

**UNITED STATES DISTRICT COURT  
NEWARK DISTRICT OF NEW JERSEY**

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KARIN WOLF, individually & as the  
parent, natural guardian and next friend on  
behalf of D.C. and G.C.,  
Plaintiffs,

-against-

GERALD C. ESCALA, individually and  
as a STATE actor Judge for the Bergen  
County Family Court, EDWARD J.  
CRANE, PETER VAN AULEN, ESQ.,  
DR. JUDITH BROWN GREIF,  
WILLIAM R. DELORENZO,  
individually and as a STATE actor Judge  
for the Bergen County Family Court,  
JUDGE BONNIE J. MIZDOL,  
individually and as a STATE actor Judge  
for the Bergen County Family Court,  
JUDGE PETER DOYNE, individually  
and as a STATE actor Judge for the  
Bergen County Court, CHIEF JUSTICE  
STUART RABNER, individually and as a  
STATE actor Judge for the NJ SUPREME  
COURT, GOVERNOR CHRIS  
CHRISTIE, individually and as STATE  
actor Governor, STATE OF NEW  
JERSEY, BERGEN COUNTY FAMILY  
COURT OF THE SUPERIOR COURT  
OF NEW JERSEY; OFFICE OF THE  
COUNTY COUNSEL, APPELLATE  
DIVISION OF THE SUPERIOR COURT  
OF NEW JERSEY, JUDGE WILLIAM E.  
NUGENT, individually and as a STATE  
actor Judge for the Appellate Court,  
JUDGE HARRY G. CARROLL,  
individually and as a STATE actor Judge  
for the Appellate Court, JUDGE ELLEN  
L. KOBLITZ, individually and as a  
STATE actor Judge for the Appellate  
Court, JUDGE JOHN C. KENNEDY,

CASE NUMBER:

**JURY DEMAND**

CIVIL COMPLAINT FOR DAMAGES,  
INCLUDING DECLARATORY AND  
INJUNCTIVE RELIEF UNDER  
42 USC 1983 and 1985; and 18 USC  
1961-1968; and 18 U.S.C. 1951

individually and as a STATE actor Judge  
for the Appellate Court, JUDGE  
JEROME M ST. JOHN, individually and  
as a STATE actor Judge for the Appellate  
Court, JUDGE VICTOR ASHRAFI,  
individually and as a STATE actor Judge  
for the Appellate Court, JUDGE JOSEPH  
L. YANNOTTI, individually and as a  
STATE actor Judge for the Appellate  
Court, OFFICE OF COURT  
ADMINISTRATION, BERGEN  
FAMILY CENTER, CONSTANCE  
RITZLER, JOHN CUTTITO,  
ALEXANDRA STREMLER, ESQ.,  
ROGER RADOL, ESQ., DIANA  
MOSKAL, KATHY KATONA, ESQ.,  
LISA ESTRIN, DYFS n/k/a DCP&P,  
TARA HORNE, SANDRA CRUZ,  
CRUZ'S SUPERVISOR, PATRICK  
YAN, DEBBIE GOMEZ, ERIKA  
FRANK, DIONOS BURGOS, IVAN  
NINA, FULL CIRCLE, KRISTIN  
CIRELLI, ADVISORY COMMITTEE  
ON JUDICIAL CONDUCT,  
ATTORNEY GENERAL OF THE  
STATE OF NEW JERSEY - BOARD OF  
ETHICS, GOOD SHEPHERD  
LUTHERAN CHURCH, THE  
REVEREND ROGER W. SPENCER,  
JANET TENORE,, LUCIANA  
COUNTINHO, MARLENI  
COUNTINHO, PLINIO COUNTINHO,  
BANK OF AMERICA MERRILL  
LYNCH, a corporation, DOES,

Defendants.

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Plaintiffs KARIN WOLF, D.C., and G.C. complain as follows:

### **INTRODUCTION**

1. Plaintiffs bring this action to vindicate their federal constitutional rights in the New Jersey State Courts.
2. Plaintiffs bring this suit under U.S. Code Title 42 §§1983 and 1985; The Racketeer Influenced and Corrupt Organizations Act (RICO) 18 U.S. Code §§1961-1968; and The Hobbs Act, 18 U.S.C. § 1951.
3. Defendants are engaging in a pattern of racketeering activity and operating RICO ENTERPRISES in the Family Court; through a calculated system of eugenics and social engineering; and dealing in obscene matters of human trafficking, child pornography and child prostitution, for motives both economic and non-economic, *National Organization for Women v. Scheidler*, 510 U.S. 249 (1994), as set forth by the averments stated herein.
4. The Bergen Family Court is a court of limited jurisdiction and will not recognize or address its own constitutional violations.
5. The Supremacy Clause provision in Article Six, Clause 2 of the United States Constitution establishes the United States Constitution, federal statutes, and treaties as "the supreme law of the land". It provides that these are the highest form of law in the United States legal system, and mandates that all state judges must follow federal law when a conflict arises between federal law and either a state constitution or state law of any state. Human Rights Treaties - the Universal Declaration of Human Rights and the

International Covenant on Civil and Political Rights are both rendered Supreme Law by virtue of the Supremacy Clause.

6. States are prohibited to nullify federal law pursuant to Article III of the U.S. Constitution.
7. Plaintiffs KARIN, D.C., and G.C. are mother and children who for more than 3 years and to this moment endure the abuse and cruel punishment by the state government actors and individuals named as Defendants herein who deliberately separated them from each other without a basis. The Family Court operates oftentimes to predetermine the “winner” without due process, which happened here.
8. The Family Court operates on a “pay to play” level, promoting “conflict for cash” and engaging in emotional blackmail. As a *pro se* litigant, Plaintiff KARIN was and continues to be treated with contempt by the Bergen County Family Court, afforded no relief in enforcing her rights as a litigant because she wasn’t and isn’t paying money into a corrupt system of racketeering, influence, and extortion in the Bergen County Family Court.
9. Defendants colluded, conspired, schemed and falsified facts and law to benefit themselves financially, harass and oppress Plaintiffs, put children in crisis, inflict emotional distress upon Plaintiffs, and engage in Schadenfreude.
10. Defendants used retaliation, threats, and coercive control against Plaintiffs. Defendants deliberately acted obtuse to family violence, ignoring and minimizing it to subvert and circumvent established principles, codes, and laws on child abuse and domestic violence.

11. Defendants provoked family violence and labeled it “high conflict” in order to subject Plaintiffs to ongoing crisis and revictimization where they would require Defendants’ “intervention,” which translated into profit for them. Defendants deliberately discourage prevention because it is not profitable for them.
12. Defendants perpetuated a cycle of psychological conditioning, eugenics, and social engineering here. All Defendants who are mental health professionals and social workers are well-aware of the outcome of their intentional tortious actions; Harry Harlow’s experiments on rhesus macaques and reports on his findings of the negative effects of maternal deprivation is standard learning for Psychology and Sociology education. Defendants are knowingly doing damage to individuals and to society as a whole. Their actions cause depression, problems in interpersonal relationships, suicide, homicide, and many other inflictions and adverse outcomes that affect society and global commerce.
13. Defendants sought to benefit their agenda by promoting Richard Gardner’s pro-pedophile, misogynistic, and unscientific theories of Parental Alienation Syndrome, which employs a “witch hunt” to pathologize female victims and marginalize protective mothers in order to subvert, enable, and cover up child abuse; and terrorize, oppress, and humiliate women.
14. In actuality, Parental Alienation is an “end goal” rather than the cause and effect it purports to be. Its purpose is to alienate the mother and completely remove her from her children’s lives, as she is a roadblock to those who seek to abuse her child; and to deprive children of their mother to the outcomes of Harry Harlow’s studies as

referenced above and the Center for Disease Control's study on Adverse Childhood Experiences (ACE study).

15. Defendants are aligned with Father's Rights groups a.k.a. Men's Rights, to resurrect Lord Hale's Law and the Rule of Thumb, hide income and assets, and avoid paying child support, without any concern for their children.
16. Father's Rights groups funnel and misappropriate government TANF funds to forward their Men's Rights agenda, employing methodologies concurrent with the 1991 book *Screw the Bitch: Divorce Tactics for Men* by Dick Hart and Sun Tzu's *The Art of War* as popularized by Gordon Gecko's "Greed is good" phraseology in the 1987 film *Wall Street*. This idolization has resulted in the degradation of human decency and phenomenal financial losses of those affected by Ponzi schemes and the like.
17. Furthermore, these family court players are linked to the banking industry and collude with the court system to defraud and cheat the American public out of their homes through predatory lending practices, which in turn affects global commerce. By crushing Women's Rights, Defendants are aimed at turning back the clock to the days when a woman could not get approved for a mortgage, simply because she was a woman, and using her gender as an excuse to charge her higher interest rates and subject her to predatory lending practices.
18. Defendants' influence, corruption, and methods promote and enable child prostitution, child pornography, human trafficking, snuff films, and other dealings in obscene matter, to which Defendants appear to be linked and/or personally involved.

19. Bergen County in particular has had numerous abductions and attempts connected to human trafficking - there was a huge bust during the 2014 Superbowl and a huge bust of a child pornography ring in Bergen County. There were several kidnapping attempts of young girls on Godwin Avenue in Ridgewood in the fall of 2013. The Oakland Journal reported:

“The fourth attempted abduction of a child in Bergen County in the last two weeks occurred most recently in Hawthorne, NJ. Other towns with attempted abductions include Oradell, Maywood, and Hackensack.

In Hackensack, a man tried to get a young boy into his car under the guise of getting directions to Costco; in the Oradell and Maywood incidents involved young girls who were being lured, sometimes under the pretense of seeing puppies.

In Hawthorne, a 13-year-old was attending a soccer game at the rec fields when a man tried to pull her to a secluded parking area.”

20. Child protective services such as DYFS n/k/a DCP&P are part of this ENTERPRISE and engage in a pattern of racketeering as they have sadistically terrorized parents, taken their children away without legitimate reason and unconscionably placed children in foster homes where the children were and continue to be sexually, physically, and psychologically abused even as one sits here reading this. They have a financial incentive to do so, given that they receive funding from the government for every child they place.

21. Defendant DYFS n/k/a DCP&P was labeled a systematic failure several years ago and remains as such. Parents dealing with DCP&P often find themselves subject to a Kafkaesque existence where there is no transparency; they don't even know what they're being charged with, nor are they provided pertinent and concrete information per the Freedom of Information Act. Defendant DCP&P failed to provide this information and retaliated against Plaintiff KARIN when she requested it.
22. Defendant DYFS n/k/a DCP&P caseworkers are not only corrupt, but also incompetent; the State fails to train them adequately to protect children. Instead they employ threats and manipulation, which happened here. DCP&P discouraged prevention, failed to protect Plaintiffs and allowed abuse of Plaintiffs to fester, which has had an adverse cumulative effect on Plaintiffs' psyches, health, well-being, and childhood development. By this method, DCP&P deliberately puts children at risk and subjects them to abuse which manifests in high rates of illegal drug abuse, alcoholism, teen pregnancies, suicide, and depression (ACE Study, Center for Disease Control).
23. New Jersey Child Advocate Kevin Ryan called DYFS n/k/a DCP&P, a "systematic failure" and "a debilitated agency that was in need of a complete overhaul." Other states have had similar problems. In 2011, in the State of Georgia, Senator Nancy Schaefer, who had been exposing corruption in CPS, was suspiciously murdered, along with her husband and documentary filmmaker. Recently, in the State of Arizona, Governor Jan Brewer disbanded CPS altogether out of disgust.
24. The destruction of civil and constitutional rights by the Family Courts is inimical to society as a whole and the Defendants' actions are anti-American and therefore treason.



This destruction negatively impacted Plaintiffs' rights to acquire property and thrive in their business. Family Courts siphon their victims' funds and assets and are aligned with the banking industry; their influence and corruption has resulted in countless bankruptcies, foreclosures, loss of retirement savings, nest eggs, college funds, etc., which have attributed to the fall of the American economy. By allowing Family Courts to run amok in a calculated anarchy, the government fails to act in the best interest of their constituents, administering to them the proverbial stab-in-the-back.

25. Defendants deliberately protracted this custody case for over three (3) years despite the NJ law mandating that the case end within 6 months after the last responsive pleading, which was over 3 years ago or 1,080 days ago. Children grow fast; when trial courts do not act expeditiously as they are required and appellate courts are even slower, it presents a quagmire, a Catch-22. When courts fail to act with integrity, it is foremost burdensome to the child and inimical to their development, health, and well-being. It is nothing short of child abuse, which happened here.
26. Relief from this Court is the last resort as relief in the State courts has proven futile. Those courts support Defendants' misconduct by providing false excuses in inconsistent and irrational decisions to protect Defendants in a court system known to be unjust rather than enforce basic civil rights. State Appellate and Supreme Courts are duplicitous, as they essentially "rubber-stamp" the corruption in the lower courts. This occurs at the phenomenal and irreparable emotional, financial, and constitutional expense and damage of Plaintiffs who lost over three (3) years of their mother-children relationship and phenomenal quality-of-life expense that can never be regained.

27. A custody battle is a form of domestic violence and Defendant CRANE started said litigation with malice to further abuse his former wife Plaintiff KARIN and their two children D.C. and G.C., as ripping a child away from a mother who is their primary attachment figure is a form of child abuse as scientifically demonstrated and cautioned by the American Psychological Association, the Center for Disease Control, and the U.S. Dept. of Justice.
28. It is imperative that a jury of the people hears this case. It is imperative that the people of the United States be made aware of the corruption and moral turpitude running rampant in Family Court. The interests of children should be of paramount importance, but have given way to an abomination of a cottage industry exploiting children for profit and bankrupting the American public. It affects all of us because our civil and constitutional rights as a whole are being destroyed. It is happening in family courts across America, the implications of which are pivotal to the future of this country. Family Court is employing eugenics and social engineering, marginalizing mothers and psychologically conditioning and corrupting American youth.
29. Family Court has become an atrocity and it is unthinkable, yet an absurd fact that it is self-policing. Put best by the Roman poet Juvenal, “Sed quis custodiet ipsos custodes?” (*Satire VI, lines 347–8*) or in English, “Who will guard the guards themselves?”

### **PARTIES**

30. Plaintiff Karin Wolf (KARIN) is an individual and resident of the State of New Jersey, domiciled in Bergen County, and natural mother of Plaintiffs D.C. (D.C.) and G.C.

(G.C.). Plaintiff KARIN has been a resident of the State of New York, domiciled in New York City, over the course of relevant litigation.

31. Plaintiff D.C. (D.C.) is an individual and resident of the State of New Jersey, domiciled in Bergen County, and natural son of Plaintiff KARIN.
32. Plaintiff G.C. (G.C.) is an individual and resident of the State of New Jersey, domiciled in Bergen County, and natural daughter of Plaintiff KARIN.
33. Defendants Governor Chris Christie, State of New Jersey, Bergen County Family Court of the Superior Court of New Jersey, Appellate Court of the Superior Court of New Jersey, and the Office of Court Administration (collectively, the “STATE”) were and are at all times herein a government entity created and authorized under the laws of the State of New Jersey.
34. At all times relevant herein, Defendant STATE employed and/or administered salaries and/or retirement pensions to Defendants Governor Chris Christie (CHRISTIE), Gerald C. Escala (ESCALA), William R. DeLorenzo (DELORENZO), Bonnie J. Mizdol (MIZDOL), Peter Doyne (DOYNE), Stuart Rabner (RABNER), Harry G. Carroll (CARROLL), Ellen L. Koblitz (KOBLITZ), John C. Kennedy (KENNEDY), Jerome St. John (ST. JOHN), Victor Ashrafi (ASHRAFI), Joseph L. Yannotti (YANNOTTI), Diana Moskal (MOSKAL), Kathy Katona (KATONA), ATTORNEY GENERAL, Bergen Family Center (BFC), Constance Ritzler (RITZLER), John Cuttito (CUTTITO), Division of Youth and Family Services (DYFS) now known as Division of Child Protection and Permanency (DCP&P), Tara Horne (HORNE), Sandra Cruz (CRUZ), CRUZ’S SUPERVISOR, Patrick Yan (YAN), Debbie Gomez (GOMEZ), Erika Frank

(FRANK), Dionys Burgos (BURGOS), and Ivan Nina (NINA). Defendant STATE is responsible for policies and customs and operated as a governmental entity acting under the color of laws, statutes, ordinances, regulations, policies, customs, and usages of the State of New Jersey.

35. Defendant Edward Crane (CRANE) is an individual and resident of the State of New Jersey, domiciled in Bergen County, and natural father of Plaintiffs D.C. and G.C.. Defendant CRANE works for Bank of America Merrill Lynch in New York, NY.
36. Defendant Judge Gerald C. Escala (ESCALA) is an individual and retired Judge on recall for the Bergen County Family Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
37. Defendant Judge William R. DeLorenzo (DELORENZO) is an individual and Judge and/or retired Judge for the Bergen County Family Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
38. Defendant Judge Bonnie J. Mizdol (MIZDOL) is an individual and the Presiding Judge for the Bergen County Family Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and

acted within the scope of her employment except when alleged herein that she acted beyond the scope. She is sued in her individual and official capacities.

39. Defendant Judge Peter Doyme (DOYNE) is an individual and the Assignment Judge for the Bergen Family Court Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
40. Defendant Chief Justice Stuart Rabner (RABNER) is an individual and Judge for the Supreme Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
41. Defendant Governor Chris Christie is an individual and Governor of the State of New Jersey. He is responsible for the conduct of the STATE actors named herein, has failed to act, and has acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
42. Defendant Judge William E. Nugent (NUGENT) is an individual and Judge for the Appellate Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the

scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.

43. Defendant Judge Harry G. Carroll (CARROLL) is an individual and Judge for the Appellate Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
44. Defendant Judge Ellen L. Koblitz (KOBLOITZ) is an individual and Judge for the Appellate Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of her employment except when alleged herein that she acted beyond the scope. She is sued in her individual and official capacities.
45. Defendant Judge John C. Kennedy (KENNEDY) is an individual and Judge for the Appellate Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
46. Defendant Judge Jerome M. St. John (ST. JOHN) is an individual and Judge for the Appellate Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.

47. Defendant Judge Victor Ashrafi (ASHRAFI) is an individual and Judge for the Appellate Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
48. Defendant Judge Joseph L. Yannotti (YANNOTTI) is an individual and Judge for the Appellate Court, State of New Jersey, and acted towards Plaintiffs under color of statutes, ordinances, customs, and usage of the State of New Jersey and acted within the scope of his employment except when alleged herein that he acted beyond the scope. He is sued in his individual and official capacities.
49. Defendant Office of the County Counsel is a government office for Bergen County located in Hackensack, NJ that serves as legal counsel to the County Executive, the eight County Government departments, the Sheriff, the County Clerk, the Surrogate, and the Prosecutor.
50. Defendant Peter Van Aulen, Esq. (VAN AULEN) is an individual and resident of the State of New Jersey, domiciled in Bergen County, and a New Jersey State licensed attorney conducting substantial business in this District from offices located at 50 Market Street, Saddle Brook, NJ 07663.
51. Defendant Alexandra Stremmler, Esq. (STREMLER) is an individual and resident of the State of New Jersey, domiciled in Bergen County, and a New Jersey State licensed attorney conducting substantial business in this District from offices formerly located at

250 Kinderkamack Road, Westwood, NJ 07675, now believed to be located at 198 Magnolia Avenue, Hillsdale, NJ 07642.

52. Defendant Roger Radol, Esq. (RADOL) is an individual and resident of the State of New Jersey, domiciled in Bergen County, and a New Jersey State licensed attorney conducting substantial business in this District from offices located at 15 Engle Street, Suite #102, Englewood, NJ 07631.
53. Defendant Dr. Judith Brown Greif (GREIF) is an individual and resident of the State of New Jersey, domiciled in Bergen County and a New Jersey State licensed social worker and custody evaluator conducting substantial business in this District, with offices located at 163 Engle St, Englewood, NJ 07631. She is contracted to conduct custody evaluations and obligated to represent children's best interests. At all times relevant herein, she is obligated to act consistent with her training and pursuant to social worker ethics. She is sued individually when alleged herein that she acted beyond the scope of her duties as a forensic evaluator and in her official capacity as an appointee of Defendants.
54. Defendant Bergen Family Center (BFC) is an organization that was and is at all times relevant herein an entity that operates on funds from the State of New Jersey, other government grants, fees, and financial contributions by professional organizations and private individuals. It was and is at all times relevant herein obligated to act consistent with ethical standards, policies and customs and operated as a governmental entity acting under the color of laws, statutes, ordinances, regulations, policies, customs, and usages of the state of New Jersey. Defendant BFC is sued when alleged herein that it



acted beyond the scope of its duties as a forensic evaluator and in its official capacity as an appointee of Defendants.

55. Defendant Constance Ritzler, LCSW (RITZLER) is an individual and resident of the State of New Jersey, domiciled in Bergen County and a New Jersey State licensed social worker and custody evaluator, employed by Bergen Family Center, with offices located at 10 Banta Place, Hackensack, NJ 07601. She is contracted to conduct custody evaluations and obligated to represent children's best interests. At all times relevant herein, she is obligated to act consistent with her training and pursuant to social worker ethics. She is sued individually when alleged herein that she acted beyond the scope of her duties as a forensic evaluator and in her official capacity as an appointee of Defendants.
56. Defendant John Cuttito, LCSW (CUTTITO) is an individual and resident of the State of New Jersey, domiciled in Bergen County and a New Jersey State licensed social worker and custody evaluator, employed by Bergen Family Center as Director of Clinical Services, with offices located at 10 Banta Place, Hackensack, NJ 07601. He is responsible for overseeing custody evaluations and obligated to represent children's best interests. At all times relevant herein, he is obligated to act consistent with his training and pursuant to social worker ethics. He is sued individually when alleged herein that he acted beyond the scope of his position and duties and in his official capacity as an appointee of Defendants.
57. Defendant Diana Moskal (MOSKAL) is an individual and believed to be a resident of the State of New Jersey, believed to be domiciled in Bergen County, and Family

Division Manager at the Bergen County Family Court. At all times relevant herein, she is obligated to act consistent with her training and pursuant to ethics, laws, statutes, ordinances, regulations, policies, customs, and usages of the state of New Jersey. She is sued individually when alleged herein that she acted beyond the scope of her duties as Manager and in her official capacity as an appointee of Defendants.

58. Defendant Kathy Katona (KATONA) is an individual and believed to be a resident of the State of New Jersey, believed to be domiciled in Bergen County, and Court-appointed Mediator at the Bergen County Family Court. At all times relevant herein, she is obligated to act consistent with her training and pursuant to mediator ethics, as well as laws, statutes, ordinances, regulations, policies, customs, and usages of the state of New Jersey. She is sued individually when alleged herein that she acted beyond the scope of her duties as Mediator and in her official capacity as an appointee of Defendants.

59. Defendant Lisa Estrin, LCSW (ESTRIN) is an individual and resident of the State of New Jersey, domiciled in Bergen County and a New Jersey State licensed social worker and conducting substantial business in this District, with offices located at 70 Hilltop Rd, #1004, Ramsey, NJ 07446. At all times relevant herein, she is obligated to act consistent with her training and pursuant to mental health practitioner and social worker ethics. She is sued individually when alleged herein that she acted beyond the scope of her authority and duties as therapist to Plaintiffs D.C. and G.C., Defendant CRANE, and in her official capacity as illegally authorized by Defendant CRANE.

60. Defendant Division of Youth and Family Services now known as Division of Child Protection and Permanency (DCP&P) is an organization that was and is at all times relevant herein a governmental entity. It was and is at all times relevant herein obligated to act consistent with ethical standards, policies and customs and operated as a governmental entity acting under the color of laws, statutes, ordinances, regulations, policies, customs, and usages of the state of New Jersey. Defendant BFC is sued when alleged herein that it acted beyond the scope of its duties and in its official capacity as an appointee of Defendant STATE.
61. Defendants Tara Horne (HORNE), Sandra Cruz (CRUZ), CRUZ'S SUPERVISOR, Patrick Yan (YAN), Debbie Gomez (GOMEZ), Erica Frank (FRANK), Dionys Burgos (BURGOS), and Ivan Nina (NINA) are each individuals and believed to all be residents of the State of New Jersey, believed to be domiciled in Bergen County and/or Morris County, and all social workers for DCP&P. At all times relevant herein, each of them is obligated to act consistent with his or her training and pursuant to social worker ethics, as well as laws, statutes, ordinances, regulations, policies, customs, and usages of the state of New Jersey. Each of them is sued individually when alleged herein that he or she acted beyond the scope of his or her duties as social worker and each in their official capacity as an employee of Defendants DCP&P and the STATE.
62. Defendant Full Circle (FULL CIRCLE) is a business entity located in New Jersey that provides mental health counseling services, conducting substantial business in this District, with offices located at 408 Main Street, Suite 203, Boonton, NJ 07005. It is an appointee of Defendant DYFS n/k/a DCP&P. At all times relevant herein, it is obligated

to act consistent with its training and pursuant to mental health practitioner and social worker ethics. It is sued when alleged herein that it acted beyond the scope of its authority and duties as a mental health facility treating Plaintiffs D.C. and G.C..

63. Defendant Kristin Cirelli, LCSW (CIRELLI) is an individual and resident of the State of New Jersey, believed to be domiciled in New Jersey (county unknown) and a New Jersey State licensed social worker employed by Defendant FULL CIRCLE. At all times relevant herein, she is obligated to act consistent with her training and pursuant to mental health practitioner and social worker ethics. She is sued individually when alleged herein that she acted beyond the scope of her authority and duties as therapist to Plaintiffs D.C. and G.C..
64. Defendant Advisory Committee on Judicial Conduct (ACJC) was and is at all times herein a government entity created and authorized under the laws of the State of New Jersey. It is responsible to uphold ethics, address violations of judicial ethics and judicial canons, and infringement of policies and customs. It is operated as a governmental entity acting under the color of laws, statutes, ordinances, regulations, policies, customs, and usages of the state of New Jersey. It is sued as such and when alleged herein that it acted beyond the scope of its responsibilities and/or failed to act pursuant to its responsibilities.
65. Defendant Attorney General of the State of New Jersey Board of Ethics (ATTORNEY GENERAL) was and is at all times herein a government entity created and authorized under the laws of the State of New Jersey. It is responsible to uphold ethics, address violations of social worker ethics and infringement of policies and customs. It is

operated as a governmental entity acting under the color of laws, statutes, ordinances, regulations, policies, customs, and usages of the state of New Jersey. It is sued as such and when alleged herein that it acted beyond the scope of its responsibilities and/or failed to act pursuant to its responsibilities.

66. Defendant Good Shepherd Lutheran Church (GOOD SHEPHERD) is a church and religious organization located at 233 S. Highwood Avenue, Glen Rock, NJ 07452.
67. Defendant The Reverend Dr. Roger W. Spencer (SPENCER) is an individual and head pastor at Defendant GOOD SHEPHERD, domiciled in Bergen County.
68. Defendant Janet Tenore (TENORE) is an individual, domiciled in Bergen County, NJ and works as the church secretary for Defendant GOOD SHEPHERD.
69. At all times herein where GOOD SHEPHERD is stated, it shall mean collectively Good Shepherd Lutheran Church, The Reverend Roger W. Spencer, and Janet Tenore.
70. Defendant Luciana Coutinho (LU) is an individual and resident of the State of New Jersey, domiciled in Bergen County in Glen Rock, NJ and has possible alternate residence in the Country of Brazil. Defendant LU meets the minimum contacts in this jurisdiction and because her offenses in the events giving rise to this action occurred within the Newark District.
71. Defendant Marleni Coutinho (MARLENI) is an individual and resident of the State of New Jersey, domiciled in Bergen County in Glen Rock, NJ and has alternate residence in the Country of Brazil. Defendant MARLENI meets the minimum contacts in this jurisdiction and because her offenses in the events giving rise to this action occurred within the Newark District.

72. Defendant Plinio Coutinho (PLINIO) is an individual and resident of the State of New Jersey, domiciled in Bergen County in Glen Rock, NJ and has alternate residence in the Country of Brazil. Defendant PLINIO meets the minimum contacts in this jurisdiction and because his offenses in the events giving rise to this action occurred within the Newark District.
73. Defendant BANK OF AMERICA MERRILL LYNCH is a Delaware corporation with its principal place of business in Charlotte, North Carolina and offices and branches in New York, NY. BANK OF AMERICA MERRILL LYNCH employs Defendant CRANE as an executive in New York City.
74. Defendant DOES are policymaking officials of Defendant STATE who are as responsible as the other named Defendants in this action and who knew of and ignored the constitutional violations in this case and in other cases which they have for years reinforced a custom and policy in the Family Court of ignoring litigants' due process rights. Plaintiffs reserve the right to amend this Complaint after discovery reveals the true names of DOES.
75. Defendant DOES are also individuals at Defendant BANK OF AMERICA MERRILL LYNCH, who are as responsible as the other named Defendants in this action. Plaintiffs reserve the right to amend this Complaint after discovery reveals the true names of DOES.
76. Plaintiffs reserve the right to amend this Complaint and add plaintiffs and defendants after Discovery reveals further information and/or as Plaintiff KARIN is able to secure legal representation for herself and her two minor children. Plaintiffs also reserve the

right to amend this complaint for any errors and/or deficiencies as Plaintiffs are unrepresented and filing in *propria persona*.

77. Upon learning the true names and capacities of the DOE defendants, Plaintiffs will amend this complaint as appropriate.
78. Plaintiffs are informed, believe and allege that at all times mentioned each Defendant was the agent, associate, affiliate, co-conspirator, superior, and /or employee of each other defendant and was acting within the course, scope, and purpose of such relationship in each ascribes of them herein, except as otherwise alleged.
79. At all times set forth by the averments herein and henceforth where Plaintiffs allege that any Defendant has perpetuated and/or continues to perpetuate a pattern of collusion, conspiracy, scheming, fraud, extortion, witness tampering, retaliation, abuse, harassment, tortious interference, tortious acts, intentional infliction of emotional distress, personal injury, kidnapping, false imprisonment, obstruction of justice, constitutional violations, ethical violations, violations of public policy and codes of conduct, indecency, engaged in or aided and abetted a pattern of racketeering activity, engaged in a RICO ENTERPRISE in violation of federal law, and/or otherwise committed a violation of law, either statutory or common, federal or state, it shall constitute a **predicate act** in each instance pursuant to 18 U.S.C. 1961 and define state actors as having acted beyond the scope of their employment and official capacity, for personal gain or pleasure, and acted beyond the scope of their responsibilities and/or failed to act pursuant to their responsibilities.

## **JURISDICTION AND VENUE**

80. Jurisdiction is conferred on this Court by 28 U.S.C. §1332; §1341; §1343(3) and (4); and §1346, which provide for original jurisdiction pursuant to 42 U.S.C. §§1983 and 1985 and 28 U.S.C. §1331 to redress federal constitutional violations and conspiracy under color of STATE law; and 42 U.S.C. §§1983 and 1985 civil rights violations and conspiracy; and 18 U.S.C. §1961-1968 to redress racketeering, influence, and corruption.
81. Venue is proper in the Newark District of New Jersey pursuant to 28 U.S.C. §1391(b) and 18 U.S.C. §1965 et seq. because the events giving rise to this action occurred within the Newark District.
82. This case has issues of diversity jurisdiction and makes litigation in Federal Court proper because throughout the litigation, Plaintiff KARIN was treated with malice, contempt, and bias by Defendant STATE and was punished because she moved out of the State of New Jersey to the State of New York. This was a violation of her Right to Freedom of Movement pursuant to the Privileges and Immunities Clause of the U.S. Constitution, Article IV, Section 2, Clause 1, as well as a violation of her Property Settlement Agreement dated May 22, 2007, which contained bargained-for terms that granted Plaintiff KARIN permission to move to New York State with the children.
83. Declaratory relief is available pursuant to 28 U.S.C. §§2201 and 2202.
84. Civil remedies and treble damages are available pursuant to 18 U.S.C. § 1964.
85. Plaintiff KARIN is part of the NJ Coalition for Family Court Reform and is dedicated to upholding and establishing civil rights and eliminating racketeering activity through



functioning as a private attorney general, *Rotella v. Wood*, et al., certiorari to the United States Court of Appeals for the Fifth Circuit, No. 98-896. Argued November 3, 1999--Decided February 23, 2000.

**FACTS AND PROCEDURAL HISTORY OF PLAINTIFFS' CUSTODY CASE**

86. Defendant CRANE and Plaintiff KARIN were married on July 29, 2000. They had two (2) children together, D.C. (born 2002) and G.C. (born 2003). They separated when Plaintiff KARIN fled the marital home with their two minor children on September 29, 2006 due to domestic violence. Plaintiff KARIN was named the custodial parent on Dec. 1, 2006 at a pendente lite hearing as a result. They entered into a Consent Order for custody on January 17, 2007, where Plaintiff KARIN was named the custodial parent and they shared joint legal custody. Child custody was bifurcated from the divorce (pursuant to NJ Rule 5:7-8). They were divorced on May 22, 2007 in Bergen County and entered into a Property Settlement Agreement (PSA), which was incorporated into the Final Judgment of Divorce under NJ Rule 2A:34-2(c), with Plaintiff KARIN having pleaded and proved a cause of action for divorce for Extreme Cruelty pursuant to said statute.
87. Defendant CRANE harassed Plaintiff KARIN post-separation to present. Six years post-divorce, Defendant Judge ESCALA entered a judgment in Bergen County Family Court on August 30, 2013 under color of law, granting sole residential and sole legal custody to Defendant CRANE.
88. On July 9, 2014, Defendant VAN AULEN, Esq. obtained an illegal ex parte order from Defendant Judge ESCALA barring Plaintiff KARIN from contact with her two children,

Plaintiffs D.C. and G.C., without basis. Plaintiffs were denied due process and rights of constitutional dimension pursuant to the Universal Declaration of Human Rights; the Privileges and Immunities Clause and the 1<sup>st</sup>, 5<sup>th</sup>, 9<sup>th</sup>, and 14<sup>th</sup> Amendments of the U.S. Constitution; and *Troxel v. Granville*, 530 U.S. 57 (2000).

89. Defendants assisted Defendant CRANE in pursuing a frivolous, vengeful, and archaic Heart Balm lawsuit for alienation of affection, as he was unable to cope with the end of the marriage and lack of physical and sexual access to Plaintiff KARIN. Defendant CRANE harassed Plaintiffs for years after the divorce in person and through electronic and telephonic communications. He then retaliated further using the court as a vehicle.
90. Plaintiff KARIN had obtained a fault divorce for Extreme Cruelty, which is domestic violence, and Defendant CRANE sought to satiate a narcissistic desire to rehash and rewrite history, as is common for perpetrators of domestic violence. The balance of the Defendants' assisted him in accomplishing this for their own financial gain and agenda.
91. Plaintiff KARIN developed Post-Traumatic Stress Disorder (PTSD) as a result of the Defendants' actions and the Court's failure to protect her and her children from domestic violence at the hands of Defendant CRANE. Defendants assisted CRANE in a cyclical and ongoing tort to inflict emotional stress upon, financially destabilize and further abuse her and their two children. Defendants committed tortious acts and are therefore responsible for personal injury to Plaintiffs and liable for damages.
92. Plaintiff KARIN lost good employment, assets, time, and health as a result of the Defendants' actions, which has in turn impaired Plaintiff KARIN's ability to keep and

acquire property and thrive in business, resulting in extenuating losses to Plaintiffs D.C. and G.C..

93. Defendant CRANE violated the terms of the Property Settlement Agreement and continues to do so; the balance of the Defendants, in particular Defendants Judge ESCALA and Judge DELORENZO, have empowered him and refused to hold him accountable for this breach of contract. As a result, Plaintiff KARIN is now impaired in her ability to hold up parts of her obligations of the Property Settlement Agreement: the PTSD, financial losses and setbacks she has incurred have adversely affected her ability to support the children financially and pay for the children's college. Defendants committed tortious acts and are therefore responsible for personal injury to Plaintiffs and liable for damages.
94. Plaintiff KARIN and Defendant CRANE starting dating in the summer of 1999 and were married in 2000. Soon thereafter, Defendant CRANE began a pattern of domestic violence towards Plaintiff KARIN, including assault, terroristic threats, false imprisonment, harassment, stalking, verbal abuse, emotional abuse, and financial abuse. Defendant CRANE threatened to kill Plaintiff KARIN if she ever cheated on him and would borrow a handgun from his best friend, Robert Rivera, a NYC police officer, from time to time, storing it in the oven. Defendant CRANE attempted to get a gun permit. This caused Plaintiff KARIN grave uneasiness.
95. Defendant CRANE was jealous, obsessive, and controlling. He instigated fights with Plaintiff KARIN on a daily basis, following her from room to room, blocking doorways, getting in her personal space, cursing in her face, putting her down, belittling and

berating her, grilling her with a flash flood of questions. Fights escalated quickly and remained in a grueling state for typically three hours, even during her pregnancies. Defendant CRANE was verbally abusive; if Plaintiff KARIN tried to leave the house, he typically said, “Where the fuck do you think you’re going?” and prohibited her from leaving the house. If she managed to leave, Defendant CRANE would call her cell phone repeatedly demanding to know her whereabouts and making threats. Defendant CRANE made Plaintiff KARIN feel like she was always “walking on eggshells.”

96. Defendant CRANE controlled all the money and major decisions and would not recognize his wife as an equal partner in their marriage. Any talk of getting a master’s degree or going back to work was met with contempt and resulted in an argument with Defendant CRANE typically saying, “Who the fuck is going to pay for it?” and/or “Who the fuck is going to watch the kids?” despite his substantial income of about \$250K/yr. Defendant CRANE would become irate and blow up at any mention of Plaintiff KARIN achieving any sort of independence or autonomy.
97. When they had their first child, a son, Defendant CRANE expected Plaintiff KARIN to do all of the child rearing and caregiving (which in itself is an admission of KARIN’s fitness as a mother). During her pregnancy with their second child, this time a daughter, Defendant CRANE was nasty to his wife because she was carrying a girl. Defendant CRANE was uninterested in the pregnancy and stated to his wife, “What’s in it for me?” He refused to help his wife carry their 30-lb. infant/toddler son up the stairs, saying, “Why the fuck should I do it?” This disregard for the well-being and safety of his wife, child, and unborn child left Plaintiff KARIN feeling demeaned and upset.

98. Plaintiff KARIN filed for divorce in 2005, but dropped it to go to marriage counseling with Defendant CRANE, which lasted for 1½ years. Plaintiff KARIN filed for divorce again in the summer of 2006, at which point Defendant CRANE became unhinged, cursing at her in front of their two children saying, “You fucking bitch! You fucking cunt! You’re not divorcing ME. You’re not getting a fucking penny. You’re not getting shit. What do you do? You don’t do anything. I’m gonna make sure you have a hard time raising these kids.”
99. Harassment heightened and she was apprehensive, fearing for her life and the lives of their two children. After several incidents requiring police intervention, where they identified her as a victim of domestic violence, Plaintiff KARIN fled the marital home with their two children, Plaintiffs D.C. and G.C.. She did not want the children exposed to any further violence. She subsequently rented a home in Glen Rock, NJ.
100. On the night of November 22, 2006, Defendant CRANE was waiting in the Plaintiffs’ driveway. He demanded to take the children. Plaintiffs did not exit the car out of apprehension and fear. Defendant CRANE began to storm around the car like a lunatic, yelling and holding up his camera phone, flashing it into the car, recording the incident, saying, “Say hello to the camera Karin.” The children were startled and began to cry. Plaintiff KARIN remained in the car with the children and told him to leave or else she would call the police. Defendant CRANE got back into his car, barreled out of the driveway, and sped off.
101. For years thereafter, Defendant CRANE continued to harass Plaintiff KARIN at her new home in Glen Rock, NJ, showing up unexpectedly, banging on the back door, and

shoving his foot in the door when she tried to close it. Plaintiff KARIN filed reports with the police. Defendant CRANE repeatedly called Plaintiffs and was verbally abusive.

102. Defendant CRANE threatened Plaintiff KARIN on the phone saying, “I’m gonna make sure you have a hard time raising those kids.” Many times, he kept their small children on the phone at length for two hours, insisting they stay on speakerphone, so that he could hear everything going on in the Plaintiffs’ home, asking question after question. When Plaintiff KARIN advised him it was inappropriate for two small children, Defendant CRANE went berserk and called more frequently. Defendant CRANE would not leave Plaintiffs in peace. This caused confusion and upset in the children and Plaintiff KARIN to again feel like she was “walking on eggshells.”

103. For many years, Defendant CRANE has stalked Plaintiffs telephonically and electronically. The children have reported seeing red lights and seeing him press red buttons while he interrogates them. They have even heard playback. This has made the children uneasy and they worry that their father is on the other side of the door recording them during times while they are being interviewed by DCP&P, therapists, etc. Defendant CRANE has submitted several recordings to the court, which indicates a pattern of stalking pursuant to NJ Rule 2C:12-10 and 2C:12-10.2.

104. Plaintiff KARIN has asked the court repeatedly to intervene and order Defendant CRANE to cease recording the children. Defendant Judge DELORENZO made it clear in court he was disturbed by Defendant CRANE’s recording of the children, saying it gives the children the impression that the other parent is doing something wrong.

105. Defendant BFC stated in their reports that he should cease recording the children.

Defendant GREIF subverted the behavior, as Defendant CRANE was her paying client. Defendant Judge ESCALA has told Defendant CRANE he shouldn't be recording the children at all. However, despite Plaintiff's repeated pleas to the court over the past three years to order Defendant CRANE to stop this psychologically damaging behavior and hold him in contempt of court, Defendants Judge DELORENZO and Judge ESCALA have failed to hold him accountable and enforce Plaintiffs' rights, greenlighting further abuse.

106. Defendant CRANE repeatedly yells at the children and interrogates them mercilessly, causing them apprehension, fear and anxiety. He castigates Plaintiffs, trying to alienate their affections through guilt and coercive control. He puts the children in the middle of conflict, speaking to them at length about court orders and proceedings, judges, reading court motions aloud to them, punishing them for speaking up, etc.

107. Defendant CRANE violated four Protective Orders on the custody evaluations, disclosing sensitive information directly to the children. The children report that they "feel nervous all the time around Daddy." Defendants Judge DELORENZO and Judge ESCALA failed to enforce the Protective Orders and hold Defendant CRANE accountable for this emotional abuse of the Plaintiffs, again greenlighting further abuse.

108. In the summer of 2009, Plaintiff KARIN moved herself and the children to Florham Park to put distance between them and their abuser Defendant CRANE, in hope of dissuading him from showing up at their home unexpectedly to cause anxiety and

conflict. It did not wholly deter Defendant CRANE and he continued to harass Plaintiffs. Plaintiff KARIN sought police intervention several times in Florham Park.

109. Just before February 1, 2010 (Plaintiff KARIN's birthday), Defendants CRANE and VAN AULEN, Esq. served her with motion papers via U.S. Mail, falsely alleging Parental Alienation and asking for Right of First Refusal. Said Defendants did this just before Plaintiff KARIN's birthday to intentionally inflict emotional distress, which happened here. In the court papers, Defendant CRANE lied, falsified stories, perjured himself; and manufactured and presented fraudulent electronic evidence. Defendants CRANE and VAN AULEN, Esq. committed mail and wire fraud here. This set in motion a pattern of legal abuse to come.

110. Plaintiff KARIN cross-motoned, citing the harassment and asked the court for a parenting coordinator. Said parties entered into a Consent Order, which Defendant CRANE violated on several accounts. Defendant CRANE obstructed the use of the agreed-upon parenting coordinator, Marie Napoliello, Esq., refusing to retain her for eight months when Judge Perez-Friscia had ordered it be done within 10 days.

111. In the early fall of 2010, Plaintiff D.C. returned home to his mother from a weekend with Defendant CRANE. The child was visibly upset and began crying, stating that his father was playing karate with him, twisting his arm to the point where it hurt afterwards. He stated he was frightened his father was going to throw him through the wall. Plaintiff KARIN called DYFS and they failed to do anything about it. A year later, D.C. came home with black and blues on his arm and leg from "playing karate" with his father.



112. On November 1, 2010, Plaintiff KARIN started as new job in Manhattan, working full-time M-F from 9 am – 6 pm, as an Executive Assistant and Marketing Manager at an architecture firm. Despite this, Defendant CRANE demanded she still drop off the children to him at his home in Teaneck, NJ at 5:30 pm on Tuesdays and Thursdays. He was unreasonable and Plaintiff KARIN insisted they go to the parenting coordinator, which they finally did on Dec. 8, 2010. During that meeting, Defendant CRANE revealed that he had been unemployed for the past five months.
113. Within three weeks, Defendant CRANE angered Ms. Napoliello to the point that she quit. She stated that Defendant CRANE had violated her explicit instructions not to interrogate the children about her conversation with them. She said he was unreasonable and that she could not help them through the principles of parenting coordination. This was an indicator of abuse, that this case was not “high conflict,” but rather domestic violence.
114. Also at that time, alimony ended and Defendant CRANE refused to recalculate child support per the terms of the Property Settlement Agreement as of Nov. 1, 2010. This caused a financial hardship to Plaintiffs and they had to move in with Ms. Wolf’s mother in Staten Island, NY.
115. On February 1, 2011, again on Plaintiff KARIN’s birthday, Defendants CRANE and VAN AULEN, Esq. filed an Order to Show Cause (OTSC) frivolously claiming Plaintiff KARIN did not have permission to move out of the State of New Jersey and again falsely claiming Parental Alienation, which cannot hold up to Daubert and Frye standards. Said Defendants came to that litigation with “unclean hands.” Defendant

VAN AULEN, Esq.'s certification included with the OTSC, which stated, "She moved outside of the State of New Jersey without my client's permission or an Order of the Court," was fraudulent. Said Defendants were well aware of the Property Settlement Agreement, which includes removal language permitting Plaintiff KARIN to move out of state with the children. The PSA was conspicuously absent from the OTSC. Said Defendants served KARIN with the OTSC through the mail, which constitutes mail fraud.

116. A custody battle is a form of domestic violence. Abusive parents are more likely to seek sole custody than nonviolent ones. *Violence and the Family: Report of the American Psychological Association Presidential Task Force on Violence and the Family, (1996).*
117. Defendant CRANE was still harboring resentment and angry that Plaintiff KARIN left him and sought to vex and control her; and keep her from asserting herself in business and acquire property, which is a violation of the Property Settlement Agreement. Said Defendant had compulsively lied and falsified facts over and over in his certifications to the court and has used mail and wire to commit this fraud. He has intentionally inflicted emotional distress for the past 14 years and continues to do so to this day. Plaintiff KARIN developed PTSD as a result, which in this case is essentially Battered Women's Syndrome. All Defendants named herein have assisted Defendant CRANE in accomplishing this tort through collusion, influence, and corruption for financial gain. It has and will continue to affect Plaintiffs' quality of life and constitutional rights to life, liberty, and the pursuit of happiness.

118. Defendant CRANE sought to punish his children for their love and loyalty to their mother and primary caregiver. He has compulsively lied and falsified facts over and over in his certifications to the court, and has used mail and wire to commit this fraud. He has terrorized the children, made them feel guilty, employed coercive control, berated their mother, and subjected the children to domestic violence. It has had an adverse impact on the children and is inimical to their best interest. The children have suffered irreparable psychological damage as a result of Defendant CRANE's intentional infliction of emotional distress.
119. All Defendants named herein have assisted Defendant CRANE in accomplishing this tort through collusion, influence, and corruption for financial gain. Defendants have unscrupulously used the children as pawns. Defendants have committed child abuse against Plaintiffs D.C. and G.C.; and abused their mother by extension as she has had to watch and deal with their anguish. It has and will continue to affect Plaintiffs' quality of life and constitutional rights to life, liberty, and the pursuit of happiness.
120. The Bergen County Family Court System is inadequately equipped to handle custody cases involving domestic violence and Defendant STATE actors are deliberately indifferent to domestic violence for their own personal gain because it is not profitable for them. Were they to follow the clear and convincing scientific evidence that exists, a great deal of litigation would halt and they would make no money.
121. In 2006, the American Bar Association (ABA) published *10 Myths about Custody and Domestic Violence and How to Counter Them*, which cited over a dozen

sources of scientific evidence and reports from leading experts in the field, including the following:

“Most victims of family violence will have some contact with the legal system that is not well designed to handle such cases. In addition, inequities in the application of the law, racial and class bias, and inadequate investigations have harmed rather than helped many families. The low priority given to funding for implementation of child protection laws results in a legal system that frequently fails to work. Many battered women find themselves in dangerous positions because the courts often do not give credence or sufficient weight to a history of partner abuse in making decisions about child custody and visitation. Racial bias often influences the court's decision about whether to order treatment or to imprison offenders.”

“Abuse at the point of and after separation is so serious that courts must pay attention to ways of keeping battered women safer. Researchers indicate that the use of mediation is not appropriate when family violence is an issue. Child custody and visitation decisions must be made with full knowledge of the previous family violence and potential for continued danger, whether or not the child has been physically harmed. Most lawyers, judges, and others in the justice system are not trained in the psychology of family violence and abuse.”

- *Violence and the Family: Report of the American Psychological Association Presidential Task Force on Violence and the Family, (1996).*

122. Defendant Judge DELORENZO violated Plaintiffs’ rights to due process and gave the appearance of impropriety that he had a personal “old boys club” relationship with Defendant VAN AULEN. He allowed a custody battle to ensue based Parental Alienation knowing it could not hold up Daubert and Frye standards.
123. Defendant DELORENZO failed to recognize domestic violence at the onset of the custody litigation, including, but not limited to, the required analysis pursuant to the UCCJEA, and refused to stop it, despite Plaintiff KARIN pointing out years of harassment and a fault-based divorce for Extreme Cruelty, which is domestic violence.

He ordered Plaintiff KARIN into mediation with her abuser Defendant CRANE, which violates the *Model Code on Domestic Violence* and the APA's report noted above.

124. Defendant DELORENZO allowed Defendant CRANE to hire his own private evaluator, Defendant Dr. Judith Brown Greif (GREIF), who is known to be corrupt, yet barred Plaintiff KARIN from using her own private evaluator and getting psychological evaluations of the parties, when she motioned to the court several times, to which Plaintiff KARIN had a right pursuant to NJ Rule 5:3-3. He denied KARIN's motion to hire a domestic violence expert to evaluate the parties, particularly Dr. Cynthia Lischick as she is an outsider to the Bergen County Family Court racket and therefore does not suit its agenda. Dr. Lischick is a protégé of one of the leading experts in the field on domestic violence, Dr. Evan Stark, as well as a foremost expert herself. Defendants colluded to cover up abuse and keep Defendant GREIF protected from being revealed as a fraud.

125. Defendant DELORENZO refused to appoint a Guardian ad Litem (GAL) and/or a lawyer for the children when one was desperately needed; he denied Plaintiff KARIN's motion for this redress and was deliberately obtuse to the dire necessity.

126. Defendant DELORENZO refused to enforce Plaintiffs' rights to proper child support. He allowed Defendants CRANE and VAN AULEN, Esq. to conceal Mr. Crane's assets and income; and dodge providing his financial affidavit and Case Information Statement for 1½ years into the litigation. Defendants grew richer with the money that was rightfully owed to Plaintiff KARIN for child support for Plaintiffs D.C. and G.C..

This empowered Defendants to maintain and acquire real estate and other property at the expense of Plaintiffs.

127. Defendants DELORENZO, MIZDOL and MOSKAL failed to handle and conclude the custody litigation expeditiously as required by statute.
128. Defendant DELORENZO denied Plaintiff KARIN an advance of counsel fees several times to level the playing field, as Ms. Wolf was unable to afford an attorney. It was within his power and discretion to do so, and it was clearly necessary for the sake of the children, yet he chose not to, to make the already complex litigation more difficult for Plaintiffs.
129. Defendant DELORENZO claimed there is no statute or case law that provides for an advance of counsel fees in post-divorce litigation. Defendant STATE has no sincere and/or practical means of assisting indigent and low-income litigants. Plaintiff KARIN was denied Legal Aid in NJ no less than three times, being told by Diana Fuller, Esq. that they don't have the funding to handle custody litigation and/or that she was ineligible the minute she moved out of state. Yet, Defendant STATE allows litigants to be sued in the state, which is inequitable and biased.
130. Defendant Judge DELORENZO refused to enforce Plaintiff KARIN's rights to proper Discovery as Defendants CRANE and VAN AULEN fraudulently concealed and tampered with electronic evidence sent to her through the U.S. Mail and FedEx, which constitutes as mail and wire fraud here. Defendant CRANE perjured himself regarding said evidence and Defendant Judge DeLorenzo "looked the other way." Defendant

Judge ESCALA allowed this fraudulent evidence into exhibit, despite Plaintiff KARIN's explicit objections at trial.

131. Defendant DELORENZO refused to enforce Plaintiff KARIN's rights to a thorough custody evaluation, thus violating her and her children's due process rights.
132. Defendant LU colluded with Defendant CRANE and lied to custody evaluators for financial and social gain at the expense of Plaintiffs. Defendants LU, MARLENI, and PLINIO all colluded and conspired with Defendant CRANE and refused to cooperate with the evaluations, in order to subvert the abuse they have inflicted on Plaintiffs D.C. and G.C. and their mother Plaintiff KARIN; and have colluded and conspired to profit from Defendant CRANE's financial abuse of Plaintiffs to achieve the result of obtaining and enjoying property at the expense of Plaintiffs.
133. Defendants BFC, RITZLER, CUTTITO, and GREIF failed to do their due diligence here in evaluating these people that would be and are presently living with and abusing the children, despite BFC's report recommending that Plaintiffs D.C. and G.C. not be left in the care of these people. Plaintiff KARIN brought this to the court's attention and Defendants DELORENZO, ESCALA, and MIZDOL ignored this, which in turn harmed Plaintiffs.
134. There was a double-standard as Plaintiff KARIN was subjected to scrutiny and Defendant CRANE was not. Plaintiff KARIN motioned to the court to correct these deficiencies and Defendant DELORENZO refused to enforce her rights. Moreover, Plaintiff KARIN objected to the use of the reports at trial and Defendant ESCALA ignored this fact in his decision. Again this violated Plaintiff KARIN's due process

rights and she was deprived of her children unjustly. Plaintiffs suffered loss of consortium here as a result.

### **Procedural Denial of Redress in Custody Case**

135. In February 2011, Plaintiff KARIN filed Cross-Motion asking for denial of Defendant CRANE's motion in entirety, CRANE to be held in contempt for breach of contract, child support, sole legal custody and anger management because CRANE was harassing KARIN, psychological evaluation of CRANE, contempt for obstructing use of parenting coordinator, relief from legal abuse, CRANE to be deemed vexatious litigant, punitive damages, tax refunds, unreimbursed medical expenses, etc.
136. This resulted in a March 28, 2011 Order "DENIED" by Defendant Judge DELORENZO.
137. Plaintiff KARIN was denied relief for her and her children. Defendant CRANE hid his financial information throughout litigation, aided and abetted by the court. Issues festered, grew worse, and became imminent, causing so much hardship, that Plaintiff KARIN lost good employment, developed PTSD, and was cheated out of thousands of dollars in child support, which in turn caused her to lose custody.
138. Defendants colluded and conspired here in a RICO ENTERPRISE and intentional tort to inflict emotional distress upon and destabilize Plaintiffs. This was also domestic violence aimed at Plaintiffs by Defendant CRANE and a breach of the Property Settlement Agreement by CRANE, aided and abetted by Defendants.
139. In February/March 2012, Plaintiff KARIN filed a motion for a \$10K advance of counsel fees from Defendant CRANE to hire a lawyer and level the playing field. Defendant



Roger Radol (RADOL) represented KARIN at the hearing and asked Defendant Judge DELORENZO for a proper custody evaluation by an evaluator of her choice, pursuant to NJ Rule 5:3-3. Mr. Radol strongly advised Ms. Wolf that this was needed, stating that Dr. Judith Brown Greif is a fraud and that Defendant BFC was horrible. Defendant DELORENZO denied Plaintiff KARIN this right, stating in court that it was “too late for that.”

140. However, over six months later, Defendant DELORENZO went against his prior ruling and sent the family back to Defendants BFC and GREIF for custody evaluation updates, which essentially were complete new evaluations that took an additional four-five months to complete. Defendant DELORENZO violated the doctrine of judicial estoppel or estoppel by inconsistent positions here.

141. Violations of the doctrine of estoppel have permeated this case throughout as Defendants DELORENZO, ESCALA, CRANE, and VAN AULEN have all routinely taken inconsistent positions - whatever it took to fabricate a false case against Plaintiff KARIN and prevent her and her children from getting a fair trial and relief.

142. In the summer of 2012, Plaintiff KARIN dismissed her attorney Defendant RADOL because he was not communicating with her, had misled her, failed to follow through in negotiating a settlement so that he and Defendant VAN AULEN could milk this case for all it was worth, and had stated to KARIN, “If you claim bankruptcy and don’t pay my fees, I’ll make sure you lose your kids.” This caused KARIN great anxiety and indicated she could not trust Defendant RADOL.

143. Defendant VAN AULEN has indicated that Defendant RADOL has spoken against Plaintiff KARIN at the Bergen Family Court, telling other attorneys, judges, and other court personnel about her inability to pay her legal fees. Plaintiff KARIN has strong reason to believe that RADOL has followed through with his threat and influenced the court.
144. In August 2012, Plaintiff KARIN sent Defendant CRANE a Supplemental Notice to Produce, asking for recordings, authentication, 2007-2008 tax returns, medical status, more specific answers to Interrogatories as they were vague. CRANE did not comply.
145. In August 2012, KARIN filed a Motion to Enforce Litigant's Rights, asking for therapeutic monitoring, monetary support for therapy for children, parenting coordinator, parenting schedule to avoid conflict, remedies for custodial interference by CRANE retroactive child support, CRANE's pro rata share of extracurricular expenses, CRANE's pro rata share for day camp so KARIN could work, for CRANE to be held in contempt of court for hiding and lying about financials, 10K from CRANE so KARIN could retain counsel and level the playing field, to compel Discovery and for authentication of Discovery, etc.
146. This resulted in an October 18, 2012 Order "DENIED" by Defendant Judge DELORENZO; almost every count was "Denied w/o prejudice subject to a plenary hearing."
147. Plaintiff KARIN was denied relief for her and her children, never received items requested in Notice to Produce, which was necessary prior to a plenary hearing. Issues were not resolved via plenary hearing and were ignored.

148. On December 24, 2012, Defendant DELORENZO gave temporary custody to Defendant CRANE without basis and was recklessly obtuse to Plaintiff KARIN's pleadings and claims for relief to her financial situation and welfare of the children.
149. On December 30, 2012 Defendant CRANE harassed, threatened, and assaulted Plaintiff KARIN with intent to batter; and terrorized and assaulted Plaintiff G.C. during pick up. Plaintiff KARIN filed an incident report with the Teaneck Police Dept. on behalf of her daughter G.C. that evening.
150. Over the next few days, Plaintiff KARIN went to Alternatives to Domestic Violence (ADV) for counseling and court prep for filing a restraining order. KARIN filed for a restraining order on January 4, 2013 and a Temporary Restraining Order (TRO) was issued.
151. In February 2013, the parties went to court for the Final Restraining Order (FRO). Defendant CRANE produced a 45-minute audio recording of the incident, which showed that he had been recording the children and terrorizing G.C. to the point where she was shrieking.
152. During the hearing, it was evident that Judge DELORENZO was visibly disturbed as he was practically flinching when he heard G.C. shrieking. He made a statement directly afterward indicating that he was bothered by Defendant CRANE's recording of the children, and called G.C.'s screams "blood-curdling."
153. Defendant DELORENZO did not issue an FRO and was inexplicably removed from the custody case shortly thereafter. He heard a few more motions and the matter was transferred to Defendant Judge ESCALA for trial.

154. \*It should be noted here that Defendant CRANE and VAN AULEN did not submit this particular audio recording during the custody trial and Defendant Judge ESCALA refused to listen to it when Plaintiff KARIN tried to enter it as evidence of child abuse and domestic violence for her side of the case. Defendants colluded and conspired to keep this audio recording off the record as it was highly unfavorable to Defendant CRANE's case.
155. In March 2013, Plaintiff KARIN filed a motion asking for dismissal, suppression of CRANE's testimony and evidence for failure to comply with Discovery, to compel Discovery, impose sanctions upon CRANE, counsel fees, costs, tax returns, to order CRANE to anger management, etc.
156. In April 2013, Plaintiff KARIN filed OTSC asking for interim relief because Defendant CRANE was violating joint legal custody, asked the court for GAL, lawyer for children, in camera interview, forensic psychological evaluations, that CRANE go to domestic violence counseling, pay proper child support, and rehabilitative alimony per *Lepis v. Lepis*, *Smith v. Smith*, and *Morris v. Morris*, etc.
157. This resulted in a May 10, 2013 Order "DENIED" by Defendant Judge DELORENZO, who blanketed the motions as "Denied subject to a plenary hearing presently scheduled for June 4, 2013."
158. Plaintiff KARIN was denied relief for her and her children, some of which was necessary prior to a plenary hearing. Issues were not resolved via plenary hearing and were ignored.

159. Not once during this entire litigation in the past four years, has Plaintiff KARIN been permitted to go before the judge on an Order to Show Cause(OTSC) the day she filed it. Of those that were converted to regular motions, in each and every one, Defendants DELORENZO and ESCALA have routinely denied Plaintiffs relief from abuse by Defendant CRANE and irreparable harm has resulted. In contrast, several times when Defendant VAN AULEN has filed an OTSC, he has gotten in front of the judge to speak and this last time, he has gotten Plaintiff KARIN barred from contact with her children. This is an egregious abuse of discretion and favoritism for those who can “pay to play” which happened here, over and over again.
160. Defendants colluded and conspired here, engaging in a pattern of racketeering activity and RICO ENTERPRISES of child abuse, domestic violence, maternal deprivation, maternal marginalization, malicious abuse of process, abuse of discretion, nonfeasance, misfeasance, and malfeasance.

#### **Collusion, Conspiracy, and Constitutional Violations at Trial**

161. Defendant ESCALA violated Plaintiff KARIN’s due process rights and abused his discretion. Defendants ESCALA, MIZDOL, VAN AULEN, and STREMLER engaged in illegal ex-parte communications and colluded to sabotage Plaintiff KARIN’s case.
162. On the morning of June 4, 2013, Plaintiff KARIN and Defendant CRANE were to commence trial for custody of their minor children.
163. **Defendant ESCALA and the Family Part presiding judge, Defendant Judge MIZDOL, allowed Plaintiff KARIN’s trial attorney to back out literally minutes**

**before trial was to begin and forced her to start the trial without representation by counsel and without her trial binders.**

164. That morning said Plaintiff could not find her attorney, Defendant STREMLER for over an hour. Defendant VAN AULEN was also conspicuously absent for over an hour. Directly minutes before trial was to begin, Defendant STREMLER appeared and told Plaintiff KARIN she was backing out of the trial. She proceeded to go into Defendant Judge ESCALA's chambers twice with Defendant VAN AULEN then both went downstairs to Defendant MIZDOL's chambers.

165. The Court permitted Defendant STREMLER to leave and forced Plaintiff KARIN to start trial, despite her pleas for an adjournment to find new representation and get her trial binders, which Defendant STREMLER deliberately failed to bring. Plaintiff KARIN stated these facts on record saying, "I have been prejudiced here. This is a gross miscarriage of justice."

166. Said Defendants' actions caused Plaintiff KARIN horror and immense feelings of surrealism, devastation, and nausea. They forced her to immediately go through a trial for child custody under those conditions. Said Defendants intentionally inflicted emotional distress upon Plaintiff KARIN, which impaired her ability to perform at trial.

167. Defendant STREMLER never provided copies of the trial binders to Plaintiff KARIN. This caused great anxiety in Plaintiff KARIN and it took several highly stressful weeks and repeated requests to Defendant ESCALA during trial for the judge to permit Plaintiff KARIN to view his trial binders, which KARIN discovered were an absolute mess - evidence was missing and Defendant STREMLER failed submit a trial summary

and witness list. Said Defendants colluded and schemed in sabotaging Plaintiff KARIN's case.

168. Defendant ESCALA was rude, intimidating, and contemptuous towards Plaintiff KARIN throughout trial, belittling her attempts to present her case, and inflicting further emotional distress upon Plaintiff KARIN, which impaired her ability to perform at trial. The trial was before a Kangaroo Court and the illegal ex parte communications were resonant of a Star Chamber.
169. Defendants STREMLER and VAN AULEN committed legal malpractice herein. Both attorneys violated the Rules of Professional Conduct. Defendants DELORENZO, ESCALA, and MIZDOL violated judicial canons. All conspired to sabotage Plaintiffs here.
170. Other than her own testimony, Plaintiff KARIN was not permitted by Defendant ESCALA to produce any witnesses at trial, such as the parties' former parenting coordinator Marie Napoliello. Plaintiff KARIN explicitly stated during trial that since child custody was at issue, it was imperative that her witnesses testify.
171. Defendant ESCALA blocked Plaintiff KARIN from testifying about crucial issues and presenting evidence of domestic violence and child abuse. Defendant ESCALA purposely ignored the recommendations in the report of the court-appointed expert, Defendant Bergen Family Center, which stated that Defendant CRANE go to counseling for domestic violence, anger management, and control issues.
172. Defendant ESCALA did not do an in camera interview of the children per Plaintiff KARIN's request pursuant to NJ Rule 5:8-6 and threatened Plaintiff KARIN that it

would negatively impact her case if she persisted. Said Defendant bullied said Plaintiff here. Defendants conspired to prevent the children from being heard on record, in order to cover up and subvert child abuse and domestic violence. Defendant ESCALA violated Plaintiffs' rights of due process here.

173. Defendant ESCALA gave the appearance of impropriety at trial by displaying his longtime friendship with Defendant GREIF when she came in to testify.

174. During trial, Plaintiff KARIN attempted to point out that Defendant CRANE paid Defendant GREIF and Defendant ESCALA stifled her in an attempt to keep it off the record.

175. Defendant ESCALA ignored Bergen Family Center's reports, which stated Defendant CRANE harassed Plaintiff KARIN and that he should go to counseling for anger management, domestic violence, and control issues. Defendant ESCALA favored Defendant GREIF's biased report. He refused to hold Defendant CRANE accountable for any of his violations and continues to do so at present.

176. Defendant ESCALA did not consider the preferences of the children in his decision, as required by statute. Plaintiffs D.C. and G.C. have a strong preference to live with their mother as stated in the reports.

177. Defendant ESCALA awarded sole residential and sole legal custody to Defendant CRANE, labeling the parties "high conflict," refusing to recognize domestic violence and subverting it by falsely accusing Plaintiff KARIN of styling herself as a domestic violence victim.



178. Defendant ESCALA stated that if there was no Final Restraining Order, there was no domestic violence. That is an absurd argument, equivalent to saying a tree does not make a sound if it falls in the forest and no one is there to hear it. The lack of an FRO does not negate the existence of domestic violence. Many women who were unable to obtain an FRO have been murdered by their abusers shortly thereafter, along with their children in some cases. This shows Defendant ESCALA's blatant lack of seriousness and his careless attitude to the crime of domestic violence. Moreover, the best interests of the child standard in the State of New Jersey does not say there needs to be an FRO to consider domestic violence in custody litigation, only that domestic violence must be considered.
179. Plaintiff KARIN had previously obtained a fault-based divorce for Extreme Cruelty and custody of the parties' children four years prior to the onset of the custody litigation. Extreme Cruelty is domestic violence, therefore Defendant ESCALA's stance is obtuse and without merit. Defendant ESCALA himself is an abuser and therefore acted with personal prejudice against Plaintiff KARIN. He is unfit to be handling family law cases.
180. Defendants DELORENZO and Judge ESCALA failed to protect children from domestic violence, placing Plaintiffs D.C. and G.C. at risk. Neither child wants to live with their father and have stated repeatedly that they want to live with their mother. Said Defendants have ignored this and failed to consider the best interests of the children pursuant to NJ Rule 9:2-4 and the Prevention of Domestic Violence Act, NJ Rule 2C:25-29(b)(11).

181. Defendants aided Defendant CRANE in violating joint legal custody, taking Plaintiffs D.C. and G.C. to Holy Communion at Defendant GOOD SHEPHERD LUTHERAN CHURCH without Plaintiff KARIN's permission, input, or involvement. Defendants colluded to keep KARIN out of her children's religious upbringing here. KARIN explicitly informed Defendant GOOD SHEPHERD that she did not want her children doing Holy Communion yet and did not want them attending that church. Defendant GOOD SHEPHERD went ahead with administering Holy Communion to the children.
182. Defendant GOOD SHEPHERD failed to do background checks on Defendants CRANE and LU before allowing them to become Sunday School teachers at the church; and colluded, aided and abetted them in putting forth a false persona of piety and righteousness to the court and to their parishioners. Defendant GOOD SHEPHERD is aiding and abetting two abusers and allowing them to influence and corrupt children in their church, which is inimical to society. It constitutes as a pattern of racketeering activity in conducting a RICO ENTERPRISE in that it deceives and defrauds the public and shapes the opinions, actions, and inactions of the public, which in turn affects global commerce.
183. Defendant GOOD SHEPHERD takes money from Defendants CRANE and LU to fund their racket.
184. Plaintiff KARIN was denied her parental rights even though she is a fit parent and has no history of alcoholism, drug abuse, arrests, etc. Defendant ESCALA's decision on custody goes against the well-established federal case law of *Troxel v. Granville*, 530

U.S. 57 (2000) and violates Plaintiff KARIN's constitutional right to raise her children.

There is a wealth of additional case law that supports this:

- a. "No case authoritative within this circuit, however, had held that the state had a comparable obligation to protect children from their own parents, and we now know that the obligation does not exist in constitutional law." *K.H. Through Murphy v. Morgan*, 914 F.2d 846 (C.A.7 (Ill.), 1990).
- b. "Rights to marry, have children and maintain relationship with children are fundamental rights protected by the Fourteenth Amendment and thus, strict scrutiny is required of any statutes that directly and substantially impair those rights." *P.O.P.S. v. Gardner*, 998 F2d 764 (9th Cir. 1993) "Parents right to rear children without undue governmental interference is a fundamental component of due process." *Nunez by Nunez v. City of San Diego*, 114 F3d 935 (9th Cir. 1997).
- c. "The rights of parents to the care, custody and nurture of their children is of such character that it cannot be denied without violating those fundamental principles of liberty and justice which lie at the base of all our civil and political institutions, and such right is a fundamental right protected by this amendment (First) and Amendments 5, 9, and 14." *Doe v. Irwin*, 441 F Supp 1247; U.S. D.C. of Michigan, (1985).
- d. "The several states have no greater power to restrain individual freedoms protected by the First Amendment than does the Congress of the United States." *Wallace v. Jaffree*, 105 S Ct 2479; 472 US 38, (1985).
- e. The United States Supreme Court has stated: "There is a presumption that fit parents act in their children's best interests, *Parham v. J. R.*, 442 U. S. 584, 602; there is normally no reason or compelling interest for the State to inject itself into the private realm of the family to further question fit parents' ability to make the best decisions regarding their children." *Reno v. Flores*, 507 U. S. 292, 304. "The state may not interfere in child rearing decisions when a fit parent is available." *Troxel v. Granville*, 530 U.S. 57 (2000).
- f. "Loss of First Amendment Freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury. Though First Amendment rights are not absolute, they may be curtailed only by interests of vital importance, the burden of proving which rests on their government." *Elrod v. Burns*, 96 S Ct 2673; 427 US 347, (1976).
- g. Law and court procedures that are "fair on their faces" but administered "with an evil eye or a heavy hand" was discriminatory and violates the equal

protection clause of the Fourteenth Amendment. *Yick Wo v. Hopkins*, 118 US 356, (1886).

- h. “Even when blood relationships are strained, parents retain vital interest in preventing irretrievable destruction of their family life; if anything, persons faced with forced dissolution of their parental rights have more critical need for procedural protections than do those resisting state intervention into ongoing family affairs.” *Santosky v. Kramer*, 102 S Ct 1388; 455 US 745, (1982).
- i. “Parents have a fundamental constitutionally protected interest in continuity of legal bond with their children.” *Matter of Delaney*, 617 P 2d 886, Oklahoma (1980). .
- j. “The liberty interest of the family encompasses an interest in retaining custody of one's children and, thus, a state may not interfere with a parent's custodial rights absent due process protections.” *Langton v. Maloney*, 527 F Supp 538, D.C. Conn. (1981).
- k. “Parent's right to custody of child is a right encompassed within protection of this amendment which may not be interfered with under guise of protecting public interest by legislative action which is arbitrary or without reasonable relation to some purpose within competency of state to effect.” *Regenold v. Baby Fold, Inc.*, 369 NE 2d 858; 68 Ill 2d 419, appeal dismissed 98 S Ct 1598, 435 US 963, IL, (1977).
- l. “Parent's interest in custody of her children is a liberty interest which has received considerable constitutional protection; a parent who is deprived of custody of his or her child, even though temporarily, suffers thereby grievous loss and such loss deserves extensive due process protection.” *In the Interest of Cooper*, 621 P 2d 437; 5 Kansas App Div 2d 584, (1980).
- m. “The Due Process Clause of the Fourteenth Amendment requires that severance in the parent-child relationship caused by the state occur only with rigorous protections for individual liberty interests at stake.” *Bell v. City of Milwaukee*, 746 F 2d 1205; US Ct App 7th Cir WI, (1984).
- n. “Father enjoys the right to associate with his children which is guaranteed by this amendment (First) as incorporated in Amendment 14, or which is embodied in the concept of "liberty" as that word is used in the Due Process Clause of the 14th Amendment and Equal Protection Clause of the 14th Amendment.” *Mabra v. Schmidt*, 356 F Supp 620; DC, WI (1973).
- o. "Separated as our issue is from that of the future interests of the children, we

- have before us the elemental question whether a court of a state, where a mother is neither domiciled, resident nor present, may cut off her immediate right to the care, custody, management and companionship of her minor children without having jurisdiction over her in personam. Rights far more precious to appellant than property rights will be cut off if she is to be bound by the Wisconsin award of custody." *May v. Anderson*, 345 US 528, 533; 73 S Ct 840, 843, (1952).
- p. "A parent's right to care and companionship of his or her children are so fundamental, as to be guaranteed protection under the First, Ninth, and Fourteenth Amendments of the United States Constitution." *In re: J.S. and C.*, 324 A 2d 90; supra 129 NJ Super, at 489.
  - q. The Court stressed, "the parent-child relationship is an important interest that undeniably warrants deference and, absent a powerful countervailing interest, protection. A parent's interest in the companionship, care, custody and management of his or her children rises to a constitutionally secured right, given the centrality of family life as the focus for personal meaning and responsibility." *Stanley v. Illinois*, 405 US 645, 651; 92 S Ct 1208, (1972).
  - r. Parent's rights have been recognized as being "essential to the orderly pursuit of happiness by free man." *Meyer v. Nebraska*, 262 US 390; 43 S Ct 625, (1923).
  - s. The U.S. Supreme Court implied that "a (once) married father who is separated or divorced from a mother and is no longer living with his child" could not constitutionally be treated differently from a currently married father living with his child." *Quilloin v. Walcott*, 98 S Ct 549; 434 US 246, 255^Q56, (1978).
  - t. "The U.S. Court of Appeals for the 9th Circuit (California) held that the parent-child relationship is a constitutionally protected liberty interest. (See; Declaration of Independence --life, liberty and the pursuit of happiness and the 14th Amendment of the United States Constitution -- No state can deprive any person of life, liberty or property without due process of law nor deny any person the equal protection of the laws.)" *Kelson v. Springfield*, 767 F 2d 651; US Ct App 9th Cir, (1985).
  - u. "The parent-child relationship is a liberty interest protected by the Due Process Clause of the 14th Amendment." *Bell v. City of Milwaukee*, 746 f 2d 1205, 1242^Q45; US Ct App 7th Cir WI, (1985).
  - v. "No bond is more precious and none should be more zealously protected by the law as the bond between parent and child." *Carson v. Elrod*, 411 F Supp

645, 649; DC E.D. VA (1976).

- w. "A parent's right to the preservation of his relationship with his child derives from the fact that the parent's achievement of a rich and rewarding life is likely to depend significantly on his ability to participate in the rearing of his children. A child's corresponding right to protection from interference in the relationship derives from the psychic importance to him of being raised by a loving, responsible, reliable adult." *Franz v. U.S.*, 707 F 2d 582, 595^Q599; US Ct App (1983).
- x. "A parent's right to the custody of his or her children is an element of "liberty" guaranteed by the 5th Amendment and the 14th Amendment of the United States Constitution." *Matter of Gentry*, 369 NW 2d 889, MI App Div (1983).
- y. "Reality of private biases and possible injury they might inflict were impermissible considerations under the Equal Protection Clause of the 14th Amendment." *Palmore v. Sidoti*, 104 S Ct 1879; 466 US 429.
- z. "Judges must maintain a high standard of judicial performance with particular emphasis upon conducting litigation with scrupulous fairness and impartiality. 28 USCA § 2411; *Pfizer v. Lord*, 456 F.2d 532; cert denied 92 S Ct 2411; US Ct App MN, (1972).
- aa. "State Judges, as well as federal, have the responsibility to respect and protect persons from violations of federal constitutional rights." *Gross v. State of Illinois*, 312 F 2d 257; (1963).
- bb. The Constitution also protects "the individual interest in avoiding disclosure of personal matters." Federal Courts (and State Courts), under *Griswold* can protect, under the "life, liberty and pursuit of happiness" phrase of the Declaration of Independence, the right of a man to enjoy the mutual care, company, love and affection of his children, and this cannot be taken away from him without due process of law. There is a family right to privacy, which the state cannot invade or it becomes actionable for civil rights damages." *Griswold v. Connecticut*, 381 US 479, (1965).
- cc. "The right of a parent not to be deprived of parental rights without a showing of fitness, abandonment or substantial neglect is so fundamental and basic as to rank among the rights contained in this Amendment (Ninth) and Utah's Constitution, Article 1 § 1." *In re U.P.*, 648 P 2d 1364; Utah, (1982).
- dd. "The rights of parents to parent-child relationships are recognized and upheld." *Fantony v. Fantony*, 122 A 2d 593, (1956); *Brennan v. Brennan*, 454 A 2d 901, (1982).

- ee. "State's power to legislate, adjudicate and administer all aspects of family law, including determinations of custodial; and visitation rights, is subject to scrutiny by federal judiciary within reach of due process and/or equal protection clauses of 14th Amendment...Fourteenth Amendment applied to states through specific rights contained in the first eight amendments of the Constitution which declares fundamental personal rights...Fourteenth Amendment encompasses and applied to states those preexisting fundamental rights recognized by the Ninth Amendment. The Ninth Amendment acknowledged the prior existence of fundamental rights with it: "The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people." The United States Supreme Court in a long line of decisions, has recognized that matters involving marriage, procreation, and the parent-child relationship are among those fundamental "liberty" interests protected by the Constitution. Thus, the decision in *Roe v. Wade*, 410 US 113; 93 S Ct 705; 35 L Ed 2d 147, (1973), was recently described by the Supreme Court as founded on the "Constitutional underpinning of ... a recognition that the "liberty" protected by the Due Process Clause of the 14th Amendment includes not only the freedoms explicitly mentioned in the Bill of Rights, but also a freedom of personal choice in certain matters of marriage and family life." The non-custodial divorced parent has no way to implement the constitutionally protected right to maintain a parental relationship with his child except through visitation. To acknowledge the protected status of the relationship as the majority does, and yet deny protection under Title 42 USC § 1983, to visitation, which is the exclusive means of effecting that right, is to negate the right completely." *Wise v. Bravo*, 666 F.2d 1328, (1981).
- ff. "One of the most precious rights possessed by parents is the right to raise their children free of government interference. That right, "more precious than mere property rights," is a liberty interest, protected by the substantive and procedural Due Process Clauses of the Fourteenth Amendment." *Stanley v. Illinois*, 405 U.S. 645, 92 S.Ct. 1208, 31 L.Ed.2d 551 (1972).
- gg. "Because of the magnitude of the liberty interests of parents and adult extended family members in the care and companionship of children, the Fourteenth Amendment protects these substantive due process liberty interests by prohibiting the government from depriving fit parents of custody of their children. See *Stanley v. Illinois*, 405 U.S. 645, 651, 92 S.Ct. 1208, 31 L.Ed.2d 551 (1972); *Santosky v. Kramer*, 455 U.S. 745, 760, 102 S.Ct. 1388, 71 L.Ed.2d 599 (1982); *Duchesne v. Sugarman*, 566 F.2d 817, 824 (2d Cir. 1977); *Hurlman v. Rice*, 927 F.2d 74, 79 (2d Cir. 1991). In the United States Supreme Court's view, the state registers "no gains toward its stated goals [of protecting children] when it separates a fit parent from the custody of his

children." *Stanley*, 405 U.S. at 652.

- hh. "In controversies affecting the custody of an infant, the interest and welfare of the child is the primary and controlling question by which the court must be guided. This rule is based upon the theory that the state must perpetuate itself, and good citizenship is essential to that end. Though nature gives to parents the right to the custody of their own children, and such right is scarcely less sacred than the right to life and liberty, and is manifested in all animal life, yet among mankind the necessity for government has forced the recognition of the rule that the perpetuity of the state is the first consideration, and parental authority itself is subordinate to this supreme power. It is recognized that: 'The moment a child is born it owes allegiance to the government of the country of its birth, and is entitled to the protection of that government. And such government is obligated by its duty of protection, to consult the welfare, comfort and interest of such child in regulating its custody during the period of its minority.' *Mercein v. People*, 25 Wend. (N. Y.) 64, 103, 35 Am. Dec. 653; *McKercher v. Green*, 13 Colo. App. 271, 58 Pac. 406. But as government should never interfere with the natural rights of man, except only when it is essential for the good of society, the state recognizes, and enforces, the right which nature gives to parents [48 Colo. 466] to the custody of their own children, and only supervenes with its sovereign power when the necessities of the case require it."
- ii. "The experience of man has demonstrated that the best development of a young life is within the sacred precincts of a home, the members of which are bound together by ties entwined through 'bone of their bone and flesh of their flesh'; that it is in such homes and under such influences that the sweetest, purest, noblest, and most attractive qualities of human nature, so essential to good citizenship, are best nurtured and grow to wholesome fruition; that, when a state is based and builded upon such homes, it is strong in patriotism, courage, and all the elements of the best civilization. Accordingly these recurring facts in the experience of man resulted in a presumption establishing prima facie that parents are in every way qualified to have the care, custody, and control of their own offspring, and that their welfare and interests are best subserved under such control. Thus, by natural law, by common law, and, likewise, the statutes of this state, the natural parents are entitled to the custody of their minor children, except when they are unsuitable persons to be entrusted with their care, control, and education, or when some exceptional circumstances appear which render such custody inimical to the best interests of the child. While the right of a parent to the custody of its infant child is therefore, in a sense, contingent, the right can never be lost or taken away so long as the parent properly nurtures, maintains, and cares for the child." *Wilson v. Mitchell*, 111 P. 21, 25-26, 48 Colo. 454 (Colo. 1910)



**Matters Particularly Concerning Defendants RABNER and DOYNE**

185. Plaintiff KARIN has implored Defendant DOYNE to take action against Defendant Judge ESCALA and DOYNE has refused. In allowing ESCALA to run rampant, DOYNE has perpetuated an obstruction of justice and constitutional violations; and aided and abetted a pattern of racketeering activity and RICO ENTERPRISE in violation of federal law, which is inimical to justice and the public; and is therefore liable to Plaintiffs and any other litigants suffering under ESCALA for damages.
186. Plaintiff KARIN has implored Defendant RABNER to take action against Defendant Judge ESCALA and RABNER has ignored her. Moreover, RABNER recalled ESCALA to the bench, has perpetuated an obstruction of justice and constitutional violations; and aided and abetted a pattern of racketeering activity and RICO ENTERPRISE in violation of federal law, which is inimical to justice and the public; and is therefore liable to Plaintiffs and any other litigants suffering under ESCALA for damages.
187. Defendant ESCALA has retaliated against Plaintiff KARIN for addressing her grievances with Chief Justice RABNER and Judge DOYNE. This is an abuse of discretion. Defendant ESCALA is controlled by greed and the emotion of anger against Plaintiff KARIN for speaking up, as is her constitutional right to do so. These are valid reasons for Defendant ESCALA to recuse himself, which he refuses to do.

**Matters Particularly Concerning Defendant CHRISTIE**

188. Defendant Governor CHRISTIE has influenced and implemented an agenda of false imprisonment in the State of New Jersey through the following: a) The George

Washington Bridge scandal in Fort Lee, NJ concocted and put into effect by his administration; b) His cancellation of the ARC Tunnel Project (a deceptive paradox to defraud the public considering all the transit villages he's building); and c) Plaintiffs' detainment and false imprisonment in State of New Jersey by Defendant STATE.

189. Despite having a Property Settlement Agreement with bargained-for terms that she could remove her children from the State of New Jersey, Defendants colluded and conspired to deprive KARIN and her children of their rights. Moreover, there is a common denominator in all three situations stated above – all are instances where individuals were trying to leave the State of New Jersey and were detained either directly or indirectly, through force, obstruction, coercion, or threats.
190. Defendants engaged in a pattern of racketeering activity of RICO ENTERPRISES to deprive Plaintiffs of their rights including Right to Freedom of Movement, to falsely imprison Plaintiffs and kidnap Plaintiffs D.C. and G.C., which are indictable offenses.
191. Defendant CHRISTIE routinely appoints corrupt judiciaries or otherwise fails to remove them. He fails to remedy the family court crisis in the State of New Jersey. Organizations such as the Nurtured Parent and the NJ Coalition for Family Court Reform have implored him to take action through newspaper ads, social media, phone calls, letters, court protests, etc.
192. Defendant CHRISTIE is well aware of the Judge Escandon scandal where a large group of women are petitioning to have Escandon impeached, which corroborates Plaintiffs case and assertion that Defendants are engaged in a pattern of racketeering activity and RICO ENTERPRISE to oppress women. The Judge Escandon scandal was broadcast by

Sarah Wallace of Channel 7 News last year. The women she interviewed have and continue to be punished by Defendant STATE and its courts for speaking up. Moreover, CHRISTIE and STATE manipulate the media to keep the family court crisis out of the news and obstruct public knowledge of it, which constitutes as fraud.

193. He consistently misleads his constituents and gives them false hope. Individuals have stood up at town hall meetings stating their grievances to him. He claims he will act, then doesn't. He's been dubbed The Governor of Divorcegate.

#### **Matters Particularly Concerning Defendant GREIF**

194. Defendant CRANE and his attorney Defendant VAN AULEN, hired Defendant GREIF to do a custody evaluation regarding Plaintiffs D.C. and G.C.. Defendant GREIF is proven as evident in her thesis *Fathers, Children, and Joint Custody*, Greif, 49 *Am.J.Orthopsych.* 311, 315 (1979) and her dealings in child custody throughout the years. Her "joint custody" standards do not apply to mothers and she is quick to marginalize them for the right price. She has a reputation for doing so and the Defendants STATE and its actors named as Defendants herein have let GREIF run rampant for many years unchecked, as they profit from her corruption.
195. Defendant GREIF wrote a biased custody evaluation twice in this case, prejudiced to award custody to Defendant CRANE, who was and continues to falsely claim Parental Alienation. She could not prove Parental Alienation, nor did she provide any supporting backup. She provided a net opinion and manipulated the report. She is not a domestic violence expert and is a misogynist. She is a proponent of Richard Gardner's unscientific and misogynistic theory of Parental Alienation Syndrome, which supports

abusers and pedophiles, and has been repeatedly rejected for inclusion in the DSM by the APA. It should be noted that Richard Gardner was a Bergen County resident and practiced in Bergen County; he has thus “flavored the water” in the Bergen County Family Court.

196. Defendant GREIF subverted evidence of child abuse, neglect and domestic violence.

For example, she castigated Plaintiff KARIN for taking pictures of black-and-blues on her son Plaintiff D.C., inflicted upon the child by Defendant CRANE. When the children were afraid of their father because he was cursing, yelling and making fists at them, she wrote that they were afraid because they “seek his approval.” She claimed that there was no domestic violence, despite Plaintiff KARIN seeking restraining orders, the police and ADV identifying her as a domestic violence victim and the court-appointed evaluator Defendant BFC recommending that Defendant CRANE enter counseling for domestic violence and anger management.

197. Defendant GREIF subverted the psychological abuse Defendant CRANE has been inflicting upon the Plaintiffs by interrogating and recording them for many years, the same abuse for which Defendant HORNE of Defendant DCP&P felt was so extensive that she determined the family to be “high risk” and initiated DCP&P’s involvement with the family including a regimen of therapy and psychological evaluations.

198. Defendant GREIF subverted the children’s strongly expressed wishes to live with their mother, their primary attachment figure. In contrast, the court-appointed evaluator, Defendant RITZLER from Bergen Family Center, stated that the children were much

more strongly bonded to their mother and that she understood their needs profoundly in contrast to their father.

199. Defendant GREIF lied to Plaintiff KARIN stating that she doesn't interview significant others such as current paramours. This falsehood was evident as Defendant GREIF declined to interview Plaintiff KARIN's boyfriend, yet proceeded to interview Defendant CRANE's girlfriend.

200. Defendant GREIF and Defendant ESCALA both gave the appearance of impropriety by displaying their friendship in court. Plaintiff KARIN motioned to recuse Defendant ESCALA as a result, who abused his power and refused to recuse himself.

201. Defendant GREIF is a social worker profiting off families in crisis. Plaintiffs are not her only victims; Plaintiff KARIN has been in touch with a good deal of women in NJ who say she is poison, notorious for writing corrupt custody evaluations and ignoring acts of domestic violence she has witnessed right in her office. Some of these women have degrees in psychology and social work and say GREIF is a female misogynist. Others, including those in the legal profession, have called her a "whore of the court." Plaintiff KARIN interviewed several family law attorneys in the Bergen County area who made the following statements about Dr. Judith Brown Greif:

- a. "Dr. Judith Brown Greif never met a father she didn't think should have everything." – Roger Radol, Esq.
- b. "She sides with whoever's paying her. I know because I've used her." – Alexandra Stremler, Esq.

- c. “She’s had a very lucrative career writing what people have paid her to write.” – Donna Dorgan, Esq. (Note: The other attorney in Donna Dorgan’s office, Robert Davies, Esq. may have used Dr. Judith Brown Greif to secure custody of his children. This is unclear, but he gave Plaintiff KARIN the impression that something dishonest was afoot regarding “Judy Greif”).
- d. “She’s not an independent. She’s supposed to be, but she’s not.” – Barbara Cowen, Esq.
- e. “She’s done so much damage. She comes to my classes sometimes, but she never learns.” – Toby Kleinman, Esq. (child abuse and domestic violence advocate)
- f. Alternatives to Domestic Violence (ADV) strongly advised Plaintiff KARIN to get a custody evaluator with a PhD and domestic violence specialization to counteract Dr. Greif.

202. Defendant GREIF presents a serious risk to children and society, according to the law and scientific findings of the following:

1. The Prevention of Domestic Violence Act - under the Prevention of Domestic Violence Act, it is presumed that a child’s best interests are served by an award of custody to the non-abusive parent. N.J.S.A. 2C:25-29(b)(11).
2. The ACE Study by the Center for Disease Control (CDC), which states that children who are exposed to domestic violence run a higher risk of low self-esteem, depression, and suicide. This can be found online at <http://www.cdc.gov/ace/>.

3. The U.S. Department of Justice's report by Dr. D.C. Saunders entitled, *Child Custody Evaluators' Beliefs About Domestic Abuse Allegations: Their Relationship to Evaluator Demographics, Background, Domestic Violence Knowledge and Custody-Visitation Recommendations*, which can be found online at <https://www.ncjrs.gov/pdffiles1/nij/grants/238891.pdf>

203. For the reasons stated herein, Plaintiff KARIN filed a complaint with Defendant Attorney General Board of Ethics (AGBOE) and asked the Board to launch a full investigation of Defendant GREIF, that her license be revoked, and that she be barred from doing any more immediate and irreparable damage to children, adults, and families.

204. Defendant AGBOE contacted Plaintiff KARIN via telephone and asked her to amend the complaint by omitting the lawyers' names and statements from her complaint. Plaintiff KARIN did so and several months later, Defendant AGBOE sent Plaintiff KARIN a letter via the U.S.P.S. twice (one certified, one regular mail), stating that they found no evidence of misconduct. Thus, AGBOE manipulated the result of the investigation, if one even took place, which is unlikely. Defendant AGBOE has conspired with other Defendants as part of a corrupt organization engaging in a pattern of racketeering and RICO ENTERPRISE.

#### **Matters Particularly Concerning Defendant ESTRIN**

205. In February of 2013, Defendant CRANE brought Plaintiffs D.C. and G.C. to see Defendant ESTRIN for counseling without Plaintiff KARIN's knowledge or consent.

This was a violation of joint legal custody. At the time, the parties were undergoing the second round of custody evaluations, which rendered the circumstances vulnerable.

206. Defendant CRANE hired Defendant ESTRIN to “coach” the children and skew those evaluations – through direct statements to the children intended to psychologically condition them and through Defendant ESTRIN’s connections to the court and influence on Bergen Family Center as the former Director.

207. Defendant ESTRIN colluded with Defendant CRANE in making inappropriate and damaging statements to the children to paint their mother in a negative light. Both children reiterated the following false statements Defendant ESTRIN made to them:

“Your mother got evicted for not paying the rent. Not paying the rent is illegal.  
It’s against the law.”

208. Plaintiffs D.C. and G.C. were extraordinarily vulnerable during the time Defendant ESTRIN made these damaging statements to them. They are children and at the time, had just been traumatized by being ripped away from their mother and primary attachment figure and sent to live with their abusive father, against their pleas.

209. This resulted in the children having breakdowns at school and seeing the school guidance counselor, whose input was excluded from the custody reports and the trial, as Defendants blocked this to shelter not only ESTRIN, but also Defendants GREIF, BFC, RITZLER, and CUTTITO.

210. Defendants also deliberately blocked Plaintiff KARIN from obtaining a prudent and complete custody evaluation to cover up Defendant ESTRIN’s willful misconduct, thereby engaging in a pattern of collusion, conspiracy, racketeering, and corruption to



support her fraudulent actions and their own related reciprocal cycle of fraudulent actions.

211. Plaintiff KARIN found out her children were seeing Defendant ESTRIN from the children, who told her they were seeing a counselor on Tuesday nights. Defendant CRANE violated the Property Settlement Agreement and concealed the “therapy” from Plaintiff KARIN. Defendant ESTRIN made no effort to reach out to the children’s mother, Plaintiff KARIN, inform or include her in any way in her children’s therapy, and proceeded without ever obtaining informed consent from Plaintiff KARIN.
212. Defendant ESTRIN refused to speak to Plaintiff KARIN several times when Ms. Wolf attempted to contact her upon finding out several weeks later. Ms. Wolf called again the following week and Defendant ESTRIN again dodged her phone call, stating that she had her 9-year-old son in the car and was on speakerphone. Plaintiff KARIN advised her she was to stop seeing the children immediately and she stated she would call back.
213. Upon finally speaking two days later, Plaintiff KARIN confronted her regarding the egregious statements she made to the children; Defendant ESTRIN fumbled for excuses and tried to cover up. Plaintiff KARIN informed Defendant ESTRIN that Defendant CRANE and her had joint legal custody and asked her where she got the impression that she could administer psychological treatment to the children without both parents’ consent. She attempted to lie by saying she didn’t need permission. Plaintiff KARIN informed Defendant ESTRIN that she was to cease seeing the children further. The phone call concluded with Plaintiff KARIN putting Defendant ESTRIN on notice that she would pursue legal action.

214. At the time, DYFS caseworker, Erika Frank, interviewed the children and felt that the children did not trust Defendant ESTRIN and should not be seeing her. They do not like her, nor trust her, and said they think their father is waiting on the other side of the door with a tape recorder, taping everything they say.
215. Defendant ESTRIN is currently administering therapy to Defendant CRANE, empowering him with further abuse tactics. This is evident in the abuse the children report in Defendant CRANE's home and the worsening of this case in Court. Defendant ESTRIN is colluding with the Court and is incentivized to do so, as she receives referrals from the judges. During the course of this case, Defendants DELORENZO and VAN AULEN suggested her in open court. Like Defendant GREIF, Defendant ESTRIN is a "preferred" vendor.
216. Like Defendant GREIF, Defendant ESTRIN engaged in vendor misfeasance and malfeasance and breached the fiduciary duty she had to child Plaintiffs D.C. and G.C., to perform prudent services. She profited from intentionally harming two children who have suffered emotional, physical, and economic injuries as a result of her actions. Defendant ESTRIN slandered Plaintiff KARIN to her children Plaintiffs D.C. and G.C.. She has intentionally and criminally endangered the welfare of two minors here and the other Defendants have supported her fraudulent actions to perpetuate a pattern of racketeering and RICO ENTERPRISE.

#### **Matters Particularly Concerning Defendant KATONA**

217. Throughout the custody litigation, Defendants DELORENZO and ESCALA ordered Plaintiff KARIN and Defendant CRANE into Mediation. This violates the report of the

American Psychological Association, *Violence and the Family: Report of the American Psychological Association Presidential Task Force on Violence and the Family*, (1996). *on Domestic Violence*, which states domestic violence victims should not be placed in Mediation with their abusers as it results in intimidation and coercive control.

218. On September 17, 2013 Defendant ESCALA ordered Plaintiff KARIN and Defendant CRANE back into Mediation, purposely subjecting her to further abuse by Defendant CRANE and emotional blackmail that Plaintiff KARIN would not be able to see her children and maintain a meaningful relationship with them if she did not go along.
219. Defendant CRANE obstructed the attempts at Court-ordered Mediation to work out a new Parenting Time Agreement. On Sept. 17, 2013 the parties went to Mediation at the courthouse with Kathy Katona, during which Defendant CRANE blew up at her, yelling at her for a considerable length, insulted her, and then stormed out of the session after 45 minutes. Defendant KATONA had recognized the domestic violence dynamic present and had admonished Defendant CRANE, however Defendant ESCALA's tortious influence changed that.
220. Plaintiff KARIN brought Defendant CRANE's behavior to the attention of Defendants ESCALA and MIZDOL. The parties were ordered to complete Mediation.
221. Prior to the next round of Mediation, Plaintiff KARIN called Defendant KATONA to make special arrangements for separate rooms during Mediation, have a DV advocate present, or some other remedy that might mitigate the domestic violence dynamic and provide for PTSD accommodations as required by law pursuant to the Americans with Disabilities Act. Plaintiff KARIN explicitly stated again that she was a domestic

violence survivor and that she had recently been diagnosed with Post-Traumatic Stress Disorder (PTSD) as a result.

222. Contrary to her previous stance, Defendant KATONA acted inappropriately during Mediation, yelling at Plaintiff Karin Wolf, making psychologically damaging statements to her, bullying her, trying to humiliate her in front of her abuser, empowering him, and exercising coercive control. This resonated the emotional blackmail that Plaintiff KARIN experienced with Defendant ESCALA, that she would not be able to see her children and maintain a meaningful relationship with them if she did not go along.

223. Defendant KATONA stated to Plaintiff KARIN, both in private and in front of Defendant CRANE:

- a. "In the eyes of the Court, you are no longer these children's mother." (said at least 3-4 times)
- b. "You think you're going to negotiate with Osama Bin Laden?"
- c. "Pretend that he is an Afghani terrorist, holding a gun to your head, and you are lying on the floor, pleading for your life."
- d. "You're on the Beggar's Block, you've got nothing. You're at his mercy."
- e. "The judge is going to take everything away from you, the same judge that disenfranchised you."
- f. "You're nuts."
- g. "I'm not doing this again, you people are crazy."

224. Mediation lasted 45 minutes the first post-trial session, three (3) hours the second, and 3½ hours the third. This caused Plaintiff KARIN severe distress and anxiety, to the point where she had to have an emergency session with her domestic violence therapist immediately following the last two sessions. Defendants KATONA, ESCALA, and CRANE intentionally inflicted emotional distress and damaged Plaintiff KARIN here.

**Matters Particularly Concerning Defendant DYFS n/k/a DCP&P**

225. In the fall of 2011, Plaintiff D.C. had a meltdown immediately upon returning from a weekend visit with his father, Defendant CRANE, sobbing and recounting to his mother that his father had been “playing karate” with him roughly. D.C. sobbed uncontrollably saying his father had been twisting his arm, to the point where it hurt afterwards. He said, “I’m scared Daddy is going to throw me threw the wall.”

226. D.C. had also recounted to his mother that about six months prior, when D.C. was eight years of age, his father had put him on a motorcycle with no gear on him and driven him around on the back of the motorcycle while his father left his sister G.C. alone sleeping in the house, who was six years of age at the time. He said his father told him not to tell his mother.

227. As a result, Plaintiff KARIN was concerned her children were being abused and called DYFS n/k/a DCP&P. Two caseworkers from DYFS, Defendants BURGOS and NINA, came out to the house later that day and interviewed Plaintiffs. All three Plaintiffs reported the abuse and the police came to the house several times thereafter where the children reported being nervous about seeing their father. DYFS failed to protect the children.

228. In addition, Defendant BURGOS lied to the custody evaluators stating that Plaintiff KARIN made a false claim because she was “upset alimony was ending.” This is without basis and in fact, when alimony ended subsequently, it turned out to be Defendant CRANE who dodged paying proper child support – he violated the terms of the Property Settlement Agreement, refusing to recalculate child support, lying about his income, and hiding financial information from Plaintiff KARIN, through collusion and conspiracy particularly, but not limited to, with his attorney Defendant VAN AULEN and Defendants DELORENZO, ESCALA, MIZDOL, MOSKAL, STATE, and BANK OF AMERICA MERRILL LYNCH.
229. This financial deprivation harmed Plaintiffs as it resulted in Plaintiff KARIN having difficulty maintaining her place of residence, she had to move her and the children in with her mother in Staten Island, and she could not afford before and after care for the children while she worked. Defendants deliberately and maliciously sought out to destabilize Plaintiffs, which happened here.
230. Subsequently, the children came home with bruises and burns on them. D.C. had black and blues on him from “playing karate with Daddy.” This caused Plaintiff KARIN distress and she notified the court by writing a letter to Defendant DELORENZO and Defendant CRANE’s attorney Defendant VAN AULEN. The court failed to act, which constitutes nonfeasance and misfeasance.
231. Defendant GREIF attempted to turn this matter around on Plaintiff KARIN as if there was something wrong with her taking pictures of her children’s bruises and burns.

232. In January 2013, Plaintiff KARIN reported to DYFS a second time, as D.C. had reported to his mother that Defendant CRANE punched him in the arm. KARIN had also filed a restraining order against Defendant CRANE for an incident on December 30, 2012, where Defendant CRANE assaulted and terrorized the Plaintiffs.
233. DYFS caseworker Erika FRANK investigated, where Plaintiff KARIN showed her the pictures and Defendant FRANK subverted the abuse, regarding it as nothing to be concerned about, nor did she think the punching was anything to be concerned about.
234. Plaintiff KARIN tried to give a copy of a recording that Defendant CRANE had made of the Dec. 30, 2012 incident, which showed he was recording the children and G.C. was screaming, for which Defendant Judge DELORENZO was visibly disturbed by at the hearing for the FRO and made a point of articulating this in court.
235. Defendant FRANK said she thought the children were being psychologically abused and that they should not be seeing Defendant ESTRIN for counseling, as they did not trust her. She stated that Defendant CRANE recording the children was unhealthy. However, she stated that she was choosing for DYFS not to get involved because they only had two tiers, but that that was changing to four tiers in a few months and that this would have been categorized as one of those tiers. She then threatened Plaintiff KARIN that if she wanted to persist, she would put D.C. and G.C. in foster care. At the end of the visit she stated to Plaintiff KARIN that she observed that Defendant CRANE was bitter and harboring anger towards KARIN for leaving him.
236. Plaintiff KARIN called DYFS n/k/a DCP&P in the fall of 2013, upon finding out that her 11-year-old son D.C. was not being supervised after school and that Defendant

CRANE was allowing him to walk around town for three hours everyday after school. She also stated to DYFS that Defendant CRANE was psychologically abusing the children. Defendant HORNE investigated, felt that the children were being psychologically abused, and stated to Plaintiff KARIN on December 10, 2013, that DYFS would be getting involved and implementing a program.

237. Also that day, in court prior, Defendant ESCALA chastised Plaintiff KARIN for calling DYFS and refused to prohibit Defendant CRANE from putting the children in danger. This is an abuse of discretion and a violation of public policy. Given the specific kidnapping attempts in the Glen Rock/Ridgewood area reported on the news at that time, this especially caused Plaintiff KARIN great anxiety for many months and continues to present, knowing that her children are not being adequately supervised and are at risk. Even more egregious was that Plaintiff KARIN motioned before the court to be permitted to watch the children after school, as she was available and had the Right of First Refusal per a Consent Order as part of Judge Perez-Friscia's March 19, 2010 Order. Defendant ESCALA denied Plaintiff KARIN this right. Moreover, it violates a wealth of case law in NJ that says bargained-for terms and agreements of the parties take precedence and are to be honored. Defendants have intentionally aided Defendant CRANE in routinely violating the Property Settlement Agreement and all other Consent Orders in this case, undoing her divorce agreement to her detriment. This constitutes a pattern of racketeering activity and RICO ENTERPRISE.

238. That morning prior to Defendant HORNE's call on Dec. 10, 2013, Plaintiff KARIN appeared in court before Defendant Judge ESCALA to redress her concerns about her



children in Defendant CRANE's care or rather, the lack thereof. Defendant ESCALA chastised Plaintiff KARIN for calling DYFS (DCP&P). Defendant ESCALA subsequently used his influence to redirect DCP&P's involvement and instructed them to subvert abuse by Defendant CRANE.

239. Defendant HORNE had stated to KARIN over the phone on December 10, 2013 that the family was labeled "high risk" and that DCP&P would be administering psychological evaluations and implementing a therapy regimen by either Families First or Full Circle, the former being the preference as it was better suited to high risk cases. She stated to Plaintiff KARIN that these programs required in-home therapy in both parents' homes somewhere between 6-10 hours per week. However, she passed the case onto Sandra Cruz (Defendant CRUZ), who was incompetent, indifferent, and dropped the ball. (Incidentally, Plaintiff KARIN consulted with the leader of her domestic violence support group, who had direct experience with Sandra Cruz and stated that she was so incompetent, that she had refused to speak to her when she called and would immediately call her supervisor instead.)

240. Therapy commenced with Defendant FULL CIRCLE, the second, lesser choice, months later. Plaintiff KARIN was excluded from the therapy, contrary to what Defendant HORNE had stated to her. Therapy was minimal, practically infinitesimal - one night a week at Defendant CRANE's home, if at all, as the therapist Kristin Cirelli (CIRELLI) was constantly rescheduling and missing appointments. Defendants DCP&P and FULL CIRCLE were well aware of this and deliberately failed to act accordingly and replace

her. Furthermore, therapy at an abuser's home is a grave mistake; DCP&P, Full Circle, and their employees should know how serious a mistake this is.

241. Defendants CRANE, LU, MARLENI, and PLINIO continued to abuse the children throughout Defendant DCP&P's involvement. Plaintiff KARIN reported several instances of abuse to Defendant CRUZ and reached out to Defendants FULL CIRCLE and CIRELLI, on whom Defendant DCP&P deliberately failed to provide KARIN with information, by finding the company's website on her own.
242. Defendants ESCALA, MIZDOL, DCP&P, HORNE, CRUZ, CRUZ'S SUPERVISOR, GOMEZ, and YAN influenced Defendants CIRELLI and FULL CIRCLE to subvert domestic violence and child abuse to intentionally brainwash and corrupt Plaintiffs D.C. and G.C. against their mother Plaintiff KARIN.
243. Plaintiff KARIN reported physical altercations and assaults Defendants CRANE and LU inflicted against the children. Said Defendants were constantly badmouthing KARIN to her children and making the children feel guilty, even punishing them for wanting to be with their mother. Defendant CRANE threatened the children with foster care, inter alia, intentionally causing them anxiety and distress.
244. Defendant CRANE has never ceased in recording the children, despite repeated instructions to refrain from this psychologically damaging behavior by the court, BFC, and DCP&P. Yet, Defendants do not enforce this nor hold Defendant CRANE accountable for this intentional infliction of emotional distress and abuse on Plaintiffs D.C. and G.C. and tangentially their mother.

245. Defendant CRUZ was indifferent and failed to contact Plaintiff KARIN when she called to check on how things were going with the therapist. She failed to respond to texts and phone calls to the point where KARIN had to call her supervisor. Instead of responding to KARIN's calls for concern, CRUZ's SUPERVISOR directed the calls back to Defendant CRUZ, who became flippant and nasty towards KARIN for calling her supervisor, going so far as to threaten to put her on supervised visits or put the kids in foster care in retaliation.
246. Defendant CRUZ threatened the children directly with foster care during her subsequent visit to Defendant CRANE's home, causing them stress, fear, and anxiety.
247. Defendant DCP&P was negligent and deliberately failed to schedule psychological evaluations for well over six months, by which time the caseworker was switched to Patrick Yan (Defendant YAN), who was also incompetent and continues to be so, along with his supervisor Debbie Gomez (GOMEZ). (Incidentally, another member of Plaintiff KARIN's domestic violence support group has had direct experience with YAN and GOMEZ, who have subverted her daughter's sexual abuse and not only failed to protect the child, but subjected the child to reunification therapy with her abuser.)
248. Defendant YAN has had some inappropriate conversations with Plaintiffs D.C. and G.C. and is intentionally trying to brainwash the children. The children do not trust him (and neither do the children of the other mother stated above).
249. Defendant YAN is biased against women and favors men. He refused to listen to Plaintiff KARIN's grievances regarding the domestic violence and abuse Defendant CRANE is inflicting upon the children. Moreover, he has different standards for women

than he does men. In the case of the other mother aforementioned, Defendant YAN told the mother he does not get involved with court orders when her former husband violated them numerous times. Contrary to this, in Plaintiffs case, this was the opposite. In both cases, Defendant YAN has not and will not hold the men accountable. He refuses to recognize domestic violence. This is clear bias in tune with Richard Gardner's unscientific theories of Parental Alienation.

250. In addition, Defendant YAN was clueless when asked if he was familiar with the ACE Study by the CDC. Defendant STATE does not train DCP&P workers adequately and they are no better than they were several years ago when they were named DYFS, came under scrutiny, labeled "a systematic failure," and were successfully sued for millions of dollars for subverting abuse to the result of catastrophic and horrific proportion.

251. Plaintiff KARIN has pointed out to DCP&P repeatedly that they are not handling this case appropriately given the history of domestic violence. This is Defendant ESCALA's deliberate influence to subvert child abuse and domestic violence.

252. \*It should be noted that for the bulk of DCP&P's involvement, Plaintiff KARIN has been living in a domestic violence shelter because of Defendant CRANE's harassment of her.

253. DCP&P has threatened Plaintiff KARIN with suspended and/or supervised visitation for living in a domestic violence shelter, an absurdity that has caused her further anxiety and distress.

254. Plaintiffs D.C. and G.C. remain adamant that they want to live with their mother.

Defendants are perpetually and intentionally inflicting emotional distress upon two minor children.

255. Defendant ESCALA's influence has had a major part to play in this, as this is collusion and conspiracy by the Defendants to marginalize a protective mother on behalf of an abuser who continues to generate an income stream for them and promote unscientific theories of Parental Alienation.

**Matters Particularly Concerning Defendant ESCALA and the Foreclosure Crisis**

256. Defendant ESCALA of the Bergen County Court is handling both mortgage cases and family court cases. He has been known to boast about his "legacy" on the bench. Litigants such as predatory lending victim Atoo Heera Sakhrani have sued him for corruption and filed to have him impeached.

257. He was chided by the NJ Supreme Court for accepting a post-retirement job offer from a law firm representing one of the litigants before him. As a result, NJ revamped the court rules and imposed stiffer strictures on sitting judges.

258. Defendant Chief Justice RABNER wrote in a NJ Supreme Court decision regarding the case of *Denike v. Cupo* that, "Escala's conduct created an appearance of impropriety and fell short of the high standards demanded of judges and fellow members of the legal profession and had the capacity to erode the public's trust."

259. However, Defendant STATE is so corrupt that it actually recalled this judge and put him back on the bench. Defendant STATE is negligent and responsible for damages done to Plaintiffs and other litigants before ESCALA as a result.

260. Many litigants have been abused by Defendant ESCALA:

"An Asian-American businessman Atoo Heera Sakhrani sues purported 'Judge' Gerald Escala, the presiding 'judge' in the New Jersey Chancery Court in Bergen County, New Jersey, for 6 Counts including corruption, fraud, conspiracy and being a Bonus Partner in helping the unscrupulous Mortgage Broker, Title Agent, Insurance Companies and Lending Institutions cover up their crimes at the expense of innocent people. A major component of the lawsuit is that purported 'Judge' Gerald Escala is aiding and abetting the mortgage lenders and their attorneys in predatory lending practices schemes to steal the property from unsuspecting minorities (e.g., Asian-American senior citizen)..."

- <http://judgesuedforcorruption.blogspot.com>

261. Atoo Heera Sakhrani's impeachment petition against Defendant ESCALA can be found online at [www.msfraud.org/law/lounge/Impeach%20judge.doc](http://www.msfraud.org/law/lounge/Impeach%20judge.doc).

262. Sharon Gregg (née Siegel) an elderly woman cheated out of inheritance by Defendant ESCALA wrote:

"Today, I have lost my home, have lost the rental car I was living out of, and, unless a miracle occurs, I will be a 62 year old disabled woman living on the streets..."

-<http://www.ripoffreport.com/r/Warren-S-Robins-Of-Hartman-And-Winnicki-Law-Firm/-Paramus-New-Jersey-07652/Warren-S-Robins-Of-Hartman-And-Winnicki-Law-Firm-Cal-Feingold-Of-Felig-Feingold-Law-Fir-248645>

263. Defendant BANK OF AMERICA MERRILL LYNCH has been sued numerous times for civil fraud and predatory lending practices in the foreclosure crisis. Defendant CRANE works as an executive for Defendant BANK OF AMERICA MERRILL LYNCH. Defendant ESCALA is a disgraced judge who adjudges foreclosure cases where he has sided with predatory lenders. Plaintiff believes that there is collusion and conspiracy between Defendants CRANE, BANK OF AMERICA MERRILL LYNCH, ESCALA and other Defendants named herein who are engaging in a RICO ENTERPRISE to turn favors for each other and benefit themselves financially, which includes bribery, extortion, and acquiring real estate properties through these fraudulent means. This pattern of racketeering activity affects interstate and/or international commerce.

264. Plaintiff KARIN was contacted recently by a woman named Melissa Barnett of California, who is in a similar situation with her former husband, who also works for Defendant BANK OF AMERICA MERRILL LYNCH. Ms. Barnett wrote the following:

“My ex-husband works for Merrill Lynch in the Napa Valley. When we first married he was the manager he now runs the philanthropic accounts. He has won custody despite the evidence of abuse. His hearsay testimony trumps evidence and witness statements he has been paying a minors council for her help in getting custody and keeping the child now 13 from testifying. Please contact me. His attorney Pat McGrath a well known Father rights attorney now has a job working for Bank of America. Hundreds of thousands have

been spent on this custody case. Merrill Lynch refused to investigate the impropriety, moral and ethical issues of a Merrill Lynch Manager posting nude photos of himself on Craigslist to meet men and women for sex. He defrauded the welfare system and interfered with my Merrill Lynch accounts.”

265. TANF funds have been reportedly linked to a funneling into Father’s Rights Groups. When Ms. Barnett states that her former husband “defrauded the welfare system,” it raises concern that Defendant STATE is permitting the same here in New Jersey, colluding and conspiring with Father’s Rights Groups.

#### **Matters Particularly Concerning Defendant ACJC**

266. In the fall of 2013, Plaintiff KARIN filed a complaint against Defendant Escala enumerating the facts as alleged herein and cited Defendant ESCALA’s offenses towards his other alleged victims as named herein.

267. Defendant ACJC failed to conduct a proper investigation, if any, and dismissed the complaint, citing incorrect dates for which Plaintiff KARIN had specifically enumerated violations and bias. Defendants ACJC and STATE are covering up Defendants’ fraud.

#### **Matters Particularly Concerning Defendants of APPELLATE DIVISION**

268. Defendants STATE, ASHRAFI, APPELLATE DIVISION, and OFFICE OF THE COUNTY COUNSEL (OCC) blocked Plaintiff KARIN from obtaining free transcripts of her case, which prohibited her from filing an appeal.

269. Defendant OCC claimed that Plaintiff KARIN was not entitled to free transcripts for a civil matter unless she had lost a right of constitutional dimension, which Plaintiff



KARIN *has* lost, therefore the OCC's claim is false and an obstruction of justice. Moreover, it took Defendant OCC approximately six months to respond to Plaintiff KARIN's Motion for free transcripts, well beyond the allotted time limit to respond, which the Appellate Court permitted. Defendants colluded and conspired here to prevent KARIN from filing an appeal.

270. Furthermore, Defendant STATE employs an attorney with taxpayer dollars to undermine the public while it deliberately fails to offer realistic and concrete legal aid to its constituents and deceives the public with inconsistent and irrational excuses, which happened here.

271. Defendants APPELLATE DIVISION, OCC, Judge NUGENT, Judge CARROLL, Judge KOBLITZ, Judge KENNEDY, Judge ST. JOHN, Judge ASHRAFI, and Judge YANNOTTI "rubber stamp" the decisions of the lower courts. They are part of the RICO ENTERPRISE and generally refuse to go against other judges; they basically "look the other way," deliberately aiding and abetting the abuse of discretion of the lower courts, which happened here. They engage in pattern of racketeering activity and RICO ENTERPRISE.

272. Defendant STATE and the courts fail to manage court calendars, ignore heavy case loads of attorneys, judges, and appellate judges and encourage such overload. They refuse to control court calendars for custody cases to move expeditiously to trial on a continuous basis and encourage trials as they bring in more revenue for legal and mental health professionals. Defendants are engaging in a pattern of racketeering and RICO ENTERPRISE.

273. On April 28, 2014 Plaintiff KARIN sent an email to the NJ Appellate Pro Bono Pilot Program asking for legal aid for her appeal. In a response email dated April 29, 2014, Meg Morocco of the NJ Appellate Division wrote the following to Plaintiff KARIN:

“As it appears you are also appealing the denial of a retrial as well as recusal of the judge you do not qualify for the pro bono program. In order to be in the program the only issue can be custody or an order regarding domestic violence. This information was taken from your case information statement that you submitted with your notice of appeal.”

274. This statement by Ms. Morocco indicates that Defendant STATE’s policy places judges above the priorities of children, child abuse, and domestic violence. This is an obstruction of justice.

275. Defendant APPELLATE COURT has informed Plaintiff KARIN that her appeal would be dismissed if she didn’t pay the deposit for the transcripts by August 31, 2014, a fee of \$3700 just for the deposit, which Plaintiff KARIN could not pay. Plaintiff KARIN cited *M.L.B. v. S.L.J.*, 519 U.S. 102, (1996), which supports equal access to justice for indigent parents in obtaining free transcripts and preserving their constitutional rights. This violates her constitutional rights of due process and is an obstruction of justice. *M.L.B. v. S.L.J.*, 519 U.S. 102, (1996) states:

“Urging that the size of her pocketbook should not be dispositive when "an interest far more precious than any property right" is at stake, *Santosky v. Kramer*, 455 U.S. 745, 758-759, M. L. B. contends in this Court that a State may not, consistent with the Due Process and Equal Protection Clauses of the

Fourteenth Amendment, condition appeals from trial court decrees terminating parental rights on the affected parent's ability to pay record preparation fees.

*Held:* Just as a State may not block an indigent petty offender's access to an appeal afforded others, see *Mayer v. Chicago*, 404 U.S. 189, 195-196, so Mississippi may not deny M. L. B., because of her poverty, appellate review of the sufficiency of the evidence on which the trial court based its parental termination decree. Pp. 5-24.

(a) The foundation case in the relevant line of decisions is *Griffin v. Illinois*, 351 U.S. 12, in which the Court struck down an Illinois rule that effectively conditioned thoroughgoing appeals from criminal convictions on the defendant's procurement of a transcript of trial proceedings. The Illinois rule challenged in *Griffin* deprived most defendants lacking the means to pay for a transcript of any access to appellate review. Although the Federal Constitution guarantees no right to appellate review, *id.*, at 18 (plurality opinion), once a State affords that right, *Griffin* held, the State may not "bolt the door to equal justice," *id.*, at 24 (Frankfurter, J., concurring in judgment)."

**Defendant STATE OF NEW JERSEY does not follow its own rules and case law.**

**Defendant BERGEN COUNTY FAMILY COURT proceeded without subject matter jurisdiction. STATE's rules and those of the UCCJEA are facetious.**

276. Defendants CRANE and VAN AULEN, Esq. failed to file the mandated UCCJEA affidavit pursuant to NJ Rule 2A:34-73 and information required pursuant to NJ Rule

5:4-2(a)(2). Defendants DELORENZO, MIZDOL, ESCALA, and MOSKAL ignored these requirements, which are mandatory to invoking subject matter jurisdiction, and allowed 3+ years of custody litigation and a custody trial to take place in violation of the UCCJEA.

277. Said Defendants deliberately ignored that Bergen County was an improper venue pursuant to NJ Rule 5:2-1(b)(1) and *Loonan v. Marino*, 179 N.J. Super. 164 (App. Div. 1981). According to the statute, venue, which in this case is actually subject-matter jurisdiction notwithstanding typical venue rules, was proper in Morris County rather, as there was no authority to lay it elsewhere; child custody is an *in rem* jurisdictional issue, making the entire custody litigation since February 1, 2011 a nullity, as subject matter jurisdiction was not present.

278. Plaintiff KARIN brought this to the attention of the trial court and the appellate, providing statutes and case law that back this up, where venue becomes jurisdictional, citing *Carter v. Carter*, 278 So.2d 394, 396 (Miss. 1973), *National Heritage Realty, Inc. v. Estate of Boles*, 947 So.2d 238 (Miss. 2006), *reh. den.* February 8, 2007, *Price v. Price*, 32 So.2d 124 (Miss. 1947).

279. NJ Rule 5:2-1 is exempt from accordance with NJ Rule 4:3-3. Therefore, all orders as of Feb. 1, 2011 and those based on it are void *ab initio*, yet the State of New Jersey refuses to recognize this. Judges who proceed without subject matter jurisdiction render the proceedings *coram non judice*, and are therefore subject to personal liability to the Plaintiffs named herein.

280. In addition, when a judge violates a litigant's constitutional rights, subject matter jurisdiction is lost.

**COUNT ONE: FOURTEENTH AMENDMENT VIOLATION - 42 U.S.C. §1983**

(Due Process, Familial Association, Right to Parent, Conspiracy, Breach of Contract, Abuse of Process, Culpable Breach of Duty, Intentional Infliction of Emotional Distress, Personal Injury)

281. The averments of the above stated paragraphs are alleged as if fully set forth herein.

282. Defendants deprived Plaintiffs of their federal substantive and procedural due process rights in the Family Court by denying them access to the court, proper legal representation, fair and full hearings and they violated Plaintiffs' constitutional rights to due process, familial association and freedom of religion as guaranteed by the 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendments of the U.S. Constitution.

283. Defendants made, caused to be made, acted in concert or conspired to make, and/or aided and abetted one another to make representations as to material facts as alleged herein which were false, and known to be false by Defendants and were done as part of Defendants' custom and policy as they are friends who undermine court proceedings and integrity to complicate and protract cases so they can profit.

284. Acting pursuant to said custom and policy, at all relevant times alleged herein, Defendants acted in concert and with the cooperation and encouragement of each other to commence and continue fictionalized proceedings against Plaintiffs and continued the prosecution of Plaintiff KARIN in the Family Court to the point of

taking away her access entirely and/or having third parties interfere with their access time without a basis.

285. Defendants caused said prosecution of Plaintiff KARIN by the filing of baseless motions against her, deficient and false forensic reports they used to support their baseless arguments to take away Plaintiffs D.C. and G.C. from their mother against her wishes, and Defendants willfully and maliciously continued to fabricate facts, reports and orders and ignore any positive report favoring Plaintiffs.

286. Defendants deprived Plaintiffs D.C. and G.C. of their federal rights to access their mother and their right to a fair hearing by ignoring D.C. and G.C.'s desire to live with their mother as reported by BFC and interfering with their wishes by allowing Defendants DELORENZO, ESCALA, VAN AULEN, and GREIF to control the court proceedings based on their personal bias and greed.

287. The Fourteenth Amendment to the United States Constitution provides Plaintiffs a right to intimate association. That guarantees an individual the choice of entering an intimate relationship free from undue intrusion by the STATE, including the fundamental liberty interest of natural parents in the care, custody, and management of their child.

288. Plaintiff KARIN is informed and believes and thereon alleges that the right to familial association guaranteed under the Fourteenth Amendment is "clearly established" such that a reasonable judge, and attorney for the child in Defendants' situation would know it is unlawful to remove a child from the care, custody, and

control of its parent or for STATE actors or private individuals working in the court system to subject a child, in the absence of proven exigent circumstances or a sound and substantial basis to change custody for years without.

289. In addition, there is a clearly established due process right not to be subjected to false accusations on the basis of false evidence that was fabricated such that a reasonable judge, attorney, and/or custody evaluator would know it is unlawful to lie, fabricate evidence, and/or suppress exculpatory evidence in court reports or filed with the court.

290. In doing the things alleged herein above, Defendants and each of them, interrupted and impaired the familial rights of Plaintiffs by unlawfully removing Plaintiffs D.C. and G.C. from the custody and care of their mother Plaintiff KARIN and continuing such interference for years that resulted from a lie and continuing lies, suppressions, subversions, and fabrications perpetuated by Defendants.

291. In doing the things alleged herein above, Defendants and each of them, interrupted and impaired the rights of Plaintiff KARIN to parent her children for years as her access was denied based on false and incomplete reports of Defendants GREIF and RITZLER/CUTTITO/BFC.

292. All Defendants knowingly, intentionally, and voluntarily collaborated with the other Defendants, and each of them in effectuating their unlawful scheme/plan to keep Plaintiffs D.C. and G.C. from the care, custody, and control of their mother, and out of their mother's home for as long as possible and continuing to date.

293. All Defendants knowingly, intentionally, and voluntarily collaborated with the other Defendants, and each of them in effectuating their unlawful scheme/plan to keep Plaintiffs in the middle of conflict, domestic violence, and in control by their abuser, Defendant CRANE, for as long as possible and continuing to date.
294. As of February 1, 2011, Defendants did these things without proper justification or authority as the orders are void *ab initio* due to lack of subject matter jurisdiction and based on uncorroborated lies by Defendants CRANE, VAN AULEN, GREIF, RITZLER/CUTTITO/BFC and DYFS n/k/a DCP&P that Plaintiff KARIN was “alienating” Defendant CRANE from their children based upon Richard Gardner’s false theories causing Defendants to fictionalize a standard of “parental alienation” to support the lie in order to establish case law on Richard Gardner’s unscientific Parental Alienation theories to demonize and control women, pathologize victims, marginalize protective mothers and get control of children to support the ENTERPRISES of the family court industry, child pornography industry and human trafficking.
295. All of these acts were and are done deliberately, maliciously and with willful indifference to Plaintiffs’ protected rights under State and Federal laws and procedures to interfere with Plaintiffs’ rights to due process.
296. Regardless of the procedures, Defendants ESCALA, DELORENZO, and MIZDOL as state actors abused their governmental decisions and actions to violate Plaintiffs’ fundamental rights when no overriding important State interest justified those infringements.



297. Defendants infringed on Plaintiffs' constitutional rights to access to each other and parental rights by summarily approving orders to violate those rights on the basis of false or greatly flawed representations of Defendants CRANE, VAN AULEN, GREIF, RITZLER, CUTTITO, BFC, and DYFS n/k/a DCP&P.
298. Defendants infringed on Plaintiffs' constitutional rights to access to each other and parental rights by using judicial proceedings that were otherwise substantially tainted by Defendants by concealing the fact that Plaintiff D.C. and G.C. want to live with her mother and fictionalizing a case against their mother.
299. For over three years, Defendants deprived Plaintiffs of their substantive and procedural due process rights under the Fourteenth Amendment by repeatedly and systematically interfering with Plaintiff KARIN's right to parent her children and Plaintiffs' rights to access each other as parent and children based upon government action that is arbitrary, conscience-shocking and oppressive in a constitutional sense by refusing full hearings, failing, refusing and deliberately ignoring Plaintiffs D.C. and G.C.'s best interests including Plaintiff KARIN's emergency motions notifying Defendants STATE, MIZDOL, MOSKAL, DELORENZO, and ESCALA that the father abuses and endangers D.C. and G.C..
300. The forgoing violations of Plaintiffs' Federal constitutional rights by the Defendants, together with their co-conspirators and accomplices, known and unknown as DOES, directly, substantially, proximately, and foreseeably caused Plaintiffs' custody case to be protracted for over three years that alienated them from each and caused them other injuries and damages as alleged herein.

301. The foregoing violations of Plaintiffs' rights were taken under color of State law and within the scope of Defendants' employment and Defendants committed the violations knowingly, intentionally, willfully, recklessly, negligently, and/or with deliberate indifference to Plaintiffs' constitutional rights or to the effect of such misconduct upon Plaintiffs' constitutional rights.
302. For over three years and continuing, Defendants infringed on Plaintiff KARIN's liberty interest in maintaining the integrity of her family and to be with her children and the children's rights to associate with her mother which is so shocking, arbitrary, and egregious that the Due Process clause would not countenance it even were it accompanied by full procedural protection.
303. Defendants STATE and DELORENZO interrupted and impaired the familial rights of Plaintiffs by removing D.C. and G.C. from their mother's custody on December, 24, 2012 and continued therefrom to impair their relationship with *ex parte* and other baseless orders to the point of completely denying access between the Plaintiffs.
304. Defendants STATE and ESCALA interrupted and impaired the familial rights of Plaintiffs by removing D.C. and G.C. from their mother's custody on August 30, 2013 and continued therefrom to impair their relationship with *ex parte* and other baseless orders to the point of completely denying access between the Plaintiffs.
305. In doing the things alleged herein above and the Court's failure to protect her and her children from domestic violence at the hands of Defendant CRANE, Defendants caused Plaintiff KARIN to develop Post-Traumatic Stress Disorder (PTSD) as a result.

Defendants assisted Defendant CRANE in a cyclical and ongoing tort to inflict emotional stress upon and further abuse her and their two children. Defendants committed tortious acts and are therefore responsible for personal injury to Plaintiffs and liable for damages.

306. By reason of the foregoing, the Defendants are liable to Plaintiffs pursuant to 42 U.S.C. §§1983 and 1985 and for punitive damages; and pursuant to 18 U.S.C. §§1961-1968 Racketeer Influenced and Corrupt Organizations Act (RICO) and for treble damages.

**COUNT TWO: RICO VIOLATION - 18 U.S.C. §1961-1968**

(Racketeering, Influence, and Corrupt Organization)

307. The averments of the above stated paragraphs are alleged as if fully set forth herein.

308. Defendants are each engaged in activities which constitute a RICO Enterprise, and each such Defendant is a “person,” as that term is defined pursuant to Section 1961(3)-(4) and 1962(c) of the Racketeer Influenced and Corrupt Organizations Act of 1970 (RICO).

309. By virtue of their affiliations, conspiracy, associations, and collaboration as alleged herein, RICO DEFENDANTS function collectively as alter ego vehicles of one another, facilitate, and further the commercial purposes of ENTERPRISES alleged herein. Specifically, in addition to the conspiracy allegations detailed above, each Defendant is liable as a principal pursuant to 18 U.S.C. § 2(a)-(b), and that each and

every RICO person that is a RICO Defendant is liable as a co-conspirator pursuant to 18 U.S.C. § 371.

310. DEFENDANTS, and each of them, while affiliated with one or more ENTERPRISES, have operated, affiliated with, and participated directly and indirectly in the conduct of ENTERPRISE affairs through a pattern of racketeering activity, in violation of 18 U.S.C. § 1964 (b), (c), and (d) as stated herein.

### **RICO ENTERPRISES**

311. Defendants' collusion and conspiracy, for purposes of Plaintiffs' RICO §1962(c) claims for relief, constitute an enterprise engaged in, or the activities of which affect, interstate and/or international commerce as those terms are defined pursuant to Title 18 United States Code §1961(4) of the Racketeer Influenced and Corrupt Organizations Act of 1970 ("RICO"), *Odom v. Microsoft Corp.*, 486 F.3d 541 (9th Cir. 2007), and *National Organization for Women v. Scheidler*, 510 U.S. 249 (1994), (collectively "RICO ENTERPRISES"), which are charged to them and are indictable offenses.

312. By reason of the foregoing, the Defendants are liable to Plaintiffs for punitive damages and treble damages pursuant to 18 U.S.C. §§1961-1968 Racketeer Influenced and Corrupt Organizations Act (RICO).

313. Defendants CRANE, VAN AULEN, DELORENZO, ESCALA, MIZDOL, MOSKAL, and STATE deliberately blocked forensics in this case by hiding Defendant CRANE's financial information from Plaintiff KARIN, barring Plaintiffs from obtaining a

prudent custody evaluation, and denying KARIN's countless pleas for redress with the court on behalf of the children Plaintiffs D.C. and G.C..

314. Defendants did this to cover up a conspiracy, pattern of racketeering and RICO ENTERPRISE, and the involvement of Defendant BANK OF AMERICA MERRILL LYNCH, in protecting and abetting Defendant ESCALA as a foreclosure judge in the Bergen County Civil Court and Defendant CRANE as a financial industry executive, computer software engineering specialist and director at Defendant BANK OF AMERICA MERRILL LYNCH, in order to connect, collude, conspire, and scheme to defraud the public, affecting commerce both domestically and internationally, including, but not limited to, facilitating and engaging in predatory lending practices, bribes, extortion, kickbacks, insurance fraud, insider trading, obstruction of justice, interference with accounts, computer hacking, spying, invasion of privacy, harassment, electronic stalking, and other offenses, which includes the creation, implementation, and upkeep of "special software" to achieve this goal, all of which Defendants are charged with herein and are indictable offenses.

315. All real estate properties and assets all Defendants own, either in part or whole, are and/or may have been acquired with proceeds obtained through, associated with, or invested into RICO ENTERPRISE, through a pattern of racketeering activity, thereby rendering those properties and assets subject to this lawsuit and subject to seizure, including but not limited to the property located in Glen Rock, NJ owned and resided in by Defendants CRANE and LU, which was acquired during the course of this litigation.

316. In addition to affecting commerce, Defendants actions cause countless bankruptcies, foreclosures, mental health issues and other traumas, thereby causing numerous personal injuries to the public at large, both domestically and internationally. This is eugenics and social engineering.

317. Defendants are engaging in a pattern of racketeering activity to harm the Plaintiffs and the public at large by subverting domestic violence and child abuse.

**RICO §1961(5) PATTERN OF RACKETEERING ACTIVITY ALLEGATIONS**

**18 U.S.C. § 1961(5)**

**COMMISSION OF RICO §1961(1)(B) RACKETEERING ACTIVITY.**

318. RICO DEFENDANTS engage in the following “racketeering activity,” as that term is defined pursuant to 18 U.S.C. § 1961 (c) (“RACKETEERING ACTIVITY”). RICO DEFENDANTS’ RACKETEERING ACTIVITY as committing, aiding and abetting, or conspiring to commit, tens of thousands of violations of the following laws within the past ten years, including:

A. Conspiracy Against Rights: 18 U.S.C. § 241

B. Deprivation of Rights Under Color of Law: 18 U.S.C. § 242

C. Federally Protected Activities: 18 U.S.C. § 245

D. Freedom of Access to Clinic Entrances (FACE) Act: 18 U.S.C. § 248

E. Fraud and related activity in connection with identification documents, authentication features, and information: 18 U.S.C. § 1028;

F. Kidnapping: 18 U.S.C. § 1201

G. Mail Fraud: 18 U.S.C. § 1341;

- H. Wire Fraud: 18 U.S.C. § 1343;
- I. Bank Fraud: 18 U.S.C. § 1344;
- J. Intangible Personal Property Right Deprivation: Title 18 U.S.C. § 1346;
- K. Influencing or injuring officer or juror generally: 18 U.S.C. § 1503;
- L. Obstruction of proceedings before departments, agencies, and committees: 18 USC § 1505;
- M. Obstruction of Criminal Investigations: 18 U.S.C. § 1510;
- N. Tampering with a witness, victim, or an informant: 18 U.S.C. § 1512;
- O. Retaliating against a witness, victim, or an informant: 18 U.S.C. § 1513;
- P. Peonage; obstructing enforcement: 18 U.S.C. § 1581;
- Q. Enticement into slavery; 18 U.S.C. § 1583;
- R. Sale into involuntary servitude: 18 U.S.C. § 1584;
- S. Seizure, detention, transportation or sale of slaves: 18 U.S.C. § 1585;
- T. Service on vessels in slave trade: 18 U.S.C. § 1586;
- U. Possession of slaves aboard vessel: 18 U.S.C. § 1587;
- V. Forced labor: 18 U.S.C. § 1589;
- W. Trafficking with respect to peonage, slavery, involuntary servitude, or forced labor:  
18 U.S.C. § 1590;
- X. Unlawful conduct with respect to documents in furtherance of trafficking,
- Y. peonage, slavery, involuntary servitude, or forced labor: 18 U.S.C. 1592;

- Z. Benefitting financially from peonage, slavery, and trafficking in persons: 18 U.S.C. § 1593A;
- AA. Conspiracy, attempt to commit acts of peonage, slavery, proscribed: 18 U.S.C. § 1594;
- BB. Interference with commerce by threats or violence: 18 USC § 1951;
- CC. Interstate and foreign travel or transportation in aid of racketeering enterprises: 18 U.S.C. § 1952;
- DD. Violent crimes in aid of racketeering activity: 18 U.S.C. § 1959;
- EE. Principal and Aider and Abettor, Attempt, Conspiracy Liability: Title 18 U.S.C. § 2(a) and (b).
- FF. Stalking: 18 U.S.C. § 2261A
- GG. Violence Against Women Act (VAWA): 42 U.S.C. § 136, subchapter III
- HH. False Imprisonment and Deprivation of Rights: 42 U.S.C. § 1983
- II. Conspiracy to Interfere With Civil Rights: 42 U.S.C. § 1985
- JJ. Criminal Interference With Right to Fair Housing: 42 U.S.C. § 3631

**Under the Prevention of Domestic Act, Defendants have aided and abetted**

**Defendant CRANE in the following violations of New Jersey State law:**

- KK. Assault: N.J.S.A. 2C:12-1
- LL. Terroristic threats: N.J.S.A. 2C:12-3
- MM. Kidnapping: N.J.S.A. 2C:13-1
- NN. Criminal restraint: N.J.S.A. 2C:13-2
- OO. False imprisonment: N.J.S.A. 2C:13-3



PP. Criminal mischief: N.J.S.A. 2C:17-3

QQ. Criminal trespass: N.J.S.A. 2C:18-3

RR. Harassment: N.J.S.A. 2C:33-4

SS. Stalking: N.J.S.A. 2C:12-10

**COUNT THREE: FIRST AMENDMENT VIOLATIONS - FREEDOM OF  
RELIGION**

319. The averments of the above stated paragraphs are alleged as if fully set forth herein.

320. Pursuant to the First Amendment, Plaintiffs are guaranteed the right to pursue their religious beliefs without interference from the State actors.

321. Plaintiff KARIN as the parent and mother of Plaintiffs D.C. and G.C. has the right to teach her children her religious beliefs and exercise religion with her children.

322. Plaintiffs D.C. and G.C. have the right to freedom of religion, to choose their religion and exercise their religious beliefs with their mother.

323. Those rights were deliberately and maliciously interfered with by Defendants supporting and promoting the father's religious beliefs on and control of D.C. and G.C. to the exclusion of KARIN's wishes, deliberately ignoring the mother's rights and joint legal custody set forth in the parents' Property Settlement Agreement.

324. Defendants as STATE actors and the other Defendants abused their powers and positions in the court to ignore Plaintiffs' constitutional rights to promote Defendants' self-interests and unwarranted and unlawful beliefs, including religious, schooling and even therapeutic, upon Plaintiffs without a basis and using fictional,

false and fabricated reports in collusion with each other to create a false case to support their unlawful objectives.

325. Defendants deliberately and maliciously interfered with Plaintiffs' rights by alienating Plaintiffs D.C. and G.C. from the heritage of their Hispanic/Native American and Scandinavian mother and their maternal family.

326. Those rights were deliberately and maliciously interfered with by Defendants bias taking preference to the father's Irish/White heritage and family by giving him abundant rights to raise D.C. and G.C. to the exclusion of the mother.

327. Because of Defendants' constitutional violations, Plaintiffs lost their right to religious freedom and heritage.

328. By reason of the foregoing, the Defendants are liable to Plaintiffs pursuant to 42 U.S.C. §§1983 and 1985 and for punitive damages; and pursuant to 18 U.S.C. §§1961-1968 Racketeer Influenced and Corrupt Organizations Act (RICO) and for treble damages.

**COUNT FOUR: 42 U.S.C. §1983 – Monell Claims**

(Defendant STATE and DOES)

329. The averments of the above stated paragraphs are alleged as if fully set forth herein.

330. The foregoing violations of Plaintiffs' Federal constitutional rights and injuries were further directly, foreseeably, proximately, and substantially caused by conduct, chargeable to Defendant STATE and DOES, amounting to deliberate indifference to the constitutional rights of persons as litigants in the Bergen County Family Court, including Plaintiffs.

331. Prior to Plaintiffs' custody case, policymaking officials at Defendant STATE and DOES, with deliberate indifference to the constitutional rights of individual litigants in Bergen County Family Court and to the risk of violating their due process rights and causing irreparable harm to familial association rights and freedom of religion by protracting custody cases beyond the 180 day statutory mandate, and to the right of all litigants to due process and a fair trial, implemented plainly inadequate policies, procedures, regulations, practices, customs, training, supervision, and discipline concerning:

- a. ignoring heavy case loads of attorneys and encouraging such overload;
- b. refusing to control court calendars for custody cases to move expeditiously to trial on a continuous basis;
- c. failing to insure litigants a full and fair opportunity to be heard without multiple adjournments that financially and emotionally burden litigants and cause them to ultimately concede or withdraw to losing their right to a fair trial;
- d. encouraging litigants and court-appointed personnel such as forensics and attorneys to use trickery, duress, fabrication and/or false testimony and/or evidence, and failing to disclose exculpatory evidence, in preparing and presenting reports and court documents to the Court;
- e. ignoring the meaning and definition of "imminent" and the application of factual circumstances to the determination of whether or not "imminent" harm exists to a sufficient degree as would obviate the need for a full hearing before the court changes custody of the child or children from his/her/their parents or guardians as

it did in this case as of February 1, 2011 and continued to do so in every subsequent order denying Plaintiffs access to each other;

- f. ignoring the meaning and definition of “temporary” and the application of factual circumstances to the determination of whether or not an order changing custody is “temporary”;
- g. ignoring the irreparable emotional trauma and resulting symptoms for children removed and/or separated from their parents and/or primary caregivers and the likelihood of life-long emotional harm and, likewise, the emotional trauma and resulting symptoms for the parent and/or primary caregiver whose child is removed from their care and the likelihood of life-long emotional harm;
- h. ignoring whether a litigant can afford to pay third parties before ordering them with the threat of contempt to pay thousands of dollars to court appointed persons;
- i. ignoring the rights of parents to be free from malicious prosecution or false without a full plenary hearing;
- j. by acting with deliberate indifference to implement a policy of inadequate training, and/or by failing to train its officers, agents, employees and STATE actors providing the constitutional protections guaranteed to individuals, including those under the Fourteenth Amendment, when performing actions related to child custody proceedings; and
- k. by acting with deliberate indifference in implementing a policy of inadequate supervision., and/or by failing to adequately supervise its officers, agents, employees and STATE actors, in providing the constitutional protections

guaranteed to individuals, including those under the Fourteenth Amendment, when performing actions related to child custody proceedings;

332. The aforesaid deliberate or *de facto* policies, procedures, regulations, practices, and/or customs (including the failure to properly instruct, train, supervise and/or discipline employees with regard thereto) were implemented or tolerated by policymaking officials for the Defendant STATE and DOES, including but not limited to Defendants MIZDOL and MOSKAL who knew (or should have known):

- a. to a moral certainty that such policies, procedures, regulations, practices and/or customs concern issues that regularly arise in custody proceedings;
- b. that such issues either present Family Court judges with difficult choices of the sort that instruction, training and/or supervision will make less difficult or that the need for further instruction, training, supervision and/or discipline was demonstrated by a history of the Family Court mishandling such situations as well as the incentives that judges have to make the wrong choice, such as forcing the case to close without due process for the incentive to clear the court's calendar; and
- c. that the wrong choice by such employees concerning such issues will frequently cause the deprivation of the constitutional rights of family court litigants and their children at issue and cause them constitutional injury.

333. The aforementioned policymaking officials had the knowledge and the notice of their policies creating unconstitutional interference with litigants' rights as the violations were so egregious that the public has decried the family court as alleged in paragraphs hereinabove, and alleged hereinabove that Plaintiff KARIN

complained many times to the supervising judges named herein as Defendants in and out of court so they have actual notice.

334. Despite this knowledge, the supervisory and policymaking officers and officials of Defendants STATE and DOES perpetuated, or failed to take preventative or remedial measures to terminate said policies, procedures, regulations, practices and/or customs, did not effectively instruct, train and/or supervise their personnel with regard to the proper constitutional and statutory requirements in the exercise of their authority, had no employee handbook or other published practices, policies or procedures for investigating and disciplining prosecutors who had engaged in constitutional and other violations, and did not discipline or otherwise properly supervise the individual personnel who engaged in such practices, but instead sanctioned or tolerated the policies, procedures, regulations, practices and/or customs, described above, with deliberate indifference to the effect of said policies, procedures, regulations, practices and/or customs upon the constitutional rights of residents and citizens of the STATE of New Jersey.

335. By reason of their lack of training and supervision, Defendants ESCALA, DELORENZO, MIZDOL, MOSKAL, KATONA, BFC, RITZLER, CUTTITO, DYFS n/k/a DCP&P, HORNE, CRUZ, CRUZ'S SUPERVISOR, YAN, GOMEZ, FRANK, BURGOS, and NINA continue for over three years to this date to collude and conspire to unlawfully remove Plaintiffs D.C. and G.C. from their mother KARIN and excessively interfere with their access to each other knowing there was never a fair hearing or a basis to do so, yet they consistently rely on false orders as a basis to do so.

336. The aforesaid deliberate or *de facto* policies, procedures, regulations, practices and/or customs including the failure to properly instruct, train, supervise and/or discipline employees with regard thereto) were implemented or tolerated by policymaking officials for Defendant STATE and DOES.

337. By virtue of the foregoing, Defendant STATE and DOES are liable to Plaintiffs because of their intentional, deliberately indifferent, careless, reckless, and/or negligent failure to adequately hire, train, supervise, and discipline its agents, servants and/or employees with regard to their aforementioned duties.

338. By virtue of the foregoing, Defendant STATE and DOES are liable for having substantially caused the foregoing violations of Plaintiffs' constitutional rights and their constitutional injuries.

339. By reason of the foregoing, the Defendants are liable to Plaintiffs pursuant to 42 U.S.C. §§1983 and 1985 and for punitive damages; and pursuant to 18 U.S.C. §§1961-1968 Racketeer Influenced and Corrupt Organizations Act (RICO) and for treble damages.

#### **COUNT FIVE: UNLAWFUL SEARCH AND SEIZURE**

340. The averments of the above stated paragraphs are alleged as if fully set forth herein.

341. Defendants invaded Plaintiffs' privacy and are liable to Plaintiffs for damages. The Fourth Amendment gives rise to a right of action against law officials for damages from an unlawful search and seizure.

342. The damage to Plaintiffs includes the irreparable injury of anxiety and emotional distress of being scrutinized without basis and subjected to abuse by Defendants for

over three years due to false state court proceedings violating their constitutional and due process rights.

343. Defendants acted intentionally and recklessly to inflict emotional distress upon the Plaintiffs. Their conduct was unscrupulous, extreme and outrageous. Their actions in requesting and subjecting Plaintiffs to the custody evaluations were the proximate cause of Plaintiffs' emotional distress. The emotional distress suffered by the Plaintiffs was so severe that no reasonable person could be expected to endure it.

344. As a result of the Defendants' actions, Plaintiff KARIN developed PTSD and all Plaintiffs have required psychotherapy and medical treatment.

#### **COUNT SIX: LEGAL MALPRACTICE**

345. The averments of the above stated paragraphs are alleged as if fully set forth herein.

346. Defendants VAN AULEN, STREMLER, and RADOL not only violated multiple laws, ethics and other procedures as alleged herein above, but engaged in fraud, collusion, malicious acts and created other special circumstances to confuse and pervert the court proceedings for which their actions constitute legal malpractice.

347. Defendant VAN AULEN violated RPC 3.1. Meritorious Claims and Contentions. Both Defendants VAN AULEN, STREMLER, and RADOL violated RPC 4.4. Respect for Rights of Third Persons.

348. Plaintiff KARIN, as parent and legal guardian to her children D.C. and G.C., has a valid legal malpractice claim against Defendants VAN AULEN, STREMLER, and RADOL for the benefit of her children as their natural guardian and herself, as but for Defendants VAN AULEN, and RADOL's negligence the case would not be protracted for over three years nor gone to trial under such egregious and collusive



circumstances; KARIN, D.C., and G.C. would not be so unduly segregated for over three years; D.C. and G.C.'s wishes would have been represented to the court that they want to live with their mother; D.C. and G.C. would not be subjected to the abuse of multiple third parties unnecessarily interrogating and investigating them, including "therapy" by DCP&P appointed Full Circle.

349. Defendants VAN AULEN, STREMLER, and RADOL failed to exercise the ordinary reasonable skill and knowledge commonly possessed by a member of the legal profession which resulted in actual damages to Plaintiff KARIN of expending thousands of dollars to Defendant BFC and attorneys, which are pecuniary losses sustained and the facts alleged herein show actual damages could reasonably be inferred from the extraordinary litigation expenses incurred by motions, oppositions and appeals, among other legal expense in Plaintiff KARIN's attempt to avoid, minimize or reduce damages to her and her children, D.C. and G.C. caused by VAN AULEN, STREMLER, and RADOL's wrongful conduct which is charged to them.

350. Defendants influenced and supported their fraudulent actions and continue to do so, constituting a pattern of racketeering and conspiracy to intentionally deprive Plaintiffs of their rights, which is charged to them and are indictable offenses.

351. Any claim to quasi-immunity fails as for a long time by Defendant VAN AULEN's misconduct he stepped out of boundaries of such immunity by deliberately engaging in a "campaign of lies" for three years as alleged herein above which any reasonable attorney or citizen can understand no attorney should conduct themselves as VAN AULEN has.

352. Any claim to quasi-immunity fails as by Defendant VAN AULEN, STREMLER, RADOL's misconduct, they stepped out of boundaries of such immunity by deliberately engaging in trickery and sabotage as alleged herein above which any reasonable attorney or citizen can understand no attorney should conduct themselves as VAN AULEN, STREMLER, and RADOL have.

**COUNT SEVEN: THERAPIST MALPRACTICE AND FRAUD**

(psychological abuse, intentional infliction of emotional distress, negligence, vendor misfeasance and malfeasance)

353. The averments of the above stated paragraphs are alleged as if fully set forth herein.

**ESTRIN**

354. Defendant ESTRIN has committed malpractice. Defendant ESTRIN failed to obtain informed consent from Plaintiff KARIN to psychologically treat her children, Plaintiffs D.C. and G.C..

355. Defendant ESTRIN psychologically abused Plaintiffs D.C. and G.C.. Defendant ESTRIN engaged in vendor misfeasance and malfeasance and breached the fiduciary duty she had to child Plaintiffs D.C. and G.C., to perform prudent services. She subverted child abuse and domestic violence. She profited from intentionally harming two children who have suffered emotional, physical, and economic injuries as a result of her actions. She has intentionally and criminally endangered the welfare of two minors here and the other Defendants have supported her fraudulent actions.

356. A psychotherapist, by law, owes a duty to use reasonable care in his or her treatment of a patient or client. When the psychotherapist violates that duty by either acting negligently toward the patient, intentionally harming the patient, abusing the patient or

defrauding the patient, it is considered a breach of the duty of care and the psychotherapist is liable to the patient for all allowable damages that the psychotherapist causes.

357. Defendant ESTRIN has a strong corruptive influence on and presence in Defendant BERGEN COUNTY FAMILY COURT, who refers business to her, and with Defendant BFC, as former Director, and also with DYFS n/k/a DCP&P.

358. Defendant ESTRIN colluded with Defendants numerous times, constituting a pattern of racketeering and honest services fraud pursuant to 18 U.S.C. §1346 and wrongful conduct, which are charged to her and are indictable offenses.

359. Defendant ESTRIN has harmed all three Plaintiffs and assisted Defendant CRANE in slandering his former wife, and tortious interference and intentional infliction of emotional stress upon Plaintiffs, which is charged to her.

360. Defendants influenced and supported Defendant ESTRIN's fraudulent actions and continue to do so, constituting a pattern of racketeering and conspiracy to intentionally deprive Plaintiffs of their rights, which are charged to her and are indictable offenses.

361. Plaintiff KARIN, as parent and legal guardian to her children D.C. and G.C., has valid malpractice and personal injury claims against Defendant ESTRIN for the benefit of her children as their natural guardian and herself, corroborated by the facts as alleged herein.

362. Any claim to quasi-immunity fails as by Defendant ESTRIN's willful misconduct she stepped out of boundaries of such immunity by deliberately engaging in a "campaign of lies" and denigration of Plaintiff KARIN to her children, Plaintiffs D.C. and G.C., as alleged herein above and engaging in collusion, conspiracy, misfeasance,

malfeasance and nonfeasance as alleged herein above which any reasonable mental health practitioner or citizen can understand no mental health practitioner should conduct themselves as ESTRIN has.

### **FULL CIRCLE AND CIRELLI**

363. Defendants FULL CIRCLE and CIRELLI have committed therapist malpractice.
364. Defendant CIRELLI psychologically abused Plaintiffs D.C. and G.C..
365. Defendant FULL CIRCLE AND CIRELLI engaged in vendor nonfeasance, misfeasance and malfeasance and breached the fiduciary duty they had to child Plaintiffs D.C. and G.C., to perform prudent services and report abuse. They subverted child abuse and domestic violence. They profited from intentionally harming two children who have suffered emotional, physical, and economic injuries as a result of their actions and inactions. They have intentionally and criminally endangered the welfare of two minors here and the other Defendants have supported her fraudulent actions.
366. A psychotherapist, by law, owes a duty to use reasonable care in his or her treatment of a patient or client. When the psychotherapist violates that duty by either acting negligently toward the patient, intentionally harming the patient, abusing the patient or defrauding the patient, it is considered a breach of the duty of care and the psychotherapist is liable to the patient for all allowable damages that the psychotherapist causes.
367. Defendants FULL CIRCLE and CIRELLI colluded with Defendants numerous times, constituting a pattern of racketeering and honest services fraud pursuant to 18

U.S.C. §1346 and wrongful conduct, which are charged to her and are indictable offenses.

368. Defendants FULL CIRCLE and CIRELLI have harmed all three Plaintiffs and assisted Defendant CRANE in slandering his former wife, and tortious interference and intentional infliction of emotional stress upon Plaintiffs, which is charged to them.

369. Defendants influenced and supported Defendants FULL CIRCLE and CIRELLI's fraudulent actions and continue to do so, constituting a pattern of racketeering and conspiracy to intentionally deprive Plaintiffs of their rights, which are charged to them and are indictable offenses.

370. Plaintiff KARIN, as parent and legal guardian to her children D.C. and G.C., has valid malpractice and personal injury claims against Defendants FULL CIRCLE and CIRELLI for the benefit of her children as their natural guardian and herself, corroborated by the facts as alleged herein.

371. Any claim to quasi-immunity fails as by Defendants FULL CIRCLE and CIRELLI's willful misconduct they stepped out of boundaries of such immunity by deliberately engaging in a "campaign of lies" and denigration of Plaintiff KARIN to her children, Plaintiffs D.C. and G.C., as alleged herein above and engaging in collusion, conspiracy, misfeasance, malfeasance and nonfeasance as alleged herein above which any reasonable mental health practitioner or citizen can understand no mental health practitioner should conduct themselves as Defendants FULL CIRCLE and CIRELLI have.

**COUNT EIGHT: SOCIAL WORKER/VENDOR MALPRACTICE AND FRAUD**

372. The averments of the above stated paragraphs are alleged as if fully set forth herein.

373. Defendant GREIF engaged in vendor misfeasance and malfeasance and breached the fiduciary duty she had to child Plaintiffs D.C. and G.C., to perform a prudent and through custody evaluation. She subverted child abuse and domestic violence. She profited from intentionally harming two children who have suffered emotional, physical, and economic injuries as a result of her actions. She has intentionally and criminally endangered the welfare of two minors here and the other Defendants have supported her fraudulent actions.
374. Defendant GREIF has harmed all three Plaintiffs and assisted Defendant CRANE in slandering his former wife, tortious interference and intentional infliction of emotional stress upon Plaintiffs.
375. Defendant GREIF has a strong corruptive influence on and presence in Defendant BERGEN COUNTY FAMILY COURT and particularly with Defendant ESCALA with whom she gave the appearance of impropriety. Defendants support her fraudulent actions.
376. Defendant GREIF has twice been paid by Defendants CRANE and VAN AULEN to perform a biased custody evaluation in this custody litigation alone. Defendants mailed these libelous reports to Plaintiff KARIN and the Bergen Family Court more than two times constituting a pattern of racketeering, conspiracy to deprive Plaintiffs' rights, mail fraud, and honest services fraud pursuant to 18 U.S.C. §1346, which are charged to her and are indictable offenses.
377. Defendant GREIF mailed her reports to Defendant BERGEN FAMILY COURT more than two times, which were then forwarded to Plaintiff KARIN by mail more than two

times, constituting mail fraud pursuant to 18 U.S.C. § 1341, which is charged to her and is an indictable offense.

378. Defendants influenced and supported their fraudulent actions and continue to do so, constituting a pattern of racketeering and conspiracy to intentionally deprive Plaintiffs of their rights, which is charged to her and is an indictable offense.

379. Plaintiff KARIN, as parent and legal guardian to her children D.C. and G.C., has valid malpractice and personal injury claims against Defendant GREIF for the benefit of her children as their natural guardian and herself, as but for Defendants GREIF's negligence and malfeasance and as corroborated by the facts as alleged herein; D.C., G.C. and KARIN would not be so unduly segregated for over three years; D.C. and G.C.'s wishes would have been represented to the court that they want to live with their mother; D.C. and G.C. would not be subjected to the abuse by Defendant CRANE; nor the abuse of multiple third parties unnecessarily interrogating and investigating them, including "therapy" by Defendant DCP&P appointed Full Circle.

380. Any claim to quasi-immunity fails as for a long time by Defendant GREIF's willful misconduct she stepped out of boundaries of such immunity by deliberately engaging in collusion, conspiracy, malfeasance and nonfeasance as alleged herein above and engaging in a "campaign of lies" and denigration of Plaintiff KARIN as alleged herein above which any reasonable social worker, mental health practitioner, or citizen can understand no custody evaluator or mental health practitioner should conduct themselves as GREIF has.

**COUNT NINE: SOCIAL WORKER/VENDOR MALPRACTICE AND FRAUD**

381. The averments of the above stated paragraphs are alleged as if fully set forth herein.
382. Defendants BFC, RITZLER, and CUTTITO engaged in vendor malfeasance and breached the fiduciary duty they had to child Plaintiffs D.C. and G.C., to perform a prudent and through custody evaluation. They subverted child abuse and domestic violence under the influence of Defendant STATE. They profited from intentionally harming two children who have suffered emotional, physical, and economic injuries as a result of their actions. They have intentionally and criminally endangered the welfare of two minors here and the other Defendants have supported her fraudulent actions. Their actions constitute honest services fraud pursuant to 18 U.S.C. §1346, which is charged to her and is an indictable offense.
383. Defendant BFC mailed their reports to Defendant BERGEN FAMILY COURT more than two times, which were then forwarded to Plaintiff KARIN by mail more than two times, constituting mail fraud pursuant to 18 U.S.C. § 1341, which is charged to them and is an indictable offense.
384. Defendants influenced and supported their fraudulent actions and continue to do so, constituting a pattern of racketeering and conspiracy to intentionally deprive Plaintiffs of their rights, which are charged to them and are indictable offenses.
385. Plaintiff KARIN, as parent and legal guardian to her children D.C. and G.C., has valid malpractice and personal injury claims against Defendants BFC, RITZLER, and CUTTITO for the benefit of her children as their natural guardian and herself, as but for Defendants BFC, RITZLER, and CUTTITO's negligence and malfeasance and as corroborated by the facts as alleged herein; D.C., G.C. and KARIN would not be so unduly segregated for over three years; D.C. and G.C. would not be subjected to the



abuse by Defendant CRANE; nor abuse of multiple third parties unnecessarily interrogating and investigating them, including “therapy” by Defendant DCP&P appointed Full Circle.

386. Any claim to quasi-immunity fails as for a long time by Defendants BFC, RITZLER, and CUTTITO’s misconduct they stepped out of boundaries of such immunity by deliberately engaging in collusion, conspiracy, malfeasance and nonfeasance as alleged herein above which any reasonable social worker, mental health practitioner, or citizen can understand no custody evaluator or mental health practitioner should conduct themselves as BFC, RITZLER, and CUTTITO’s have.

**COUNT TEN: UNJUST ENRICHMENT**

387. The averments of the above stated paragraphs are alleged as if fully set forth herein.

388. In reliance on Defendants’ acts and omissions, and as an actual and proximate result of Defendants’ misconduct, nonfeasance and malfeasance described herein, Defendants GREIF, BFC, RITZLER, CUTTITO and ESTRIN have been unjustly enriched in amounts paid by PLAINTIFF KARIN and/or Defendant CRANE, the exact amount to proven at trial.

**COUNT ELEVEN: DISGORGE FEES**

389. The averments of the above stated paragraphs are alleged as if fully set forth herein.

390. As a result of Defendants VAN AULEN, GREIF, BFC, and ESTRIN’s misconduct, nonfeasance, and malfeasance described herein, all fees paid to them must be disgorged and paid to Plaintiffs.

**COUNT TWELVE: DECLARATORY RELIEF & INJUNCTIVE RELIEF**

391. The averments of the above stated paragraphs are alleged as if fully set forth herein.

392. The damage to Plaintiffs includes the irreparable injury of anxiety and emotional distress of being separated for over three years due to false state court proceedings violating their every constitutional and due process rights that can never be regained unless this court stays the unlawful proceedings.

393. The state court proceedings must be immediately stayed pursuant to the federal anti-injunction statute as this is a 42 U.S.C. §§1983 and 1985; and 18 U.S.C. §§1961-1968 Racketeer Influenced and Corrupt Organizations Act (RICO) suit in equity before this court, which authorizes this court to redress the deprivations and racketeering ongoing in the state court.

#### **INJURIES/DAMAGES AS TO ALL COUNTS**

394. Defendants have endangered the welfare of the two minor children, Plaintiffs D.C. and G.C., pursuant to NJ Rule 2C:24-4 by their acts as alleged herein. Discovery will serve to further illustrate the damage they have done to the Plaintiffs, reveal how far those acts reach to other victims who may be named as Plaintiffs after Discovery reveals their identities.

395. As a result of Defendants' actions and their deliberate indifference to Plaintiffs' constitutional rights, Plaintiff KARIN suffered the loss of custody and access to her children, lost wages, incurred medical and legal fees and other expenses, Plaintiffs D.C. and G.C. suffered the constitutional violations as alleged herein and loss of liberty and of the care and guidance of their parent and mother and all Plaintiffs suffered extreme humiliation, pain and suffering, terror and mental anguish, which resulted in KARIN developing Post Traumatic Stress Disorder (PTSD), of which are

irreparable damages continuing to date and beyond, and other damages as Defendants continue their violations of Plaintiffs' rights alleged herein.

396. Plaintiffs demand a preliminary and permanent injunction against all Defendants, disgorgement of fees ordered against Defendants VAN AULEN, GREIF, and BFC, declaratory relief and damages to wit:

**WHEREFORE**, Plaintiffs pray for following relief, jointly and severally, against Defendants:

- a. That the aforesaid conduct of Defendants be adjudged and declared to have been in violation of Plaintiffs' constitutional rights;
- b. That the aforesaid conduct of Defendants be adjudged and declared to have been in violation of the common law and statutes of The United States of America;
- c. That the aforesaid conduct of Defendants be adjudged and declared to have been in violation of the common law and statutes of the State of New Jersey;
- d. That the aforesaid conduct of Defendants as alleged against each of them herein be adjudged and declared to have been conspiracy, racketeering, influence, and corruption;
- e. That the proceedings before the Bergen County Family Court as of February 1, 2011 are adjudged and declared to have been void *ab initio* for lack of subject matter jurisdiction;
- f. That the aforesaid conduct of Defendants as alleged against each of them herein be adjudged and declared to have been tortious in inflicting intentional, prolonged, and irreparable emotional distress upon Plaintiffs;
- g. Granting an order to bring Plaintiffs D.C. and G.C. before this court to be heard;

- h. Granting an order for the Plaintiffs and Defendants CRANE, LU, MARLENI, and PLINIO to undergo a domestic violence evaluation by Plaintiff KARIN's chosen expert;
- i. Granting an order that Defendant CRANE advance Plaintiff KARIN the sum of 20,000 U.S. DOLLARS for the evaluation;
- j. Granting an order that the Defendants advance Plaintiffs the sum of 100,000 U.S. DOLLARS to secure legal representation;
- k. Granting an injunction against Defendants from continuing their unconstitutional conduct;
- l. Granting an injunction against Defendants STATE, BERGEN FAMILY COURT, ESCALA, DELORENZO, MIZDOL, DOYNE, RABNER, MOSKAL, KATONA, APPELLATE COURT, GREIF, BFC, RITZLER, CUTTITO, ESTRIN, DYFS n/k/a DCP&P, HORNE, CRUZ, CRUZ'S SUPERVISOR, YAN, GOMEZ, FRANK, BURGOS, NINA, CIRELLI, and ESTRIN from any further involvement and/or influence in Plaintiffs' family case;
- m. Granting an injunction against Defendant STATE that it provide free full transcripts to Plaintiff KARIN of all proceedings involving the case of Wolf (Crane) v. Crane, Docket number FM-02-439-07;
- n. Granting an injunction against Defendants to temporarily seize all Defendants' assets and prevent the transfer of potentially forfeitable property;
- o. Granting an injunction against Defendants requiring them to put up a performance bond of 100 MILLION U.S. DOLLARS;

- p. That DCP&P must provide all reports and information regarding the Plaintiffs KARIN, D.C., and G.C., and Defendants CRANE, LU, MARLENI, and PLINIO to Plaintiff KARIN;
- q. That Defendants are adjudged and declared to have subverted domestic violence and child abuse;
- r. Awarding Plaintiffs compensatory damage of not less than 100 MILLION U.S. DOLLARS;
- s. Awarding Plaintiffs punitive damages of not less than 100 MILLION U.S. DOLLARS to punish Defendants and deter them from future misconduct;
- t. Awarding Plaintiffs treble damages pursuant to RICO law;
- u. Awarding Plaintiffs interest on all causes of action from the date Defendant CRANE filed his petition for custody in the Bergen County Family Court because since that date Plaintiff KARIN has never received a fair hearing and was abused in the process for over three years;
- v. Awarding attorney's fees, costs and disbursements accrued in pursuit of this action under 42 U.S.C. §1988 and CPLR Article 86;
- w. A declaratory judgment that a court cannot interfere with a parents and child's freedom of religion and parent's right to raise and educate their child to a certain religion by ignoring a litigant's complaints that the court's orders are denying her rights to raise her children in her religion;
- x. A declaratory judgment that the STATE Defendant and Defendants named in their official capacity herein have a constitutional and statutory obligation to

ensure that custody cases are completed expeditiously in 180 days from the date of filing;

- y. A declaratory judgment that Defendant STATE's failure to oversee the Bergen County Family Court has created a severe and unacceptably high rate of custody cases protracted beyond the statutory 180 days which deprives litigants of due process and harms them and their children by the irreparable effects of being separated and without a decision for an undue length of time;
- z. A declaratory judgment that the STATE Defendant and Defendants herein have a constitutional and statutory obligation to ensure that custody cases are completed expeditiously in the Appellate Division within 180 days from the date of filing the Notice of Appeal;
- aa. A declaratory judgment that the STATE provide free full transcripts to any and all family court litigants upon application where child custody is an issue;
- bb. A declaratory judgment that a special federal court division is created for interstate custody disputes;
- cc. A declaratory judgment that STATE family court judges, attorneys, child custody evaluators, guardians ad litem, and parenting coordinators are mandated to complete a domestic violence training program no less than 80 hours with a continuing education requirement of 40 hours every two years;
- dd. A declaratory judgment that STATE family court judges are mandated to undergo psychological evaluations by a domestic violence expert prior to performing any judicial acts in any family and/or juvenile court;

- ee. A declaratory judgment that STATE family court judges, attorneys, child custody evaluators, guardians ad litem, and parenting coordinators are mandated to report attendance and/or involvement in any and all business and/or other interests, activities, and events where they consort with one another and that the transparency of this information is to be made freely available to the public;
- ff. A declaratory judgment that STATE Legal Aid and legal representation in family court must be provided on a reasonable sliding scale by all attorneys practicing in the STATE and that flat fees are imposed on any and all family court litigation, including legal fees, evaluators, guardians ad litem, and parenting coordinators; and full upfront disclosure of what family court litigation will cost to litigants - financially, emotionally, and privately; and if violated, attorneys face disbarment via a one-strike-you're-out policy. No waiver and/or release for such shall be lawful nor new "creations" of titles and occupations to circumvent this rule;
- gg. A declaratory judgment that an extensive family court overhaul commence through an agency by the people, for the people to assess and implement new family law rules in the STATE;
- hh. A declaratory judgment that a domestic violence expert analysis is done and is the first factor considered before any custody litigation proceeds, especially if parental alienation is claimed;
- ii. A declaratory judgment that the absence of a Final Restraining Order does not negate the existence of domestic violence; and that parties must be aware of what constitutes domestic violence

- jj. A declaratory judgment that reporting to child protective services (DCP&P) regardless of the outcome, cannot be used against the reporting party;
- kk. A declaratory judgment that full explanations are required by STATE courts on all decisions;
- ll. A declaratory judgment that an attorney for the child(ren) must be appointed automatically whenever custody and/or child support is of issue;
- mm. That DYFS n/k/a DCP&P is adjudged and declared to have been in violation of parents' and children's rights and is hereby disbanded and replaced with a new agency to actually protect children;
- nn. Granting Plaintiffs all legal fees and costs; and
- oo. Such other, further and different relief as the Court may deem just and proper.

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Date

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Karin Wolf, for herself and as the  
parent, natural guardian and next  
friend on behalf of her children,  
D.C. and G.C.  
Plaintiffs

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