

Supreme Court of the State of New York

Appellate Division: First Department

Anonymous

Plaintiffs/Respondents

Index Number

314860/2011

v.

REPLY/ ANSWER

TO CROSS MOTION

Anonymous

Defendants/Petitioners

_____ X

PLEASE TAKE NOTICE that upon the annexed affidavit and exhibits of Seema Kalia, sworn to the 2nd day of August the undersigned will move this Court at a term thereof to be held at the Appellate Division Courthouse located at 25th Street and Madison Avenue, New York, NY 10010, on the 5th August 2013, for an order

- 1) Granting emergency restoration of custody of my infant children, Lola Vedula Kalia Murti and Dravin Vedula Kalia Murti based on previous criminal and fraudulent conduct by opposing counsel before the court;

- 2) In the alternative, seeking the granting immediate and generous visitation as children have had no contact with their mother for nine months because of criminal conduct by Plaintiff and opposing counsel, in violation of the International Treaty of Children's Human Rights to which the United States is a signatory.

- 3) An order immediately removing Harriet Cohen, Paul Kurland, Karen Steinberg and the other counsel of record due to their personal criminal conflict of interest as targets in the Department of Treasury criminal investigation of these events that resulted in the criminal abduction of my children, as well as an Order voiding all submissions made by them throughout their filings wherein they knew they were under criminal investigation and had a conflict of interest as they used the children's wellbeing to try to cover up their criminal acts
- 4) An order voiding the judgments and final orders of Judge Ellen Gesmer for the same reasons as above;
- 5) An order for payment of support in the amount of \$20,000 month when the children are returned to me. Also a payment of \$72,000 in support for the adjusted support order in light of the Vacate Order of Motion Sequence #6 wherein Gesmer illegally denied me custody in October, 2012. Alternatively an immediate payment of \$9,000 in arrears as required by even Gesmer's punitive support Order. Respondent has not paid in three months and is alleging false deductions in an effort to cover up the June 3rd, 2013 "Federal Freeze" of his assets by the IRS as he came officially under criminal investigation.
- 6) An order for the respondent to obtain new legal counsel not affiliated with any of the criminal targets in the Department of Treasury criminal investigation within 7 days; and
- 7) An order for the respondent to settle the matter within 30 days or have the matter set for trial.

I will not be submitting an answer to the respondents' cross-motion in lights of the illegality of their standing before the court and continued fraud in their submissions. I respectfully request the court to immediately void all submissions made under these criminal circumstances and not consider any submissions by the respondent until he obtains new legal counsel not under criminal investigation with him.

Dated August 2, 2013
Kalia
(Concealed address)

Seema

917.284.8239

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Supreme Court of the State of New York
Appellate Division: First Department

Anonymous

Plaintiffs/Respondents

Index Number
314860/2011

v.

AFFIDAVIT
IN SUPPORT OF MOTION TO RETURN
CUSTODY AND OTHER RELIEF

Anonymous

Defendants/Petitioners

_____x

State of New York)
County of New York) ss.:

I, Seema Kalia, being duly sworn, deposes and says that:

1. I am the defendant/respondent in this matter. I make this affidavit in support of my motion for an order restoring my infant children, Lola Vedula Kalia Murti and Dravin Vedula Kalia Murti to my custody based upon the legal exclusion of previous evidence used to make the lower court's custody order. This affidavit is also in support of motions for enforcement of support orders and additional support, the dismissal of the respondents' cross-motions, a motion before the court to sanction opposing counsel for multiple counts of fraud and perjury and an order to the respondent to obtain lawfully qualified legal counsel not otherwise implicated in the criminal investigation against him.
2. In April 2011 I reported the trustees of Trinity School in Manhattan of suspected improprieties regarding school funds and several trustee mandates that violated state education law with respect to the protection of children. The report was only made after discreet outreach to the school's administration to which the trustees responded in writing with personal threats.

3. In May 2011 I also filed a report with the Manhattan Das office in the hope of initiate legal review in a way timely enough to save the School. While the ADA Chris Conroy inititated an investigation, I was informed after the start of the investigation that it was stopped at the personal instruction of Cy Vance Jr. Vance's letters contained several concerning and misleading staements that suggested a cover up of the tax crimes. I forwarded Vance's letter as part of my report to the IRS and Department of Treasury.

4. The stress of the threats against our family and the subsequent online defamation and accusations took a toll in our family and in May 2011 my ex husband, Vedula Murti finally left the family home after a series of very troubled absences where we did not know his whereabouts. He left me and the children with no assets, and I relied on personal savings because I could not get him to arrange financial support for the family. In October 2011 I filed with the Family Court in New York County for a support and custody order. The magistrate gave me custody of the children as well as approximately \$15,000 months support (including rental). *A copy of the Family Court Magistrate's order is in this Court's file.*

5. In November 2011 I was informed that my divorce matter was being removed from family court where I had the existing support order to the new Judge Ellen Gesmer of Supreme Court family division. Neither the respondent nor I requested this change.

6. Between December 2011 and May 2012 we had a course of a protracted and excruciating series of court conferences and meetings in chambers. While in chambers Judge Gesmer made repeated personal attacks and opined on her disapproval of my status as an IRS whistleblower. At each appearance she reduced my support awards or otherwise penalized me. This emboldened the respondent and his previous legal counsel, Millicent Greenberg to commit numerous fraudulent submissions to Judge Gesmer as they realized she would never rule against them. This culminating in the respondent producing a fraudulent W2 form to conceal half his income, which he also presented to the court appointed psychologist, Dr. Marilyn Schiller in an effort to fraudulently get a reduction in her fees. *Attached hereto as Exhibit A is the fraudulent W2 respondent generated and submitted in our divorce.*

7. In the spring of 2012 I attended alone and with my children, Lola, then 9 and Dravin, then 5 at Dr. Schiller's office for evaluations. After a series of meetings Dr. Schiller told me that she was going to recommend that I have full custody of my children. She told me she was seeking to have the respondent tested by a specialist for Asperger's syndrome and more seriously his symptoms of a more severe "personality disorder". I do not know the results of that testing. The custody recommendation was due

to be submitted to Judge Gesmer on July 1st, 2012. Without explanation Judge Gesmer notified us that the report would not be submitted until mid August. *Attached hereto as Exhibit B is a copy of a memo from Judge Gesmer advising of the later deadline of the forensic report.*

8. On or about July 27th, 2012 the court appointed psychologist, Dr. Schiller emailed and asked me to come to her office for an unplanned meeting. Dr. Schiller was appointed to provide a psychiatric evaluation report and to recommend a custody decision in my divorce from Vedula Murti, the plaintiff, my children's father. *Attached hereto is Exhibit C – a copy of the email asking me to return to meet with Dr. Schiller after submission of custody recommendation.*

9. While at Dr. Schillers office for the unplanned meeting, she informed me that she had submitted the report on July 1st as required and had recommended that I have custody of my children. She then told me that Justice **Gesmer refused her report and instructed her to change the report to include false diagnoses disparaging me, and recommendation that Judge Gesmer give custody to the children's father.** Dr. Schiller was very distressed by this.

10. On or about August 22nd 2012, eight police officers arrived at my apartment with an undated court order from Judge Gesmer taking custody of my children. The children were crying, distraught and confused. The officers did their best but when I asked why such a large number had to come in – like storm troopers-- one of the officers said the respondent's counsel, Harriet Cohen and Paul Kurland arrived personally at the police station and specified the nature and style of the "raid". I was blindsided and had no chance to pack even an overnight bag for them because **the hearing taking custody from me had taken place without my knowledge.** It was the worst night of our lives, and I believe it was structured to deliberately inflict emotional distress on my children as a way of retaliating and intimidating me for having reported Wachtell Lipton and Cy Vance Jr. to the federal Department of Treasury. *Attached as Exhibit D is a picture of my daughter, Lola, crying in my arms begging me to not let the officers take her.*

11. Two days later on the morning of August 24th, 2012 two of the officers involved in the enforcement, Officer Diaz and Officer Crawford returned to see me. They told me that their lieutenant had concerns about the custody order that was enforced as it was undated. They urged me to **notify my lawyer to address the lawfulness of the order**. I heeded their advice but could not find anyone willing to assume the case before Judge Gesmer.

12. I remained in my apartment in a state of emotional distress for five days. I was distraught about the unlawful taking of the children and the emotional harm this was causing them. Judge Gesmer issued immediate mutual restraining orders forbidding me to have any contact with the children by phone or email and to have any contact with their school. These orders made it impossible for the respondent and I to correspond for a resolution. Despite his million dollar a year salary, the respondent has had the children in his one bedroom apartment which he rented a only a month before the criminal abduction. Because he never wanted or intended to have custody of our children, he has had to hire three full time caregivers at great expense and has missed several professional opportunities.

13. After five days indoors alone in great emotional despair, I finally emerged from my apartment building on the morning of Sunday August 26th to buy groceries. When I returned about 30 minutes later, there was an NYPD patrol car parked out front of my building and Officers Diaz and Crawford were inside. I was surprised to see them again, and thought it was an odd coincidence for them to be there. I greeted them and Officer Crawford asked me if the opposing counsel or judge had asked for any financial consideration in order to not take the children from me. I told them that Harriet Cohen and Ellen Gesmer communicated that **I would “not see my children again until I stop these actions against Wachtell Lipton and Cy Vance.”** Harriet Cohen explicitly asked for a release of all claims against them. They told me I needed to file a federal kidnapping complaint as soon as possible. Two days later I received a copy of the federal criminal complaint in the mail. I immediately signed it and submitted it to the SDNY DoJ office.

14. On August 22, 2013 The children were taken from me by an illegal court order during a phone hearing I was not notified of. Opposing counsel claims I was represented by phone by previous counsel, Ms. Harounian who never notified me of the motion. Ms Harounian later stated that she had to comply with Judge Gesmer’s threats or she would also be retaliated against. Ms Harounian was interviewed by Treasury officials within the next weeks with Dr. Schiller to corroborate the retaliation and kidnapping scheme. After these interviews special agents started obtained warrants and wiretapping Judge

Gesmer's courtroom and chambers and the phone lines of Dr. Schiller, opposing counsel and Judge Gesmer.

15. As Gesmer and Harriet Cohen re-wrote the fraudulent psych eval with Dr. Schiller, Dr. Schiller's communications with them were being recorded under the federal wiretap warrant. Dr. Schiller cooperated with the special agents from Treasury to perform a "sting" of the illegal instructions. Until recently, none of Cohen, Kurland or Steinberg knew that their criminal acts were recorded with wiretap evidence.

16. In early September 2012 soon after I met with Special Agent Wood on August 28th I provided him with Dr. Schiller's contact information. I received a call from my own physician Dr. Stephanie Brandt. Dr. Brandt is a forensic psychiatrist who had appeared before Judge Gesmer and with Harriet Cohen. She is also professionally acquainted with Dr. Schiller who wanted me to know that Dr. Schiller was extremely upset the children were taken from me. I issued releases for both Dr. Brandt and Dr. Schiller to speak with Special Agent Wood about this case.

17. In mid September, 2012 I received a call from Dr. Brandt that she had again heard from Dr. Schiller. Dr. Schiller wanted me to know **that she had not changed her opinion that I should have full custody of my children, and that she was very very sorry but that I would see horrible things written in the report that she did not believe.** She wanted Dr. Brandt to reassure me that the report to be filed was not her true opinion and was done for external reasons (which she did not disclose.)

18. Harriet Cohen was so comfortable with her control over the illegal procedure she violated state law by obtaining the forensic report FIVE DAYS before my counsel was notified it was ready. This is probably easily done when one is the de facto author of fraudulent evidence. The respondent called me on the Friday before the report was made available to say he was concerned about it and that it was troubling. My counsel Jackie Harounian was not allowed to read the report until the following Tuesday. **I have never been allowed to read the report and have not read it to this day** and cannot speak to its contents.

17 Gesmer appointed Guardian ad Litem Karen Steinberg and she has been instrumental in the abuse of my children. Steinberg has **seen the children only once almost a year ago**. Despite telling my children she was “their” lawyer and that she would enact their wishes as best as she could. She never went back to see them. In the four brief visits granted under a special motion by Judge Moskowitz of this court (later rapidly removed by opposing counsel and Ms. Steinberg) the children asked me at each visit when Steinberg would come back to see them so they could tell her they wanted to come home to me. They really believed she was “their” lawyer and that she would take their instructions and that they could fix the situation that way. On every one of these few visits, they asked the social worker Ms. Steinberg appointed to supervise these visits, Ann Sydor, to implore Karen to contact them as their father does not allow them any use of a phone or the internet to reach out on their own. Steinberg ultimately removed herself from the file upon becoming aware of the federal investigation into this matter – and did not serve proper notice to any of the parties or her clients. She had to be reappointed by special order to appear at a motion to show cause. Further my many efforts over the winter to speak with Karen to find a lawful way to comply with the oppressive visitation order requirements went grossly neglected, resulted in dozens of emails, messages and faxes ignored by Karen despite the fact that she continued to bill on this matter. *Attached hereto as Exhibit E is a copy of the order reappointing her as Guardian after she unlawfully removed herself from the file without notification to me or the children she was supposed to represent.*

18 On or about August 28th 2012 for several occasions through to November 2012 I met with special agent Erik Woods of the US Treasury Department. I reported Dr. Schiller’s information in addition to later personal threats I received from opposing counsel and Judge Gesmer to the Treasury Department as they had jurisdiction over threats and intimidation relating to my status as a federal relator to the IRS since March 2011. *Attached hereto and marked as Exhibit F is, a phone log of messages exchanged between US Treasury special agent Wood over the three months and two interviews he conducted with me.*

2. Over the course of trial September 7th 2012 to October 8th 2012 I received numerous threats from opposing counsel (brought in by Judge Gesmer) Harriet Cohen, Judge Gesmer and the law guardian Gesmer appointed Karen Steinberg relating to my status as a federal whistleblower for the Treasury Department. The threats all related to being told I would never see my children again if I did not recant the evidence I gave Treasury about a law firm, Wachtell Lipton and Manhattan DA Cyrus Vance.

3. On October 8th, 2012, opposing counsel with Judge Gesmer’s encouragement engaged in an extensive cross examination of me relating mostly to illegal questions surrounding the confidential

information given to Treasury about the law firm, Wachtell Lipton and Cyrus Vance Jr. The questions also demanded a list of all legal counsel and federal employees who I knew to be working on the investigation of Wachtell and Vance. I objected repeatedly to the proceeding as improper and illegal as it required me to answer questions about my status as a federal criminal witness during my divorce proceeding. I also referenced the ongoing CJC investigation of Judge Gesmer and repeatedly asked her to remove herself. She refused. *Attached hereto as Exhibit G is a copy of the transcript of the October 8th, 2012 cross examination of me pertaining to the information I had about the federal investigation of Cy Vance Jr. and Wachtell Lipton.*

17 The two hours of cross-examination constituted the only evidence I was allowed to give during the divorce trial. **During that cross examination Paul Kurland asked me over 125 questions about my knowledge of the federal investigation into Wachtell, Cy Vance Jr. and Trinity School. He asked only 3 questions about my children. Unexpectedly, Judge Gesmer asked 19 direct questions of me about the investigation into Wachtell (and none about the children.) Gesmer repeatedly asked for names of attorneys who may be helping me. Ms. Steinberg, the children's guardian asked 26 questions about the children – but the bulk of her cross examination was spent on 72 questions about the federal investigation into Cy Vance and Wachtell Lipton.**

18 Throughout October and November 2012 I also submitted reports of Gesmer's illegal conduct and threats to the New York Commission on Judicial Conduct . On November 3rd I spoke with a lawyer with the CJC urged me to file a written motion to recuse Judge Gesmer. I told hadn't filed previously because Gesmer had repeatedly threatened to have me arrested. After talking to the CJC I filed the motion for recusal, and, as threatened, Gesmer had me addressed that the following day, November 7th, ostensibly for sending an email twelve days earlier in violation of a different court order. The arresting officers came from midtown this time on the basis that the respondent had opened the 9pm email at his office twelve days earlier. I learned later that the 24th precinct (where Officers Diaz and Crawford work) had refused to make the arrest when asked by Harriet Cohen and Paul Kurland. Most bizarrely on November 9th Judge Gesmer issued what was labeled a "Final Order of Custody" permanently taking the kids away from me. We were mid trial when she issued that Order. Attached hereto as Exhibit H is a copy of the November 7th misdemeanor complaint.

19 Given the threats and illegal inquisition I did not attend court again as I knew that Gesmer had been told by the CJC that she must remove herself. I learned she WAS removed by the CJC immediately upon having me arrested and disappeared from the courtroom for about three weeks. She was alternatively listed on the calendar as "retiring" December 31st, absent without explanation and vacation. During her unplanned leave from the bench, Gesmer had failed at efforts to defeat the federal

Department of Treasury criminal investigation of her for witness intimidation, extortion and related crimes. It is my belief she has a plea deal to wear a wiretap to procure evidence for federal agents of other parties for whom she was doing criminal favours, and that is why she remains on the bench until the other public figures can be investigated.

20 By the end of November, 2012 As Gesmer did not retire as I was reassured, she proceeded to try the case without me. I sought several legal opinions from retired judges and senior counsel as to handle the very unusual situation. **All had advised that I NOT go to court without a warrant for my arrest or I would be conceding lawfulness of what I knew to be a criminal act.** Also after two false arrests where I spent the night in prison I was afraid of further criminal retaliation at the hands of Judge Gesmer and the other counsel she had recruited to intimidate and threaten me.

21 In December 2012 Despite written requests for a bench warrant for me to appear, none was issued. Gesmer moved forward with the hearing without cross examination of witnesses, closing arguments, or any submissions from me. And despite the fact that she had already issued a “Final Order” for custody mid trial in November, in December she issued another one with the original threats to deny me access to my children and a severely reduced support order. I had no opportunity to interview witnesses or submit argument. I knew for a fact she had been interviewed by the special agents at that point and had negotiated a plea deal with the CJC to “retire” by the end of the year. Gesmer remains on the bench today as part of her plea deal now with the DoJ to provide information about others involved in the criminal retaliation against me. The documents relating to this information require special security clearance not available to me. *Copies of the fraudulent orders is attached to the respondents filings.*

22 In April 2013 I received a copy of Gesmer’s final order denying me custody or visitation with my children unless I complied with a rigorous psychiatric treatment schedule in accordance with her falsified psych report. The falsified psychiatric report would become of great interests to investigators in the coming months.

23 From December 2012 to May 2013 I attended at six psychiatrists and my personal physician in an attempt to comply with the illegal order just to see my children. Every doctor I consulted refused to provide the treatment Gesmer mandated as they said it required insurance fraud, and abuse of health care resources and an attempt by Gesmer to use health care services as form of punishment for me, as I required no such treatment. I contacted Harriet Cohen and Karen Steinberg over 32 times to try to settle this issue and seek a modification of the Order as at that point I had not seen my children in

ten months. Neither replied to any of my messages or emails over several months and I later learned Steinberg removed herself from the file without notifying me or the children. The children asked to see her, but Steinberg saw them only once the previous August and never returned as promised.

- 24 In May 2013 in further steps of retaliation Harriet Cohen issued an illegal order against the children's babysitter, Aneesha John threatening her to not contact me or provide any information to me about my children. Aneesha was my only connection to my children. At that time, for Mother's Day my son, Dravin, now 6 asked Aneesha to arrange for my companion, Daniel Gold to pick up a mother's day gift for me. The gift was a picture frame he decorated with a recent picture (Aneesha had been instructed by Harriet to not send me any more pictures under threat of arrest.). Dravin had also learned to read and write in our year apart. He wanted me to know, and he sent the attached letter. I cannot read this letter without crying. *Attached hereto as Exhibit I is a copy of Dravin's letter.*
- 25 On or about June 19th I received an anonymous text message suggesting I go review the paper court file in my matter to see if there had been any changes.
- 26 The next business day I went to the file room at 60 Centre Street and obtained a fresh "Vacate order" of matter #6 (the order that denied me custody or visitation in the interim), but no date or signature. I also found a documented indicating some of Ms. Steinberg's evidence had been shredded. I could see from the court file that parts of the file were missing, but attended to that a different day. *Attached as Exhibit J is a copy of the vacate order and order for shredding Ms. Steinberg's exhibits.*
- 27 On June 25th, 2013 as part of an effort to obtain an emergency visitation order I filed a petition at the Westchester Family Court before Judge Klein. Not realizing I knew about the new and urgent order issued to seal the forensics report, opposing counsel, Paul Kurland filed this letter with Judge Klein containing **numerous flagrant and gross violations of a June 19th court seal in an attempt to win the motion fraudulently**. Judge Klein refused to hear the motion based on jurisdictional issues, so I was not able to record the court seal violation at that time. *Attached as Exhibit K is a copy of the letter Paul Kurland filed by mail and presented in person to the court with full knowledge that he was violating the court seal order, as well as copies of Judge Gesmer's order sealing the psychiatric reports three months after the judgment was entered.*

28 Based on the vacate order and excluded evidence, I brought an ex parte motion on Friday July 5th to revert back to the original Family Court order that gave me custody and support in November 2011. Judge Stallman reviewed the physical file and ordered a Show Cause for the following Thursday July 11th **explicitly placing the onus on opposing counsel to provide evidence that the children were in imminent harm by being returned to me.** As I had not seen the children in several months, and the fraudulent psychiatric reports were now removed from the file, I didn't anticipate this would be a problem. Legal counsel from NYLAGG assured me that the onus on the respondent was so exceedingly high because of the nature of the mental health evidence required and she did not see how the motion would be denied me.

29 The following Thursday July 11th we appeared before Judge Gesmer. I spoke candidly that I did not know what the status of the present counsel was or why they were still present on the matter. At no time did Judge Gesmer or opposing counsel raise any psychiatric issues which were to be the crux of the hearing that day. I noted this omission and confirmed **this was because the reports are marked as evidence in the criminal investigation and cannot be used in the course of the matrimonial action any longer.** On July 12th Judge Gesmer issued a **one line rejection of my motion without reasons which I then filed to appeal before this Court. It was a glaring error of law in that the onus was on the respondent, not me.** This did not concern me as I was advised it was better to have a different Judge beside Gesmer issue the Order returning custody, and that she heard the matter only procedurally so it could be forwarded to this court. *Attached as Exhibit L is a copy of Gesmer's denial without reasons from July 11th, 2013, as well as a copy of the transcript of the proceeding.*

30 The following Monday July 15th I appeared before court counsel of this court, Ariel Chesler and Justice DeGrasse of this court. Harriet Cohen and Paul Kurland showed up to oppose my motion despite the respondent's desire to return the children to me. Cohen and Kurland repeated the falsified psychiatric evidence in court as the sole basis to deny me even visitation for the children. The presented psychiatric diagnoses as the basis to Mr. Chesler, who then referred the matter to Justice DeGrasse. Once **again before Justice DeGrasse, Cohen and Kurland knowingly violated the court seal order and made repeated reference to specific contents of the falsified**

- 31 **psychiatric evidence to deny me visitation.** They did not know that I knew the evidence they referred to be under court seal and that there was a strict prohibition of its use in any context without a special court order. As I was shocked by the violation of the sealed court file, I waited to obtain written proof of the seal before raising the matter of the Ms Cohen and Mr. Kurland's deception upon Justice DeGrasse in order to win the motion. **Based on Ms Cohen and Mr. Kurland's fraudulent submission Justice DeGrasse denied me visitation that day** and ordered this court to hear the matter on August 5th, 2013 with a five judge
- 32 On Wednesday July 17th I met with Chief Clerk at 60 Center Street, Mr. Joseph Antonelli who confirmed the file had been sealed by a special order that he described as "extraordinary". He even showed me the physical sealed file and said even he couldn't look in it without a special court order and that there was a strict prohibition against the use of the contents. He also printed out a copy of the file minutes to show the file had been sealed since June 19th and said that all counsel were clearly instructed not to violate the seal and use the contents without a court order. *Attached as Exhibit M is a copy of the Court file minutes indicating clearly the sealing of the falsified forensic reports under federal criminal investigation.*
- 33 I have learned from our babysitters and extended the family that the children are devastated and suffering increased levels of depression. However Ms. Steinberg removed herself from the matter and refuses to see them a second time in a year.
- 34 I cannot adequately state the immense pain I am in as a parent knowing my young children have felt distressed, abandoned and abused by adults involved in a white collar fraud matter. These crimes are unspeakable to me and in clear violation of their human rights to see their mother. I have been in a state of despair and shock and frustrated that the abstruseness of these bizarre facts have left many on the bench to simply try to punt the matter for someone else to deal with. After a year of punting there is simply no excuse to keep denying any consideration of the children's best interests.
- 35 It is my sincere belief that Ms. Cohen and Mr. Kurland knowingly misled Justice DeGrasse in an effort to continue their criminal retaliation for my status as a federal witness. In light of the criminal penalties they are already facing from federal charges I believe they are harassing me in the hope

that I will somehow be able to intervene to stop the criminal indictment of themselves and parties with whom they conducted the retaliation efforts. As such the fact that Cohen, Kurland who know they are criminal targets in the investigation are allowed to further abuse my children as pawns to try to cover up their own criminal acts astounds me. Their hubris and disregard for the children's well-being has been absolutely shocking.

36 I know my children need to be immediately returned. Their lives have been in limbo and distress since there they were illegally taken from my custody a year ago. They have been used as pawns for the past year and with each passing day they continue to suffer unimaginable pain from not having any contact with me. I felt the file had been sealed on June 19th to facilitate the return of my children in time for summer so that they could begin to emotionally recover from the severe trauma inflicted upon them. With the continued fraud and crimes by the opposing counsel this has not been possible and my children have had a summer of wondering where I am and what has happened to me to their mother. They also express distress that the legal system has been so perverted and that "No one is thinking about us."

37 I make this affidavit for no improper purpose and only to seek the consideration and implementation after a year of delays of the best interests of the children.

Dated: _____, New York
_____, 20____

Sworn to before me this _____

day of _____, 20____

Notary Public