is horrifying. What does Superior Court Judge Judith Savage do? She accused Gloria Johnson of unlawful practice of law helping her children to file their claims in Superior Court and ordered Gloria to be investigated by the Unlawful Practice of Law Committee that is staffed with lawyers who were disbarred in other states for unlawful practice of law! Subjecting Johnson to court con fabricated charges of unlawful practice of law, of course nothing came of the “investigation” by a committee staffed with disbarred lawyers discarded by other states, Savage dismissed Johnson’s claims against Rafannelli under quasi-immunity theories. Savage retired from the bench in August 2013 leaving vacant a seat for which Rafannelli now seeks to fill. The allegedly quasi-immune Rafannelli had not just tried to refer Johnson’s children to out of state experimental treatments for a buck, he also brought his own mother to forcibly enter Livingston’s home under the guise of conducting a home study on Livingston, under false pretenses that his mother is a court personnel. Such is the caliber of candidates for the Rhode Island judiciary nowadays.

Gloria attempted to submit evidence of TRIPPLE dipping by the quack court psychologists practicing PAS, trying to submit documents of defendants Kosseff billing Blue Cross Blue Shield for the “treatment” that he had already billed privately to Gloria Johnson for payment, as well as through federal funding. She was subverted by the judicial

defendants and prevented from entering such crucial evidence of crimes into the record, in a clear facial obstruction of justice scheme.

Tina Kufner

161. Tina Kufner had lived in Europe, and Germany prior to 2007. Since April 2007 -to present the present, Plaintiff mother Tina Kufner's ex-husband, Dominic Kufner ("DK") prevented all forms of contact to the children by telephone and/or visitation supervised or unsupervised in violations of US and German Court orders/-including German law on children's rights- upon return to Germany with temporary custody due to a Fraudulent Hague Convention in Rhode Island on Jan 31, 2007. DK has denied Telephone contact on Christmas and children's Birthdays since April 2007 to the present. In a stunning four month period in pervasively corrupt Rhode Island where Plaintiff Tina Kufner simply brought her young sons to see her parents and the children's maternal grand parents for a routine visit, DK schemed to bribe every corrupt judge and defendants using ex-parte proceedings to terminate Plaintiff's rights of travel to exit Rhode Island and to her children, force her into supervised proceedings by Rhode Island con artists falsely under the Hague Convention (which specifically PROHIBITS altering custody) and deprived her of all her rights, including defendant GAL O'Keefe "garnishing" her alimony paid into her German bank account, to pay for the children's school tuition via an EMAIL ORDER, which Defendant O'Keefe had no subject matter jurisdiction or personal jurisdiction to order under court con to commit international embezzling, international bank fraud, international money laundering and international kidnapping and kidnapping ransom demands against the Plaintiff, as she was conned under color of state law into supervised visitation, demand for supervision fees if she wanted to see her children and denied seeing her children because she did not pay up.

162. Prior to the fraud Hague Convention in Rhode Island on January 31, 2007, between March 1, 2006-Feb 16, 2007 Plaintiff Tina Kufner had both sole physical and legal custody of children, with any all of DK's attempts to gain custody of children having failed. DK was granted visitation rights every 14 days since October 18, 2006. DK schemed to entrap Plaintiff Tina Kufner in Rhode Island, knowing that the state is pervasively corrupt and everyone can be bribed and pay kick backs. DK set up Tina in an international scheme by falsely acquiescing to her taking her sons to Rhode Island for a routine visit with her parents and the children's maternal grand parents, bribe judicial issuance of ex-parte orders

to prohibit Tina from traveling back to Germany with her previously purchased return ticket, and thus having all her rights removed and kidnapped her children and demanded extortionate “supervision fees” ransoms under color of law.

163. 161. Tina Kufner had lived in Europe, Germany since 1994 and forced to return permanently back to the US in September 2011 and finally terminated Germany as her primary place of residency, and returned to Rhode Island, after 6 long years of legal abuse that began as soon as she found one image and close up of a child's anus in 2006, that carried over to Rhode Island, that took her sole custody rights away. Since April 2007 -to present the present, Plaintiff mother Tina Kufner's ex-husband, Dominic Kufner (“DK”) prevented all forms of contact to the children by telephone and/or access and visitation, including supervised or unsupervised in violations of US and German Court orders/-including German law on children's rights, DK returned to Germany with a temporary custody order and sole custody order as a result of the Fraudulent Hague Convention in Rhode Island filed 6 days after she arrived and 6 days prior to her return, on Jan 31, 2007. DK has denied all telephone contact on Christmas, children's Birthdays, Easter, and all major Holidays, including their grandparents since April 2007 to the present. In less than 20 minutes, after 6 days and in three month period in pervasively corrupt Rhode Island where Plaintiff Tina Kufner simply brought her young sons to see her parents and the children's maternal grandparents for a routine visit, to obtain 2 urgent medical operations, one at Mass Eye and Ear Hospital for her son and another for herself, both had been prevented by DK schemed to bribe every corrupt judge and defendants using ex-parte proceedings to terminate Plaintiff's rights of travel to exit Rhode Island even to obtain medical treatment for herself and her child, even a sexual examination by Hasbro Hospital for the children that lead to being forced into supervised visitation and loss of custody by the proceedings and by Rhode Island con artists falsely under the Hague Convention (which specifically PROHIBITS altering custodial rights) and deprived her of all her rights prior, during, and to present day, including defendant GAL O'Keefe “garnishing” her alimony paid into her German bank account, to pay via vire transfer to DK's attorney Charles Tamulivez in order not to pay for the children's school tuition, but to pay her and the DK's attorneys legal fees, information that came via an EMAIL, but Tina never received such an ORDER. Defendant O'Keefe acted solely as an attorney contracted by DK and had no subject matter jurisdiction or personal jurisdiction to order under court con to commit international embezzling, international bank fraud,

international money laundering and international kidnapping and kidnapping ransom demands against the Plaintiff, as she was conned under color of state law into supervised visitation, just for staying in a hotel with her children, for attempting to have her children seen by a child sexual abuse expert at Hasbro Hospital, for attempting to contact the Boston FBI office to report the crimes concerning child pornography, for submitting translated medical record into the court because her pro bono attorneys refused to address them, including the child pornography, for contacting the National Center for Missing and exploited children, for attempting to have her son operated on as diagnosed by over expert doctors in the US and in Germany since 2004, to be treated a criminal by both sides and demand Tina to be supervised and pay for supervised visitation if she wanted to see her children, even the German Courts found this all outrageous, but followed the errors of the RI Court Order because the mother and children are not German citizens, only US Citizens. The German Courts could not and will not change the error of the RI Courts, and after exhausting all avenues and being blocked on all sides, the advice of the German Government was to return to the US and deal with here, as they jurisdiction had been taken from the German Courts and brought to the United States Federal District Court of RI by a federal district court Judge to use the Hague as a custody and divorce proceeding, that had over one year more to go in Germany. DK in Germany did not get sole custody from a German court until December 1, 2008. Tina went from sole physical custody in both countries to being denied seeing her children because she could not pay up, to being denied legal fees for court transcripts on her pro se Appeal to Stay the Order of Return by Judge Smith.

162. Prior to the fraud Hague Convention in Rhode Island on January 31, 2007, between March 1, 2006-Feb 16, 2007 Plaintiff Tina Kufner had both sole physical and legal custody of children, with any all of DK's attempts to gain custody of children having failed. DK was granted visitation rights every 14 days since October 18, 2006. DK intentionally and premeditated a scheme to entrap Plaintiff Tina Kufner and the children in Rhode Island, on their (3) third trip since the separation began knowing that the state is pervasively corrupt and everyone can be bribed and pay kick backs. DK being in the Textile business has a history of paying kick backs in receive sales and orders in Asia and in the US. DK set up Tina in an international scheme by falsely acquiescing of taking her sons to Rhode Island against his knowledge and against a German Court Order, by intentionally submitting an Affidavit that states he had no idea where they and it was against his will or her to use the

children US passport, that belong to Tina and not DK, like using ones toothbrush, DK believed that everything that belonged to Tina belonged to him, including the children's US passports. DK attempted the German Judge to violate the Geneva Convention by ordering the US passport to be handed over to him or to the German Judgment, by ex-parte. Fortunately the Judge had been informed of he treaty and the consequences of such a treaty. Tina reserve the right to take this civil action not only to the supreme court, but reserves the right to take this to the European Human Rights Court or the European Criminal Court.

Although DK had been on the telephone with the children in route, and spoke to Tina's father, succeeded in bribing judicial issuance of ex-parte orders to prohibit Tina from traveling back to Germany with her previously purchased return ticket, and thus having all her rights removed, had the children exported out of the country and gained the access to the children's US passports in order to return to Germany. The American Consulate in Munich will not reissue the children's passports to the father because according to the Department of Home Land Security the father is not allowed to request US passports , that have since 2014 expired for children, whether he has custody or not, does not grant DK to violate the Geneva Convention or kidnap her children back to Germany.

163. After this farcical stripping of Tina's parental rights, she was forced to return to Germany in April 2007 along with the clearly in error of the Rhode Island District Court order stripping her of her parental rights under the Hague Convention. Upon returning to Germany and since December 1, 2008, Tina Kufner has had no legal counsel who is fluent in English. Tina neither spoke nor barely understands German, making her a sitting duck in Family or Domestic Violence proceedings in Germany. Due to the illegal Hague Convention and violating the Geneva Convention, proceeding in Rhode Island, Tina lost sole custody and the pending divorce proceeding awaiting her back in Germany, which she was not even present for due to the abuse, stalking, threats, and having become homeless returned to the US to recover from trauma and shock from January 2008 to April 2009 , and the German Divorce and Custody Order , had no hearing, no German legal counsel, just an Order granted on December 1, 2008, and not given an English translation until 2012.

164. Since 1994, DK began abusing Tina Kufner once he conned Tina into relocating to Germany from USA.

165. In December 2000 Tina had been an entrepreneur having begun her own business in Germany in 1994, due to marital rape of her second son she had to sell her business and give up her career, but Tina ready to devote herself as a full time mother did not know that DK's actual intent was to make sure she had no personal income of her own later, and so exhausted for the first three years having 2 babies born less than one year apart gave Dk the opportunity to send all bank record and personal information to his office, so Tina had no over view of their accounts since 1999, including her untouched business account having over 300,000.00 dollars a year for over 9 years, suddenly by April 2005 had disappeared.

166. Since 2004 to December 2006 Tina noticed symptoms for sexual and child abuse blood in stool, pains walking, strange bacteria's found in stomach, soars herpes in stomach and mouth, 2006 eye-twitching, bed-wetting (only at fathers) hyper activity, trauma, sticking objects in anis (2006), night terrors, adult language, imitating father, genital, strange bruises neck (2006), hips injury, strange drawing of dragons with sticks in mouth, naked dolls tied together with belt found in playroom, drawing (red and black), invisible friend, sudden anger and fear of father. Tina, neither speaking nor understanding German, did not know how to seek help or guidance to report these signs.

167. At the same time, from July 5, 2005 to August 2005 Tina Kufner and her children were not only stalked in USA , but DK joined them to make sure that Tina and the children did not speak to anyone concerning any of the above, including further photographing the children genitals on vacation in Florida, California, and later in 2007 in Rhode Island (witnesses and photographs available). Additionally, in September 2005, another au pair Alexandra Kain disappears 2 weeks after arriving in Germany (Affidavit) DK attempted to sexual assault her prior to witnessing DK exploiting children.

168. By September 2005 Tina Kufner uncovers DK has invested heavily in himself - 5 pension plans company and additional life insurance using all their money.

169. By September 2005 DK insisted Tina register with local tax authorities insisting she works after years of interfering with her previous attempts to work – and insisting on full-time care to children (Susan D. under oath). At the same time, in June 2005 DK insisted on relocating the entire family to an isolated and remote house in a forest (no houses in area).

170. In December 2005, Tina de-registered with Tax authorities due to children's health and sudden strange behavior concerning DK stranger behavior concerning DK, an

over-powering fear of being alone with him since September 2005. Unable to find English speaking child psychologist, DK cancels US plans on December 22, 2005 to RI for Christmas.

171. From September 2005 to February 2006 DK became extremely hostile, sending strange messages and forced the children to be in the Morlbach house alone another rented home for the entire family, and 2 of three total homes.

172. From January 5, 2006 DK abandoned Tina and her children and moved out. Tina discovered all her bank accounts have been withdrawn to zero balance and she was accused of stealing the money-have not seen bank statements since 2000.

173. From January 2006 to September 2006 DK refused to pay for living expenses or child support, stranding Tina and her children in the forest, not having any finances to move out.

174. On January 6, 2006 Tina received a letter from German Tax Authorities stating that DK was being investigated for failing to claim all worldwide Income from several countries and Tax Fraud since 2000.

175. On February 2, 2006 another Letter was received from German Tax Authorities stating DK was investigated for tax fraud for the years 2000-2004.

176. On Feb 6, 2006 Tina Kufner called Tax attorney Rene Schaeffler discovering he had not been their tax attorney since 1999. DK has been having TINA sign tax returns since 1994, knowing he was committing tax fraud.

177. From September 2005 to May 2008 DK was cyber stalking and hacking Tina's bank accounts, bank statements, banking accounts and private email and private email correspondences in a scheme to embezzle and launder money internationally, including double dipping on money given to parents in Germany for having children, called KinderGeld.

178. On Feb 8, 2006 Tina found a photograph of a close-up of JK's anus along with disturbing photos of children.

179. On Feb 9, 2006 Tina changed all locks and found out DK allowing children to watch hardcore porn (receipt and fax).

180. On February 17, 2006 DK forced his way into the house by coercion using passive aggressive behavior-abducted Tina's boys in pajamas for three weeks. Tina filed child abduction reports but local German Police refused to take Tina's report by saying she was a frantic American woman and they do not speak English.

181. On February 21, 2006, DK filed for his first petition for full custody 00552/06 after receiving a letter from Tina's attorney demanding explanations for the naked Photos. On March 1, 2006 there was a Court Hearing case 00 140/06. The Interpreter did not interpret during the hearing. The Court issued "RECORD" PROTOKOL visitation with father EXPIRED AUGUST 2006- (Case 140/06 file missing) Tina was granted Sole physical and legal custody - DK 's petition for Sole Custody had been rejected. 00 2 DK requested a "joint agreement to determine children's primary place of residence" expired in August 2006 after Tina filed a motion to the German Family Court to relocate to US.

182. On April 27, 2006, Tina and her children traveled to RI, USA for Easter vacation, where she was stalked. DK filed another petition for FULL Custody under 00139/06 alleging Child abduction due to Tina returning a mere 2 days after the previously scheduled return, which was due to Tina's son MK's health of another attack of Serious Otitis Media, partial hearing loss and an urgent operation was set for June 2006.

183. On April 27, 2006 DK filed for Divorce case# 002 F 00 298/06, 002 F 00295/06, while Tina was in USA (filing time is usually 1 year after separation not 4 months)

184. On May 2006 DK illegally and without consulting TINA cancels the rental lease for the house, stopped paying 3000,00 Euros a month rent, and all normal living and health insurance. TINA forced to sell her Mercedes (automatic) 95% cars in Germany(not automatic-) DK knows it would be hard to find another car - American lack of awareness 95% cars in Germany are Mercedes or BMW including taxis (legal fees case 00 046S) economic abuse.

185. On June 1, 2006 to September 2006 DK VIOLATED " ORDER "of June 1, 2006 WEILHEIM AMSTGERICHT Maintenance 4000.00 Euros and 875.00 Euros for each child. Tina never received throughout the entire German procedure any English translation.

186. On June 15, 2006 DK threatened to sue the hospital when Matthias was being admitted Dr Arnold report Dr Reiderir children ear nose and throat doctor since 2001 diagnoses Report.

187. On June 19, 2006 Ms Holfer (Family social services) who is a non English speaker investigated Tina for alleged child abuse reports from DK –(PAS)-obviously blinded –misreads their fear bias

188. On August 17, 2006 TINA found an entire series of Child pornography photos of her children taken by Dominic Kufner including the one naked anus shot among them that she found back in Feb 2006, TINA was terribly traumatized.

189. In September 2006 DK filed a “civil “ 3750,00 Euros case number.

190. On September 27, 2006, Dr Benzol, the children’s pediatrician, diagnosed MK with hearing loss that required urgent operation.

191. In October 2006 TINA hired Mrs. Franke Oehl petitioned against the GWG – due to illness on October 13, 2006 –no longer can represent TINA –again without legal counsel.

192. On October 18, 2006 “ORDER” issued by Weilheim case 002 F 00 552/06 visitation rights granting father every 14 days from Thursday to Tuesday, no prior notice, hearing, no English translation, no investigation with child abuse or investigation performed. DK violated “ORDER” continues to take without warning the children from school early every 7 days not every 14 days. TINA and children were deteriorating with no means to communicate to the Court.

193. On December 4, 2006 TINA obtained from the American Consulate a US citizen Rights to travel (letter).

194. From December 11, 2006 to December 13, 2006 an “ Order” issued by the Court secretary violating US citizen Civil and Constitutional Rights another alleged abduction and full custody order deposit American Children passports to the German Social Services Ms Holfer social worker or the Court secretary- No prior notice, no lawyer, no hearing, no English translation-which was unlawful.

195. On December 15, 2006 Tina filed Pro Se with assistance in writing German with Attorney Bogoza.

196. On December 18, 2006 there was a “Notice of a Hearing “Children to be heard based on petition filed by DK concerning Christmas vacation. Children denied English Interpreter to be present based on DK communicating directly with the new Judge Hausladen (1st time as Judge)(witness)

197. On December 20, 2006 there was a last minute hearing DK knowing TINA without legal Counsel for a “Hearing on December 20, 2006” hires Christopher Wachter RECORD” “PROTOKOL (DK never submitted this petition in RI or a correct translation of agreement - TINA was not violating expired agreement on Jan 31, 2007- agreement expired US time on concerning children passports as of Jan 30, 2006 case 00 2 F 00552/06. –also shows DK having - Visitation Rights – not from Jan 25-Feb 7, 2007 Hague filed on Jan 31, 2007 based on fraud allegation child abduction and DK having custodial rights or rights of access was a lie – TINA had no legal counsel, no notice Judge Smith RI FEDERAL Court issued “ Order “ restricting TINA rights to free travel outside RI. Dk continued stalking and surveillance of Tina unfettered.

198. On January 26, 2007 DK filed fraudulently another “full custody “ petition alleged abduction with the GWG and Weilheim Family Court MK’s suffers Otitus Media attack (Sharon o Keefe’s (GAL) report incorrect)

199. On January 27, 2007 DK traumatized Tina’s parents, the Melo household with 2 cars privately hired to patrol the Melo household on 48 hour surveillance. Inside the household were Tina’s elderly parents, parents, the children’s great grandmother and handicapped Aunt, herself and her two children. On January 30, 2007 Cumberland Police issued an urgent RESTRAINING ORDER along with the RI FAMILY COURT. The police identified the photos as Child pornography.

200. On January 31, 2007 Tina obtained a restraining order against DK, with TINA receiving in RI temporary custody of children.

201. On January 31, 2007, DK lawyers called Cumberland police with unfounded investigations with DCYF.

202. On Feb 2, 2007 Judge Smith issued another “ORDER” staying the RI Family Court Order, misleading TINA to file a new custody and divorce proceeding believing she had no custody rights in Germany--not a restraining Order- also ordering TINA to release

passports believing to be German Passports not American –TINA cancels return flight Feb 7, 2007, no due process, service, legal counsel, (Court transcripts) TINA forced to cancel Dr Keamy's appointment, again Mass Eye and Ear Hospital- MASS, for MK operation.

203. On FEB 16, 2007 in GERMANY DK GRANTED A TEMPORARY SOLE CUSTODY OF CHILDREN TEMPORARY last for 2 weeks, no hearing, notice, legal counsel, based on Tina's failure to return to Germany because of Rhode Island federal court's detainment of Tina and DK's false allegations of abduction.

204. On Feb 21, 2007 DK submitted a fraud forensic psychological evaluation by a Dr Weinthrob because TINA claimed GWG is not SFP (Forensic) and DR Weintraub never met the parties.

205. On Feb 22, 2007 in RI FEDERAL COURT (in a 2 weeks bench trial in violation of the Hague in Domestic Violence cases), DK submitted a Fraud English translation of FEB 16, 2007 ORDER (5 page order in a 2 page order) that excluded reasons confirming unlawful and no investigation of child abuse by the police in Germany.

206. On March 13, 2007 to March 16, 2007, there was no Legal Counsel for Tina and on March 15, 2007, RI FEDERAL COURT issued a Gage "Order." And gave DK temporary sole custody in illegal violation under the Hague Convention. The lawyer firms and judicial defendants took advantage of Tina's pro se status to commit court con against her.

207. On March 22, 2007 DK Violated RI VISITATION ORDER of 3-19-2007- kept children and on March 28, 2007 "Opinion and Order" returning the children based on Tina's appearance and DK continued petitions slandering Melo Family, TINA and using Dr Gardner's PAS quack theories with a Civil judge in federal court. TINA's evidence and translated orders were never submitted along with MK and JK's German doctors submissions and many other evidences. Tina was denied her right to be heard.

208. On April 3, 2007, the First Circuit Order granted "Pro Se" petition to Staying the federal court's Opinion and Order of March 28, 2007." DK filed for Legal fees/Motion against the Order to Stay the opinion and order Dr Jenny, paid by DK, testified falsely that the nude photographs of children's exposed spread anus, scrotum and penis were "cultural," not child pornography, which materially endangered the children. Dr Jenny never spoke or saw the children or the mother.

209. On April 7, 2007 TINA Stay motion was lifted. DK immediately left the country with Tina's children while TINA's reconsideration motion had been filed and awaiting the Appeals Court decision, it had not been answered until May 30, 2007.

210. On April 24, 2007 TINA had no choice but returned to Germany. DK violates " OPINION and ORDER 's all 4 undertakings: MK had no operation, -hearing loss- witness children traumatized-DK denied all contact-continued to sue Tina for money and places TINA on food stamps and homeless since June 2007 forced to return to States in December 25, 2007 in fear DK .

211. In January 2009 DK continued to file for \$327,450.00 Legal fees from the Hague proceeding. By March 12, 2009 DK has been granted the same Order in Germany in 2 Courts in January 2008 while on appeal in US, with Tina having had no legal counsel, no notice, DK filed for urgent order. Altogether, the scam totaled over \$1 million for the same proceeding from three different courts, constituting a scheme of court con, embezzling and money laundering by DK and team of his lawyers.

212. In September 2007 to July 2008 TINA still had no legal Counsel. The children are crying in school. Tina has witnesses who filed affidavits under oaths, which the courts were rejecting even being admitted into evidence.

213. In May 2008 -DK found TINA in Woonsocket and stalked TINA in RI and forced her to finally flee to a Battered Woman Shelter, severely traumatizing Tina.

214. In July 2008, Tina flew back to Germany, her flight paid for by the battered women coalition.

215. On October 27, 2008, Tina was given a lawyer who spoke no English, Frau Pfad, on custody, money and visitation matters. TINA's witnesses were not allowed into evidence or mentioned by TINA's attorney-interpreter Wolf. German Judge Wachhofer claimed that TINA did not look like a victim of Domestic violence. DK claimed poverty when Kufner Enterprise's net profit in 2007 was around 500 million.

216. On December 1, 2008 Germany ordered full custody to DK and divorce, no English translation or motions ever filed to Court concerning DK violating any orders since 2006. DK filed a criminal charge in 2009 - Courts believe TINA has given up her custody

rights, DK pension, alimony, courts never received motions filed by TINA trying to speak to her children.

217. In January 2009 DK filed with Oberlangericht appeals Court against supervised visitation and for child support from TINA pending motion in Germany by March 12, 2009 pending must file against the custody and divorce degree from December 1, 2008.

218. Tina Kufner's lawyers Neville Bedford and Barry Pollock conspired with DK's legal team to aid and abet the criminal acts of child molestation and rape from criminal law enforcement authorities. They refused to report it, or to submit evidence thereof to the Appellate Court in the First Circuit. The GAL reported was sealed and Tina was denied her rightful copy as a party of the proceedings, nor given the opportunity to cross-examine the GAL and the report. Additionally Richard Boren entered his appearance on March 16, 2007 on behalf of Tina but had a conflict of interest and concealed it from Tina, because Tina discovered that Boren was contacted by Dominik Kufner to be assigned as the GAL.

219. Dr. Jenny, DK's hired "expert" in Rhode Island also conspired with DK's legal team to aid and abet the criminal acts of child molestation and rape from criminal law enforcement authorities. They refused to report it, or to submit evidence thereof to the Appellate Court in the First Circuit.

220. Dk's lawyers, Robert Parker, Gerald Nissenbaum, and Brad Martin conspired to aid and abet the criminal acts of child molestation, hid the evidence of children pornography from criminal law enforcement by contracting Sharon O Keefe and others to evaluate the images, instead of notifying criminal law enforcement authorities. They refused to report and in fact possessed, shared, via the internet, mail, and via hand delivery the K-1-K43-45 domestically and Internationally, and did not submit the evidence thereof to the Appellate Court in the First Circuit, as well as the scheme to get paid three times in three different cases in three different courts to fraudulently procure legal fees against Tina Kufner for the fraudulent and illegal Hague Convention proceeding in Rhode Island. The lawyers in Tina's case did not have licenses to practice in Federal Court.

Mary Seguin

221. Mary Seguin had filed criminal charges against the Rhode Island RICO enterprise of court con, \$3 million insurance fraud and defrauding federal program funding

participants: Textron, Adler Pollock Sheehan, McIntyre Tate Lynch & Holt, Patrick Lynch, Gero Meyersiek, Sophia Meyersiek, Patricia Rocha, Gilbert Rocha, Jeremiah Jeremiah, Kathleen Voccola, Lynch & Friel, Paul Suttell, Haiganush Bedrosian, Patricia Murray Rapoza, Mary Lisi, Barbara Grady, Michael Forte, Stephen Capineri, John McCann III, Lori Giarrusso, Peter Kilmartin, Rebecca Partington, Susan Urso, Lincoln Chafee, Steven Constantino, Sharon Santilli, and Priscilla Glucksman, including their defrauding federal funding pursuant to fraud state administration of federal funded programs under the Juvenile Justice Delinquency Prevention Act, the Violence Against Women Act and Social Security Act Title IV 42 U.S.C. sec. 658a and 667(b)(2).

222. The Defendants were bribed and continue to be bribed, and received and continue to receive kickbacks from Gero Meyersiek and Textron to grant favorable family court orders benefitting them, by secret illicit contractual agreement in 2001 (See EXHIBIT A), with moneys Meyersiek and Textron set aside deposited in an escrow account at Citizens Bank from the proceeds of the exercise of Gero Meyersiek's Textron stocks and options. By illicit and secret contractual agreement, Textron and Gero Meyersiek pre-agreed to jointly interfere, influence and bribe the corrupt state of Rhode Island family court defendants to rule against the Plaintiff in two family court proceedings, (with the purpose in part of illegally interfering in the Plaintiff's fundamental right to familial integrity to her two daughters) in which the Plaintiff is the defendant, Seguin v. Seguin and Meyersiek v. Seguin. Whence, from 2001, the Defendants schemed to deprive the Plaintiff of her intangible right to honest services, in which scheme the Rhode Island defendants conspired to defraud the Texas plaintiff for child support, and made repeated ransom demands of \$50,000 and \$25,000 if the Plaintiff mother wanted to see her children, motivated in retaliation for the Texas Plaintiff's constitutionally-protected open criticism of corruption by the Rhode Island's state and local governments, and the Plaintiff's reporting Rhode Island's government agencies' violation of federal laws to the F.B.I. and law enforcement officials of the U.S. Department of Justice for over a decade that caused Rhode Island to be under on-going federal investigation. The Rhode Island defendants conspire to defraud the Texas Plaintiff in pre-agreements to corrupt the judicial process in a scheme to first terminate the Plaintiff's parental rights on ex-parte based on outrageous illegal human rights violation petitions demanding the termination of the Plaintiff mother's parental rights on ex-parte petitions that state "the grandmother does not speak English" as a basis to terminate parental rights without

notice or a hearing or stenographic recording, in a scheme where Rhode Island then used as a fraudulent basis to make ransom demands of \$50,000 and \$25,000 if the Plaintiff wanted to see her children and then to order inflated child support obligations against the Texas Plaintiff through fraud. Without the outrageous impermissible termination of the Plaintiff's custody on ex-parte based on petitions that openly and textually state "the grandmother does not speak English," that shows facial human rights violations of ethnic and racial discrimination in facial violation of established U.S. Supreme Court case law Palmore v. Sidoti, 466 U.S. 429 (1984), in the courtroom against citizens and immigrants who do not speak English in the First Circuit, a Circuit that encompasses Puerto Rico, where all households do not speak English at home, there would be no basis for Rhode Island to order any child support obligations against the Texas Plaintiff, or demand any monetary ransom of \$50,000 or \$25,000 if the Plaintiff wanted to see her children. The ethnic and racial discriminatory termination of the Plaintiff's parental rights on ex-parte is a racketeering scheme to set up the Plaintiff for Rhode Island state officials to extort the Texas Plaintiff under color of state law, including demanding \$50,000 as a condition for the Plaintiff to see her children, \$25,000 as a condition for the Plaintiff to see her children in Texas, and a \$160,000 facially fraudulent child support debt. This suit also demands monetary damages against the defendants individually for the corrupt policy, practice and the manner and conspiracy to defraud the Texas Plaintiff interstate in which the State Executive Defendants and Judicial Defendants administer and operate "Title IV-D" of the Social Security Act agency program as an enterprise engaged in fraud and racketeering, through its agents, employees and subordinates, to conspire to defraud under color of state law, extort under color of state law, including the judicial Defendants pre-agreeing to aid in cover up of the fraud and racketeering by causing no stenographic recordings to be made of state proceedings conducted impermissibly pursuant to retaliatory motives, including the judicial Defendant Suttell conspiring with R.I. Family Court Enterprise participants, judges John E. McCann III, to conduct facially fraudulent proceedings, including Defendants Kilmartin's, Clements' and O'Donnell's knowing refusals to investigate and prosecute public corruption and criminal activities by the named defendants in violation of 42 U.S.C. sec. 1983, 1985 and 1986, and 18 U.S.C. 1346, including Defendant Kilmartin's conspiracy with the named Defendants in this case to cover up said criminal activities, including lying to this Federal Court that the facial fraud, obstruction of justice and racketeering state activities are

legitimate, and lying through interstate electronic transferal in violation of federal wire fraud and mail fraud laws, of said lies to the New Hampshire Federal Judges, and to retaliate against the Plaintiff, an out of state domicile of Texas, for her exercising the Constitutionally-protected right of reporting the State of Rhode Island's violation of the Juvenile Justice Delinquency Prevention Act to U.S. Department of Justice on January 3, 2011, which resulted in on-site federal investigations of the reporting non-compliance of juvenile incarcerations and over-all non-compliance of the Juvenile Justice Delinquency Prevention program operated and administered by the Governor's Office of the State of Rhode Island in April 2011 and on-going; because the State's noncompliance shall result in ineligibility to receive federal funding, and at a time that the State has difficulty balancing its own budget, the Executive and Judicial Defendants seek to retaliate against the Plaintiff for reporting their federal law violations; Plaintiff's January 3, 2011 report is merely one of almost a decade's long history of her making criminal reports of extortion and racketeering by the Rhode Island Family Court RICO Syndicate and its state and private participants under color of state law the Plaintiff filed and reported to the United States Department of Justice against the State judicial actors in the R.I. Family Court enterprise under Defendant Suttell's direction, head, budgetary support and supervision between 2003 to the present: (1) 2002- the Plaintiff reported to the F.B.I. of the criminal conspiracy to commit criminal insurance fraud by Gero K. H. Meyersiek that is aided and abetted by the father of Textron's counsel, R.I. Family Court Associate Justice Gilbert Rocha and the then associate-Family Court Justice Haiganush Bedrosian; (2) 2004 – the Plaintiff reported the admission by then-Chief Judge of the Rhode Island Family Court Jeremiah Jeremiah his admission of Rhode Island Family Court racketeering, admission that the Plaintiff was systematically conned by the family court judges, the G.A.L., and various attorneys "aiding the court" and awarded fees by the corrupt judges through fraud from upfront court-impounded assets belonging to the Plaintiff until all impounded assets are stolen, in the same pattern as the infamous First Circuit trilogy cases of Cok v. R.I. Family Court, 985 F.2d 32 (1993); (3) 2010 – the Plaintiff reported criminal extortion, racketeering and destruction of evidence and obstruction of justice under color of state law by R.I. Family Court Justice Stephen J. Capineri and R.I. Family Court full-time mediator and part-time patronage G.A.L. "to aid the court" appointee Lori Giarrusso for a scheme to first terminate her parental rights on ex-parte without basis in state or federal laws in unrecorded secret tribunals based on ex-parte termination petitions that racially

discriminatorily state “the grandmother does not speak English,” destroying and shredding evidence, fabricating evidence, and then outright extortionate ransom demands of \$25,000 and \$50,000 against the Plaintiff if the Plaintiff wanted to see her children under color of state law (a ransom demand by the State) and the conspiracy and scheme to forcibly break in and enter, with Gero Meyersiek, the Plaintiff’s locked residence in Rhode Island calculated to search for any incriminating evidence the Plaintiff might have held in her locked residence; (4) 2011 – the Plaintiff reported systemic criminal constitutional deprivations in violation of 18 U.S.C. sec. 242 and 241; systemic criminal violation of 18 U.S.C. sec. 1513 of retaliation of the Plaintiff, a long-time federal informant, for reporting criminal violations of 28 U.S.C. sec 1961 et seq. and 28 U.S.C. sec. 242 and 241, and 18 U.S.C. sec. 1346 by the R.I. Family Court justices; (5) 2012 – The Plaintiff reported criminal violation of 18 U.S.C. 1513 and 18 U.S.C. sec. 1346 to the U.S. Department of Justice and the U.S. Department of Human Services against the R.I. Family Court and the Child Support Office under Governor Chafee’s direction and supervision for retaliation against the Plaintiff for reporting criminal activities by the Defendant , as well as conspiracy to defraud calculated to receive additional incentive payments to the state’s federal funding under 42 U.S.C. sec. 658a and 667(b)(2); the aforesaid actions by the defendants is further in violation of 42 U.S.C. sec 667(b)(2), where their retaliation, fraud and conspiracy to defraud are calculated to receive additional “incentive payments to states” federal funding and payments pursuant to 42 U.S.C. sec. 658a through fraud in judicial proceedings, presided by John E. McCann III, Associate Justice of the Family Court, who conspire with the Executive R.I. family court enterprise participant-defendants and the Chief Justice of Family Court, Haiganush R. Bedrosian, in their official capacities, to conduct both sham child support and domestic violence proceedings calculated and motivated to retaliate against the Plaintiff for reporting the state executive office’s cover up of the R.I. Family Court enterprise’s illegal incarcerations of children and conducting sham proceedings for the purpose of extorting unwarranted fines, fees by threat of incarceration by the family court’s systemic practice and policy of depriving, abridging and infringing on fundamental constitutional parental rights on ex-parte without basis in law or fact, without stenographic recordings of deprivation proceedings calculated to cover up the illegal proceedings, destroying evidence, and its incarcerating children for status offenses in violation of the Juvenile Justice Delinquency Prevention Act. From February 2011 to the present and on-going, Associate Justice John E. McCann III, Haiganush Bedrosian and Paul

Suttell conspired with, aided and abetted the executive office R.I. family court enterprise participants in conducting sham and fraudulent child support proceedings in violation of 42 U.S.C. sec 667(b)(2), calculated to retaliate against the Plaintiff for reporting their federal law and constitutional violations to the U.S. Justice Department that caused an on-site investigation in Rhode Island by the Federal Justice Department, and to aid and abet the executive office R.I. family court enterprise participant to unjustly receive “incentive payments to states” federal funding and payments pursuant to 42 U.S.C. sec. 658a, for which the R.I. family court enterprise participant and the State of Rhode Island would not be eligible when it violates 42 U.S.C. sec 667(b)(2). From January 2011 to the present and on-going, Chafee, Constantino and Santilli conspired to retaliate against the Plaintiff in conspiracy with the corrupt judges, Bedrosian, McCann and Suttell. In a scheme to defraud the Plaintiff in farcical judicial proceedings, they conspired to defraud the Plaintiff over \$160,000 in child support through fraud, when her state tax returns state that she has been both unemployed since 2008 and her court records show she had been suffering from pregnancy and post-partum surgery complications since March 2010. Consistent with the pattern of racketeering activity of a RICO enterprise that the R.I. family court enterprise is, as documented since the Cok trilogy, John E. McCann III carried out the judicial syndicate pre-agreed scheme and ordered facially fraudulent child support debt obligations between May 24, 2012 to August 15, 2012, indebting the Plaintiff to a staggering \$160,000 of child support debt through farcical judicial proceedings, framing the Plaintiff as earning \$280,000 plus bonuses fictitiously at Bank of America, which places the Plaintiff in America’s TOP 1% earning bracket in 2012. In an interstate racketeering scheme, Pricilla Glucksman, a personal friend of Gero Meyersiek who socializes with Meyersiek at Lincoln School events in Providence, Rhode Island, her herein named defendant-supervisors and Gero Meyersiek, Barbara Grady and John E. McCann conspired to have Gero Meyersiek perjure that the Texas Plaintiff worked at Bank of America outside of Rhode Island earning over \$280,000 plus bonuses. The Plaintiff never worked at Bank of America. What is worse, Meyersiek’s friend Priscilla Glucksman retrieved the Plaintiff’s tax returns from the State’s electronic database maintained by the state’s Child Support Office and Department of Human Services showing that the Plaintiff has been unemployed for four years, since 2008, and that she never earned \$150,000, never earned \$280,000 plus bonuses, and never worked at Bank of America. What is even worse in a case of prima facie fraudulent and corrupt judicial

proceeding, Priscilla Glucksman showed Plaintiff's said tax returns in court to McCann, Gero Meyersiek and Barbara Grady. McCann conspired with Bedrosian and Suttell pre-proceedings in ex-parte conversations in person, by phone and by email on how to defraud the Plaintiff irrespective of obtaining the Plaintiff's tax returns that show she has been unemployed since 2008. In clandestine ex-parte conversations and correspondences from January 2011 and October 2012, they schemed to defraud the Plaintiff by fraudulently claiming she has an earning capacity of \$150,000. What is even worse, Glucksman held the Plaintiff's tax returns in her hands during the multiple farcical judicial proceedings between on or about September 2011 to May 24, 2012, claiming the Plaintiff worked at Bank of America earning over \$280,000 plus bonuses, showing facially illegitimate, fraudulent and criminal administering of the Rhode Island state's Social Security Title IV Part D program. What is even worse, Santilli and Glucksman threatened to enforce the fraudulently obtained and facially fraudulent child support debt interstate against the Plaintiff in Texas. The Plaintiff reported the aforesaid racketeering, obstruction of justice, retaliation and RICO violations to the local authorities in Texas and the U.S. Department of Justice in Texas. The Plaintiff requests that this Court enpanels a Special Grand Jury to criminally investigate and prosecute the R.I. family court enterprise participants Instead of investigating and prosecuting the Plaintiff's facial criminal complaints contained in this Federal Complaint of RICO, fraud, obstruction of justice and racketeering against the Rhode Island R.I. family court enterprise participant , Kilmartin, O'Donnell and Clements conspire with Chafee, Constantino, Santilli, Glucksman, McCann III, Bedrosian, Capineri and Suttell to defraud this Federal Court that in Rhode Island, the most corrupt state in the country, the interstate fraud, retaliation and criminal activities the Plaintiff asserts in this claim actually serves a legitimate state interest, which **SHOCKS THE CONSCIENCE**. In Rhode Island, where rampant public corruption pervades all levels of government, bribery and kickbacks are how business is done, therefore, by the defendants' standards, legitimate. In Texas, defrauding anyone of facially fraudulent child support is categorically not a state interest, and defrauding a ransom of \$50,000 and \$25,000 if the mother wants to see her children after terminating the mother's parental rights in unrecorded secret tribunals on ex-parte based on termination petitions that state "the grandmother does not speak English" is a crime in Texas, in prima facie violation of deprivation of the public's right to honest services, so why would fraud and ransom demands be a state interest in Rhode Island? The R.I. family court enterprise

participants' violation of 42 U.S.C. sec 667(b)(2) through fraud and conspiracy to defraud calculated to retaliate against the Plaintiff may render the State of Rhode Island ineligible for federal funding under 42 U.S.C. sec 651 or Part D of Title IV of the Social Security Act. The Plaintiff is a federal informant protected under 18 U.S.C. sec. 1513(e) and 1513(f), and the R.I. family court enterprise participants' acts of retaliation to defraud and extort ransoms are criminal, in violation of 18 U.S.C. sec 1513 *et seq.*, that are, further, predicate acts of 18 U.S.C. Sec. 1961 *et seq.*

223. Mary Lisi, Chief Justice of the U.S. District Court of the District of Rhode Island, is a former employee of the Rhode Island Family Court from 1982 to 1987. She has first hand working knowledge of the RICO manner in which the defendants Suttell and Forte and the R.I. Family Court defendants impound upfront litigants' assets in a scheme to award patronage appointees for kickbacks outlined as far back as the Cok trilogy in Cok v. Cosentino, 876 F.2d 1, (1st Cir. 1989), and Cok v. R.I. Family Court, 985 F.2d 32, (1st Cir. 1993) and Cok et al v. Michael Forte, 69 F.3d 531 (1995). She further has first hand working knowledge of the R.I. Family Court's policy and practice of shredding evidence, fabricating evidence and obstruction of justice by defendant Lori Giarrusso. She has first hand knowledge that the Rhode Island Family Court routinely con litigants under color of state law, which was admitted to by former Chief Justice of the R.I. Family Court Jeremiah Jeremiah. She has first hand knowledge that Gero Meyersiek committed insurance fraud in a scheme with Textron and the cabal of R.I. family court lawyers in Rhode Island family court aided by Gilbert Rocha. Not only did she do nothing, she sought to cover up cases alleging judicial corruption for dismissal with the New Hampshire District Court judges by arranging for such cases that allege judicial corruption involving the R.I. Family Court syndicate members to be assigned, after the recusals of all four resident federal judges in the district of Rhode Island, pursuant to 28 U.S.C. sec. 636(f), to the newly-appointed magistrate Landya McCafferty, who was only appointed in January 2010, and who categorically has no judicial common sense grounded in judicial experience in Rhode Island law or pervasive Rhode Island public corruption, to dismiss at the pleading stage so that they do not see the light of day. Mary Lisi, while hearing Meyersiek's and his wife Sophia's testimony in one federal case, Meyersiek v. U.S. Immigration that he was blind, could not travel and disabled, but simultaneously approved monetary settlements of hundreds of thousands of dollars benefiting Meyersiek in a simultaneously file case by Meyersiek, Meyersiek v. Richards et al, in which

Meyersiek sued Richards for \$1 million for the work he allegedly did in Rhode Island and other states, such as Gerogia, for Richards. Mary Lisi recused herself from this instant case.

224. The Rhode Island federal judge William Smith, according to R.I. family court records, has personal and intimate knowledge of the common backroom dealings by Rhode Island Family Court judges and officers of the court involving ex-parte communications – he had one such ex-parte meeting with one wealthy German father’s lawyer and the deprivation of a person’s right to honest services. Judge Smith himself engaged in an ex-parte meeting with the lawyer of a wealthy German father in a R.I. family court case, in which Judge Smith stopped the F.B.I. investigation into that family court case, not in open court.

**RHODE ISLAND IS RANKED THE MOST CORRUPT STATE IN THE
COUNTRY**

225. Public corruption is a way of life in Rhode Island and the state of Rhode Island is ranked the most corrupt in the nation. The state is incestuous, mostly because Rhode Island natives describes that the hiring by public officials of their family, friends and mistresses to \$100,000+ state jobs in Rhode Island is merely the way business is done in the state’s government at all levels. F.B.I. files show that members of the bar lie routinely, bribery and kickbacks are routine, it is not beyond the Rhode Island supreme court justice to have ties with the mob, and \$31 million is unaccounted for in the Traffic Court. However, compared to the numerous reports of public corruption unearthed publicly by Pulitzer-prize winning journalists, a small percentage is ever prosecuted, indicted or arrested. Rhode Island is notorious for the transfer of an out-of-state F.B.I. Special Agent Dennis Aiken, to make an integral impact in the actual prosecution of corrupt public officials, the most notorious being former Providence Mayor “Buddy” Cianci. It is inferred and implied that without out-of-state agents like Mr. Aiken, such public corruption prosecutions would have been less successful.

226. Former governor Edward DiPrete also spent one year in jail after pleading guilty to 18 corruption charges that he took bribes from state contractors while in office. The Ocean State tradition of political scandal isn't limited to executive officers—just look at the legislature and court system. Former speaker of the House and chief justice of the state Supreme Court Joseph A. Bevilacqua resigned in 1986 during impeachment proceedings, in which investigators alleged that the then-judge had strong ties to the mob.

227. In the corrupt state's family court, it is routine and common practice to illegally prolong litigation, exhaust the mother's funds through prolonged litigation, award custody of her children to the father after her funds are exhausted and she could no longer afford a lawyer, and then order the mother to pay child support to the father.

228. In the corrupt state's family court, it is routine and common practice to illegally impound the parties assets upfront, appoint a cadre of "special assistants," award the assistants the upfront impounded assets, from which the judges and the court are paid kickbacks by the court-appointed and awarded "special assistants," and lawyers.

CLAIMS FOR RELIEF AGAINST DEFENDANTS

COUNT ONE: SUPREMACY CLAUSE OF THE U.S. CONSTITUTION

229. Each of the foregoing allegations is incorporated as if fully set forth herein.

230. The actions and inactions of the defendants violate the Supremacy Clause , Article VI of the U.S. Constitution, because they conflict and interferes with federal laws, regulations and the Constitution.

COUNT TWO: DUE PROCESS CLAUSE OF THE 14TH AMENDMENT TO THE U.S. CONSTITUTION

231. Each of the foregoing allegations is incorporated as if fully set forth herein.

232. The defendants' actions and inactions violate the due process clause of the 14th Amendment.

COUNT THREE: IMMUNITIES AND PRIVILEGES CLAIM

233. Each of the foregoing allegations is incorporated as if fully set forth herein.

234. Defendants have violated and continue to violate rights guaranteed to Plaintiffs by 42 U.S.C. § 1983, the Privileges and Immunities Clause of Article IV, Section 2 of the United States Constitution.

COUNT FOUR: IMMUNITIES AND PRIVILEGES CLAUSE OF THE U.S. CONSTITUTION ARTICLE IV, SEC. 2, CLAUSE 1

235. Each of the foregoing allegations is incorporated as if fully set forth herein.

236. The Defendants' conduct and fraudulently procured orders against the Plaintiffs impermissibly infringes on the right to travel and freedom of movement.

COUNT FIVE: FRAUD

237. Each of the foregoing allegations is incorporated as if fully set forth herein.

238. By using their official capacity to retaliate against the Plaintiffs for reporting Defendants' federal offenses, and for scheme to receive bribes and kickbacks, the Defendants commit fraud as officers of the court, procuring judgments and orders under malign and corrupt influence for personal gain.

239. By using their official capacity to financially benefit other officers of the court to protract or initiate proceedings without basis in law or fact, to financially benefit other officers of the court who agree to the scheme to deprive constitutional rights under color of law, to financially benefit other officers of the court who agree to the scheme to extort the Plaintiff under color of official right, to financially benefit other officers of the court to use fraud upon the court to initiate, extend or protract proceedings, the Defendants commit fraud on the court as officers of the court, issuing judgments against the Plaintiff based on fraud, under malign or corrupt influence for personal gain or the financial gain of other officers of the court and themselves.

COUNT SIX: 42 U.S.C. sec. 1983, Mail Fraud and 18 U.S.C. sec. 1346

240. Each of the foregoing allegations is incorporated as if fully set forth herein.

241. The Plaintiffs have a right to honest services. The Defendants schemed to deprive the Plaintiff of her right to honest services. Also, Defendants' misconduct, conspiracy and fraudulent procurement of child support order deprives the Plaintiffs of rights, privileges and immunities secured by the United States Constitution and federal laws.

242. The Defendants were acting under color of state law when they procured the fraudulent child support order from biased judges, and all agents of the State of Rhode Island and Massachusetts attempting to effectuate or enforce the fraudulent orders are, and will be, acting under color of state law.

243. The Defendants' misconduct and fraudulently procured-orders, bribery and kickback schemes, extortion of supervision fees, including \$25,000 and \$50,000, if the Plaintiffs wanted to see their children, deprive and subject the Plaintiffs to the future deprivation, of rights secured by the Constitution and federal law. Accordingly, the Plaintiffs are entitled to recover damages they have suffered as a result of the Defendants' misconduct.

COUNT SEVEN: 42 U.S.C. Sec 1981

244. Each of the foregoing allegations is incorporated as if fully set forth herein.

245. Title 42 sec. 1981 provides that all persons within the United States shall have the same rights enjoyed by citizens to make and enforce contracts and to have the full and equal benefit of all laws and proceedings for the security of persons and property.

246. The Defendants' misconduct and procurement of fraudulent child support orders and supervised visitation orders in sham proceedings that are based on the initial deprivation of the Plaintiffs' parental rights based on "PAS" or "the grandmother does not speak English," or "taking the children to a hotel to spend a night" deprived the Plaintiffs of their rights guaranteed and protected by 42 U.S.C. secs. 1981.

COUNT EIGHT: ATTORNEY'S FEES, COSTS AND FEES

247. Each of the foregoing allegations is incorporated as if fully set forth herein.

248. As a result of the Defendantw' conduct, the Plaintiffs have brought this suit pursuant to 42 U.S.C. sec 1983 and 1981. Accordingly, the Plaintiff may recover attorney's fees under 42 U.S.C. sec 1988(c) and any and all relief deemed just by this court.

COUNT NINE: 42 U.S.C. SECTION 1985(2) AND 1985(3)

249.Each of the foregoing allegations is incorporated as if fully set forth herein.

250. All defendants entered in the scheme of bribery and kickbacks, and did nothing to prevent them, failed to report it to law enforcement authorities and failed to prosecute. The Defendants knowingly conspired to deprive the Plaintiffs through sham or ex-parte proceedings of their fundamental constitutional rights, under color of state law, and knowingly violated the rights guaranteed to Plaintiffs by 42 U.S.C. Section 1983 and 42 U.S.C. Section 1985(3).

251.By knowingly and conspiring to deprive the Plaintiff through sham proceedings of her fundamental rights in the manner stated above in order to maintain jurisdiction of her children so as to illegally fine her and extort her tens of thousands of dollars in child support, supervised visitation fees or \$25,000 and \$50,000 if Plaintiffs mothers wanted to see their children, the Defendants knowingly violated the rights guaranteed to Plaintiffs by 42 U.S.C. Section 1983 and 42 U.S.C. Section 1985(3).

252.By knowingly and conspiring to deprive the diversity Plaintiffs through sham proceedings of their fundamental rights, as retaliation after the Plaintiffs reported the Defendants' actions, inactions, and state-wide federal offenses to the federal

justice department, the Defendants knowingly and conspired to violate the rights guaranteed to Plaintiff by 42 U.S.C. Section 1983 and 42 U.S.C. Section 1985(2) and 1985(3).

COUNT TEN: 42 U.S.C. SECTION 1986

253. Each of the foregoing allegations is incorporated as if fully set forth herein.

254. The Defendants had knowledge that the wrongs in 42 U.S.C. Section 1985 are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglected or refused to do so. This is especially true of the law-enforcement defendants, Kilmartin, Partington, McHugh and Donnelly.

COUNT ELEVEN: EQUAL PROTECTION CLAUSE

255. Each of the foregoing allegations is incorporated as if fully set forth herein

256. The Defendants' practice, policy and pattern of practice and local custom deprives the Plaintiffs' fundamental constitutional rights and discriminates against the Plaintiff Seguin because her mother allegedly "does not speak English," because she is an out-of-state citizen of Texas, and because all Plaintiffs reported the Defendant's federal law and constitutional violations to the U.S. Justice Department and other federal agencies.

COUNT TWELVE: CIVILRICO 18 U.S.C. sec. 1964(c), claim for sec. 1962(c), sec. 1962(d) and 18 U.S.C. sec. 1513(e) and sec. 1513(f)

257. Each of the foregoing allegations is incorporated as if fully set forth herein.

258. The Defendant's practice, policy and pattern of practice and local custom is in violation of CIVIL RICO, and the Plaintiffs make claims for sec. 1962(c), sec. 1962(d) and 18 U.S.C. sec. 1513(e) and sec. 1513(f), and mail fraud.

COUNT THIRTEEN: FIFTH AMENDMENT VIOLATION

259. Each of the foregoing allegations is incorporated as if fully set forth herein.

260. The Defendant judges' policy and practice of impounding the Plaintiffs' assets and attempting to impound the Plaintiffs' assets and taking the Plaintiffs' private property pursuant to fraudulently obtained court orders, is preempted by the Fifth Amendment protecting private property from government taking.

COUNT FOURTEEN: DUE PROCESS RIGHT TO A FAIR TRIBUNAL

261. Each of the foregoing allegations is incorporated as if fully set forth herein.

262. By recusing themselves only when they learn of impending or pending federal investigation of their violation of federal laws and the Constitution by federal law enforcement agencies pursuant to reports by the Plaintiff, the Defendant judges conspire to deprive the Plaintiff of her due process right to a fair tribunal.

COUNT FIFTEEN: 42 U.S.C. Sec. 2000d et seq.

263. Each of the foregoing allegations is incorporated as if fully set forth herein.

264. By impermissibly conducting fraudulent child support proceedings pursuant to State laws calculated to defraud the Plaintiff Seguin because her mother is alleged to not speak English, the Defendant engage in and promulgate a policy, practice and rule of law that is strictly preempted by 42 U.S.C. sec. 2000d et seq., the Supremacy Clause, and the Equal Protection Clause, legalization of which outrageous conduct would tantamount dictate fraudulent child support schemes in all Hispanic households that speak Spanish pursuant to state statutes and programs funded by Title IV of the Social Security Act, which especially constitutes an outrage in the First Circuit that includes Puerto Rico. The Plaintiff will appeal this outrageous and preposterous practice to the U.S. Supreme Court where a Hispanic judge presides, raised in a household that speaks little English, as well as conservative Judge Scalia, whose grand-parents hailed from Italy, speaking little English.

COUNT SIXTEEN: THE COMMERCE CLAUSE (ARTICLE I, SECTION 8, CLAUSE 3), AND THE NECESSARY AND PROPER CLAUSE (ARTICLE I, SECTION 8, CLAUSE 18)

265. Each of the foregoing allegations is incorporated as if fully set forth herein.

266. The court con, double dipping, fraudulent child support and supervised visitation constitute creation of debt through fraud on an interstate basis, using Title IV, Violence Against Women Act federal funding to collect and enforce fraud on an interstate basis, forming the basis of interstate racketeering activities that is preempted by the Commerce Clause, as the interstate creation of fraudulent debt and attempted collection of fraudulent debt is regulated by the Commerce Clause and the Necessary and Proper Clause.

COUNT SEVENTEEN: FOURTH AMENDMENT

267. Each of the foregoing allegations is incorporated as if fully set forth herein.

268. By searching and seizing the Plaintiffs' homes without probable cause, without issuance of warrants and without subject matter jurisdiction, Defendants have committed court con that is preempted by the Fourth Amendment.

COUNT EIGHTEEN: FIRST AMENDMENT

269. Each of the foregoing allegations is incorporated as if fully set forth herein.

270. The Defendants have deprived and conspired to deprive the Plaintiff mothers of their First Amendment Rights of familial integrity, rights of association, right of freedom of speech, and right of freedom of religion.

COUNT NINETEEN: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

271. Each of the foregoing allegations is incorporated as if fully set forth herein.

272. The Defendants have intentionally inflicted emotional distress on the Plaintiff Mothers.

COUNT TWENTY: INTENTIONAL NEGLIGENCE

273. Each of the foregoing allegations is incorporated as if fully set forth herein.

274. The Defendants have intentionally harmed the Plaintiffs through negligence.

COUNT TWENTY-ONE: BREACH OF FIDUCIARY DUTY

275. Each of the foregoing allegations is incorporated as if fully set forth herein.

276. The Defendants breached their fiduciary duty to the Plaintiffs.

COUNT TWENTY-TWO: FALSE IMPRISONMENT

277. Each of the foregoing allegations is incorporated as if fully set forth herein.

JURY DEMAND

277. The Plaintiffs hereby demand a trial by jury of all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief as follows:

1. Impaneling of a federal Special Grand Jury pursuant to 18 U.S.C. sec. 3331-4 to investigate the notices of felony contained herein and the separate notice of felony filed by the Plaintiffs that is filed concurrent to this herein complaint. See docket.

2. Award of actual, compensatory, exemplary and incidental damages against the defendants brought to this court in their individual capacity, each and individually for \$50 Million from each defendant,

4. Award of actual, compensatory, exemplary and incidental damages against the judicial Defendants for their non-judicial administrative and supervisory actions brought to this court in their individual capacities for \$50 Million each from each defendant,

5. An award of reasonable attorney's fees pursuant to 42 U.S.C. sec. 1988(c).

6. Costs of the Court.

7. Award of exemplary/punitive damages for \$1 billion.

8. Any other relief, at law or in equity, to which Plaintiffs may be entitled and which this Court deems just and proper.

Dated this 6th day of November, 2013.

Respectfully submitted,

By: _____

Plaintiff
Tina Kufner

By: _____

Plaintiff
Mary Seguin
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By: _____

Plaintiff
Kathy Lee Schlopp

By: _____

Plaintiff
Gloria Johnson