

JOHN ...

ADDRESS CONFIDENTIAL

**PLAINTIFF, PRO SE**

JOHN [REDACTED]

*Plaintiff,*

v.

ANASTASIA [REDACTED]

*Defendant.*

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION/FAMILY PART

**HUDSON COUNTY**

DOCKET NO: **DOCKET NO: FM-09-1928-14A**

Civil Action

**CERTIFICATION OF PLAINTIFF JOHN**  
[REDACTED]

I, John ..... of full age, hereby certify:

1. I am the PLAINTIFF in the above-titled cause of action and I am filling this Certification in support of my Notice of Motion to:
  - a. Change Custody arrangements
  - b. Change Parenting arrangements
  - c. Request the recall of the Civil Warrant issued on January 6 2015
  
2. In Summary:
  - a. **September 5<sup>th</sup> 2014:** Judge Daniel D'Alessandro seizes my parental rights and orders "temporary supervised parental time" giving me 5 minutes to identify my supervisor (Exhibit#1, September 05 2014 Order, para. 2). This order was based on no act of abuse on my son or on my ex wife and no criminal record nor any threats on my end to inflict harm to my son and ex-wife. This order was based on the fraudulent accusations of a vindictive 41 yr old ex-wife under the guidance of

attorney Brad Micklin. The awarded supervisor was unable to devote 20 hours of his week to supervise a man he believed was of no threat to his son.

- b. **September/October 2014:** Daniel D'Alessandro deprives me of an immediate full hearing regarding my parental rights allowed to me under the US Constitution. I am forced to be supervised by my ex-wife who abuses both me and my son (Exhibit#8).
- c. **November 14 2014:** During the parental rights reinstatement hearing, Daniel D'Alessandro refuses to afford me a full hearing on reinstating my parental rights and ignores my 30 page certification (dated October 1 2014 Exhibit #4) comprising of evidence that I am of no threat to my child. Instead Judge Daniel D'Alessandro threatens me (at the time I was unemployed) that if I don't come up with thousands of dollars within 3 days there will be "sanctions." The Judge completely ignores my child's need for access to his father.
- d. **November 18 2014:** Daniel D'Alessandro refuses to afford me a full hearing on my parental rights, continues to deprive my son of access to his father without any "clear and convincing evidence" that the child was in danger of being harmed by his father. Instead Judge Daniel D'Alessandro continues to bully me with the threat of jail time (Exhibit#5 transcript November 18 2014, pg. 18 line 24). In addition, Judge Daniel D'Alessandro throws me out of my residence causing me to lose my job (Exhibit#1, November 18 2014 Order, para. 2).
- e. **December 22 2014:** Hearing is held about my new request for parenting time and to put pressure on attorney Brad Micklin to stop delaying the settlement process. Judge D'Alessandro ignores it and issues "a warrant for my arrest for failure to surrender my passports." In addition he bans my son from even coming in contact with me over Skype (Exhibit#6, transcript December 22 2014 hearing, pg. 32 line 25 and pg. 33).

Judge Daniel D'Alessandro took the above parental alienation actions in violation of:

- a. N.J.S.A 9:2: The legislature has declared that it is “the public policy of this State to assure minor children of frequent and continuing contact with both parents [...] and that it is in the public interest to encourage parents to share the rights and responsibilities of child rearing in order to effect this policy”
  - b. N.J.S.A. 9:2-4: Suspended my parental rights without ever conducting a parental rights custody or termination hearing.
  - c. N.J. Div. of Youth & Family Servs. V. F.M., 211 N.J. 420, 447 (2012). By act of leaving me homeless (Exhibit#1, November 18 2014 Order, para. 2) deprived my meeting my obligation to mandatory custody and parenting mediation that the Court later ordered me to attend.
  - d. Clemens v. Clemens, 20 NJ. Super. 383, 392 (App. Div. 1952). The Court failed to evaluate my “character, condition, habits and other surroundings’ by denying me 4 times a fair and full hearing on reinstating my parental rights: September 5 2014, November 14 2014, November 18 2014, December 22 2014.
3. In the attached publication, “Response to the Judgment of Divorce” (Exhibit#2) I respond to all the emetic, malicious, fraudulent attacks against me that Judge Daniel D'Alessandro adopted from attorney Brad M. Micklin. I identify them as such since for most of them the Judge already had written evidence to the contrary. It is important that this publication accompanies this motion to erase any shadow he was trying to cast over me regarding my ethics.

4. In this motion, I am making available to you evidence that Anastasia ..... has recently (January 2015) provided in writing her consent in my co-parenting Alexander. I disclose my whereabouts, and finally I propose a schedule that will allow me to continue to raise my son subject to the new circumstances Judge Daniel D'Alessandro has imposed on my family.

### **PREFACE**

5. I learn that following the criminal act Judge Daniel D'Alessandro enabled upon my son, he proceeded amongst others in the past few months to depriving 3 underage children of their pediatrician mother. He also deprived a 3yr old boy from readily access to his dad by enabling his vindictive mother to move to another state.

Judge Daniel D'Alessandro's child abuse centered decision pattern makes me feel certain that I was addressing a "professional" that has been ill-educated of the devastating effects his orders are having on the children of Hudson County. Following my criminalization and the mud the Judge threw on me I have no thread of hope that this motion will even be considered besides him inviting me to submit it. Yet as a parent I have the obligation to do all that it takes to enable my son with access to both of his parents.

### **PERSONAL RESPONSIBILITY**

6. I take full responsibility for what happened to my son under my watch. I take full responsibility for not being able to protect my son from a narcissistic mother and a corrupt Family Court system. I take full responsibility if I don't manage to enable my son equal access to both of his parents.

**WRITTEN CONSENT BY MY EX WIFE FOR REINSTATEMENT OF MY PARENTAL RIGHTS**

7. Anastasia ....., my ex-wife and mother of my child, following her August 27 2014 certification comprising of her claim that “the plaintiff does not have the ability to care for Alexander,” her request for my undergoing a “psychological evaluation,” and all the accusations she mounted against me in Court in midst of tears, sent to me via her legal representative in writing a settlement proposal for parenting time of my son. Her proposal has no “psychological evaluation” requirements, no supervised visitation requirements, and does not express any concern of my son’s well being with me, because there is none.

NOTE: Attorney Brad M. Micklin eventually torpedoed the settlement by delaying for 43 days to draft it by which time circumstances had dramatically changed.

8. On **January 2<sup>nd</sup> 2015** attorney Brad M. Micklin sent my then attorney <confidential> a draft settlement (**Exhibit#3**). The settlement on page 4 includes the following parenting schedule:

Custody/Parenting time:

To: Page 4 of 8

2015-01-02 18:40:38 (GMT)

From: Brad Micklin

1. Plaintiff will pick up Alexander every Tuesday and Thursday from 6:00pm to 9pm. If Alexander has an activity in the city, the Defendant will drop off the child at the activity location.
2. Plaintiff will pick up Alexander on Saturdays at 8:30am and return him at 6:30pm.
3. During visitation hours, the Defendant will only be present during the child's exchange (pick up/drop off).
4. Overnights will start when Alexander turns 7 years old.
5. Plaintiff is entitled to 1 week with Alexander in Greece every year during which time the Defendant should also be in Greece. During that time the following visitation schedule will be followed
  - a. Till the age of 7 every day 9am to 8pm for 7 days.
  - b. Starting age 7, the entire week.
6. Alexander will be in the care/presence of the Plaintiff at all times when away from Defendant. No third party is allowed to care for Alexander unless agreed upon by the Defendant.

9. I attach the entire draft settlement as **Exhibit#3** for your review. There is no requirement for a psychological evaluation, no concern about my son's well being when left alone with me, nothing that would constitute this woman is in any way afraid of leaving her kid with his father; the father who raised Alexander up to his 3 yrs of age with absolutely no incident of abuse. And the reason she states no such concern is because there is none. The only thing this woman wanted from me was money and revenge because our marriage did not work out (it is no one's "right" to go after 93% of someone else's NET income as Judge D'Alessandro contended on the November 14 2014 hearing). Anastasia ..... lied in her August 27 2014 certification about her concerns about me and repeatedly lied in Court to gain unfair advantage of this case. Her settlement proposal unequivocally proves that.

10. That Settlement had a \$16,000 lump sum attached to it covering the support of months January to June 2015 so that she would let me find a job and settle with my life without constant malicious prosecution. I am noting, that \$16,000 is not an earth shattering amount that would constitute any type of coercion on my part. It is not an amount that

would have “forced” the Defendant to accept un-willfully the settlement. It is merely two and a half months of the temporary support Judge Daniel D’Alessandro had ordered, to a woman that a few days later secured a \$100,000 full time job.

11. I am also noting that the financial support that I and the Defendant agreed on the proposed settlement was far more than what Judge Daniel D’Alessandro eventually ordered: I had agreed on Five (5) years of alimony instead of two (2), 40% more in alimony, 46% more in child support, health insurance on me, etc. So in no way could this settlement be termed as unjust because doing so would automatically label Judge Daniel D’Alessandro’s judgment (Judgment of Divorce July 21 2015) as unjust.

Any contention by my ex-wife that I singlehandedly drafted and proposed the settlement would be a lie since on Exhibit#3 you can clearly see the settlement was sent by Brad Micklin.

My ex-wife has absolutely no concern of leaving my son with me because there is no such concern.

### **THIRD PARTY AFFIDAVIT OF MY BEING A LOVING FATHER**

12. As additional evidence, I re-submit below the notarized affidavit of the person who my wife selected as my temporary supervisor. Judge Daniel D’Alessandro ignored the below and left my son orphan of a father. I hope it has better treatment with the new Judge presiding over this case. The affidavit is of a respectable US doctor who asserts my being a loving father and contends that awarding supervised visitation was unnecessary and caused harm to my son.

September 15, 2014

Hon. Daniel D'Alessandro, J.S.C.  
Hudson County Administration Building  
595 Newark Avenue  
Jersey City, New Jersey 07306

Re: [REDACTED]  
Docket No: FM-09-1928-14

My name is [REDACTED] and I am an MD Ob Gyn at Jamaica Hospital. I have currently been assigned to be the supervisor of John Cambiotis during his visitation time with his son. I have known John and Anastasia since 2009 and Alexander since 2011 when he was born. John and I have been in contact almost weekly for the past few years and I was also with him during his recent trip to Greece being able to follow his thought process.

I am writing this letter to attest that John is a loving and devoted father. Notwithstanding the recent event of his trip to Greece and the resulting consequences, I have no indication that he intends or that he is capable of inflicting any type of direct or indirect injury to his son, physical or emotional. Supervised visitation is unnecessary moving forward and will only harm his relationship with Alexander. John is a very involved father and I cannot imagine any "supervisor" being able to follow him and Alexander in their regular activities. Supervision will only result in the activities being reduced and the father/son bond to be weakened.

[REDACTED]

MARY ELLEN REILLY  
Notary Public, State of New York  
No. 01RE6173838  
Qualified in Nassau County  
Commission Expires September 4, 2015

*Mary Ellen Reilly*

**REGARDING MY WHEREABOUTS**

13. I currently work and reside in Athens Greece, in Europe. My address is:

<CONFIDENTIAL>

I attach the utilities bill of December as "Exhibit#11 Utilities Dec 2015" showing my name and current address.

I use the following US address for guaranteed delivery of mail regarding this case

JOHN .....

<CONFIDENTIAL>

I have a respectable full time job in the IT sector as a Project Manager where I make 1/6<sup>th</sup> of my former salary (24,000 Euro).

I do not intend to return to the US because I am concerned of my freedom and well being (which borderlines being left to die on the streets of NJ since I have no family in the US or rot in a jail cell). Judge Daniel D'Alessandro violated my US Constitutional rights and I have found harbor here in Greece where I can live another day to fight for them.

I will return to the US when the unconstitutional deprivation of my parental rights has been lifted; when the unconstitutional order to deprive me of my right to travel (surrender my passports) has been lifted.

I will return to the US when the corrupt Family Court system of NJ is fixed. Only when Courts stop criminalizing parents for not having to pay exorbitant unjustified amounts of money in support, only when Judges stop arresting innocent civilians for \$2,000 child support “debts,” and shooting parents because they were trying to avoid jail time due to child support arrears (see Walter Scott case). I will return to the US only when destroying a parent’s life is not as simple as a vindictive wife contending without evidence that that parent is an unfit dad.

I will return to the US only when there are no posts on the news like the below showing a State that robs children of their childhood, a State that destroys families. Only when the corrupt Family Court system of NJ is fixed:



**Time to Put Kids First**

September 30 at 10:00pm · 🌐

How many days has it been?  
~TPKF Team

**For those of you who have been withheld from a child, how many days has it been since you've seen them? Tell us your relationship and number of days.**



**TIMETOPUTKIDSFIRST.ORG**

Like Comment Share

Top Comments ▾



**Sarafina Elizabeth Broughman** How many days is 4 years?

Like · Reply · 3 · September 30 at 10:02pm



**Time to Put Kids First** 1460 😞

Like · Reply · 2 · September 30 at 10:02pm

↳ View more replies



**Rachel Critton** 1,439 days since we have seen our beautiful son. He was taken away when he was 4.5 years old and he will be 9 years old this coming March. We have missed his first day of kindergarten, first grade, second grade and third grade. Sporting events, parent teacher conferences, his stories, birthdays, holidays, everything. He is our entire world and we never left and we will never give up. **Andi Critton SallySue Steel**

Like · Reply · 7 · September 30 at 10:48pm

↳ 1 Reply



**Debra Childs** Grandmother - I went 181 days (from 6 days old to 6 months old). My granddaughter has not yet been able to meet the majority of her paternal family, and she has sadly lost the opportunity to meet two of her great grandparents, who passed away while she was being completely withheld. 😞

Like · Reply · 2 · September 30 at 11:11pm · Edited



**Michelle McNellan** Daughter over 920 days step daughter 2190 plus days other step daughter 120 days. So 2.5 years, 6 years and 4 months.

Like · Reply · 1 · September 30 at 10:59pm

↳ 1 Reply



**Naomi Felts Schulenberg** Grandparents - it's been a year and a half 494 days I guess.

Like · Reply · 4 · Yesterday at 12:44am



**Jessica Frazier** 2,640 days from my son.

Like · Reply · 1 · Yesterday at 2:54am

-  **Alexandra Glen** Stepnum, it's been nearly 7mths, the youngest turns 6 tomorrow 😞  
Like · Reply · 19 hrs
-  **Truth Renaissance** Grandparents - over 4,000 days  
Like · Reply · 5 · September 30 at 10:09pm
-  **Paul Allin** My son is turning 3 in october. It has been over 400 days.  
Like · Reply · 3 · September 30 at 10:54pm
-  **Sarah Bailey** 1500 days, daughter. She will be 12 next month. 😞  
Like · Reply · 6 hrs  
↳ 1 Reply
-  **Susanna Ritva Hukkinen** Not days but years...too many to count.  
Like · Reply · 18 hrs
-  **Chris LaRue** 160 days and counting. Since he was 3 months old. Life is not the same without him. Worst pain possible. ✕
- 
- Like · Reply · 2 · September 30 at 11:31pm  
↳ 1 Reply
-  **Mindy Williams** I have seen my daughter in 184 days... It hurts so much!!!  
Like · Reply · 2 · Yesterday at 1:50am
-  **Raymond Reynolds** Daughter, 203 days of absolute no contact and no idea where she is being harbored.  
Like · Reply · 2 · September 30 at 11:03pm
-  **Autumn Anderson** I lost count with my son. 8.5 months. 4 days with my daughter, the most with her was 68 days.  
Like · Reply · 2 · September 30 at 11:13pm
-  **Jessica Zierhut** 2 sons, 1224 long agonizing days, 112 days since one of them passed away  
Like · Reply · 1 · September 30 at 11:15pm · Edited
-  **Euan Bowen** Nearly 4/5 years since last Quality Time with X 3 Sons...So much good history until a partner decided he was jealous and wanted to recreate a young family!...If they had been older he wouldn't have got them to keep secrets early 2009.  
Like · Reply · 1 · September 30 at 10:38pm
-  **Arie Oosterbaan** Daughter Angelina Guurtje Apollonia born January 17th, 2005. Dearly missed since August 16th, 2008, 2588 days.  
Like · Reply · 1 · September 30 at 10:59pm
-  **Shannon Chidester** Father- and I haven't seen my daughter in 730 days. Her mother has alienated my whole family. ✕  
Like · Reply · 3 · September 30 at 11:57pm
-  **Oscar Medrano** Midland, TX - I was not held away too long but I was held to a obey or lose your child demand. The mother held me & my son (1 year old) to her demands & if we did not listen she would flee the country to Mexico. For an entire year she twist my baby son... [See More](#)  
Like · Reply · 2 · September 30 at 11:33pm





**grammys house** My grandson Oscar. July 20 2010. He is 13 years old now. The first day of school for 2nd grade he ran up to his first grade teacher who I did volunteer work with and said "Do you know what happened to my grammy?". She told me this and she told me she just smiled at him. I was floored! He had just turned 8.

Like · Reply · 1 · 10 hrs

1 Reply



**Belinda Bonnici** It is an agonizing experience exactly the same as the death of a child you feel the same grief . The grief lasts for 1.5 years and then you kind of move on and become stronger and then you end up going through a process of letting go of your child

Like · Reply · 1 · Yesterday at 1:57am

1 Reply



**Veda Williams** Six years. They were stolen from me when they were only 1 and 4. ✕

Like · Reply · Yesterday at 6:36am



**Judy Darcy** Mother - 2195.5 last time I saw both of my daughters & was able to give them a hug.

I've gone & sat in the back for a few important events that I found out about through friends. I did get to see my oldest graduate from high school & she even came by after & gave me a hug! First hug since 2009.

Like · Reply · Yesterday at 5:23am · Edited



**Tracy Oglesby Smith** 3 years

Like · Reply · Yesterday at 3:46am



**Ruth Chichester** My oldest daughter will be 28 yrs old this month. I've not seen her since December 1998. My second daughter, 25 and her brother, 21 have refused all my attempts to communicate with them since 2007. I've not seen them since 2003. I had hoped, once the... [See More](#)

Like · Reply · 22 hrs



**Gerri McKenney Carpenter** 365 X 8. Day after tomorrow is his 14th birthday. I usually do pretty well until October. 8 long years since I've laid eyes on my grandson. All because of a power hungry millionaire that brain washed her son

Like · Reply · Yesterday at 4:38am



**Simon Kretschmer** 1500 days (4+ years). She's 16 now and we did pass her late one night at a public Christmas display last Christmas. That was when she saw her baby brother who is 3 years old for the first time and backed off into the crowd. She was a teenager carrying ... [See More](#)

Like · Reply · Yesterday at 2:26am



**Stacy Ward** Mother, it's been 11 days. I get them tomorrow for the weekend. I'm waiting for our court hearing. I've asked for joint legal & physical custody and my ex refuses 😞

Like · Reply · 4 hrs



**Laurie Rininger** over 2 and a half years..im the grandma who raised her

Like · Reply · September 30 at 10:06pm



**Nicki Lee** 5 years.

Like · Reply · 19 hrs



**Alison Susanne** My boyfriend hasn't seen his oldest daughter in almost twenty years.

Like · Reply · Yesterday at 12:03am

-  **Elaine Williams** I'm a Nan and it's been nearly 3yrs since I've seen my granddaughter.. 🥺🥺  
Like · Reply · Yesterday at 2:59am
-  **Matt MacLachlan** 180 something days  
Like · Reply · September 30 at 10:41pm
-  **Barbara Bennett** So, my situation is 'silly'...he brings them by every other week during the shool year and makes them tell me they aren't staying as he rolls his car by my house. But, here's the breakdown...531 days since we've had some sort of conversation (it was v... [See More](#)  
Like · Reply · September 30 at 10:28pm
-  **Sharon Martin** My daughter and my son, 20 years.  
Like · Reply · 7 hrs
-  **Scott D Casper** 374 days  
Like · Reply · Yesterday at 1:14am
-  **Tim Foye** 931 Days  
Like · Reply · September 30 at 11:56pm
-  **Holley Anne Gordon Haskins** My Daughter [Michaela L Haskins](#). Its been since before Christmas 2014, 5 yrs before that, 2 yrs before that.  
Like · Reply · September 30 at 10:40pm
-  **Kyra Amick** I've been kept from my 2/3/8 yr old since June over drug allegations that I have proven false by going for weekly. Drug screens for 10 months  
Like · Reply · 14 hrs
-  **Janice Burns** Oh I am a grandparent. No rights. Hope at 71 I will met them again. Sad for them as well as us. 11 year old twin girls with their mum.  
Like · Reply · Yesterday at 1:29am
-  **Janice Burns** about 1450 days.  
Like · Reply · Yesterday at 1:26am
-  **Ed BonGiovanni** it's just short of 14 years since I have seen my daughter. Her mother poisoned her against me and there has been NO relationship for the entire time of seperation and a few years prior.  
Like · Reply · 11 hrs
-  **Dan Reyna Hair** Almost 1865 days! I have joint custody but he likes to take me to court and I just couldn't afford it anymore!  
Like · Reply · 16 hrs · Edited
-  **Michael Candy** Son- 1033 days 🙄  
Like · Reply · Yesterday at 6:23am
-  **Evan Eketone** 143 days..  
Like · Reply · September 30 at 11:11pm
- ↳ 2 Replies
-  **Wayne Hartman** About 2400 days  
Like · Reply · Yesterday at 4:58am
-  **Barry How** Sorry to hear - hope it improves in the near future - thinking of you  
Like · Reply · 21 hrs
-  **Ron Smith** 6 Years in November  
Like · Reply · Yesterday at 12:22am
-  **Laura Giese** I am estranged from my daughter and she has alienated me from her four children. It has been 18 months or approximately 540 days. It seems so much worse when you look at it that way. That actually equals 152 times that they missed staying at my house and 78 Sundays I didn't get to take them to church.  
Like · Reply · Yesterday at 2:54am

...and the pages go on.

The NJ Family Court system constitutes the middle ages of Family Court in the US. This system will be studied in 50 years the same way we study McCarthyism during the Second Red Scare, the same way Courts in Great Britain are being studied today for jailing and chemically castrating homosexuals 60 years ago, the same way we are studying today racial segregation in much of the 20<sup>th</sup> century in the US.

#### **REGARDING MY PASSPORT**

14. My ability to travel is paramount to my current job. I could not have had this job if I did not have a passport. "Surrendering" my passport to the Court will deprive me of a source of income and my son of a father. The requirement for my handing the Court my passport accompanied by the unethical arrest warrant Judge Daniel D'Alessandro issued to enforce the same is one of the main reasons I cannot return to the US, to be with my son, and to support my ex wife.

My right to life, liberty, and the pursuit of happiness which my job enables me to uphold is an unalienable right afforded to me above Judge D'Alessandro's orders.

#### **REGARDING THE LEGAL FEES OF ATTORNEY BRAD MICKLIN**

15. Brad Micklin is currently under investigation by the District Ethics Committee (Docket No V-C-2015-0018E) on 5 counts of unethical conduct performed on my case.

16. Judge Daniel D'Alessandro awarded me an obligation to pay \$38,520 in legal fees to the parental alienation criminal attorney Brad M Micklin. The psychopath who left my son orphan and staged an eviction to kick him out of his house in order to find an excuse to delay my parental custody hearing. As a matter of principle I refuse to send a single dollar to that individual. He will NEVER extract a penny from me. If I am to spend any money I will spend it to prosecute and expose him for the child abuse he has inflicted on my son.

17. Furthermore, I initiated a simple divorce case that would have cost no more than \$10,000. My ex-wife took \$21,000 out of our joint assets shortly after the divorce papers were served. The fees Judge Daniel D'Alessandro has awarded me were generated after attorney Brad Micklin advised maliciously my ex wife to follow parental alienation tactics to gain unfair advantage over me; advised her to abuse me into my own house so that I was forced to move out; advised her to file a temporary support motion and go after 93% of my net income. To financially beat me into submission. Thus if there is one person responsible for these legal fees, that is my ex wife who fell victim of that attorney besides my constant support and advice.

#### **REQUEST FOR THE RECALL OF CIVIL WARRANT**

18. I am requesting the Court to recall the Civil Warrant issued on January 6, 2015 for my "failure" to surrender my passport. As the Defendant admits in her proposed settlement offer I am of no threat to my son. There was never a basis for my surrendering my passport and the Defendant was insincere from the beginning on her claims that I am a flight risk. I

would never separate my son from his mother. As stated earlier that is an act that only criminals do.

19. "Surrendering" my passport will automatically mean that I will lose my job. It will also mean that, judging from the past record of this Family Court, my ex-wife will be in total control of my life enabling her to leave me homeless. I have no family in the US and with the JoD of July 21 my fair share of my real estate property has also been confiscated. My ability to return to where I have a roof to put my head under is paramount to my survival and to the happiness of my child.

20. Finally, the civil warrant is an unconstitutional barrier to my defending my child's rights in US Court since it prevents me from returning to the US and attend Court in person. Without the civil warrant lifted I cannot return to US soil. The impoverishment inflicted on me by Judge Daniel D'Alessandro and Brad M Micklin render me unable to attend Court via a legal representative as well. Those two acts prevent me unconstitutionally from defending myself.

### **REQUEST FOR JOINT LEGAL CUSTODY**

21. I am requesting that my ex-wife and I receive joint legal custody for the best interest of the child. There is one and only one serious reason I am submitting such request. If anything, God forbid, happens to my ex-wife that renders her unable to care for my son, my son automatically remains orphan since the law does not recognize me as his parent following the irresponsible orders Judge Daniel D'Alessandro issued. We have no family residing in the US. In such case my son will end up in an orphanage or under the care of another family. It is imperative for the best interest of my son that the Court gives me back legal custody of my son. It is beyond belief that Judge Daniel D'Alessandro proceeded in this unconstitutional act and endangered my son like this by legally

imposing that my son has only one parent guardian. The danger that this kid is right now is beyond belief.

What has been done on the Judgment of Divorce of July 21 2015 by Judge Daniel D'Alessandro is a crime equal to the crimes committed in similar cases by Judges John Call Jr. of Burlington County; Nancy Sivilli of Essex County; and Maureen Sogluizzo of Hudson County; and Lawrence DeBello and Anthony Massi of Mercer County currently being investigated by the US District Court for the District of New Jersey.

### **REQUEST FOR PARENTING TIME**

22. I am requesting that you afford my son his right to have access to both of his parents as follows.
- a. Every year my ex-wife should bring my son to Athens Greece where he will stay under my supervision for one month. This can happen in two (2) 2-week increments or for an entire month during which I will take Sabbatical to be with him.
  - b. I will be covering the travel expenses of my son (from/to the US) and of course all of his expenses during his stay in Greece including medical coverage in addition to my child support/alimony obligations.
  - c. During his time with me and especially during the first few times and up to the age of 7, my ex-wife can exercise the following visitation schedule:
    - a. 3 times a week between Monday and Friday Anastasia can pick up Alexander for 3 hours.

- b. Alexander will be spending overnights with me unless he requests his mother at which event Anastasia should be readily available to spend the night with him. In such cases I will be picking up Alexander at 9am the next day.
- c. Anastasia can Skype/Call Alexander daily. I will be bringing in touch Alexander with his mother every time Alexander requests so.
- d. After the age of 7 Anastasia can visit Alexander once a week during his stay with me if she chooses so unless we are on a trip outside of Athens.
- e. If Anastasia and I cannot agree on a parenting issue during Alexander's stay with me in Greece, I will have the final say (during the other 11 months the mother does).
- f. I will not accept any "supervision" by my ex-wife nor any supervision of any kind, since that will result in her continuing the abuse of myself and of my son in front of me. Our only contact will be for her to drop/pick up my son until the years go by and she realizes that our divorce was a step towards the right direction.
- g. In addition, for 2 additional consecutive weeks during the calendar year, and as long as there is no danger of arrest of the Plaintiff in US soil, the Plaintiff will be permitted the following visitation schedule in the US:
  - a. Every morning the plaintiff will pick up and drop off the child to school.
  - b. Every afternoon, the Plaintiff will pick up the child from school and return him home
  - c. 3 overnight stays with Alexander during the week.
  - d. 2 Saturdays the entire day

Note: It seems that I might be able to request my employer to enable me to work two weeks a year remotely. During that time I can be staying at a hotel near my son.

The above is a step towards my gaining back my parental rights and gaining trust to the NJ Family Court system.

23. I provide below clarifications on the relationship that the Defendant has with Greece. I understand that allowing an underage US citizen to move outside of US borders might sound troublesome yet by reading the below you will understand that Alexander will be travelling to Greece regularly anyway due to the relationship the Defendant has with Greece. By enabling me to cover his travel expenses this will also enable the Defendant to visit her family more frequently. Something that is so crucial to both her psychological well being and her family's well being:

1. Anastasia ..... was born of Greek parents in New Jersey and her native language is Greek. Anastasia's parents moved back to Greece when she was 8, she lived in Greece from age 8 to her mid-twenties.
2. Anastasia's family resides in Greece, her mother, sister, her niece and nephew, her aunts and close social circle all reside in a city in the South of Greece (Neapoli Voion) about 4 hours drive from Athens. Anastasia's father is deceased.
3. Anastasia owns a two story house in the above mentioned city.
4. Anastasia attended College in Athens, Greece.
5. Anastasia and I performed a religious marriage in Greece.
6. When I first filed for divorce, I was concerned that Anastasia would kidnap my son to Greece and I did not consent for her going on vacation to Greece till the divorce was final. Anastasia, back then, filed a motion to the Court to allow her to travel to Greece (See Excerpt 1 below).
7. Most important of all, Anastasia owns an apartment in Athens, just 40 minutes drive from my apartment.

DEFENDANT' S TRIP TO GREECE

11. I will be visiting my father, Alexander's grandfather, in Greece from August 10, 2014 to September 6, 2014, and I want to take our son with me. I sought the Plaintiff's consent regarding taking Alexander; however, he refused. It is important that Alexander sees his grandfather, as he is 72 years old and his health is rapidly deteriorating. He is suffering from Parkinson's Plus and is now bed ridden. This may be the last chance that Alexander will get to see his grandfather and it is respectfully requested that the Court allow me to bring our son to Greece with me. Additionally, I respectfully requests a shortened return date limited to this issue as I will need to make the necessary arrangements for Alexander to accompany me on the trip.

[Excerpt 1 Certification of Anastasia ....., July 10 2014](#)

I just wanted to add the above information to show that I am not asking for my son to come to some random foreign country, but to the country he will be visiting anyway on an annual basis for vacation. My proposal will reduce Anastasia's annual vacation expenses. I consider it abuse for the child for Anastasia to be bringing him in Athens, just 40 minutes away from his father and preventing him to see me.

24. My intentions are clear. I wish to continue parenting for Alexander as I did up to his 3 years of age, up to the moment he was forcefully taken away from me. My parenting was and will be responsible, fun, educational, loving, simply an amazing experience for the kid. A kid that I taught how to read the English and Greek alphabets, how to scooter, how to speak, how to be confident in the water, a kid who I taught the names of animals and vegetables, a kid that I was taking to French class and to the swimming pool a kid that I love like nothing else in the world.

Most of Alexander's cousins and nieces are in Athens Greece (9 in total from my side of the family and 2 from Anastasia's side of the family) with which I have a loving relationship and they live close by. Their ages range from 3 yrs to 16 yrs old. Uncles and Aunts and cousins and grandparents that love Alexander. He has no relatives in the US and the ones he has are decades older than him. Forming a family bond is an asset and a right for every person on this earth.

I will continue to be a great parent as I was up to the point that fraudulent temporary support motion was filed against me abruptly ending my support of 90% of the expenses of my ex-wife and son.

25. In closing I need to state that my understanding of case law suggests that parenting time has no impact on my obligations for child support. Now that Anastasia clearly indicated she has no concern on my parenting Alexander, affording me parenting time does not lift my obligation to pay alimony and child support. Kids of poor parents still have the right to be raised by them. Humans don't have to be rich to have kids. My intention is to fully pay the child support that the Judgment of Divorce indicates. I cannot fully do so now but I

will when the circumstances allow me to. I have already started doing so. I believe that the alimony and child support order that Judge D'Alessandro finally issued is just (and as I stated earlier is less than what I had offered myself), assuming of course I can retain again a \$150K job which is something that the Court is now preventing me to do via the threat of jail time if I don't surrender my right to travel.

Please protect the psychological well being of my son. Don't allow my vindictive ex-wife to destroy his psyche for life. And as the months go by, as the years go by, she will realize that it is the best interest of our child to have access to both of his parents. I did nothing bad to my ex-wife, I only wanted a divorce. When the gun was pointed to my head I had to protect myself, I am a fighter and I will not let anyone deny my son of a father. I had to protect myself so that my son can at least experience me via Skype and not in jail whenever my ex-wife decided to visit me.

26. My son has been asking for me every single day and my wife has been patching it up by saying that I am on a very long trip.

But time will come when my son will start asking the real questions, and the evidence is all out there, The Court's orders are published on the Internet, her lies are all out there in the form of certifications and transcripts. My supervisor has intimate knowledge of the case and when asked he will inform. We are only a few years away until my son understands what his mother did to him. He will grow up without a father and with a mother that he will hate for the rest of his life. So what if she is now taking him to the park, feed and protect him, take care of his expenses, and tuck him in bed at night. She took his father away from him and that is something a child will never forget.

What my ex-wife is doing is as tragic and disgusting as a man entering a stranger's house, killing him and his wife and lovingly raising their 3yr old child to adolescence.

When this child grows up should he be indebted to that man?

And the main reason my ex-wife did this is because she was told she can and because Judge Daniel D'Alessandro enabled her to. She was promised a fat monetary support and an ex husband who would beg not to be put in jail. She got in return an upwards of \$40,000 debt in legal fees, flimsy monetary support, and a kid who will soon be psychologically destroyed.

And one of the handful of people who genuinely cared for her and for our kid, who was constantly by her side, got criminalized and turned into a fugitive. It is irrelevant that my ex-wife harmed me and my kid so much and hates me like an enemy, and tries to poison me with vitriol words every time I talk to my son on Skype. Her well being and happiness have a direct impact to my son and my innate instinct is to protect and care for her, but going to jail to satisfy her vindictiveness is of no use to anyone.

This story has been told over and over again. My son is not the first victim and he will not be the last one in the corrupt Family Court system of NJ. My ex wife will not be the first hated mother and she will not be the last one. But I am taking this opportunity afforded to me to ask for what is right for the child.

27. There is only one reason to keep a child away from his parent and that is if that parent is performing any act of physical or emotional abuse on the child. There is no such accusation in my case, no such intention. On the contrary we have a mother that proposed in writing my spending time with my son in Greece (Exhibit#3, pg.4).

## RESPONSE TO DEFENDANTS CROSS MOTION

28. In response to this motion, the Defendant painted a picture of me that contradicts her January 2<sup>nd</sup> 2015 settlement offer in which she was proposing full blown parenting rights, no strings attached. I provide responses to the cross motion below:

a. In response to my parenting motion the Defendant requested the following:

*“3. Finding the Plaintiff in violation of litigant’s rights for failure to pay his child support and alimony.”*

The Defendant once more tries to tamper with the Court’s judgment by skewing the scope of this motion. It is her right to request child support equally as it is my son’s right for access to both of his parents. Two issues that are separate and apart and as such they need to be considered.

Alexander is entitled to the love and support of his Mother and his Father. The Legislature has declared that it is “the public policy of this State to assure minor children of frequent and continuing contact with both parents [...] and that it is in the public interest to encourage parents to share the rights and responsibilities of child rearing in order to effect this policy.” N.J.S.A 9:2-4.

I am requesting that the Court remains focused on the scope of this parenting motion which is about the right of my son to access to both of his parents. It is my right to be afforded the opportunity to fully respond to any motion aiming to deprive me of my liberty as it relates to child support related issues and I am

requesting the Court to treat such a motion separately. I am requesting that the Defendant is asked to submit a separate motion as it relates to child support.

In case you decide to proceed with considering the Defendant's request for deprivation of my freedom as it relates to child support issues, please note that poor parents have a right to access to their children too. As indicated by the Supreme Court on Turner v. Rogers, 564 U.S. \_\_\_ (2011) "There is no evidence that incarceration results [in] more reliable child support payments that families can count on to make ends meet" and urged states to find alternatives wherever possible. Afford me to respond in a separate motion as it relates to child support and I will provide solutions and alternatives for the well being of my son.

- b. The Defendant contends that she "*endured one year of hell with the Plaintiff's irresponsible demands and failure to support his family.*" I have been solely supporting my voluntarily unemployed wife's luxury lifestyle and my son for 4.5 years without a single complaint to the authorities on my parenting abilities. Suddenly when I filed for divorce to get out of the psychological hell the Defendant had unleashed on me, the defendant went after 93% of my net income, she brought the police to my door step, evicted me from my apartment, went (financially) after my mother in Greece, and asked for me to be jailed. During that time I continued supporting 90% (!) of her and my son's expenses via borrowing from everyone I could borrow until I could borrow no more and until I was forced out of a job. My "demands" were to continue to support 90% of my ex-wife's expenses and to be present in my son's life. That is how irresponsible I was.

- c. The Defendant states: “...when he abandoned his family with no money...”

The Defendant is lying.

The Defendant here refers to \$25,000 cash and \$4,000 per month as “abandoned his family with no money.” The Defendant has provided a sworn statement on her CIS of her receiving the above mentioned amount.

- d. The Defendant states about me “...but never accepts responsibility for his own actions and obligations.”

The Defendant is lying.

On Paragraph 6 of this motion I clearly take full responsibility for everything that has happened to my son. More importantly, for 4.5 years I was solely responsible for supporting my ex-wife’s irresponsible luxury lifestyle till I could see she wanted to remain unemployed forever and till I realized I had no money to take my son to pre-school. The Defendant lies once more in the face of clear evidence of the responsible parent and husband I was till she went after 93% of my net income and left me homeless.

- e. The Defendant states: “At any rate, I do not have the money nor do I think it safe or in my child’s best interest to do so.”

This is a mother that contends that it is not in her child’s best interest for her son to spend time with his father. While a few months earlier she was proposing I

have full parenting rights. Besides those two illogical acts being basis for a psychological evaluation for the Defendant this is in addition in direct opposition to the States' policy N.J.S.A 9:2-4.

- f. The Defendant states: “...yet, he has not sent one dime to support his child since he left the country.”

The Defendant is lying.

I have sent over \$3,000 since I left the United States as indicated with receipts on Exhibit #10.

- g. The Defendant states:

process. He had three lawyers, all of whom requested to be relieved as counsel because he was uncooperative and refused to abide by Court Orders. Then he left and refused to disclose his whereabouts until he

The Defendant is lying.

The first 2 lawyers were fired for poor performance. The last lawyer was hired solely on the false promises by the Defendant that we will have a settlement.

After her attorney torpedoed the settlement I had no more money to retain her and we mutually ended our cooperation.

- h. Para 10:

month to hand him over, unsupervised time with his father. The best line was that if we cannot agree on a parenting issue, then what he says goes! Is this the thought process of a rational person? Does he seriously think the Court will say OK to such preposterous demands?

Defendant forgets that these are her words. On the altered settlement agreement that the Defendant submitted back to me, these are the exact same words she used as seen below (see Exhibit#3 150102 Brad Original Settlement, page 4, article 9) which I copy pasted verbatim:

9. If the parties cannot agree on a parenting issue, Defendant has final say.

According to her own words “Is this the thought process of a rational person?” This is the second indication that the Defendant should undergo psychological evaluation which I am strongly starting to consider. I was merely following her pattern of thinking.

Regardless of the above rant, we are both Alexander’s parents, when the child is under his mother’s supervision she has the final say when disagreements erupt, when he is under mine, I do. This is solely to ensure no heated arguments erupt and that both parties will exercise respect towards one another.

i. Para 12:

12. Despite all that, he has done, I still allow him Skype time with his son. It breaks my heart that my son cannot have face to face time with his

I believe with "...all he has done" the Defendant refers to my supporting her financially for 4.5 years, raising my son while she was voluntarily absent from a \$100K career, continuing to support 90% of her expenses even after she tried to go after 93% of my net income, depriving me of my son with lies, and trying to put me in jail.

father, but I must keep him safe. I will not allow an unstable father to threaten the safety of my beautiful son. He has abandoned us, left us

The Defendant has submitted no evidence of my being unstable or a threat. There are no records of abuse during my time with Alexander, no records of abuse towards my wife. The Court even rejected her preposterous demand for my undergoing a psychological evaluation. There is a ratified note from the person that the Defendant is trusting with her son's well being, <supervisor's name>, a respected doctor that all the above claims are childish unsupported nonsense. It is a matter of ethics. I was ethical enough to not first claim she is unstable, to not bring first the police to arrest her. I am ethical she is unethical, this is the bottom line. I brought this case to court to uphold my son's right to access to both of his parents. Right from the start she has been asking for her son to have no access to me. I am seriously puzzled on whether my ex-wife is psychologically unstable or using our son as leverage in an attempt to hurt me (although this last act truly shows a psychologically unstable mother).

j. Para 13:

13. I ask the Court to refer to the 24 page decision of the Court. It is well reasoned and fair. It addresses each and every issue at length. At P. 13

I equally request the Court to refer to my fact supported responses to the Court's 24 page decision which was based on fraudulent allegations from the Defendant (exhibit#2).

k. Para 14:

14. I ask the Court to deny Plaintiff's motion in its entirety and award counsel fees to my attorney.

I ask the Court to respect the public policy of this State.

The Legislature has declared that it is "the public policy of this State to assure minor children of frequent and continuing contact with both parents [...] and that it is in the public interest to encourage parents to share the rights and responsibilities of child rearing in order to effect this policy." N.J.S.A 9:2-4.

Above all, in her cross motion, the Defendant does not explain how come to the Court she presents me as a threat to our son, yet in her settlement offer she does NOT consider me as such! In her settlement offer she has unequivocally admitted that I am of no threat to my son giving me ample visitation time. There is absolutely no evidence that I have ever threatened or harmed my kid. At last the Court has to recognize her tactics for what they are, fraudulent accusations that harm a 4 yr old kid. Her only incentive is, as she told me over Skype, "don't think that you will come out of this without any consequences." And she was referring to my asking for a divorce.

I really have no hope in this system, but I am writing this because as a father I have to explore even the faintest paths of salvation for my son. By lifting the restraints that are currently in place for my seeing my son, you are not making my life easier, you are adding more responsibility. I

am asking for more responsibility. Please help my son grow up like a normal kid, with access to both of his parents.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

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Date

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Plaintiff, *Pro se*