STATE OF MINNESOTA

COUNTY OF SCOTT

DISTRICT COURT
FIRST JUDICIAL DISTRICT
FAMILY COURT DIVISION
COURT FILE NO. _____
CASE TYPE: DISSOLUTION

In Re The Marriage of:

Bijoy Raghavan

Petitioner,

and

Smeeta Antony

Respondent.

**AFFIDAVIT OF BIJOY RAGHAVAN IN SUPPORT OF EXPARTE MOTION AND MOTION FOR TEMPORARY RELIEF**

State of Minnesota )
) ss.
County of Scott )

Bijoy Raghavan, the Petitioner in this proceeding, being duly sworn and upon oath state the following in support of his Ex-parte Motion and Motion for Temporary Relief:

1. The Respondent and I are the parents of twin girls; namely,

   Raeanna Raghavan, DOB: April 27, 2006, currently 9 years of age
   Renelle Raghavan, DOB: April 27, 2006, currently 9 years of age

2. Until approximately five years ago, the Respondent was a devoted mother, well-organized and focused on the well-being of our children. (2010)

3. She is highly intelligent and has a Master's Degree from University of St. Thomas in Computers. She worked as an upper level executive in this field until the end of 2010.

4. At that time, Respondent abruptly quit her job. This was very puzzling to me, since Respondent appeared to have no plan ahead of time, nor did she seem to want to make one.

5. For approximately the next year and one-half, Respondent exhibited other uncharacteristic and eventually quite concerning behaviors.

6. At first she appeared to be depressed and without energy. She exhibited no interest in anything around her, was unable to participate in conversations and was seemingly unaware of what was going on around her. Then she had bursts of energy and agitation. She was up early in the morning and late at night.

7. Then she developed paranoia. She thought she was being watched through the windows of the house. She demanded the lights be turned off at dark. She thought people were tapping her phone and she called the police to report this.

8. The Respondent told me, "I know what you are doing. Controlling me through signal lights and microwave technology." She also accused me of hypnotizing her and the girls.

9. Respondent talked to herself, yelled to herself, used abusive language and yelled strings of profanity, even in front of our girls.

10. I frequently had to go into the children's rooms and stay with them when their mother was in the midst of an episode.

11. Respondent appeared to be responding to some internal stimuli. She spoke to people who weren't there, waved her hands wildly in the air, and broke into high-pitched laughter.

12. Respondent refused to consider getting any medical treatment for her condition.

13. One morning, when the Respondent was yelling to herself, she unmistakably yelled, "Smeeta, I am not going to let you live." She was up at 4:00 a.m., banging objects around in the kitchen, hitting walls, hitting herself in the forehead forcibly and yelling, "Smeeta, I am not going to let you live. I'm going to get you. I caught you; I'm going to kill you."

14. I called 911.

15. Respondent was placed on a 72-hour hold. She went through a commitment proceeding in Scott County. Because she refused to take any medication, her commitment file also included a Jarvis Order to permit medication to be given to Respondent without her consent. Respondent's diagnosis was Psychosis –NOS.

16. Amazingly, by November 2012, the Respondent has improved significantly. She returned to work. Unfortunately, shortly after she returned to work, she stopped taking her medication.

17. Respondent quit her job again in June 2013.

18. It was not long before the bizarre behavior returned. Respondent was hospitalized on an emergency basis in September 2014. I am not sure if she was given any medication.

19. The Respondent's parents were visiting from India at the time. She was behaving normally until her parents returned to India.

20. Her untreated mental illness has been extremely hard on our children. The ranting and raving, the abusive and angry yelling, the irrational and profuse swearing, the irrational and prolonged giggling are the pattern of sounds my children hear the most.

21. I have had to instruct them in how to keep their ear buds in and their ipads turned up when the Petitioner takes them to school and back.

22. The Petitioner is a very bad, impatient driver. She has had three "fender benders" in the past two months. When I ask the Respondent what happened, she responds, "I don't have any information."

23. Her driving behavior is so bad that the home owners association in our neighborhood consulted with the police department about what they could do to try to make stop Respondent from speeding down the streets of our neighborhood. The police put up a "speed trailer" in our neighborhood for her benefit. This report is part of Exhibit A which is attached.

24. On March 3, 2015, the Respondent was cited for going 65 miles per hour in a 45 mile per hour zone. The children were not with her. She took this case to trial.

25. On April 16, 2014, the Respondent was cited for "speed faster than reasonable or prudent." She was going 85 miles per hour in a 55 mile per hour zone. She took this case to trial.

26. At home, the children know how to turn up the volume on the electronic equipment, so that it drowns out their mother's rages.

27. We have tried, in spite of the difficulty, to maintain the fiction of a "normal" family.

28. At the end of this summer, we went with some friends of ours and their children on a camping trip. The Respondent's behavior could not be characterized as "normal." Our friends have spoken to me in private and have asked not to have themselves or their children exposed to Respondent's conduct again.

29. In March 2015, the Respondent attended a choral concert that the children participated in at our church, she sat in the front of the audience and yelled obscenities while the program was going on. The other children in the choir noticed, of course, and asked, "Who is that?"

30. The children sang with their school choir on May1, 2015. The Respondent stood in the back of the auditorium and yelled obscenities. School staff and other parents became concerned when they witnessed this. Someone who saw this behavior made a report to child protection on May 6, 2015. The report is part of Exhibit A which is attached.

31. The children love school. It is one place they get relief from the conduct of the Respondent. They are excellent students.

32. The other place that the children are able to have some time to do what they enjoy is on the weekends when we go places together. The children do not want to return home after our outings. We go to movies, go to eat – and just sit quietly together watching the crowds at the mall.

33. I can make my schedule flexible at work. I believe I will be able to keep the children in their familiar schools and activities (the ones they enjoy) while we are figuring out how Respondent's mental illness with affect the adjustment that our family needs to be make when we begin residing in separate residences.

34. In March 2015, I spoke with the school counselor about what was happening in our family. The children are in contact with the counselor each week.

35. The children need this support.

36. Respondent's symptomology continues: she has oral and visual hallucinations, verbal outbursts, irrational beliefs and obsessive behavior.

37. She is obsessive about the children's "education." She has insisted that the children attend school in the Edina School District, which she has determined is superior to any other school district. She drives the children to and from school.

38. Once the children are home, Respondent insists that the children complete, not only their assigned homework from school, but also additional workbooks and reading and other "educational" activities especially selected by the Respondent. These "educational" activities are usually two grade levels above the level that our children are working on. The Respondent will keep the children up very late at night, or get them up very early in the morning to assure that they complete this work.

39. I have had to intervene time and again in this process. The Respondent, however, does not respond rationally to my efforts to point out that the time is late, or the children are tired, or the work does not need to be completed this very minute.

40. There have been times that the Respondent locks herself and the children in their rooms and refuses to allow me to restore some balance to the children's experience.

41. I am always trying to assess how much harm the children are exposed if I try to intervene on their behalf and Respondent and I argue. I do not want to add listening to disagreements between their parents to the weight the children are already carrying.

42. The Respondent has frequently called the police, including reporting to them that she has been abused. I am grateful that the police arrive, but it is clear to me that they cannot do anything to address the Respondent's mental illness. Attached to this Affidavit and incorporated herein by reference as Exhibit A are a number of the recent reports detailing police calls to our home and child protection reports and responses.

43. One Shakopee Police officer recently (August 2015) went out of his way to refer our family to a social service program called Parent Support Outreach Program (PSOP). When the social worker came to the house, the Respondent refused to talk to the social worker and prevented the girls from talking, too.

44. Respondent's "educational" plans do not end with academics. She has also selected certain activities for the children and demands they participate in them regardless of their wishes, their talents, or their enjoyment of the activity.

45. The children take piano lessons, but the best and only suitable instructor for the children in the entire Twin Cities area, according to Respondent, is in Brooklyn Park, so the children travel there and back. The children are also expected to practice every day of the week for an hour or longer.

46. The children also take swimming, ice skating diving and dancing lessons. The first two they enjoy, the second two they hate. The Respondent appears oblivious to the children's preferences. Her interaction with the children has only one dynamic, complete unquestioning control in an irrational situation.

47. The most recent effort by the police to assist us, once again involved the Respondent's obsession with the children's "education." The police officer tried

to give us some counseling options. Respondent said she did not want to hear options and wanted the police to leave.

48. Over this summer, the Respondent began spending more money that I make. This is especially disconcerting, because I believe the Respondent's spending is fueled by the rigidity and irrationality of her mental illness and not by any need at all. Starting in June, I have tried to convince the Respondent to curtail her excessive spending.

49. The Respondent has started presenting an "invoice" to me each month. She insists that I pay the amounts she lists, even though she provides no documentation of the expenses – and even though I pay many of the expenses she lists on her "invoice."

50. I do all of the grocery shopping for the house, pay all the house expenses, the children's expenses and the car expenses. I pay the Respondent what I believe is necessary for her gas and personal spending.

51. When I pay a reasonable amount that I can afford and that I believe represent what Respondent may have spent, the Respondent "carries" a balance forward from her unsupported "invoice."

52. The Respondent can be vicious in her language when she is trying to get what she wants, no matter what. If I do not give her the money she demands, she has threatened to lock me out of the house and has created a scene to keep the children from going anywhere with me on the weekend.

53. The invoice I received on November 3, 2015, for October is typical:

AMOUNT DUE THIS MONTH

| | |
|---|---|
| Education | 1,214 |
| Indian Store | 175 |
| Miscellaneous | 500 |
| Kid's clothes | 500 |
| Gas | 550 |
| Grocery, Halloween and Miscellaneous | 1,020 |
| Food | 250 |
| Dry cleaning | 150 |
| Vitamins | 200 |
| Haircuts | 88 |
| Total for this month | 4,627 |
| Outstanding dues | 10,884 |
| Amount paid out this month | 2,500 |
| OUTSTANDING DUES WITH THAT | 13,0111 [sic] |

54. Respondent presented an invoice for each of the past seven months in 2015 as follows: April: 6,786, May: 3,296.10, June: 3,172.93, July: 2,554.52, August: 3,162, and September: 5,800.00.

55. The total of these invoices is $29,398.55 – and average of $4,200 per month. I have tried to be reasonable with what I pay the Respondent from these invoices, but she is very angry when she does not receive the full payment she asks for.

56. Respondent's response to my request for information about her figures is to send me an email stating "You have to go to the authorities and solicit the necessary help and make the f*** call as indicated by the authorities. Sending me these emails borders on harassment and calls for juristic action. I suggest u use your advantageous situation with the authorities WELL AND WISELTY[sic] and make the F**** CALL. Refrain from sending me any further emails."

57. Respondent is not taking medication. She is not seeking treatment. She does not believe she has a mental illness. She has turned down every offer of assistance

Dr. Kennedy xpost my doctor from 2012
I do not need medication

that has been made to her. Unless she agrees to get help, nothing will change for the children or our family.

58. The Respondent communicates with me only by email, even though we live in the same house. On a couple of occasions, the Respondent has taken possession of my car keys, my work bag (containing my laptop), my house keys and my wallet. It was extremely difficult to get this property back.

59. I now do not bring this property into the house, having taken protective measures to assure that the Respondent is not able to control my access to our home and my vehicle.

60. I have always felt that it was my job to take care of the Respondent – and that I could keep the children's lives stable. I have seen the situation get worse, not better for the children.

61. The children deserve a childhood. They deserve to have friends over to their house. They deserve to have free time to spend on hobbies and activities they enjoy.

62. I am the only person who can give the children what they need.

63. The Respondent, who can be a good mother when she is healthy, simply will not be able to help make this situation right.

64. I will continue to support contact between the Respondent and the children when it can be done safely, but I cannot help the children and stay in this marriage.

65. I have made the difficult decision to divorce the Respondent.

66. She has not been in the category of "danger to herself or others" as is required for a commitment. However, the Respondent has been angry, threatening, verbally abusive and acts out irrationally.

67. I am very concerned that the separation between Respondent and me not prompt Respondent to do something harmful to the children.

68. I am asking that the court provide the most protected circumstances possible for the children and I as we separate from Respondent.

69. If the Respondent's mental illness remains untreated, I cannot imagine how she will react to this very significant change in her environment.

FURTHER YOUR AFFIANT SAYETH NOT.

Bijoy Raghavan

Subscribed and sworn to before me by Bijoy Raghavan this 19 day of November 2015.

Notary Public

JOAN MILLER
NOTARY PUBLIC - MINNESOTA
My Commission Expires Jan. 31, 2020