

State of Minnesota

District Court

County : Scott

Judicial District:	_____
Court	File 70-FA-15-22094
Number:	_____
Case Type:	_____

In Re the Marriage of:

Bijoy Raghavan
Petitioner,

vs.

Smeeta Antony
Respondent.

Closing Arguments <i>Dissolution of Marriage</i>
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CLOSING ARGUMENTS

SUMMARY

The above-entitled matter came before the Honorable Diane M. Hanson Judge of the District Court asking for a Dissolution of the Marriage initiated via an Exparte Order on December 1 on grounds of the Grave Threat and the Imminent Danger she posed to her children’s lives asking the Court to Protect their young lives from such a mother.

The order was superseded by Temporary Order ruled on 12/15/2016 granting unsupervised parenting time to the respondent every alternate weekend, granting the \$1000 spousal maintenance and employing a custody evaluator to determine the best interests of the children Raeanna & Renelle Ragahavan.

The affidavit submitted by the petitioner predominantly calls out that she is an unfit mother who is chronically and very acutely ill dictated by her Schizophrenic brain as diagnosed in 2012 and is unable to discharge her parental duties. The respondent while a wonderful mother and individual prior to 2010 who was an incredibly loving mother simply has been unable to perform her parental duties courtesy her illness impacting the lives of her innocent children to the point where her innocent children have pleaded for their father to move on so that they may all get their lives back. The father after 6 years of struggling with the grave decision that had to be made has made a very difficult decision to move on and has initiated the divorce proceeding asking for sole legal and physical custody on grounds of the fact that the mother is truly incapable of providing a fit home or any kind of relationship that ensures the care and safety of her children.

The respondent has asked A VERY SIMPLE QUESTION for 6 years. How can a woman who screams profanity, who laughs for extended periods of time, who speaks to imaginary friends, who trashes objects, who hurts herself to find some relief from what she is feeling as a result of the constant state of threat and paranoia she is experiencing and as a result of the command hallucinations she experiences, who can be driven to any lengths to hurt herself or others as a result of the hallucinations she continually lives NOT experience any episodes in the community when she ensures she has AN HR FACE TIME WITH 3RD PARTY INSTRUCTORS in the community around her children and other parents children ON A DAILY BASIS who are swimming, dancing, singing at the choir in church practicing for performances every Sunday, piano playing, or diving. She ensures of her presence every single day. Why are there only 2 intake reports calling in concerning behavior in 2015, 5 years into her mental illness that began in 2010 and a few months prior to the divorce proceeding initiated in November of 2015?

Please note when a Psychiatrist from her 2012 paperwork states that the respondent is dictated by her internal stimuli completely driven by how it dictates her and can be driven to any lengths to hurt herself of others it can only be inferred

that she is a woman who has been diagnosed as a woman incapable of NOT Being ABLE to exercise self-control as she has no way to control how very ill overloaded with internal stimuli brain who lives in fantasy world or not the so real world dictates her. Please note as per the Psychologist report that she concurs with the Psychiatrist diagnosis of a Paranoid Schizophrenia, Undifferentiated Schizophrenia, Psychosis NOS.

The fundamental grounds of the case will always boil to down to **ONE ELEMENTAL SIMPLE FACT**. How can such a brain that is so reactive on the inside of the home that is diagnosed as a brain so dictated by its own ill circuitry exercise self-control and NOT react in a person's presence at all her activities when she ensures of that hr face time for 5 years straight on a daily basis?

SUMMARY OF SECTIONS WITHIN THE DOCUMENT

The Respondents Arguments for how Property Must be Divided can be found [here](#).

The Respondents Arguments that counter the Allegations can be found [here](#).

The Respondents Arguments for the Exhibits that were offered as concrete evidence are found [here](#).

The Respondents Primary Argument can be found [here](#).

The Respondent's Summation Argument can be found [here](#).

ARGUMENT

This divorce proceeding is built on the foundational grounds of her involuntary committal in 2012 and a commitment that did not hold up to standards in 2014. The entire **FOUNDATION OF THE CASE** continues to build on the **GROUNDS OF “HERESAY” statements alone** as the system failed to summon witnesses to the stand to be cross-examined in 2012 **AND 2 PUBLIC EPISODES DOCUMENTED IN 2015.**

The fact of the case continues to remain, that the testimonies provided by 2 petitioner’s best friends, the children’s testimonies and 2 testimonies provided by the respondent’s parents with whom she has had no contact for years is that, it was simply written down verbatim as stated by the interviewee without any questions posed by the custody evaluator as the evaluator as per her testimony on the witness stand did not deem it to be her role to challenge any testimony or ask eliciting questions trying to uncover the truth. **Her job as per her testimony was to simply document the testimony** rendering the testimony offered by these sources as nothing but **HERESAY with no supporting evidence** that can corroborate or support the testimony.

The fact of the case also continues to remain that these testimonies offered by these sources continues to build on the foundational grounds of her mental health diagnosis from 2012 even though there is a clear absence of intake reports in the community till 2015 – 5 years into her mental illness.

The foundational ground of the case also remains, that almost a year into the proceeding neither the custody evaluator nor the psychologist feel like they are Qualified or do they feel it is within the bounds of what is expected of them to render an opinion on a very simple question “How does a woman who is so intensely ill on the inside of the house not exhibit those signs outside of the house?”

The court appointed psychologist eludes to the fact that she has seen similar cases where mentally ill individuals do have the ability to paint themselves in good light to get out of medication. She does however contradict herself when she forgets that she is talking about a woman who has a need to scream endless profanity, talk to imaginary friends, laugh uncontrollably and let out what she is feeling by trashing objects and hitting herself to find relief in her completely dictated by internal commands inside of her which as per the petitioner happens on a daily basis. Such a brain cannot find it in herself to exercise that kind of self-control for 6 years straight where she is in the community on a daily basis.

The foundational ground of the case also remains that the conclusions or the diagnosis that the psychiatrist arrived at in 2012 were on the basis of the statements made by the petitioner alone. There is no concrete evidence of the bizzare behavior as stated by the petitioner observed while in unit in a person's presence during her committal stay. Any statement or conclusions made by case workers on the witness stand in 2012 is built on the basis of THE PETITIONERS STATEMENTS ALONE and was not subject to cross-examination and did not uphold to the standards of the civil commitment where cross – examination of such statements is the right of the respondent CAUSING INJURY to the respondent and ENSURING of the RESPONDENT AS A VICTIM OF THE SYSTEM. Such a fact inspite of it being the foundation is consistently ignored and is portrayed that the respondent has an incorrect perception of what it means to be a victim of the system as a direct result of her illness.

The foundational ground of the case also remains that the respondent's symptoms began rather explosively in 2010 and very co-incidentally the very next day after surgery.

The foundational grounds of the case also remain that her parents and her sister and brother-in-law visited her in 2011 and stayed with her for a period of 2-3

months in 2011 and did not attest to seeing such bizarre behavior to the case workers during their stay with her in 2011 when they chose to fly in again in 2012 to meet with the state appointed case workers in 2012. They did not attest to seeing such behaviors in 2012 either although it can be argued that they did not see those behaviors because I was on medication. In 2011 however, I was not on medication and they did not attest to seeing those behaviors and chose to be guardians of such a situation in 2012 when my father chose to work with both the psychiatrist at Owatonna in 2012 and the county appointed case worker in 2012. There is also no mention of any statements from her parents visit reporting bizzare behaviors in 2014 when they lived with her for 2-3 months. My father, mother, sister and brother-in-law met with the case worker in 2012 and were not afraid to chat freely with the case worker and share their thoughts. I was not privy to those conversations as I have always chosen to not participate in conversations between them and the system. That said it should be noted that my family did choose to take it upon themselves to work and speak very freely with the system and if they did witness the bizarre behavior as stated in the OFP in 2014, I am sure the court can see why it appears odd that they would feel hesitant to express their concerns to the system. It should also be noted that the testimony offered by the respondent's parents is free of coaching and of any hesitation that they might experience as the respondent chose not to have any ties with them which enables them to speak even more freely without any emotional ties getting in the way. It should also be noted that as per the evaluators verbatim written down testimony offered by my parents states that my parents have expressed that the respondent is quiet and keeps things bottled up and talks to herself to vent it out. Please note that this behavior illustrated by the respondents parents is significantly different from that of the behavior across the mental health paperwork of the respondent that very clearly calls out the continual paranoia that the respondent felt beginning in 2010 manifesting itself as atypical reactions that a paranoid schizophrenic experiences which is extreme agitation, violent outbursts, crying and sobbing – an emotional reaction as a result of the paranoia experienced, talking to imaginary friends, state of constant threat of being watched, laughing for very prolonged periods of time, trashing and screaming every morning in the bathroom, EXTREME depression where she cannot even bring herself to DO anything and is lost in space where she cannot even take in what is going on around her all of which as repetitive as that sounds but unfortunately

cannot be ignored occurs ONLY WITHIN the CONFINES OF HER HOME and NOT ON THE OUTSIDE.

Both evaluators were also provided with my case workers contact information. The custody evaluator while submitting paperwork to me in the form of emails during the divorce proceeding asking for me to sign release forms such that they may speak with the department of human services appointed case worker fails to account or cite any interviews conducted with my county appointed case worker from 2012 in their reports.

The foundational elements of the divorce proceeding also continue to remain that the respondent is exhibiting a paranoid flair and is exhibiting marked delusions and marked lack of insight when she perceives herself as a victim of crime and is a victim of her husband and the system.

The foundational elements of the case continue to remain that both the psychologist and the evaluator exhibit a complete disregard of the victimization that the respondent has endured:

- Forced committal in 2012 on grounds of HERESAY statements alone made by the petitioner and his best friend not subject to cross – examination.
- Complete disregard of the fact that there are no observations in the community.
- Complete disregard of the fact that her parents did not attest to seeing such bizarre behavior in 2011 when they chose to appoint themselves as guardians of such a case by working with the psychiatrist and the case workers in 2012. They did not attest to seeing such bizarre behaviors in 2014 as well.
- Complete disregard of the fact that highly influential parents did nothing to ensure of attorney representation in 2012.
- Complete disregard of the fact that such influential parents did nothing to ensure that she could be free of such an abuser
- Complete disregard of the fact that such influential rich parents did nothing to

ensure that surveillance was setup to offer concrete evidence to the case workers and challenge the system some more to ensure that their daughter was well represented and did not remain victimized with her husband ESPECIALLY WHEN HER SYMTOMS BEGAN EXPLOSIVELY THE DAY AFTER SURGERY.

- Complete disregard of the fact that such highly educated parents did nothing to meet with psychiatrists to comprehend such a spilt personality especially when every medical journal will state that Schizophrenia is not a split personality disorder.
- Complete disregard of the fact that she was stolen of \$70,000 worth of jewelry whose dollar value was attested by the individuals who gifted her that jewelry i.e. her parents which made it non-marital assets that the respondent owned that were now stolen.
- Complete disregard of the fact that the respondent has lived thru prejudice rendered by the community as a direct result of her mental health published on public portals as per police reports having community members walk up to me and scream in my face, having community members park under my window and turn on blaring music in the wee hrs of the morning, crash ins to my stationery car for which I cannot offer any evidence as I chose not to work with Law Enforcement as a result of their demeanor towards me when I went to them asking for help or stating how I felt.
- Complete disregard of the fact that police reports do not add up when the maid states that I threatened with a knife and that she lived in fear working for me when she worked for me for a year and half. Why would a maid put herself thru that kind of pain when there are other jobs available? Why would Law Enforcement not investigate such a case? It is assault.
- Complete disregard of the fact that Law Enforcement demeanor and lack of education in cases such as these weakened my case as I did not receive the necessary education to gather evidence to build a stronger case assuming that there is always evidence left behind in cases of physical abuse.
- Complete disregard of the fact that victims in such cases where they do not receive any help or education to document such a case do not tend to be comfortable with Law Enforcement, an example of which is her refusal to call in the burglary theft and her need to let her husband deal with Law

Enforcement Official's as she does not anticipate to receive help of any kind.

- Complete disregard of the fact that she did attempt to reach out to the Victims advocate office looking for help and guidance. **It is the job of the Law and agencies that deal with the Law to listen and try and uncover the truth regardless of what one might believe till all facts are uncovered.**
- Complete disregard of the respondent's statements of physical abuse as that boils down to my statements for which I cannot provide concrete proof in the forms of cuts and bruises.
- Complete disregard of the fact that sworn statements were provided by the respondents parents attesting to a week of goading and stalking that they witnessed in 2014
- Complete disregard of the respondent's statements of emotional abuse and financial abuse for which she can provide concrete evidence in terms of the financial takeover where she has no insight into any decision in the household and not even into how much he earned till the divorce proceeding in 2015.
- Complete disregard of the respondent's statements where the invoices that she presented the petitioner with ONLY comprised of elements that were necessary to take care of the children that she footed and kept rolling to the petitioner.
- Complete disregard of the continual defamation of the respondent's character. Petitioner cannot prove inspite of his continual claims of a needy, vicious, vile demanding wife that he has bought her anything expensive to keep her happy and keep the situation under control. She ran a run down car for years, wore a \$50 watch for years, switched her cell phone out to a \$100 cell phone after 6 years, does not own a single piece of fancy jewelry.
- Complete disregard of the continual intimidation, gas lighting and abuse that she lived with in the household that she cited many examples for to the evaluation team but was disregarded as abuse as elements such as letting maids go, refusal to train dogs, shutting down joint accounts, shutting down favorite channels, ensuring little things are constantly moved around are difficult elements to prove and boiled down to my statements for which tangible evidence was offered in the context of the fact that maids are no longer employed, accounts are no longer joint as it was between 2010 & 2012 in the form of bank statements and in the form of pictures of the amount of

poop, pee and puke she cleans.

- Complete disregard of the fact that the children were obtaining counseling sessions at school for an entire year, without the respondent's knowledge in school without any notification from school or the petitioner for which the petitioners statements exist on the record as evidence.
- Complete disregard of the electronic harassment endured inspite of evidence offered by the respondent in terms of videos showing her computer continually hijacked and the logs of continual tech support requested at Best Buy.
- Complete disregard of the Law Enforcement Tailing that she has endured inspite of videos showing obvious tailing behavior where 2 units are parked on the shoulder and one moves into traffic as the respondent drives by the parked unit. She also cited other examples of police units leaving parking lots at the same time that she left parking lots and following her for a brief distance till she changed lanes and let them pass by. She also cited an example where an Edina police unit that typically would not conduct its patrol in Shakopee tailed her for a brief distance on her way to court till she changed lanes to head to court and let it pass by. Co-incidentally Edina is where her girls go to school. There are 8-9 videos collected over a span of 2-3 weeks. What concrete evidence is the evaluation team looking for to spot tailing when a behavior such as this is so apparent.
- Complete disregard of the fact that the respondent was able to provide evidence of her exposure to radiation as a result of a forensic test performed at a lab.

The definition of being a victim is an injury sustained. How do the above listed elements NOT constitute towards any injury sustained as a result of her mental health inflicted by the system. How is it lack of insight when she states that she received no help from the system inspite of her statements in the form of written requests as a direct result of her mental illness for which a copy of the police reports and her statements were provided to both evaluators. How is it a marked lack of insight into her illness when there is no evidence of any kind of help offered by the system documented inspite of the injury sustained? How is it lack of insight

when a forensic test states it as the fact that I am exposed to radiation?

It is the petitioners burden of proof to ensure of concrete evidence rendered. The respondent chose to approach the case by ensuring that both the forensic psychologist and the custody evaluator was presented with all facts of the case in writing – a 27 pg document titled the Genesis which is a bulletized listing of facts ensuring that content is not lost in translation. She also presented both evaluators with a log of her daily life in the community with all dates listed attesting to her presence in the community giving both members of the investigative team an opportunity to ask the right questions and reach out to the members of the community as needed where they choose to take it upon themselves to follow thru an investigation as needed at their end. Every effort was made to ensure that the investigation team was provided with the data elements so that forensics could be conducted.

The custody evaluator's report and RECOMMENDATION is based on the fact that the respondent is a grave threat to her children's lives as a result of the extreme CHRONIC NATURE OF HER ILLNESS LEAVING HER HANDICAPPED in her ability to pay any attention to the children or perform her parental duties impacting the children gravely as stated by the petitioner, children and 2 best friends. As per the statements from both the petitioner and the children, "Laughter and Profanity" is all the children hear and while the children understand why their mother behaves the way she does, they are truly fedup of the situation and they need to move on. They feel safe with their father and the mother is truly unable to provide for them. The children are also very afraid of what might happen at social celebrations at the household and are traumatized and are very victimized and embarrassed as to what their friends might see at these events and truly do not want for them to come over to attend these celebrations. They are traumatized by the constant fear that they live, and truly are unable to handle the irrationality of a very rigid ill mind anymore and are very saddened, however have been very mature and accepting of the situation and truly believe that they will find their happiness with their father."

Neither report calls out that up until November 2015, given the number of celebrations held in the household and the number of events the children are at as cited in the behavior log, the key question that continues to remain unanswered is that why are there as many children at these celebrations till November 2015?

There are pictures at every one of these events that do not show her psychotic in any way. These are large scale celebrations where there are at least 25-30 children at these celebrations. Why are there as many children present at these celebrations when they are all so traumatized? Also, there are many pictures of celebrations inviting all their friends over from school showing them all having a blast. These celebrations are held consistently every year. How unusual is it for a woman this ill over a period of 6 ½ years to not experience an episode at any of these events? How unusual is it for parents who are quick to call in and report concerns otherwise as attested to in the petitioner's testimony to not log concerns or refuse to send their children over to these events if their children were truly experiencing a threat from me?

Neither report also calls out the fact that some of these events are held at public places at venues where such bizzare behavior should be reported in. Why aren't there any reports from these venues? Both evaluators were provided with evidence of her credit card statements and all pictures from these celebrations. Why do both reports not account for any of it?

The custody evaluators report and the Psychologist report log the fact that she chose to cite her parents as co-laterals. That in itself as per their reports and testimony is clear evidence of the fact that she lacks insight into her illness as an individual who has severed ties with her family should not be presenting them as co-laterals attesting to her ability to parent. Neither report accounts for the fact that her parents have spent time with her in 2011, 2012, and 2014 for 2-3 months in all the years cited watching her parent during the tenure of her identified mental illness. They are also individuals whose testimony is free of any coaching as she chose to not have any relationships with them. If anything, their testimony can be viewed as objective testimony. Neither report documents any mention of any questions posed to the parents as to if they have witnessed her screaming profanity or laughing uncontrollably for extended periods of time on a daily basis. Neither

report also documents either investigator asking her parents as to if they found it odd to see her very insanelly ill on the inside of the home and not on the outside of the home. Neither evaluator documents posing any questions to parents asking them if they found it odd that her symptoms began explosively on the day after her surgery especially in light of the fact that there is no history of Schizophrenia in the family. Both investigators as per their testimony in court continue to maintain it is NOT their role to be asking those questions.

The custody evaluators report also does not factor in the respondent's logged Police reports of Domestic violence at as it boils down to the respondent's statements for which there is no eye-witnesses or concrete evidence of cuts and bruises from the abuse endured. The evaluators report clearly states that "There is no Evidence of Domestic Abuse" insinuating or supporting the petitioners statement that the respondent's statements are a direct result of her ill mind. Her report also does not account for how she has seen most victims build evidence in cases where they were slapped, shoved or abused otherwise. While, there is a sworn statement from her parents visiting at that time for which the defendant's surprise and grief is called out in his testimony in the report, it was not factored in as abuse into her report. Please note that the custody evaluator needs concrete evidence for the domestic violence endured and that the RESPONDENT'S STATEMENTS ALONE WILL NOT DO as that is not evidence of the fact it occurred. Please note that is NOT THE STANDARD that the PETITIONER IS HELD TO as HIS STATEMENTS ALONE DO SUFFICE to forcibly institutionalize her and ensure of a mental health diagnosis as his statements were plenty evidence of the fact that it occurred in the absence of intake reports within the community and no questions asked.

The financial abuse endured where every cent was taken over post 2013 leaving her no insight into what funds were in the household or any decision of the household, inspite of the fact that every cent was documented between 2010 and 2012 and grown to 40,000 was not considered abuse to a mentally ill. The respondent's statements where she offered it as proof of the fact that the petitioner was not able to prove irresponsible decisions at the respondent's end were ignored in the

evaluators reports. She contributed \$66,000 to the household while she was working in 2013 and shut a joint account down with \$12,000 in it after she was stolen of every cent (\$70,000 attested to by her parents) was considered enough of a reason to warrant the petitioner shutting her out of all decisions in the household. Such a decision is portrayed in her reports as he earns and pays for it all and is considered support to a mentally ill woman as it is simply a shift of responsibility to the petitioner as per her statement in court as a direct result of the respondent's illness which such a statement in itself is prejudice against the mentally ill as alleged especially WHEN THERE IS NO CONCRETE EVIDENCE OF ABUSE TO THE FUNDS or any item within the household when the respondent ran the show in the household which was between 2010 and mid 2013. Please also note that the petitioner in his testimony also states that there were no joint accounts since 2010 and that he managed it all. Please note that the statement is untrue as there is no evidence that the petitioner can provide TO CORROBORATE that the management of funds between 2010 and 2012 were handled solely by the petitioner but the respondent can provide concrete proof that she shows that she did solely manage it. Verification of bank statements alone with the cheque deposits showing that the respondent signed for the deposits is proof alone that the respondent managed transactions either personally at the bank or online.

The reports also do not consider that the 2 dogs that were purchased after the respondent returned from commitment in 2012, were not trained. She is woman who is that ill who has returned to work to a job where she use to be the Director of Development of a team of individuals that she was leading, now bracing the mock and stigma of mental health while she is working as a consultant in her current role, is also now saddled with taking care of 2 dogs that are not trained in addition to 2 children, her job and a household while on medication. To this day she cleans, the poop, pee and their puke off the floors which is not considered abuse especially when she is a Schizophrenic overloaded with sensory stimuli where clearly the stench of the poop, pee and puke should affect such individuals but were however not factored in their reports as they are not qualified to render an opinion on that matter in their reports, inspite of pictures provided to the psychological evaluator and the custody evaluator. Statements from Dr. Jarvis from my 2012 paperwork will

state that the respondent is a chronic case who is responding to command hallucination's and can be driven to any lengths to hurt others around her or hurt herself. The respondent has pictures almost on a daily basis that shows the amount of poop and pee she cleans and has not been driven to kill the dogs or hurt them in anyway. She handles all their appointments and has ensured of their well-being till the dogs are disposed as part of the divorce proceeding.

She also provided to the custody evaluation evidence of the fact that after looking for labs who conduct forensic studies on hair samples she was able to find a lab in Canada that conducted forensic studies to determine if she is exposed to Radiation, for which she tested positive. She provided to the Custody Evaluation a call recording of a conversation between the lab and me documenting the Fact that she is Exposed to Radiation and also a report articulating the lab's recommendation in such cases. She also provided to the Custody Evaluator and the Psychologist evidence of Radiation effects on her skin for which they did not feel qualified to render an opinion nor was it factored into their reports.

The argument posed is that it is not their role to consider such evidence and that it is my role to present such evidence to the court. However, when evidence is presented where it is impossible to present such a lab on the witness stand it is presented as "Heresay" by the opposing counsel. What might be the difference between a scientific report produced from a lab and that of a testimony written down blind by an evaluator with no questions asked but courtesy the evaluators presence in court the statements written down blind do not qualify as "Heresay"? It is a piece of evidence presented to the investigation team that if they needed to know more and were concerned about the abuse I endured could have asked for me to provide the contact information such that they might contact the labs and avail of more information similar to that of writing down testimony blind such that the investigation might present their recommendation to the court.

Their reports also do not consider conditioning of young minds of the children and

what they might have heard and what they might be parroting as a result of the forced parental alienation. While the custody evaluator may be trained to observe trained statements from children coached by the father, it fails to account for the conditioning of young minds exposed to continual statements over a period of 6 years especially when they have had as much alone time with the father over a period of 6 years. The report also does not account for any questions posed by the custody evaluator to children asking for evidence of whether the children have seen the abnormal bizzare behavior that the respondent exhibits at home at any of their classes and what their instructors reaction was if they saw any.

Their reports also do not consider that the petitioner has solicited parents from abroad when he claimed to have no funds and has had grandparents living with the children for 6 months straight now where tickets and cost of living with them can range up to \$6000 based on past experiences not to mention the vacations they have had as a family, building a perfect family and conditioning their minds to a mothers absence even more. What might they be parroting as a result of that?

The custody evaluator and the psychologist report further calls out that the mother is not connected emotionally as a result of her illness and is not concerned for their well being as she does not feel the need to call the children. Both reports ignore that there is a temporary order that specifically calls out that her timings of visit are every alternate weekend Friday evening 5 p.m. to Sunday 5.p.m. The order supersedes the Exparte and there is no mention of any phone calls nor would the respondent have a need to impose on his time like the Petitioner does on her time which was specifically called out to the evaluators as to the harassment endured. He calls repeatedly, sometimes 5 times a day harassing her continually asking the children as to what they are doing and what they should be wary of in my presence leaving her with no peace.

The case continues to remain at ONE VERY SIMPLE FACT FOR THE LAST 6 years.
She spends an average of 5 hrs in the community each day for which she can very

easily demonstrate clear and concrete evidence to the court. There are no reports of any kind of psychosis or episodes of vile outbursts of profanity or hysterical laughter in the community. Neither court appointed expert can answer Why?

She has provided plenty concrete evidence for the emotional abuse endured, however as per the psychologist report she states that the petitioner comes across somewhat passive and that the respondent's reports of abuse of the petitioner being controlling and abusive is likely reflective of the respondent's view of herself as a victim since there is no documented history of any physical violence nor did Law Enforcement, Child Protection Intake or Social Services provide any evidence of aggression on his part. Please note again the NEED that the psychologist has for CONCRETE EVIDENCE showing the physical abuse and aggression. Please also note the Psychologist's need to factor in 2012 paperwork agreeing with the diagnosis when it is largely based on the PETITIONERS STATEMENTS ALONE that was not subject to any cross-examination and especially when she does not understand what is making me ill only inside of the house for 6 ½ years straight.

Furthermore, the elements of abuse as stated by the respondent is called out as abuse in any guideline published by the agencies that are funded by programs of the United States Department of Justice, however is CONTINUALLY REPRESENTED as elements of what an ill mind sees. The context of both evaluators is solely based on 2 best friends testimony of the petitioner and the children's testimony and interviews with the respondent, the petitioner and the respondent's parents written down blind without any questions posed. Please also note that the both reports call out that MY arguments have nothing to do with the BEST INTEREST of the children when the PREMISE of the best interest of the children solely lies on whether the RESPONDENT IS MENTALLY ILL OR NOT and if she has the ability to offer parental care to young children even though there is no concrete evidence of any endangerment to their lives NOR any concrete evidence of how the petitioner was impacted over the last 6 years to ensure that the children had the parental care they needed i.e. his ability to provide evidence of the time off he needed to take to ensure the children had the necessary care or any evidence of impacts to the

children that can show how affected the children were such as examples of how poorly they performed at school etc.

The impacts of which is that she has been alienated completely out of her children's lives with every decision taken over forcing more negotiation tactics. The impacts of which also has been that every pattern instilled in their lives was canned even prior to the ruling of the Temporary Order on 12/15/2015 and was portrayed as the need the petitioner had to balance out a very rigid over ambitious schedule laid out by the respondent completely ignoring the fact that patterns were switched out prior to the ruling of the temporary order and that the respondent was given no ability to partner on any decision inspite of the Joint Legal Custody Award. She is also a lone woman forced on a \$1000 support fighting it by herself with legal costs mounting that she has to foot the bill for on a lengthy divorce proceeding, which almost a year into the game has solved nothing other than document a handful of testimonies.

As per the Psychologist Report, she spends a lot of time alone which aligns with a Schizoid profile that tends to exhibit marked social withdrawal making it impossible to judge why she is so ill on the inside of the house and not on the outside of the house. The respondent also exhibits schizoid traits on grounds the fact that the respondent does not have a need to connect to her parents or husband, leading the psychologist to agree with the diagnosis of Schizophrenia. Her statement where she states that she spends a lot of time alone making it impossible to judge the phenomena is TRULY NOT ACCURATE as the respondent ensured of her presence in court on a daily basis from April till October of this year giving the psychologist the ability to contact references in the courthouse if needed making it possible to judge the phenomena. Also, she ensured that the psychologist availed of her daily activities outside of the home where she can provide concrete evidence of the fact that she spends close to 5 hrs outside of the home which by any means cannot be construed as a mentally ill woman exhibiting the need to withdraw socially and confine herself to the house as a result of her being overwhelmed by her illness where it makes it impossible to judge the phenomena on the outside of the home.

Divorce is a stressor especially in the case of paranoid Schizophrenics. In spite of being yanked out of all decisions and continual continuances and having to live on a \$1000 spousal support with mounting legal costs, the respondent exhibited no display of agitation OR any kind of bizzare behavior while she was in court.

The psychologist report also goes on to say that the respondent did not express any grievances about what her children might be going thru the divorce period which is a Schizoid trait as it represents superficial feelings. The custody evaluator expressed similar concerns where she expressed that the respondent was not emotionally connected to the children. Both evaluators seem to want to ignore the primary crux of the case which is “Are they qualified to judge such a scientific phenomenon where have they seen a woman this ill on the inside of the home on a daily basis this normal on the outside of the home at the same time especially when Schizophrenia is not classified as a split personality disorder”. They also seem to want to ignore the purpose of the interview is for the respondent to put on the table data to counter the allegations such that the evaluation team can see the other side of the picture and not for me to pour out any emotions about my grief that does not solve what needs to be analyzed and uncovered.

It should also be noted that the respondent is a woman alleged to be incredibly emotional as per the allegations. She HAS BEEN ABLE to exhibit her ability to detach and present data objectively which NOT behavior of a PARANOID EMOTIONAL VOLATILE Schizophrenic mind that is being SYSTEMATICALLY IGNORED in their reports and is instead being portrayed as cold and devoid of emotion without any thought into what the Temporary Order is asking for OR without any thought into the fact that a woman this volatile and emotional cannot be cold and devoid of it at the same time.

The psychologist in her report also goes on to stay that I test as a person wanting to project my angry feelings and aggressive impulses onto others, my anger is apt to be expressed in apt and indirect manipulative ways that might be difficult for others to

deal with and that she has seen such similar cases where patients present themselves in good light and wanting to be organized when wanting out of treatment.

The psychologists statements in her report is very contradictory to the facts that occur in the case as stated by the petitioner on the witness stand. He has testified to both in his testimony in the reports as well as on the stand that I scream and laugh hysterically in the bathroom on the daily basis and exercise in activities such as trashing and hitting where I can hurt myself and others. He also stated in his testimony on the witness stand that I was so paranoid between 2010 and 2012 that I would freak even at the sight of a cell phone exhibiting extreme profanity and agitation as a direct result of the paranoia I was experiencing. As per his statements I was so paranoid that I could not even handle the blinds not drawn as I was so afraid of the systems ability and any individuals ability to see into the home. He further attests to the fact that after I was done exercising a demon of screaming profanity, hysterically laughing, punching walls, hurting myself to find relief, I would step out of the house and drop off the girls to school, walk into the school premise each morning without any episodes coming on within the school premise especially in the light of the fact that my brain had just experienced a major psychotic episode. She can provide references from the school that state she use to walk into each morning and afternoon between 2010 and 2012. **Why do I not want to project my angry feelings and aggressive nature as soon as I step outside of the home?**

The respondent is also alleged to have excessive obsessive interest in all the activities that the respondent structured for the children. She was yanked out of all decisions at a moments notice. There is no evidence of the respondent calling the petitioner needlessly or writing to the petitioner needlessly wanting to project her angry feelings or feelings of aggression that she should feel for a woman this obsessive and rigid especially when she was yanked out of everything she was obsessive about.

The court also ordered that all issues revolving around the joint legal custody award be resolved thru the custody evaluation. If the respondent's memory is shaky and not clear on the direction of the court, she can provide an email from the opposing counsel that articulates the same direction. The respondent's approach with the custody evaluation as stated earlier was to ensure she knew all items that were in dispute and the fact that she had no say in their lives and the fact that I was asked to look to the custody evaluation to get support and mitigation of the issues on the table for which I received none nor was it stated in her report. The respondent had no need to portray any obsessive-compulsive behavior by following up with the custody evaluator needlessly to get a response **NOR** can the petitioner provide any proof or concrete evidence of her writing that shows her getting overtly emotional and distressed about not having any say in any decision over 6 years. When the respondent continues to stay her behavior of staying away from those situations the evaluators are quick to present her as devoid of emotion and attachment as they are not able to stir one. **How does she test as wanting to project her angry feelings?**

There is no evidence of any gift or anything luxurious that the petitioner may have gifted the respondent to appease his very ill mentally ill wife to ensure that he kept her episodes to the minimal. How is she testing manipulative where she has exercised decisions in a manipulative fashion where it makes it impossible for him to live with her?

The respondent also provided both the psychologist and the evaluator supporting articles from Journals of Psychiatry that support her case what a true Schizophrenia Profile is and why she does not fit that profile. She has also submitted articles from the Journals of Psychiatry that show that for a woman who is **Switching** to the extent she is **each day**, she should have had significantly more number of affective episodes in the community and more number of police reports and hospitalizations stemming from it. The **psychologist report** will read that some of these articles were difficult to comprehend. Why should a woman well versed with the symptomology of **Schizophrenia who concurs with the diagnosis** of the psychiatrist from 2012 **have a hard time comprehending the medical literature** showing the progressive decline of

such cases where a patient experiencing Switching between the emotional states to the extent the respondent is over a tenure of 6 ½ years should truly be catatonic by now where the respondent should find it almost next to impossible to perform any useful function as trivial as household work or taking care of oneself.

The fact also remains that the respondent has lived by herself for a year, IS ABLE to take care of herself and advocate for herself without cracking under the strain of a divorce proceeding where she was yanked out of her entire life in a moment's notice without infringing on anyone's time and posing a threat to anyone inspite of being alleged where she is experiencing such a volatile brain on a daily basis inside of the home.

The fact also remains that inspite of the fact that neither are comfortable AS PER THEIR OWN STATEMENTS to render an opinion of why there are no observations in the community for a mentally ill woman as repetitive as that sounds, they do however feel comfortable NOT DELAYING THEIR RECOMMENDATION till after more observation, investigation or analysis of the case has been conducted and is comfortable presenting their recommendation as that she is to have NO CONTACT WITH the CHILDREN, sole legal custody and sole physical custody allotted to the father, no presence at any activities forcing alienation, until a psychiatrist can observe her in an inpatient setting, goes back on medication and once she receives medication and gets treated, she is to have SUPERVISED TIME ONLY with the children at Easter, Birthdays and Christmas since the custody evaluator recognizes how important those celebrations are to me.

Observing me living my Day to Day Life in my habitat as I live it each day is the key to presenting the true story to the Court. Neither the psychological evaluator's report nor the custody evaluators report accounted for her continual requests of her asking both the Law Enforcement Agencies and the Court in her last memorandum to consider in home monitoring of her home and her car so that the court can get to the bottom of the truth and that the report of observing me living my life be the

source of a Psychiatrist report.

Both reports i.e. the psychologist and the custody evaluator accounted for her requests to the Law Enforcement Agency and the court as Lack of insight into how the system works and how grandiose her delusional beliefs are where she might think that such services might be available to her.

She would like to educate the court that if both investigators were to look hard enough that such services might be available via the Department of Human Services or thru private investigative agencies that can be employed by the petitioner especially in custody evaluation cases where private investigators have the ability to set up video surveillance such that concrete evidence might be offered to the court.

She on her own accord after some sleuthing uncovered that the Department of Human Services offers an Extended Diagnostic Testing service component which is offered in the case of very chronically mentally ill patients to observe them in their natural habitat which accounts for face to face observations in home, in the community such as place of work or other places that the respondent might visit so that such a report might be offered to a psychiatric evaluation and to the court.

On grounds of that can her requests be seen as lack of insight when such services are available thru the system available to an investigative team looking to uncover the truth and offer their recommendation to protect the children's best interest. Options of what services might be available in the system should be the job of the team appointed and not of that of the respondent. However, in cases where a victim does not spend the time to uncover what is available to her, the victim winds up having her life wrecked as she has no one to advocate for her but herself. Both evaluators reports elude to the time that the respondent has spent fighting the divorce proceeding as a symptom of her obsessive-compulsive illness while disregarding her lack of experience in matters of the law, the abuse she has been

thru, what she might have felt when she was completely alienated out of her childrens lives, and the little resources she has had to fight this proceeding that single handedly.

Both reports also continue to disregard the KEY ELEMENTAL FACT of the case which is that He has waited 6 years, inspite of the grave terror that the children have experienced without trying to step them out of my care over the last 6 years.

As per his statement found in the mental health paperwork he lived in fear of every moment of what could happen to him or the children. He has waited for the children to be 10 such that their testimony may be solicited after she was stolen of every cent, after she was taken over in every way possible where she was forced to go to him for her basic needs, left with no resources to fight such an exhaustive proceeding and after she was ensured of a mental health diagnosis leaving her with no ability to even find a job.

Both reports also continue to disregard the key elemental fact that he is man who earns \$15,000 a month who could have very easily appointed a private agency to setup equipment that could have been offered as concrete evidence to the court attesting to her inability to take care of the children and also attesting to her ability to move between alter states of extreme agitation and calm such that the court can see firsthand what is causing the extreme agitation and what might be causing the calm to follow that consistently.

To ensure that a mother's life is not even more victimized than it already has been, she requests the court to consider the petitioner funding the costs of the investigation thru a court appointed agency such as the Department of Human Services or a private agency that can set up surveillance systems such that an investigation report be the source of a psychiatrist's evaluation and not simply use PETITIONERS statements as a co-lateral source as indicated in the evaluators recommendation. How can simply using the petitioner as a co-lateral source for the psychiatrist to render an opinion be fair judgement for the court

to consider?.

For the courts benefit, the respondent took it upon herself to record herself. The respondent has sent letters asking her family to fly in after watching the evidence of her recordings at home for the entire month of September such that family is in a better position to ask more intelligent questions of the system this time around and work with the system to understand the true nature of her illness. She has also sent letters to her sister and brother-in-law asking for them to take in the recordings, solicit medical opinions, fly in and offer their help to partner with the system and take care of her and her innocent children's well-being. A copy of those letters along with a similar external drive containing the same set of recordings is also sent to my case worker who was appointed in 2012 such that she is aware of the extent to which the respondent has tried to truly partner with the medical community and her family to understand the nature of her illness and ASK QUESTIONS THAT NOBODY HAS ASKED FOR HER.

Also for the court's benefit the respondent has chosen to refrain from stating what the respondent would like to see on a custody award as it truly makes no sense unless psychiatrists can present to the court concrete evidence of a case such as mine and not just plain textbook definitions that I am more than happy to read out to the court even though the honorable court does not require education on what domestic abuse might mean or Schizophrenia might mean.

I hope the court will uphold any psychiatrist to the same standards and ask the psychiatrist to do more than just read off a textbook and diagnose me. I hope the court in partnership with my family whose presence I have requested as of my letters 11/10/2016 and 11/21/2016 will appoint a psychiatrist with experience in true SWITCHING DISORDERS and that is open to educate my family as to what the medical community might typically expect to see in such cases and what about my case might surprise the medical community. The medical community after watching

my recordings might also want to partner with my family to educate them on what baffles them or what kind of ailment I might be suffering from for 6 years straight.

The medical community might also want to educate my parents and my sister on surveillance systems so that MY FAMILY does not have to rely on their memory when they are my bedside rendering me all their love and support and working with the medical community to get to the bottom of the truth so that 2 innocent girls best interests are truly protected and taken care of.

SUMMARY OF ALLEGATIONS AND THE RESPONDENT'S COUNTER CLAIMS WITHIN THE CASE

A. Respondent is mentally ill mother, who is experiencing hallucinations, has vivid outburst (profane in nature), obsessive behavior with children's activities, irrational beliefs (false claims of domestic abuse), negatively affecting her children and all people around her. She is incapable of taking care of the children at this point of time as per petitioner. Children have plug their ears to shield them from the profanity. The profanity and Prolonged Laughter is what the children hear the most.

The respondent argues it as the following :

- i. Can the Petitioner prove that the respondent is not at Diving once a week, swimming twice a week, choir once a week, piano once a week, dancing once a week, ice skating twice a week.
- ii. Can the Petitioner prove that all the above elements are what the children HEAR THE MOST at all these activities?
- iii. Can the Petitioner prove impacts to the children in terms of their performance at school where in there are reports of the

children's grades declined or their health declined while they were in her care?

- iv. Can the Petitioner demonstrate that the Petitioner took time off his work schedule to fulfill these duties since the respondent was limited by her disability and was not able to perform her parental duties.
- v. Can the Petitioner provide concrete evidence of level of endangerment to the children's lives besides the 2 intake reports in 2015 in spite of how regularly she was seen at school or other activities prior to 2015?

B. Allegations - She quit her job unexpectedly in spite of holding leading positions. Was unable to return to work courtesy severe mental health issues.

The respondent argues it as the following :

- i. Can the Petitioner prove impacts to the household prior to her committal in 2012 where in the household needed to take on more loans or more debt to keep up with the expenses of the household as a result of the respondent quitting her job in 2010?
- ii. Can the Petitioner prove that the respondent did not complete out her contract when she returned to work in 2013? Can the Petitioner prove the respondent's inability to ensure that her contractual obligations were met courtesy of her illness?
- iii. The respondent has also argued it as that her mental health is public knowledge and commonly available on public portals and that in spite of her 557 documented attempts at trying to find a job over a year and a half across the twin cities she was unable to do so.

C. Rash Driving Habits endangering children's lives and neighbors lives.
Numerous complaints from friends and neighbors.

The respondent argues it as the following:

- i. Since 2010 since her illness began she has 2 speeding violations and 3-4 petty misdemeanor violations as petty as not coming to a full stop at a stop sign, failure to make a left turn on signal, failure to make a right turn signal etc.
- ii. Can the Petitioner prove that any speed monitoring trailers were parked elsewhere outside of the community to monitor the respondents speed?
- iii. Can the Petitioner prove if any evidence was collected off those trailers that showed the respondent speeding?
- iv. Can the Petitioner prove that there has not been prejudice in the community when there have been instances of people walking to the respondent and screaming in her face?

D. Respondent obsessive about the children's education to the point where she imposes rigid timelines and is completely insensitive to the children's needs as to where they might want to head in terms of their interests and ambitions. She has false sense of grandeur illusions in her head such as not sticking with her local school district and forcing the children into Edina. Respondent is dictatorial, her rigid behavior does not end with academics alone. She ensures and demands that her children participate in all activities regardless of wishes, their talents, or their enjoyment of activity fueled rigidity, and irrationality of mental illness. The children do not have a childhood, friends or what they need courtesy the respondent's behavior.

The respondent argues it as the following ;

- i. Can the Petitioner provide any concrete evidence of the irrationality posed by the respondent on the children's lives? All allegations till date has been the petitioner's statements alone which amounts to nothing but HERESAY for which there is no concrete evidence offered by the petitioner.
- ii. When lives of children are at stake especially over a tenure of this length i.e. 6 ½ years and with an earning as high as \$15,000 a month all it takes is to hire a private investigator commonly available in custody evaluation cases or infidelity cases to set up covert surveillance to offer concrete evidence of the nightmare the children live in the household.
- iii. Was the petitioner able to provide 3rd party objective testimony that has watched her interact with the children especially when she has at least an hr presence time at all these activities as to how irrational or rigid her behavior seems while interacting with her children.

E. Respondent has developed irrational spending habits, and demands that the petitioner pays whatever she demands. She is very vicious in nature, and if the petitioner does not adhere to demands, she is very abusive. The defendant take care of all costs in the household. In spite of that, the respondent has I kept invoices rolling that averages to about \$4200 a month, he claims to have been very reasonable and pays when he can, for fear of how he might be treated by me.

The respondent argues it as the following:

- i. The respondent offered the evaluation team a copy of all her credit card statements for the year of 2015 asking for the team to conduct an analysis of her irresponsible spends or asking the petitioner to offer the evaluation team or the court with an

analysis of her irresponsible spends and did not see anything tangible produced.

- ii. The Petitioner also failed to produce any concrete evidence in terms of her writing that indicated or showed vicious vile language.
- iii. The Petitioner also failed to produce any 3rd party objective testimony of her vicious vile demeanor.

F. Responded is not taking medication and not seeking treatment. Unless she is ordered to go back on medication nothing will change for the family.

The respondent argues it as the following:

- i. The Petitioner has failed to demonstrate to the court any evidence of past cases where a psychiatrist or psychologist has seen this kind of behavior where a woman has one personality for the inside of the house and one personality for the outside of the house for a tenure as long as 6 ½ years especially when she is rapid cycling on a daily basis.
- ii. The Psychologist as per testimony states that she has seen this done before where a mentally ill has the ability to paint herself in good light and present a good case to any psychiatrist or psychologist
- iii. The psychologist also fails to stay cognizant of the fact that this is woman who has a need to scream endless profanity, talk to imaginary friends, laugh uncontrollably and let out what she is feeling by trashing objects and hitting herself to find relief in her completely dictated by internal commands inside of her. Such a brain cannot find it in herself to exercise that kind of self-control for 6 ½ years straight where she is in the community on a daily basis.

- iv. She fails to cite specifics on the cases where she has seen cases where patients can present themselves in good light to get out of treatment that specifically draw a parallel the behaviors the respondent exhibits especially when they are as involuntary as it in a Schizophrenic brain especially when she is declared a paranoid schizophrenic that is exhibiting such marked symptoms as a direct result of the marked fear and paranoia that she experiences.
- v. The psychologist also contradicts herself where she states that the respondent might be in partial remission when her children's testimony and the petitioner's statements contradict her assessment where they state that the profanity and the laughter is all the children hear and that the volumes of the T.V. in the household have to be turned up to shield the children from it or that they have to wear ear plugs to shield them from the profanity. How is the respondent in partial remission and not in a deteriorated chronic phase of her illness?

G. Respondent gets into rages where she has damaged electronic items in the house. Petitioner is in fear of his belongings where he refuses to bring them home.

The respondent argues it as the following :

- i. The petitioner fails to cite concrete evidence of the damaged goods within the household and produce any tangible evidence in the form of pictures or any other concrete means of showing that there was indeed damage to any item within the household.

EXHIBITS THAT THE RESPONDENT SHARED WITH THE EVALUATION TEAM TO COUNTER ALLEGATIONS

Exhibits that Counter Rash Irrational Spending and Irresponsible Decisions

- i. Financial Statements – A Statement from 2012 of a Joint Account held by the Respondent and the Defendant clearly showing that the Respondent Grew the Savings to 40,000 before committal.
- ii. Financial Check Registers – The Respondent shared home registers and corporation registers with the evaluation team showing that every cent was documented and transparent, and has made very decision in the household that responsibly inspite of the alleged impulsive behavior that wreaked havoc in the petitioner’s life.
- iii. She can also offer bank statements and transactions at all financial institutions that show that she managed all the joint accounts from 2010 to 2013 as all transactions have her signature on it.
- iv. Post 2013, concrete evidence can be provided that show bank statements that show that the Petitioner handled the corporation accounts, his accounts and that I handled ONLY my personal accounts. I had no insight into the corporation inner workings.
- v. A Copy of all Credit Card Statements for the Year 2015 provided to the evaluation team to show evidence of irresponsible spending.

EXHIBITS THAT COUNTER ALLEGATIONS OF EXPOSING THE CHILDREN TO EDUCATION 2 GRADES HIGHER

- i. The Respondent offered to the evaluation team a printout of the education

plan laid out by the school they attend when they were in Grade 4, calling out the exposure that the school would like to see the kids have to various topics in Grade 4.

- ii. The books referred to in the testimony in the evaluators reports very specifically “Bones” are listed as books published from Smithsonian ages 5 – 9.
- iii. The games they are play are very age appropriate and fun away of learning their terms and vocabulary.
- iv. The respondent offered examples of their writing at home and at school such that the evaluator may draw comparisons as to what that allegation meant.

Exhibits that attest to the Domestic Violence Endured and the Lack of Help Received from the System

- i. A copy of all her written statements to Law Enforcement Officials responding to their statements on the scene.
- ii. A copy of the sworn affidavit from my parents attesting to them witnessing the continual goading and stalking that they saw take place over a week in their presence in 2014
- iii. A copy of them attesting to my statement to Law Enforcement Officials as to what transpired in this home in 2014 necessitating my committal in 2014 that did not hold up to committal standards.

Exhibits that counter social withdrawal and the children’s statements of the fear felt by the children when their friends are invited over.

- i. Pictures of all large-scale celebrations inside of the household showing at least 20-25 children attending these celebrations

- ii. Pictures of all celebrations where children from school are invited every year.
It also shows that there is no fear portrayed by them or their parents as their friends from school seem to return and participate in the celebrations every year.

Exhibits showing that she is exposed to Radiation.

- i. A call from a lab in Canada discussing my lab results clearly stating that I am exposed to Radiation
- ii. A lab Report showing that I am exposed to electromagnetic waves that are harmful to me and that have depleted my immune system and my vital elements.
- iii. Pictures showing the reactions experienced by an immune system as a result of exposure to radiation
- iv. Articles showing how tissue can be excited or how exposure to EMF waves can cause extreme excitation of the tissue causing extreme agitation and psychosis.

In the absence of any diagnostic testing done on the respondent - her efforts to understand the rare nature of her illness and the testing that she tried to solicit to obtain a deeper understanding of why she is so ill only on the inside of the house is documented below :

<u>No</u>	<u>Medical Community Appointments</u>	<u>Dates</u>
1	Initial Appointment with Dr. Ekern – Psychiatrist – Park Nicollet	8/15/2016
2	Follow Up Appointment with Dr. Ekern	10/25/2016
3	Initial Appointment with Neurologist – Dr. Worley	8/25/2016

4	Brain EEG Recordings – 24 hrs	8/30/2016
5	Removal of Brain EEG Recordings	8/31/2016
6	Appt at John Hopkins Research Program – 2 days at Baltimore – All Day within John Hopkins for 2 days	9/12/2016 to 9/13/2016
7	Appointments with the University of Minnesota – 3 interviews testing cognitive function via the use of computerized tests designed for Schizophrenics	9/29/2016 – 10/4/2016
8	Appt scheduled with Dr. Kennedy – Psychiatrist from Scott County Mental Health from 2012	11/1/2016
9	Appt scheduled at Mayo Clinic with Dr. William Bobo to seek an opinion	12/1/2016

Exhibits From the Journal of Psychiatry that used to support her arguments

- i. Articles from the Journals of Psychiatry that have performed Longitudinal studies in the cases of Schizophrenia and Bipolar I attesting to the fact that schizophrenic patients or bipolar patients experiencing such emotional high and lows on a daily basis as described by the petitioner is more vulnerable to psychotic episodes and have a much higher re-hospitalization rate as a direct result of a an overtly sensitive ill brain and is unable over the long term to keep with such an overloaded brain rendering it catatonic and pretty useless at performing basic functions such as taking care of oneself.

Known Cases in the Courts of the United States of where a Victim's Life Can be Rendered Worthless as a result of use of Technology – Not so bizzare inspite of the

insistence of the Legal System to want to see it as a Paranoid Schizophrenic Mind

- i. A Court Case Win of acquiring the right forensic experts to detect electromagnetic fields that can render a victim's life worthless – Kathleen Watterson, Court Case Win.
- ii. The respondent is exposed to radiation however does not have the resources to acquire the right forensic experts to ensure that the appropriate investigation is conducted.
- iii. James Walbert a true case in the United States Court of nano implants which he was lucky enough to be able to detect but the reality is that they are dissolvable and often time not detectable.
- iv. True cases that the respondent shared with the evaluation team where she shows the use of technology that can render a victims life worthless as stated by reputed people such as (Detective Lumbley – Dallas PD – *Family Violence Unit*) within law enforcement agencies where it is truly possible to fill a person with unimaginable amounts of fear where it can make you feel like any device is talking to you using assisted technology or remotely turn on any device and use the device as a listening bug within the household and turn it against you. Technology exists where a simple download of some software on your cellphone (specific example – software made by KDDI) can scan your biometric signatures in an instant and upload it to a central database where the rest is history.

<http://cops.usdoj.gov/html/dispatch/07-2011/stalking.asp>

- v. Technology today exists and has existed for years and the fact that the respondent can offer some evidence today of the fact that she is subjected to exposure having her test positive for exposure to radiation in light of everything stolen, everything taken away followed by a DIVORCE

proceeding asking for SOLE CUSTODY reeks motive.

PROPERTY AND DEBT DIVISION

1. Proceeds of the Sale of the House to be written out to the Respondent

She has been the primary driver behind all the earnings of the household for the majority of initial 14 years of marriage from 1997 – 2010 that enabled everything they owned till date. The down payment towards a town house bought in 1998, the first home that the petitioner and the respondent shared in the amount of \$10,000 was a gift from her father. From 1998 – 2002 when the current property was bought, respondent was the primary driver behind the household income that enabled them to buy the current property in 2002. Petitioner had heavy family obligations and a portion of his earnings were funded to his family. Payments to his family till date can amount as high as \$200,000 over the span of almost 20 years which is the net balance on our current mortgage for which she can provide evidence. These payments were cash out payments that if saved could have paid this house out in full. Respondent's earnings gave them the ability to maintain a high style of living while maintaining the petitioner's obligations towards his family. Proceeds from the sale of townhouse in 2002 was rolled into the current property. At the time, there was significant disparity of income between Petitioner and Respondent. **The Respondent earned almost twice the amount he did between the period of 2000 and 2004 when the foundation of this home was built.** 20% cash down payment was put towards the current property purchased in 2002 in the amount of \$ 80,000 and \$ 50,000 - \$ 75,000 cash down towards furniture, interiors and landscaping courtesy the respondent's ability to draw a high income. Interiors down the road such as built ins within the home, the four season porch addition, the patio in the amount of an additional \$70,000 cash down was also courtesy the respondents ability to earn and consistently stay earning high dollar amounts inspite of continued obligations towards the petitioners family. That would mean about \$230,000

worth of equity some not completely tangible in terms of equity as some of it was furniture but nevertheless is a huge amount cash down courtesy the respondent's earnings. In addition, it was always the nature of the respondent to ensure that she planned out all details and ensured that everything was realized towards any plan that she worked on. Her high earnings always offered them the ability to not accrue any debt which was maintained in the household post 2010. A good example of that is another \$75,000 in cash savings before the girls were born to ensure that the girls had a mother's care for a good 8 months before she tried day care or any other alternate means of care to ensure that the girls do not suffer any unnecessary exposure or complications as a result of a premature birth. Another example of high cash out expenditures for which was no loans were taken is \$30,000 - \$40,000 towards fertility procedures.

The foundation of this home with all additions to the home was courtesy the respondent's high earnings completed prior to the respondent quitting her job in 2010. Today, the fact is that the respondent is declared mentally ill and as per petitioner incapacitated to take care of herself and or the children. The respondent can also offer concrete evidence of the fact that she has very slim prospects at finding a job since she was not able to find a single job in spite of repeated attempts by her. The fact also is that till date the medical community cannot offer an explanation for her illness.

That said given what her future looks like and given what the petitioner is asking for with regard to sole custody and the respondents life back on medications because the respondent is so gravely ill that she is unable to take care of herself or the children, it cannot be ignored that such a statement translates to the fact that she is also unable to take care of her future prospects in terms of taking care of herself for the rest of her life.

It should also be noted that the nature of her illness as diagnosed is that of a degenerative one which might at a later date require long term care and costs

for which she might have a hard time planning financially especially in light of the fact as to how difficult it is for her to find a job today. That said the petitioner has the ability to continue to draw such high earnings (\$211,000) gross as of today, and is fairly certain of the fact that he can continue to earn such high earnings with a fair amount of predictability and certainty.

The respondent would like to request that the court grant that the house be written out to the respondent. While that sounds like a request of a delusional ill mind the respondent would like to summarize her reasoning's for her request as below:

- An equity of almost \$230,000 in the house cash down courtesy the respondent's high earnings. The petitioners earnings back in the periods of 2000 to 2004 is the cash out foundation of this home.
- The respondent would also like the court to stay cognizant of the fact that the balance on the home as of today could have been paid out cash out had the petitioner chosen to save that amount instead of the high cash out family obligations the petitioner had to take on in the realm of \$200,00 for which she can offer evidence.
- The respondent would also like for the record to state that she had plans to pay out this house by increasing the principal payments cash out on a monthly basis so that when the respondent and the petitioner parted ways when the girls were ready to go to college there would be an asset paid out in full which was taken away from her when she was committed in 2012 and all financial decisions were taken away from her and she was forced to live a life with no insight into even what he earned.
- The respondent would also like to state that whatever she had left which was in the amount of \$70,000 was stolen from her and today she is left with nothing but mounting legal costs and all her efforts to learn the system, learn the law, find out what is available to her, counter and challenge the medical community in the absence what her family could not do for her.
- Also, if the court chooses to chart out the petitioners gross earnings

(\$211,000) over a span of the next 20 years assuming the petitioner will retire at age 65, I am sure the court can see how easily the petitioner can recover and grow.

- The respondent would like the court to chart her inability to earn since she is gravely ill where she is not able to take care of herself or the children which over the span of the next 25 years assuming a life span of 75 living with Schizophrenia, the probability of what she might accrue by the time she gets to age 75 is probably very little.
- She would also like to remind the court that a lifespan of 75 living with Schizophrenia is optimistic as woman's average life span as per statistics is calculated out as 85 and if she is as ill as stated that would require medication and continual inpatient hospitalization with high costs.
- The brain is known to not perform under such medication regardless of what standard medical literature might say. As per the respondent's paperwork the respondent experienced heavy weight gain as much as 25 lbs in weight gain alone with a very foggy disoriented brain while on medication which is how most Schizophrenics live ensuring of bleaker prospects with each passing year.
- I hope the court can stay cognizant of the care and the costs the respondent will have to incur long term with her inability to earn getting bleaker with each passing year and his ability to continue to grow and getting richer with each passing year and see it as fair and equitable that the house be written out to the respondent.

That said the respondent would like to re-iterate her request to have the house written out to her.

2. Retirement Plans 70-30 split with 70% allotted to the Respondent

As stated in 1 the petitioner will continue to have the ability to draw very high earnings with a fair amount of certainty and predictability which translates to a high predictability of how he can continue to grow his retirements assets

without any fear of what his old age or retirement age might look like.

Also, in the last 6 years since the respondent quit her job, the petitioner's retirement has continued to grow with no funds contributed towards any plan that the respondent could have owned retirement or otherwise.

The respondent on the other hand is facing a degenerative illness as diagnosed by the medical community and not explainable with no hope of complete recovery as it has NO CURE as defined by the medical community with very slim prospects of what she might be able to grow in her retirement funds not to mention that her prospects of the care that she will need in her retirement age as of today is very expensive especially in light of the fact that most Schizophrenics will need in home assisted care in their old age.

The respondent is also ensured of no family as the petitioner has asked for sole custody of the girls with very little exposure to the mother which translates to the fact that the children are absolute strangers to her and the likelihood of her having any family in the future with regard to any hope of having anyone want to be with her during her retirement age is slim to none.

While the court is entitled to view that as a mentally ill woman's delusional mind, from a practical standpoint all the court has to do is look at the probability of the level of attachment the children who spend only 96 hrs a month is likely to have to a mother for no fault of the mother as that schedule is mandated by the court. Also, as per the recommendation of the evaluator the respondent should have supervised time 3 times a year further amplifying the probability of very little attachment with the mother ensuring of a very lonely all by herself retirement age having to rely on a stranger or community services to help her with assisted living.

That said the respondent deems that a 70 – 30 % split of the retirement funds with 70% allotted to the respondent is a fair distribution of the retirement funds.

3. Long Term Care Individual Policy to be bought and owned by Petitioner for the Life of the Respondent

The fact of the matter continues to remain that till date the medical community cannot offer an explanation for her illness. As of today the respondent is diagnosed with Paranoid Schizophrenia, Psychosis NOS a chronic and debilitating condition that began explosively on the day after surgery putting her in the bracket of a very chronic acute case for which there is no hope for recovery. The symptoms that she experiences as stated in her paperwork is that of classic paranoid Schizophrenia i.e. extreme agitation, severely handicapped with extreme depression, inability to take care of anything not even herself where she can't even bring herself to get up and get going, manic highs, lack of focus and concentration leaving with her very serious handicap of not being able to get anything done as clearly stated by the petitioner and the medical community that whole heartedly rendered a paranoid schizophrenic diagnosis on grounds of the statements that the petitioner stated with no questions asked.

Today, the court is left with no choices but to continue to evolve the case on those grounds as the foundation of the case is precisely that when a psychologist report concurs with the diagnosis after analyzing the mental health paperwork from 2012 with no questions asked on the circumstantial grounds of the case or trying to research similar cases that can show the court that such patients do indeed have the ability to exercise immense amounts of self-control in an environment when they are so out of control in another environment completely dictated by internal stimuli as such is the nature of the illness.

From an argument standpoint, the fact also remains the petitioner did nothing for 6 years and It is a very valid argument that if the respondent is as ill as she is that the petitioner is responsible for the state that she is in today. The fact also remains that the petitioner has done nothing to comprehend the illness or work with the medical community to ensure of his wife's well-being. It cannot also further be ignored as to what the respondent has endured with the victimization endured, the continual defamation of her character, her life under the microscope, little respect in her children's eyes with her inability to state the facts as is to them and what she has had to suffer in silence courtesy the lack of support and the lack of belief that the system rendered her courtesy her mental health.

It cannot also be further ignored that a very mentally ill schizophrenic has coped with continual stenches of cleaning in the house and working with run down bathrooms and toilets when it was very simple for the petitioner to have simply paid her out and be done with the dogs ages ago especially in light of his high earnings and have fixed the issues in the house months or years ago. It should also be noted that the respondent has no qualms stating that it continues to remain proof of the fact that they seem be to well taken care of in spite of living an ill brain overloaded from a sensory standpoint.

It cannot also further be ignored, that her family has done nothing to comprehend schizophrenia which as per any mental health definition may have simply added to what the respondent has endured in silence.

That said regardless of reasons that caused the respondent to decline so rapidly in the last 6 years, the court as of today from what the respondent can tell has stayed very cognizant of psychologist reports that had done nothing but factor in the foundation laid in the mental health paperwork with no

questions posed.

That in the respondent's eyes translates to the fact that the respondent is a very ill woman as stated and is a very paranoid schizophrenic with a very bleak and slim future.

It cannot be ignored that there are heavy long term care costs tied to such an illness coupled with the fact that a family had done nothing to ensure that the respondent is ensured of a future. If anything, they ensured that the respondent stayed in the arms of a filthy abuser with no prospects for a future causing for her to deteriorate so rapidly.

The fact also remains that as stated in bullet 2 there is a very high probability the fact that the respondent will spend her old age in some assisted living home all by herself dependent and reliant on strangers with no family and as of today she has no one but herself to ensure that her future is taken care of.

While the opposing counsel and the petitioner might like to make the court aware that those were the respondent's choices to sever all ties with her parents and sister, the respondent would like to remind the court that she has reached out to her family, offered them recordings of her at home for an entire month asking for them to stay cognizant of the questions she has posed to the medical community, offered them the opportunity to visit with leading doctors if they are interested in knowing more in India, OR fly in and work with the system as they chose to work with the system in 2012 and 2014 and take care of her future, as today both age and resources in terms of finances do permit them to fly in and resolve the issue, as they so did by putting themselves in charge of a mental health situation in 2012 and 2014.

That said given the prospects of her old age and the continual fact that the

respondent has no family, the respondent requests the court to order the petitioner to foot the costs of a long-term care policy ensuring that the respondent can be taken care of when she will need the assisted living care.

4. Medical Insurance & Dental Insurance Policy – Individual Policy to be bought and owned by Petitioner that takes care of medical and dental care costs for the Respondent FOR THE LIFE OF THE RESPONDENT

In the interest of not being repetitive, the respondent would like for the court to stay cognizant of the reasons stated above and ask the court to have the petitioner own payments of **an individual medical insurance policy in the name of the respondent** that takes care of mental health, medical expenses, vision related expenses and dental expenses for the rest of her life.

As stated these were decisions the respondent was an integral part of till mid 2013 when everything was rudely yanked out of her hands and shut down in her face where he took over all decisions and ensured that I had no insight into any decisions of the household.

He currently earns a gross of \$211,000 a year, there is a fair amount of certainty and predictability to the supposition that he can continue to grow and get richer with each passing year. The respondent can't make that supposition today. In light of a degenerative illness as diagnosed there is a fair amount of certainty and predictability that her prospects will look slimmer with each passing year.

Such that she is not reliant on state appointed systems that she might not even qualify for, she asks the court grant that the petitioner own an individual policy that takes care of all medical, vision and dental needs for the

respondent.

5. Mental Health Costs as a result of evaluations needed by the court to be owned by Peititioner

The mental health costs that will be needed immediately are a direct result of the courts need and the petitioners need to have the respondent observed inpatient to determine if the respondent needs medical attention effective immediately and to also determine the safety of the children in the respondents care and if they should be entrusted to the respondent's care.

That said those are costs that the petitioner's current policy should incur.

She would also like to remind the court of the 3rd party services that the Department of Human Services offers with its extended diagnostic component that allows the department of human services to monitor the respondent while in home and in the community offering a very accurate report to any psychiatrist who has a need to know as to what brings on the episodes only inside of the home, especially when the respondent is working by herself at her desk or simply going about living her life in the home. It also would give a psychiatrist the ability to understand the rare phenomena of why those episodes do not come on in court especially when the triggers in her environment should be no different. The costs associated with such a component should be borne by the petitioner assuming that the current insurance policy does not account for those costs.

The past pattern and behavior of simply offering the petitioners statements as co-lateral as recommended by the psychologist has never shed any light on what has truly transpired and so today, the respondent is offering the court the ability to see what its own system has the capability to do by using one of its own system components - the department of human services ability whose true core and intrinsic feature is to take care of mental health cases.

6. Beneficiary for the Life Insurance to continue to remain the Respondent for the life of the respondent

The petitioner has the ability to move on after the divorce proceeding and remarry and have a beautiful perfect family with a perfect new wife, 2 children and his perfect family invited from abroad ensuring of perfect grandparents and a perfect family for the children.

As the custody evaluator, has stated the petitioner truly provides a very balanced approach towards life, the children are very happy and very well adjusted to the father and the new environment. That said it is a very good indicator of all the happiness their future holds as proposed by the custody evaluator since she is so trained to be able to tell just from an interview without looking at any supplemental evidence as to what the forecast holds.

That said it is only fair that since the petitioner will have the ability to buy a supplemental life insurance policy if he chooses to re-marry that it only be fair that the respondent continues to remain the beneficiary on the current policy for the life of the petitioner.

7. Will to be Drawn where Respondent's Sister to be appointed Guardian of the children in the uneventful demise of both the Petitioner and the Respondent

As stated by the respondent she has not been part of any decisions in the household since mid-2013. As a practical matter the fact remains that there does not exist a will in place today that ensures of the care of the children in the event that something were to happen to either the respondent or the petitioner.

As a practical matter, the fact remains that in the absence of a will if

something were to happen to both the respondent and the petitioner the children would be entrusted to the care of the state.

As a practical matter, regardless of the respondent's differences with her family, the fact remains that her sister is very financially resourceful who has owned as many as 4 very beautiful, very spacious, very richly decorated homes across the globe and will continue to have a very high drawing financial resource with a certain amount of high predictability. She is also a highly educated individual with no need to tap into any assets that the respondent and the petitioner may have left behind at the time of an uneventful demise given how financially resourceful she is and has the ability to ensure that a trust is established with whatever funds might be left in the event that something was to happen to both the petitioner and the respondent.

As a practical matter, the fact also remains that as per history, the petitioner's family has been a financial drain on both the petitioner and the respondent where she can provide proof of the fact that an amount as high as \$200,000 has been paid cash out over the tenure of their marriage draining their ability of what they might have been able to do with that money.

The fact also remains that his family has very little financial resources with opportunity as a result of very little financial resources to tap into assets that might be left in the event of an uneventful demise and are not the right fit to take care of the children in the event that something were to happen to both the petitioner and the respondent.

That said the respondent would like for the court to instruct the petitioner to draw up a will to protect the children in an uneventful demise of both the petitioner and the respondent. The respondent would like the court to see the most practical choice that ensures of the children's well-being and appoint my sister and her husband as guardians of the children in that Will. As of today, my sister and her husband are the god parents of the girls and their duties of being god parents lends itself nicely to be asked to be appointed

guardians.

8. Child Support to be Reserved as it is contingent on the parenting time allotted to the Respondent which is contingent on a Psychiatric Evaluation in an Inpatient Setting subject to a further court order ordering an Inpatient Assessment

As per where the divorce proceeding stands today, it is a little premature to be asking child support as it is contingent what parenting time is allotted to the respondent as dictated by the psychiatrist report to the court.

The respondent requests the court that the respondent have the ability to Reserve this matter for a Later Date and that the respondent be granted the permission to submit a motion for the courts consideration at a later date.

9. Spousal Support - \$4000 permanent spousal support contingent on the following:

The respondent agrees with the proposed offer of a monthly \$4000 permanent spousal support as proposed by the petitioner contingent on the following:

- The Petitioner to own Disability Insurance that insures Spousal Support and all other payouts as part of Spousal Support
- The petitioner owns an individual medical insurance policy for the respondent that takes care of the medical costs for the respondent for life.
- The petitioner owns a long-term care insurance policy for the respondent that will plan on taking care of the assisted living costs for the respondent
- Petitioner to Leave the Beneficiary Unchanged on the current Life Insurance Policy that the Petitioner owns.
- The sale of the home as proposed by the respondent

- The retirement account split as proposed by the respondent
- Child Support reserved for a later date

10. Appointment of Guardian Ad Litem to work with my family and the system during the evaluation period and ensure of all conversations recorded

The respondent anticipates that there will be a court appointed order in place ordering that the respondent be observed inpatient to determine the nature of her illness. It is standard procedure of civil commitments to ensure of a court appointed lawyer and a court appointed case worker from the department of human services to work with the mentally ill in such cases.

The respondent is requesting that the court instruct the case worker and or the appointed the guardian ad litem to ensure that her family abroad has all the information necessary to work with both the respondent and the medical community to ensure of her future and to ensure that all the concerns her family raises is duly recorded by the system and that every effort is made to educate such a family on the challenges of the case while offering them the opportunity of being her support and strength.

11. Petitioner should own a disability insurance such that all payments as specified by the divorce decree continue to be paid out especially in the event the payor becomes disabled.

The respondent would like the court to stay very cognizant of the fact that in the event of an unfortunate event or demise that occurs in the petitioner's life the respondent would be left with no spousal support and no ability to take care of herself at a later date especially when she is ill with an illness that progressively declines with each passing year.

That said, the respondent would like to request that the court orders the

petitioner to own disability insurance where the following payments to the respondent is insured:

- Permanent Spousal support in the amount of \$4000 on a permanent basis
- Long term Care Policy premium costs
- Individual Policy premium cost for the respondent that take care of medical costs and dental costs
- Child Support Payments which needs to be factored in at a later date

12. Dog Sale and Finding a Home - \$4499.87

The dogs were bought at a time, when the respondent was on medication and had just returned from a month of being committed involuntarily using the resources that the respondent had earned on a 6-month contract.

That said with his refusal to train them, and as stated by the respondent where it was simple enough to pay her out and be done with the dogs the respondent would like to ensure that the court is made aware of the original costs of the dogs and the upkeep costs of the dogs since the commencement of the divorce proceeding.

- a. Original Costs of Dogs - \$2000
- b. Costs of Upkeep since 11/20/2015
 - i. Banfield Well Check (6 month well check) - \$216.87
 - ii. Training Pads - \$113
 - iii. Grocery for Dogs for the last 12 months at \$30 a week - \$1560
 - iv. Dog Grooming Since Divorce Proceeding (Clipping Nails) - \$40
 - v. Plastic Sheets Used as Protectants to cover the Family room area to protect carpet to the best degree possible - \$20 every 2 weeks - \$320

vi. Costs for Well check on 8/16/2016 - \$250

c. Grand Total – Costs for upkeep \$2139 + Original Cost \$2000 = \$
4,499.87

Please note it does not entail the cost of what it means to clean the stench.

13. Piano to be continued to be owned by Respondent

The piano was purchased by the petitioner and the respondent about a couple years ago for \$1800. Please note the cost of the piano purchased as it is an average piano purchased owning the bare minimum necessary features enabling the girls to practice while there are many expensive pianos available that can offer far superior features including a true feel of a piano.

The petitioner while portraying that he has no funds ensured that he invited parents from abroad and ensured of the perfect vacations with them. The petitioner has per statement in court stated that the tickets alone amounted to \$1500 which is money he could have used to buy an equivalent piano instead of portraying that he has no funds and that he needed to borrow a piano from his friend to help the girls practice.

That said given that the parenting time is in dispute which could mean that the respondent may or may not have parenting with the children, translates to the fact that when the children visit the mother they need a piano with the respondent as well to practice their lessons that the respondent cannot afford. Also, given that the respondent has been allotted only \$1000 a month for the last year with her costs climbing the respondent is in no position to buy them a piano new or used.

The respondent asks that the court stay cognizant of his capacity to earn and continued growth earnings of \$211,000 or more and grant that the piano stays with the respondent.

14. Outstanding Dues in the Amount of \$10,690 to be paid out to the Respondent

The respondent was alleged of rolling invoices to the petitioner and asking for the petitioner to pay amounts that were more than he could afford. The petitioner has alleged that if she did not receive payments that she would turn into a vicious vile monster threatening him. The petitioner has also stated that to appease his wife to try his best possible to ensure that no vicious vile outbursts are brought on by him, he has done his best to pay her out and keep her happy in every way possible.

The petitioner has failed to demonstrate any written communication that shows the vicious vile nature of the respondent. The petitioner and the evaluation team were also offered all the credit card statements for the year of 2015 to ensure that the petitioner could demonstrate to the court examples of irresponsible spends or grandiose delusional spends fueled by the rigidity and the grandiosity of her delusional mind.

The respondent also offered credit card statements for the year 2016 so it may be analyzed the controls that she exhibits in terms of managing her finances. The respondent has spent the entire year living off a \$1 sandwiches or \$1.99 sandwiches and cheap coffees costing \$2.00 from Burger King while the petitioner continues to earn, enjoy his children and diligently complaints about the respondent's inability to manage her funds and continual harassment of the petitioner where he is truly unable to live

without a moments peace courtesy the unimaginable fear that she induces into him.

To enable the respondent to pay her legal costs and enjoy a decent meal every once in a while, the respondent asks that the court order the petitioner to either demonstrate the disputed amounts or pay the amount in full.

The amount of \$10,690 has been outstanding to the respondent for more than a year now. Listed below is the itemized breakup of what it entails :

Outstanding Dues as originally articulated in my original answer on 12/1/2015 as filed in Court

Outstanding Dues till Date		Payments Received	Amount
As of Aug 3rd email	5084	11/4/2015	2500
As of Aug 31 st email	3162	10/1/2015	2500
As of September 29th email	5800	9/1/2015	3000
As of Nov 3rd email	4627		
Total	18673	Total Received	8000

Outstanding Dues with that 10,673

Detailed Breakup as submitted to the Petitioner in 2015 for which there were no disputes posed within court nor any demonstration of irresponsible spends :

As of Aug 3rd Email \$5084 entailing \$3296 for the month of May + \$3172 for the month of June and \$2233 for the month of July

Month of May 2015

Music	696
Fedex	108.34
Cilento Photography - Portraits	300
Monthly	1000
Grocery	121.11
Whole Foods	104
PetsMart	196.65
Misc	770
Total	3296.1

Month of June 2015

Grocery	441
Petsmart	18.93
Education Materials	685
Swimming	324
Landscaping	629
Dance	75
Monthly	1000
Total	3172.93

Month of July 2015

Education - 642

Footsteps Dance Studio - 346

Misc -> 500

Grocery -> 200
Puppies -> 160
Whole Foods -> 100
Landscaping -> 285

Total -> 2233

Month of August 2015

Chappatis	60
Clothing + Grocery	620
Banfield	70
Misc	300
Monthly	1000
Whole Foods	100
Meals & Ent	230
Education	170
Parking	5
Music	84
Indian Store	65
Ice Skating	338
Sunday School Reg	120
Total	3162

Month of September 2015

Dance	1000
Ipad	750
Puppies	250
Music	700
Education	330
Monthly	1000
Vitamins	200
Gas	500
Food & Entertainment	500
Grocery	570

Total 5800

Month of October 2015

Education - 1214

Indian Store - > 175

Misc - > 500

Kids Clothes - > 500

Gas - > 550

Halloween & Grocery & Misc - > 1020

Food - > 250

Dry Cleaning - > 150

Vitamins -> 200

Haircuts - > 88

Grand Total for the Month of October -> 4627

15. Current Auto Insurance and Payments of the Car the Respondent Owns to be paid out by Petitioner till RAV 4 is paid out

The car that the respondent currently owns the Toyota Rav4 purchased in 2014 is titled to both the petitioner and the respondent. The respondent would like to request that the petitioner stay responsible for the payments of the car and the insurance of the car till the car is

fully paid out.

The argument still continues to remain that as of this moment till the petitioner can work with the medical community to prove the source of the respondent's unexplainable illness, as per the petitioner the respondent is severely handicapped making the petitioner responsible for all debt that currently exists tied to the household as the respondent as of this moment is unable to contribute to any payment of the debt.

As of 2010 when the respondent quit her job the respondent was driving an almost brand new BMW X5 purchased in 2009 and the petitioner was driving an older BMW X3 which was paid out in 2009 as per records.

When she quit her job in 2010 the almost brand new X5 was transferred over to the petitioner as requested by the petitioner and the respondent drove the older car of the household.

The X5 was paid out as of 2013. The petitioner wanted to invest in a brand-new car, and ensured that he transferred the title of a joint owned car to him, sold the car and ensured of the money from the sale proceeds in the amount of \$10,000 or more not privy to the respondent of a relatively brand new car whose original cost is about \$50,000 fully paid out to him such that he may enjoy the earnings from the sale.

The X3 paid out in 2009 that the respondent got handed down from the petitioner drove ran without air for almost 2 summers before the petitioner bought the respondent a brand-new car because the car that she was driving in 2014 was totaled as the result of an accident by a laundromat in Shakopee.

She was trying to park the car in the parking lot by the laundromat in Shakopee and wound up accidentally stepping on the accelerator

causing the car to ram into a building as the distance between the parking spot and the laundromat entrance was probably less than a couple of feet not giving her an opportunity to break in time.

There should be a police record for the crash in 2014 describing the scene if the court needs for the petitioner to produce documentation to augment the petitioners claims of the numerous crashes the respondent has had and the continual complaints of her rash driving in the absence of any other proof or concrete evidence that the petitioner has been able to provide.

A brand-new car is not what the respondent needed and wanted to pay for. The respondent has always driven old run down cars in the household and did not want a brand-new car. The insurance more than paid out the value of the old car that was totaled in 2014 which could have been transferred to a used car for which the petitioner would not have needed to hold the payment or debt that he holds today. The respondent would like the court to ask the petitioner to produce documentation of her insistence at a new car if the petitioner so chooses to state that the new car was bought courtesy her demands and her vile vicious demeanor.

It can be argued that the respondent was gifted a brand-new car in 2013 which unfortunately has no bearing on the fact that both cars in the household were joint assets and which meant that earnings from sale proceeds should have either been split jointly or transferred into a joint account.

The respondent has demonstrated in this document her behavioral pattern where everything in this household has always been paid out as cash and has always ensured of no debt accrued unless the

petitioner can provide concrete evidence for it. As she stated prior, no additional payments in the household needed to be incurred if the petitioner had chosen to transfer it to a used car as the respondent did drive a rundown car from 2010 onwards till the new car was purchased in 2014.

Also, the Petitioner has been enjoying tax deductions of 2 brand new cars attached to the corporation that the Respondent has not enjoyed any benefits on last year. She did avail of her half of tax re-imbursments courtesy the divorce proceeding this year as the law mandates it. She was not privy to any re-imbursments for prior years.

That said in light of the fact that \$10,000 or more from the sale of the car was paid out to the petitioner, tax benefits for year prior was paid out to the Petitioner, and the fact that the respondent is severely handicapped to the point where she is recommended to have supervised visitation only 3 times a year even after she goes back on medication, she would like to have the court order the petitioner to stay responsible for any payment of debt tied to the RAV4 which includes any insurance deductible for any damages to the RAV 4, auto insurance, and car payments till it is fully paid out.

She would also like for the court to stay very cognizant of her inability to find a job between the period of Mid 2013 and Nov 2015 when the divorce proceeding was served on her insipte of 557 emails sent out to all vendors within the twin cities on her list and contacted repeatedly. In light of that she does not anticipate it to be any different in any future searches.

16. Other Costs Outstanding to the Respondent - \$1498.17

- Carpet Cleaning Costs - A Light Clean done way back in April. It has been pending since April - \$170 owed to respondent
- Microsoft Apps License Key – Current PC at home was purchased by the Petitioner with no input from the Respondent. Old PC at home was traded back in with no input from the Respondent. Software on current PC, very specifically Microsoft Apps expired on current PC. Respondent had to purchase new license keys for software that comes pre-configured on the machine. It is the Petitioner's responsibility to upkeep devices and appliances in the household. Impact to Respondent as a result thereof - \$162
- Original Temporary Spousal Support Ruling Impact – Ex parte Order requested a \$200 payout per week. Temporary Order was ruled on 12/15/2015 which was mid-month ordering that the respondent be paid a flat amount of \$1000 per month on the 1st of every month. Since the order was ruled mid month, the petitioner refused to pay for the last 2 weeks of December impacting her in the amount of \$285.71
- Vision Care – The current policy that the Petitioner owns does not support vision costs. The temporary order ruled on 12/15/2015 however states that the petitioner is responsible for all medical costs which should include vision related costs in the household as well. Amount owed to the respondent for a pair of eye glasses - \$380.46
- Car Fixes – As requested in her motion, that never had an opportunity to be heard, the car also needs to be fixed. The Petitioner is responsible for all payments, maintenance and any damages to the car that the Petitioner ensured he backed out of off

by alleging rash driving for which he cannot provide any evidence besides 2 speeding violations and 3-4 petty misdemeanors while ensuring he got paid out all sale proceeds for the X5. A check has been collected from insurance to pay out for the damages mid last year which could not be used, as the Petitioner refused to pay the deductible. Assuming the estimate still holds true today, a check from the insurance is ready to be used once the petitioner pays the deductible. Impacts - \$500.

17. College Funds

The respondent agrees that the college funds account should stay funded as it is today. She would like to make the court aware, that even though it might be my statements alone that she had plans to double up on their accounts around the time of her committal in 2012 since the accounts were almost at a 50% deficit if they wanted to study out of state, a decision that was taken away from her with the financial takeover and her inability to find a job.

The respondent has been continually alleged of her inability to see past education plans and a future for the kids in a manner that was rigid and obsessive posing a detriment to the kids upbringing.

She would like to educate the court on the fact that the petitioner has done nothing to provide the court with concrete evidence other than his statements. In cases, such as these as stated before with his high earnings, he could have very easily setup surveillance to show the harsh behavior rendered by the respondent.

She would like to educate the court on the fact that products of private schools are almost always placed in IVY League colleges securing a very bright future for the children.

She is a woman who has done nothing but budget and balance the pros and cons of every option trying to realize the best of all worlds to be brought to them with the funds that were available to them while continuing to grow it all.

That said, their future is one that is reduced to an average education with no thought of to raise the kids as all-rounder's, no thought to a robust college plan, and no thought to a promising a future in terms of the very best that a parent can provide the children with.

She would like for the court to stay very cognizant of the choices the petitioner has made.

18. Legal Costs that Respondent has Incurred and what the Petitioner is Asking For

Legal Costs that Respondent has incurred till date amount in the amount of \$10,000 - \$12,000 without accounting for all the outstanding dues to her.

The Temporary Order clearly states that each individual is responsible for their portion of the Legal Costs.

She would like to Request the court Order that the Petitioner stay responsible for his costs. It is the Petitioners Burden of Proof and it is not for the respondent to have to pay the costs of the evaluation for the Petitioner to prove the Respondent as an unfit mother. That said she

would like for the Petitioner to stay responsible for all evaluation costs tied with proving that the Respondent is an unfit mother along with any other legal costs that he might have incurred.

19. Proposal for Petitioner to Move into the House and prepare home for Sale.

To prepare a house for sale, while the house needs to be cleaned, fixed, inventoried and property value assessed it does not require for the petitioner to move into the house to prepare it for sale.

The house as it stands today needs a through clean contracted to a cleaning service and fixed up in a few areas which can be contracted out to some service as well.

The Petitioner today is a very well-adjusted man in his current apartment. As per the custody evaluators report, the children are very well adjusted and are very happy with the Petitioner in his new well furnished apartment.

As indicated in the Petitioner's Exhibits, the Petitioner has spent \$8,371.11 to prepare his new apartment with furniture and household goods including kitchen appliances and goods that were needed for his new apartment.

It makes no sense for the petitioner to dispose of the goods that he purchased and move into this home especially when the amount is as big as \$8,371.11 which is by no means a trivial amount.

The house does need to be appraised by at least 2 – 3 realtors which the respondent is open to having the house appraised prior to fixing the house to discuss what can increase the value of the home or post fixing of the home.

The petitioner's demeanor is not conducive to discussion, it would be best for the court to instruct that appraisals be written up such that it might be presented to the court in an event of dispute.

Agreements/contracts for what any realtor will need to perform their services to sell the home need to be detailed out with all specificity and agreed upon between the petitioner, respondent and the realtor.

Once agreements are drawn and are in place, it certainly does not require the petitioner's presence or the respondent's presence while showing the home as long as the realtor, petitioner and the respondent sticks to the terms of the agreement.

Also as part of the counter petition that the respondent filed in December as a response to the Exparte Order, a proposal was put on the table to ensure of a Harassment Restraining Order so the stalking and harassment the respondent endured from the Petitioner necessitating calls to Law Enforcement were eradicated. She also requested that the court ensure that the Petitioner and Respondent co-habit so parental alienation can be mitigated in the absence of any concrete evidence that showed the level of Endangerment that the Petitioner was trying to demonstrate.

The Petitioner rejected the offer, has spent \$8,8371.11 on furnishing his

home, inspite of continual portrayal of no funds has spent an additional \$6000 to ensure of grandparenting support and trying to ensure a mother's absence was alienated out of the children's lives.

To ensure that the respondent is not alleged any more than she has been about lack of insight into the requests she has put on the table, I would like for the court to be very aware that co-habitation is a standard option provided by answer and counter petition forms used in divorce proceedings available on the Minnesota courts website.

That said to summarize, the petitioner has spent a chunk of money in his new apartment, girls are settled in the new apartment as per the custody evaluator with their father and are very happy as of today. The cleaning and fixing of the home can be contracted out once an agreement of the agreed upon items that need fixing is drawn out between the petitioner respondent and the contractor selected - none of which requires the petitioner to move into the home.

The following needs to be fixed in the home for which contract services need to be summoned to fix the home such that its value is not impacted:

- Decks need to be stained
- Carpets need to be replaced as it is stained and damaged as the petitioner chose to not clean the home or simply payout the respondent the original cost of the dogs and find a home for the dogs. His refusal to make a simple choice of just an original payout of the dogs in the realm of \$2000 when he earns \$15,000 or more forced continual upkeep of the dogs and continual maintenance of the carpets leaving it in bad shape for which the petitioner should account for as it brings down the value of the house.

- Cabinetry unhinged – Kitchen Cabinetry needs to be fixed in the household. Many cabinets are unhinged for which a service can fix the cabinetry.
- Toilets are stained and leaky. The toilet on the main level leaked for months where the respondent cleaned and soaked up the water stains from the leaks for months leaving huge water mark stains on the wood floor damaging the floor of the toilet and leaving behind black dark stains that cannot be easily removed off the floor.
- Toilets in the upper bathroom have leaked for at least a couple of years where towels were laid down on the floor trying to soak up the leaking water leaving the wood trims in the master bathroom all stained and soiled.
- Toilets are old and stained and will require to be thoroughly cleaned.

She would like the court to instruct the petitioner that fixing and cleaning of the home agreements be drawn such where pictures are taken of a before state of the home and an after state of the home. As per the respondent's statement in court this should have been done before the petitioner left the home a year ago. The respondent only receives a \$1000 spousal support with about \$12,000 in legal fees alone and had done her best to upkeep the home on her own.

20. Furniture Division as Proposed by the Respondent

The Petitioner has proposed the following:

No	Petitioner Proposed the Following	Agrees with the	Respondents Comments on the Offer

		Offer	
1	Kitchens, Dishes, pots and Pans allotted to Respondent	Y	
2	Family Room	N	The Family Room Furniture is all run down and is best disposed by the Petitioner – disposal costs to be owned by him
3	Sun Room Set	Y	For now the Respondent Agrees
4	Dinette Set	N	Respondent Disagrees and would like for the Petitioner to own it. It is very old and needs to be disposed unless he wants to hang onto it. Petitioner to own disposal costs if needed.
5	Living Room Set	Y	Respondent would like to own the Living Room Set and the coffee table along with the cabinet to display the curios.
6	Dining Room Set	Y	Respondent would like to own the dining table, the hutch to display the dining ware. I would like the court to be aware that the dining table is a charred table as a result of an accident where the petitioner left the candle burning overnight burning down the surface of the table pretty badly. All crystal china within the dining room hutch to be owned by the respondent.
7	Furnishings and Equipment in the Computer Room	Y	Respondent agrees to own the furniture.
8	Guest Bedroom Furniture	Y	Respondent agrees to own the

			furniture.
9	Children's Room Furniture	N	Petitioner can have both girls rooms furniture. Respondent does not anticipate that she will be able to afford an apartment that has more than a bedroom post the sale of this home. The Petitioner can plan on having the girls room furniture.
10	Altar Furniture	Y	For now, respondent agrees to own it.
11	Basement Furniture	N	Furniture is really old and should be disposed unless the petitioner wants to hang on to it. Disposal costs to be owned by the Petitioner
12	Deck Furniture and Chairs	Y	For now, the Respondent agrees
13	Garage		I don't anticipate picking up anything at this point
14	Piano	N	Respondent has explained her reasons as stated above. Respondent to own it
15	Swarovski, Crystal Figurines	Y	Respondent agrees to a 50% split as proposed by the Petitioner
16	Respondent receive 2 T.V.'s	Y	Respondent agrees with the offer
17	Children's clothing, toys and books	N	Clothing currently hanging in the closets are bought by the respondent and she does not have the resources to buy them new clothing. Books in their rooms are bought by the respondent. The respondent was alleged of using those books obsessively which translates to the fact that the petitioner never used them or has no uses for them. That

			said the petitioner should not have a need for those books. Toys are items that the petitioner has no uses for. They are items that need to be sorted out and disposed.
18	Family Albums and professional portraits.	N	The petitioner should demonstrate proof to the court as to any effort put in by him to maintain those albums or portraits that were framed in the household. That said the respondent disagrees and refuses to have the Petitioner own them. Alternatively, the petitioner has the opportunity as per court order to see them at all their activities. He also has the ability to demonstrate to the court the level of effort or the level of interest he may have had in this last year to maintain any new albums or portraits that he may have gathered this last year. That said the respondent refuses for him to own efforts that he has never demonstrated any interest in.

21. Petitioner Proposed Maintenance and Child Support Language

The petitioner has not attached a proposal to his exhibit book that calls out Child Support Language. The respondent is choosing to request the court to reserve the matter as it is contingent on the outcome of the psychiatric evaluation to determine if the respondent is a fit mother to discharge parental duties.

22. Jewelry Reimbursement

The petitioner has alleged that the respondent has stated that the petitioner stole from the reimbursements paid out for the steal of jewelry.

The respondent was stolen \$70,000 worth of Jewelry. The Petitioner

He made false statements in his police reports about asking her several times to compile a list of Jewelry.

He has also stated in his affidavit, that there is no communication between the respondent and the petitioner except via email. In spite of the fact that only written communication exists, the petitioner has not been able to demonstrate a single piece of evidence or writing that shows that the petitioner has asked for her to compile a list of jewelry several times.

There is also no record of any evidence that shows that the petitioner has compiled a list of jewelry items that the petitioner was missing in his statements to Law Enforcement.

The petitioner as per police reports states that the respondent is missing jewelry. There is no record of any statements from the petitioner claiming that the petitioner has any item that belonged to him stolen from the house.

The petitioner on his report to the insurance company while claiming reimbursement claimed an expensive watch and a ring of his stolen while listing out some items that were stolen from the respondent without conferring with her or talking with her about the value of the items stolen.

The petitioner was reimbursed \$5800. He cut her a cheque of \$3500 and cut him the rest even though there is no police record of his statements stating that he was indeed stolen of items nor is there any record of any items that he compiled for the Police listing specifically as to what was stolen.

In Light of that, petitioner has always known to ensure he was well taken care of and her stolen of what was rightfully hers.

In light of that respondent requests the court grant her the balance \$2300 as the petitioner does not record any items stolen as per his statements to the police.

23. A Copy of All Current Policies that are owned by the Petitioner and the Respondent

The respondent would like to receive a copy of all current policies in place that includes the following along with his agents contact info in the event the respondent has any questions.

- Auto insurance
- Life Insurance
- Home Insurance

24. Girls Passport

The respondent would like for the court to be aware that the Petitioner

has the girl's passports. Currently while a Joint Legal Custody Award is in place, the respondent has had no say in their lives nor any say in any decision pertaining to their lives.

Today the petitioner is in a position to either travel abroad or leave the country and the respondent would be in no position to either stop them from leaving nor would she have the resources to fight him.

To avoid such a difficult situation, the respondent asks the court that the court author a custody agreement or instruct in its order that the petitioner is not allowed to leave the country without the written permission from the respondent.

Also to ensure that the children are always traceable and locatable the respondent would like the court to author the custody order mandating the following:

- A set of fingerprints for each of the girls recorded at the local law enforcement agency to enable quick searches on the girls if needed.
- A copy of the petitioner's driver's license

Summation

1. Key Crux of the Case – What Medical Explanation exists for a woman who is declared a paranoid schizophrenic when schizophrenia is a disease of an ill brain to be able to exercise such self-control on the outside of her home every single day for 6 ½ years straight when she is alleged to be a woman demonically possessed, exhibiting classic paranoid schizophrenic symptoms where she exercises her demon every morning screaming and laughing to herself, responds to command hallucinations where she cannot find reprieve until she hits herself, punches and trashes walls, trashes objects and bangs steering wheels, finds herself talking to her imaginary friends in her

hallucinations and is in continual threat zone where she freaks at the sight of cell phones and is continually paranoid about people reading her thoughts and watching her from the outside.

2. She has a woman who has no episodes logged in the community inspite of an hr face time with some 3rd party instructor every single day for 5 years straight from 2010 – 2015 till magically out of the blue there are 2 episodes in 2015 in the community just a few months prior to the divorce proceeding.

3. She is a woman who has sent letters to her family (*i.e. her sister, mother and father*) abroad along with an external flash drive containing recordings of her at home for the entire month of September asking for them to watch all the recordings, take them to any leading psychiatrist abroad, educate themselves on Schizophrenia, fly in and work with the system to ensure that I receive the proper representation and ask intelligent questions.

4. Primary Allegation against the Respondent is that she sees her family as her enemy which is a marked symptom of her paranoia and very limited insight into her illness which is what most Schizophrenics exhibit. Today, the respondent is offering them the opportunity to see the information first hand educate themselves on the ailment or work with a private investigator to educate themselves on the use of technology if their knowledge is lacking and offer their support and love if they are truly misunderstood parents as a result of the victims marked illness

5. The Respondent is asking for her family to uncover why the respondent rapidly declined in an explosive onset on the day after surgery.

6. A Similar Letter and Recordings for an entire month is also mailed out to the

Scott County Case Worker Heidi Schultz appointed on her case in 2012
looking for a medical explanation for her ailment in partnership with her family.

7. She has also made requests to the Scott County Human Services to monitor her in home and conduct face to face observations in her natural habitat going about living her life in her home, in court and in other places of the community such that such a report be made available to the psychiatrist for an evaluation as oppose to the Petitioners statements that he has never been able to offer any concrete evidence on.

Dated: 11/25/2016

Signature

Name: Smeeta Antony

Address: 1495 Wakefield Circle

City/State/Zip: Shakopee, MN - 55379

Telephone: (952) 239 9643

State of Minnesota

District Court

County : Scott

Judicial District:

Court File

70-FA-15-22094

Number: _____
Case Type: _____

Bijoy Raghavan
Petitioner / Plaintiff

and / vs

Affidavit of Service by Mail

Smeeta Antony
Respondent /Defendant

STATE OF MINNESOTA)
) SS
COUNTY OF Scott)
(County where Affidavit signed)

I, Smeeta Antony, state that I am at least 18 years of age having been born on 3/27/1972, and that on _____

Nov 25th 2016 I served the following papers Closing Arguments served on the opposing counsel via Fedex Mail.

(list all papers mailed to the other party)

upon Joan Miller by placing in an envelope a true and correct copy of each document addressed to Joan Miller at 327 South Marschall Road in the City of Shakopee, State of MN, Zip Code 55379 and depositing the envelope, with sufficient postage, in the United States Mail at the Post Office located in the City of Shakopee in the State of Minnesota.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Dated: 11/25/2016

Signature

Name: Smeeta Antony

Address: 1495 Wakefield Circle

City/State/Zip: Shakopee, MN 55379

Telephone: (952) 239 - 9643

E-mail address: simi_27@yahoo.com