

State of Minnesota

District Court

County : Scott

Judicial District:	
Court	File 70-FA-15-22094
Number:	
Case Type:	Dissolution of Marriage

In Re the Marriage of:

Bijoy Raghavan
Petitioner,

Closing Brief

vs.

Smeeta Antony
Respondent.

BRIEF

SUMMARY

This brief is intended to serve as a short abstract to the best degree possible of the respondent’s closing argument that is filed along with this brief.

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 the respondent Smeeta Antony 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The order was superseded by Temporary Order ruled on 12/15/2016 granting unsupervised parenting time to the respondent every alternate weekend, granting \$1000 spousal maintenance and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 Custody Evaluation was adopted by the Court Ruling as of 12/15/2015 Temporary Order as the engine thru which evidence would be gathered to prove the respondent Ms. Smeeta Antony a parent not fit to discharge her parental responsibilities on grounds of severe mental health issues and as a result thereof a primary source of Endangerment to their young lives. As per the Court Order it would be the intent of the custody evaluation to prove her as a parent who is a GRAVE THREAT to her children's lives on grounds of severe psychosis and the emotional trauma that she inflicts around the children.

It would also be the intent of the Custody Evaluation to prove that she is a Mother who is a Manic Psychotic Individual who has Grandiose Delusions, who has a tendency to show poor judgement, who is reckless and impulsive, who is obsessive

compulsive and who demonstrates little regard to children's needs or interests, who is manic depressive causing father to be in grave fear of his life and his children's lives as alleged by the Petitioner.

As of 4/19/2016 when she first heard the request from Ms. Eva Cheney Hatcher requesting a Psychological Evaluation it would have been 5 months with NO PROGRESS sought by the Custody Evaluation to GATHER EVIDENCE that could PROVE the level of ENDANGERMENT or any of the above listed Allegations that warranted the discharge of her responsibilities ASAP as of 11/23/2015.

The court also chose to use the Custody Evaluation as a mechanism to resolve the disputes that warranted immediate attention post the 2/23 hearing for which there was ZERO PROGRESS or ZERO ATTEMPTS by the custody evaluator to even try and resolve those issues ensuring that a mother was completely taken out of the equation on all pertinent decisions related to their young lives and ensuring that a father was realized the motive that was sought with an advantageous divorce proceeding.

The mother inspite of a Joint Legal Custody Award had no say in their lives. The father ensured that he had all decisions in place that pertained to their young lives that he knew would affect her and bother her in place by December 8th a week prior to the ruling of the Temporary Order on 12/15.

The father ensured that their religious upbringing that she had instilled never happened on his watch, dance lessons when they were really close to their recital that she was really proud of was canned, ice skating instruction trimmed down, music lessons transferred to a person with bare minimum experience that she would never have chosen, any proposals she put on the table to stay engaged in their lives shot down by his counsel, all put in place even before she could react to the ex parte order issued on 11/20.

Did the father have the resources to ensure all plans were in place to take effect so quickly even before the court had a chance to issue the Temporary Order?

The respondent in spite of attempts to present her grievances to the court and in spite of attempts to work with the custody evaluation could not be heard.

The respondent chose to stay compliant with the order and stay away from the ugly situation and waited her turn for the court to resolve the issue.

The custody evaluator chose to approach her evaluation by conducting interviews with the respondent, petitioner, 2 best friends of the petitioner, the respondents parents and the children by conducting a home visit with the petitioner and the respondent. The testimony offered by these individuals were written down blind with no questions posed and no questions to collect supplemental evidence to corroborate the testimony offered by these individuals. As per the testimony by both these individuals during trial on 10/19/2016 both the psychologist and the custody evaluator maintain that it is not their role to be asking questions, but simply to write down the testimony, review old mental health records that was based on petitioners testimony alone especially in the absence of intake reports in the community and offer a recommendation to the court that states that the respondent is to have no contact with the children till she can be observed inpatient, go back on medication and once she has completed both steps within the process she may have supervised time only with the children 3 times a year on Easter, Christmas and Birthdays.

It should also be further noted that both the custody evaluator and the psychologist refused to stay cognizant of the fact that the psychiatrist appointed in 2012 arrived at his diagnosis by simply taking the petitioners statements at face value without

any thought into why there were no observations as the petitioner had stated both while she was committed in patient or in the community. The diagnosis was primarily rendered by simply marrying up the statements that the petitioner stated to a DSM V definition in Medical Journals without any diagnostic testing that could corroborate the diagnosis especially in the absence of any intake reports in the community and when the respondent has as much face time within the community.

The respondent chose to approach the evaluation by submitting evidence that could show that she has a daily active life in the community and she is on the outside on a daily basis with no intake reports of concern on her behavior from 2010 to 2015 i.e. 5 years into her mental illness when out of the blue she experienced 2 public episodes in public places when profanity just flowed out of her mouth out of her control just a few months before the divorce proceeding.

The key evidences that the respondent chose to submit to the evaluation team that proves what she just stated are a behavior log enlisting all dates of her presence in the community, a genesis document of pages 35 enlisting bulletized facts of her life, a copy of all credit card statements showing her activity in the community and her nature of spends, 3 -5 articles from journals of psychiatry that describe the long term prognosis of Schizophrenia especially with Switching between emotional states that shows the out of control nature of such an ill brain that does not marry up to the respondents profile.

In addition, the respondent also chose to present to the evaluation team the level of victimization that she has endured over the last 6 years presenting her case of why she believes she is a Victim of Organized Crime primarily setup by her husband.

She also presented to both evaluators the issues at hand, grievances with the length of the process, impacts to her, impacts to her inability to participate in their lives, the courts recommendation to have the custody evaluation mitigate the issue and

waited her turn to see how they would initiate any mitigation of the issues and how they would ensure that parental alienation was mitigated.

To quantify her arguments she presented the evaluation team with evidence that showed that she was forcibly committed in 2012 on grounds of her husbands statements alone inspite of a no intake reports in the community and a daily life in the community amounting his statements to HERESAY especially when he was not even subject to cross-examination and she was denied her appropriate attorney representation CAUSING INJURY to her as she had no one to advocate for her rendering her a victim of the system.

She also presented to the evaluation team other elements of her victimization where she showed that she was stolen of \$70,000 of jewelry as attested to by her parents that gifted her the jewelry, she was subject to continual physical and emotional abuse for which evidence was offered as sworn testimony from her parents that witnessed a week of goading and stalking, a scientific lab report that conducted forensics on her hair sample that shows that she is exposed to radiation and evidence of financial abuse where she is able to show that all accounts were held JOINT prior to 2013 i.e. the life of their marriage from 1997 till mid-2013 and post mid 2013 she had no access and no insight into any joint accounts nor did she have any insight into what he earned OR primary decisions that were made in the household.

She presented her statements to the evaluation team where she stated that she has experienced people in the community walking up to her car and screaming at her in her face, she has experienced trucks parked under her window with blaring music, she has experienced crashes into parked stationery cars, front yard littered courtesy her mental health for which she cannot provide concrete tangible evidence other than her statements showing her as a victim of mental health prejudice.

She has also experienced no help from Law Enforcement on grounds of mental health prejudice. She has always submitted her responses or statements in writing letting law enforcement be aware her side of the story in response to calls initiated by her husband for which she received no guidance or help from any agent that educated her on how she could document her evidence and strengthen her case or what she could do to help herself. The evaluators were provided a copy of the police reports along with her written statements.

She also experienced no help from Law Enforcement when she was stolen of every cent. Their reports clearly called out that the respondent is mentally ill, clearly called out the publicly listed profile of mental health and chose to communicate only with her husband.

She also experienced very rude demeanor from Law Enforcement on their visits initiated by the petitioner where they were prejudiced by the mental health record and did not want to give any weight to the domestic abuse allegations.

Please note there is no evidence documented of any kind of help or guidance offered by Law Enforcement that is documented in their Reports

Most Victims in such cases do not feel comfortable with the Law. A prime example of that is the respondent's refusal to call in the Burglary Theft and let her husband deal with the Law as she does not anticipate any kind of help from the law. The best she can do is put her statements in writing, walk away and the let the law and the system figure out their processes and walk up to her if they find it concerning as it truly is the system's responsibility to protect their citizens and me being in the system's face continually asking for help solves nothing. It only amplifies the mental health prejudicial grounds that this case revolves around.

She has also experienced amplified tailing where she can demonstrate 8-9 videos of Law Enforcement directly behind her car tailing her for a brief distance over a span of 2-3 weeks that she has never experienced in her almost 20 years of stay in Minneapolis. She has in her closing arguments presented the nature of tailing endured such as 2 police units parked on the shoulder, one moving into traffic after respondent passes by, an Edina truck tailing her for a brief distance on her way to court in Shakopee when co-incidentally her children study in Edina, more than a couple instances of police units leaving parking lots of stores that she visits at the same time that she does which is such obvious tailing behavior designed to intimidate a victim but once a victim is declared a paranoid schizophrenic the legal system can get away with murder as it becomes the insistence of the system to want to use the nature of a paranoid mind and ignore the evidence at hand.

While both evaluators acknowledge review of all documents presented they also state that the information presented was voluminous and they did not deem it to be their role to process the material presented. The respondents hope was that the role of a Forensic Psychologist would have been that of an investigator performing forensics on the case trying to take each element apart but was however was sadly disappointed to find otherwise. Neither the report produced by the Psychologist or the Custody Evaluator accounts for the statements listed by Law Enforcement or her responses.

Primary Argument At Hand

The respondent rapidly declined as stated by the petitioner the day after her surgery.

The petitioner stated that the respondent was instantly paranoid, so paranoid where she would freak at the sight of a cell phone, demand that blinds be drawn, afraid of the dark and believed that all her objects and devices were talking to her. He also stated that she had periods of manic high bursting with energy, manic depressive

phases where she could not bring herself to do anything, not even bring herself to participate in a conversation, she was experiencing extreme agitation, violent outbursts, crying and sobbing when no one was watching, talking to imaginary friends and responding to command hallucination's were she had a need to hit herself, trash objects around the house so she could find relief from what she was feeling.

Please note Petitioners Statement of the manic-depressive phase that the respondent is experiencing where she cannot even bring herself to get up and do anything i.e. perform her daily functions that she use to be able to perform in her daily life.

He also stated that she would go into the bathroom **each morning** scream profanity and laugh uncontrollably for prolonged periods of time, head downstairs scream even more profanity, hit herself and trash objects around the house. He would then head to work, she would wake the girls up, get them ready for school, step out of the house, drive them into school, walk them in, spend about 20 min in school till they are all settled in and drive back home without any episodes coming on after spending an entire morning that explosively psychotic.

She can provide Letters of Reference from Principal of the Shakopee Area Catholic School that can attest to her presence at school each morning and afternoon between 2009 and 2012

Please also note the Petitioners Statement where he states that the mother is severely handicapped during the period of 2010 to 2012 before she was committed in 2012.

Please also not the Petitioners inability to provide concrete evidence where he

can demonstrate that thru the period of 2010 to 2015 he ensured that the drove them to school, picked them up from school, cooked and cleaned the home, managed all the funds in the home and ensured that he adjusted his schedule to perform both a father's role and a mother's role to make up for the severe handicap that the mother was experiencing

Her reports to Law Enforcement in 2010 right after her surgery where she believed she was stalked, tailed and wiretapped where she believed that people at Large retail stores somehow knew her and were intimidating her with their cell phones was used back in her mental health records to declare her a paranoid Schizophrenic.

The respondent more than recognizes that the symptoms on the paperwork are truly of that of a paranoid schizophrenic and the fact that her illness onset is that of an explosive nature i.e. the fact that she rapidly declined the day after surgery, she is recognized as a very acute chronic case of paranoid schizophrenia.

She also recognizes that a paranoid schizophrenic's brain is so consumed with the paranoia that the brain begins to manifest its reactions to the paranoia in various forms where it could manifest itself as social withdrawal – the need to withdraw as a result of being consumed by the fear, extreme agitation – a reaction from not being able to handle the intense paranoid emotion within her, the constant auditory and visual hallucination's – a state of virtual reality where she is speaking to imaginary friends within the virtual world, screaming, trashing – a response to the fear that she is consumed by where she feels like everything within her environment is dictating her or a response to the hallucinated virtual world , hitting herself - a reaction manifested where she feels the need to find relief from what she is feeling, profanity and incoherent talk – a reaction of a misfired brain circuitry within the brain that simply spews out any incoherent talk which the respondent may not be even aware of and certainly has no control over.

The respondent's primary argument that the medical community has failed to provide an explanation for is that how can a woman who is clearly dictated by a very ill circuitry based on the statements that the petitioner has made be out in the community for an average of 5 hrs on a daily basis especially with an hr face time with a 3rd party instructor watching her interact with her children and other children and their parents not have any episodes or experience any bizzare behavior or experience any involuntary reactions for 5 years straight from 2010 – 2015?.

Please note the Petitioner's inability to Provide any 3rd party testimony that rebuttals the respondents statement when she states that she does spend an average of 5hrs in the community and does have an hr face time with 3rd party instructors. Her credit card statements alone and the absence of intake reports in the community is proof of her DAILY normal life in the community.

Why would such an ill woman who clearly suffers from progressively degenerative disease as diagnosed by the medical community who as per the medical community studies cannot show such a brain to have the ability to stay in control especially when the tenure is as long as 6 years, why would such a woman out of the blue in 2015 just a few months before a divorce proceeding experience 2 public episodes that show how her experiencing profanity flowing out of her mouth completely out of her control. Those episodes in itself show the nature of the brain where she is not capable of exercising self-control over what flows out of her mouth.

Why then could she exhibit self-control and not have any episodes prior to 2015? What about those 2 episodes is so different especially when it is only a few months prior to the divorce proceeding? What about those 2 episodes should be even more concerning especially when she was such a highly-paid woman earning 200,000 prior to her surgery who began to experience such a rapid decline in her mental health the day after a surgery. **Why should it ring alarm bells when a rapid decline beginning the day after her surgery is followed by a refusal to have her**

have attorney representation ensuring of a mental health diagnosis, followed by every cent stolen, every cent taken over, constantly abused and intimidated, and is completely alienated out of her children's lives? **Why should it be truly concerning when a lab report indicates that this woman is also exposed to radiation?** What should such a story tell? **Why is she paranoid when the story reeks motive?**

It should be noted that this is a woman who as per the petitioner is displaying all symptoms that a Paranoid Schizophrenic brain does. A Paranoid Schizophrenics brain as per medical definition is a brain continually processing stimuli from its environment where it flooded with constant messages from its environment. It is a reactionary brain, where when it is overwhelmed with the constant messages and the overloaded amplified sense of threat it perceives that does not exist, it reacts, shuts down and withdraws into the confines of the home.

What kind of reaction should that brain experience when it is surrounded by people when she ensures that she spends an HR face time in the community in the presence of a 3rd party instructor with her children and around other children and their parents. Why is that brain NOT constantly processing the threat signal and other stimuli wanting her to react at those times? Please there is no evidence of her withdrawing into the confines of her home and not stepping outside of the home.

The Petitioner has waited 6 years to step the children out of her care especially when he has stated continually beginning 2012 that he has lived every moment of his life in fear not knowing what could happen to him or the children.

Private Investigators who offer services especially in custody battle cases offer covert video surveillance where a man i.e. the Petitioner who is earning \$211,000 gross as of today, could have easily solicited services from such an agency to setup cameras such that such concrete evidence might be offered to both the medical

community and the legal system such that the court or the medical community could see firsthand as to what was bringing on the reactions especially when the nature of psychosis has been predominantly experienced only on the inside of the house and not on the outside of the house.

There is also no evidence of the fact as to any reasons the Petitioner or My Family i.e. my parents or sister might have as to why they are not perplexed about why a woman this ill experiencing as many involuntary reactions ONLY on the inside of the home does not have any involuntary reactions trigger on the outside of the home.

Divorce is a stressor for most normal human beings. This is a woman dictated by a very ill brain. She was seen in the courthouse on a daily basis beginning April thru October. Why is this woman not overwhelmed with the stress of a Divorce Proceeding especially when she is paid only a \$1000 support, is yanked away from all decisions that she was alleged to be obsessive about, she is alienated from her children and has no experience with the law where she needs to study the law, study her illness, try to locate doctors and or research programs that can answer her questions, try to locate experts that can help her and learn a system and the navigation of a system that she has no experience in.

Why is she not experiencing any involuntary reactions after everything that she has endured either in the courthouse or at any of these clinics?

She can also provide Letters of Reference from Fedex in Eden Prairie that show that she is a woman in their location very often sometimes even multiple times a day and that they know me as a pleasant, patient, all smiles easy to work with person during such a stressful phase of her life.

The Psychologist Report states that the Respondent spends a lot of time alone

making it impossible to judge this rare scientific phenomenon. **She would like to remind the court that it cannot be viewed as an accurate statement.** The above stated letters of reference that can be provided in itself clearly show that after experiencing such volatility and intense emotion within the confines of her home she does not exhibit any occurrences of those episodes in public. She also ensured of her presence in the courthouse on a daily basis from April thru October for ½ a day taking in trials so that the court could see firsthand that in spite of one of the most stressful times of her life, she is not experiencing any episodes while learning the law.

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 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?

The fundamental grounds of this case will also always boil down to another VERY SIMPLE ELEMENTAL FACT, that reports that do not have an answer for why this scientific phenomenon occurs will instead of focusing on the core of the case will present diversionary statements such as the respondent is devoid of emotion and that she has no interest in connecting with the children while refusing to

acknowledge the continual attempts initiated by the respondent via proper channels and processes that were shot down and her ability to stay in compliance with the system inspite of it without any interference into their lives that the petitioner was incapable of providing at his end during this divorce proceeding.

Her Argument on Her Efforts to Understand the Nature of Her Illness

She has met thru this last year with 3-4 psychiatrists, 2-3 research programs including trying the county's mental health clinics to try and find an answer to her key question where her psychiatrist (Dr. Kennedy) from 2012 appointed by the county states that he would be comfortable stating that he has not seen a case where a schizophrenic woman can step out of the house transform into a calm woman and step back into the house and transform back into a demon possessed and dictated by her ill brain. He has not seen such a case and certainly not for this tenure.

She has also met with other psychiatrists that within the system do not seem comfortable expressing an opinion in writing as they would rather state it as that they have not had the ability to observe me, do not know me but however with some reluctance do seem to offer up that they have not seen a schizophrenic move between alter states one for the home and one for the outside but however do not want to express such a simple opinion in writing.

She has challenged them further by simply offering up the petitioner's statements from the OFP and ask a simple question "can a schizophrenic based on these statements be normal outside of the home as she is in a position to offer contacts as evidence". The absence of intake reports alone till the 2 intake reports in 2015 is evidence of no observations in the community. The presence of continual complaints from the neighborhood and the presence of the 2 intake reports followed right after the episode is proof of the fact that people do call in concerning behavior especially when it is around other children.

Most Psychiatrists do not want to stay educated on what technology can do to wreck a human beings life. It is an age old story regardless of how bad one ones to see it as Schizophrenia that technology can be used in many ways to render a human beings life worthless

While the court does not need any education a simple article from the Policing Community, guidelines for Community Oriented Policing partnered with the United States Department of Justice says it all :

(Detective Lumbley – Dallas PD – *Family Violence Unit*) states that 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>

She on her own accord also chose to connect with the Scott County Department of Human Services Case Worker asking her as to what the process might be for her to check herself in to be observed for a week and received a reply that stated that there was nothing she could do. She also after some research was able to find an Extended Diagnostic Component offered by the Department of Human Services that offers face to face observations inside of the home, inside of the community or place of work especially available to cases of the chronic mentally ill especially when the validity of the diagnosis rendered in the past is in question.

She also chose to record herself at home. The primary allegation against her is that

she views herself as a victim of her husband, her family and the system which is a direct manifestation of her paranoid ill mind very true to the nature of paranoid Schizophrenia.

She has sent letters to her family accompanied by a month of video recording of her at home asking for them to go to any leading specialist asking what might cause their daughter to rapidly decline immediately after a surgery especially when there is no history of any Schizophrenia within the family. She also offered them firsthand information such that they can show that to a psychiatrist and get an explanation why does she exhibit a split personality disorder one reserved for the home and one reserved for the outside especially when Schizophrenia is not known to be a split personality disorder. If she is suffering from a true split personality disorder what makes her have the ability to own her behavior that consistently without taking on the forms of the different personas that live in her very ill brain. Why can her lifestyle and her behavioral patterns be that consistent especially for 6 years with no observations on the outside of the home?

She has asked for her family i.e. her parents and her sister and brother-in-law to fly in, work with the system, work with the medical community, use their money ensure of proper representation, use their money and build her life and her innocent children's lives back up.

She has also invited her family to use the system to try and partner with law enforcement or a private eye that can record her using a third-party objective source and try and uncover the truth.

She is more than happy to offer her family all her research if they are naïve enough to not think motive such that they are at least in a position inspite of their globe trotting exposure to stay educated and ask intelligent questions and ensure of a future for 2 innocent lives as a family rightly should do. The respondent would not

want to deny such loving grandparents and godparents their privilege.

Summation

A Very Repetitive but Truly Undeniable Fact that cannot be Ignored

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 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 is 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 been completely alienated from her children's lives and inspite of the Joint Legal Custody Award was forced to have no say in their lives or any decisions made in their lives effective November 20th 2015.
4. She is a woman who was forced to be alienated from her everyday life that revolved around taking care of them, taking care of the home, taking care of

all decisions financial or otherwise and ensuring they were raised as all rounder's prepared for a better tomorrow filled with prospects that any college door would open to them on when they had an opportunity to see their resume and to see how accomplished they were, all their lives.

5. She is also a woman is alleged to be cold and devoid of emotion because she does not intrude into their lives between her allotted times of every alternate weekend as dictated by the temporary order. She is also presented as that the children have no attachment to the mother.

6. She would like for the court to stay very cognizant of what the probability is of any attachment that children might experience when they see their mother only on every alternate weekend. She also would like the court to stay cognizant what conditioning young minds might have been exposed to over a period of 6 years with what they might have heard or seen with regard to a mentally ill mother.

7. She would like the court to stay very cognizant of the fact that it will be always be portrayed as the respondent's fault regardless of the choices she makes. There is no winning once you are ensured of a mental health diagnosis especially when there are no forensic questions asked. The best the respondent can do is stay compliant with the order and turn a blind eye to the criticism and not let anything get to her.

8. Since her day to day life in the community primarily centered around their activities at different community arenas, the divorced proceeding ensuring of very minimal contact with her children took that life away from her forcing a degree of social isolation. Since her log in the community is primary foundation cornerstone whereby she can prove no observations in the community and since she required to learn the legal system, she ensured of

her presence in the courthouse from April to October so that the court could see firsthand the lack of episodes that the respondent experiences and she could learn the law firsthand.

9. She is also a woman who has sent letters and videos of her recordings at home to her family inviting for them to fly in, watch the videos, get educated on the illness, work with the system, ask intelligent questions, use their money and ensure of her future and 2 innocent girls future.

10. She is also a woman who has sent emails to the Department of Human Services requesting the use of the Extended Diagnostic Service Component that enables for face to face observations at home and offering such a report as the source of a Psychiatrist Evaluation as oppose to the Petitioners Statements alone.

11. She is also a woman that intends to mail out a copy of everything that was sent to her family to the Department of Human Services such that all efforts may be initiated by the system to work with her family to uncover the truth of why a woman rapidly declined the day after her surgery, slowly died, lost her life, all her dreams and everything she owned each day of her life.

Her Brief is Accompanied by a Detailed Closing Argument that contains the following Sections and Reasons and or Arguments for the same

1. The Respondents Arguments for how Property Must be Divided.

2. The Respondents Arguments that counter Each Allegation as Listed by the Petitioner.

3. The Respondents Arguments for the Exhibits that were offered as concrete evidence to rebuttal each Allegation as Listed by the Petitioner.
4. The Respondents Primary Argument
5. The Respondent's Summation Argument.

A Summary of What She Is Asking For – Her Reasoning's are stated in her Detailed Closing Argument

1. The Proceeds of the Sale of the House be Written Out to the Respondent – found on [Pg 37](#) of her Detailed Closing Argument.
2. Retirement Plans 70 – 30% split with 70% allotted to Respondent and 30% allotted to Petitioner – found on [Pg 40](#) of her Detailed Closing Argument.
3. Long Term Care Policy paid for by the Petitioner to take care of Respondents Long Term Care Costs - found on [Pg 42](#) of her Detailed Closing Argument.
4. Individual Medical Insurance Policy paid for by the Petitioner that takes care of medical, dental and vision costs for the Respondent for her life term. – found on [Pg 45](#) of her Detailed Closing Argument
5. Mental Health Costs associated with a court order that will need to be put in place to determine if the Respondent is a fit parent to discharge parental duties to be met by the Petitioner's policy – found on [Pg 46](#) of her

Detailed Closing Argument.

6. Beneficiary for the current Life Insurance Policy owned by the Petitioner to continue to remain the Respondent. The Respondent's Life Insurance Policy will continue to remain unchanged as well – found on [Pg 47](#) of her Detailed Closing Argument.

7. Court to Order a Will to be Drawn to Protect the children in the uneventful demise of the Petitioner and Respondent and to appoint the Respondents Sister as the Guardian of any assets left over in the uneventful demise of both the Petitioner and the Respondent - found on [Pg 47](#) of her Detailed Closing Argument.

8. Child Support to be Reserved contingent on the determination of parenting time allotted to the Respondent contingent on a court appointed psychiatric evaluation - found on [Pg 49](#) of her Detailed Closing Argument.

9. Respondent Agrees to the offer of a \$4000 Permanent Spousal Support contingent on the following : - found on [Pg 49](#) of her Detailed Closing Argument.
 - a. Petitioner owns a Long Term Care Policy for the Respondent
 - b. Petitioner Continues to leave the Beneficiary Unchanged on the Life Insurance Policy for the Petitioner currently owned by him
 - c. Petitioner to own an Individual Medical Insurance Policy for the Respondent
 - d. The sale of the home as proposed by the respondent
 - e. The retirement account split as proposed by the respondent
 - f. Child Support reserved for a later date

10. Appointment of the Department of Human Services Extended Diagnostic Services Feature enabling the Department of Human Services to observe her in a natural habitat i.e. her home going about living her life at home and have such a report available to the psychiatrist as oppose to using the Petitioners statements as co-lateral – found on [Pg 50](#) of her Detailed Closing Argument.

11. Alternatively instruct petitioner to pay for a week’s worth video surveillance thru a private investigative agency such that such a surveillance report be available to the psychiatrist as observing why her episodes come on only at home is key to understanding the scientific phenomena she lives.

12. Petitioner should own disability insurance such that all elements of the spousal support is insured in the event that something happens to the Petitioner leaving the Respondent with no resources. Payments that will need to be insured : - found on [Pg 50](#) of her Detailed Closing Argument.
 - a. \$4000 spousal support
 - b. Long Term Care Premiums
 - c. Individual Medical Policy Premiums
 - d. Child Support Costs

13. Dog Sale and Outstanding Dues to Respondent which entails original cost plus cost of upkeep since divorce proceeding in the amount of \$4499.87 - found on [Pg 51](#) of her Detailed Closing Argument.

14. Piano to be continued to be owned by the Respondent - found on [Pg 52](#) of

her Detailed Closing Argument.

15. Outstanding Dues in the amount of \$10,690 to be paid out in full or Petitioner to demonstrate what is disputed. - found on [Pg 53](#) of her Detailed Closing Argument.

16. Auto Insurance and Balance Car Payments to be Paid out by Petitioner till Car is Paid Out - found on [Pg 57](#) of her Detailed Closing Argument.

17. Other Miscellaneous Costs outstanding to Respondent in the amount of \$1498.17 found on [Pg 61](#) of her Detailed Closing Argument.

18. College Funds - Respondent agrees to the Petitioners offer that current accounts should remain funded by the Petitioner - found on [Pg 62](#) of her Detailed Closing Argument.

19. Division of Legal Costs – Costs of Evaluation to prove that the Respondent is an Unfit Mother is the Petitioners Burden of Proof. It can't be expected for the Respondent to Pay for proof to prove that she is an Unfit Mother. It is the Petitioners need and should be footed by him - found on [Pg 63](#) of her Detailed Closing Argument.

20. Offer for Petitioner to move back into the house and prepare the house for sale while Respondent moves into an apartment is disputed and rejected by the Respondent - found on [Pg 64](#) of her Detailed Closing Argument.

21. Audit of the Home – Respondent would like for an audit to be conducted

so that damages and the upkeep of the home is documented and on Record

22. Furniture of the Home – Proposal by Respondent as stated in her closing argument. - found on [Pg 67](#) of her Detailed Closing Argument.

23. Petitioner Proposed Maintenance and Child Support Language – The respondent has not seen an exhibit submitted by the Petitioner that speaks to child support language. However, since child support is contingent on the court determining the respondent’s parenting capacity and parenting time contingent on a psychiatric evaluation the respondent requests the court reserve the child support payment calculation for now. - found on [Pg 70](#) of her Detailed Closing Argument.

24. Jewelry Reimbursement – The respondent has presented her arguments and reasoning’s in her closing argument requesting the petitioner to pay her out the balance of the insurance reimbursement in the amount of \$2300 - found on [Pg 71](#) of her Detailed Closing Argument.

25. The Respondent would like to request A Copy of All Current Policies owned by the Petitioner and the Respondent along with agent contact info in the event that the respondent has any questions on any of the policies - - found on [Pg 72](#) of her Detailed Closing Argument.

26. The Respondent would like to request the Court author its custody award such that the Petitioner cannot leave the country with the girls without written consent from the respondent - - found on [Pg 73](#) of her Detailed Closing Argument.

Dated: 11/28/2016

Signature

Name: Smeeta Antony

Address: 1495 Wakefield Circle

City/State/Zip: Shakopee, MN - 55379

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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: 11/28/2016

Signature

Name: Smeeta Antony

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