

UNITED STATES DISTRICT COURT
OF
CONNECTICUT

Docket No: _____

PLAINTIFF:

Michael J. Nowacki

DEFENDANTS:

The State of Connecticut

The Honorable Chase Rogers

The Honorable Peter Zarella

The Honorable Alexandra Depentima

The Honorable Christine Vertefeuille

The Honorable Michael Sheldon

The Honorable Eliot Solomon

The Honorable Barbara Quinn

The Honorable Judge Jane Emons

The Honorable Judge Robert Malone

The Honorable Judge Marylouise Schofield

The Honorable Judge Taggart Adams

The Honorable William Wenzel

The Honorable Michael Shay

The Honorable Harry E. Calmar

The Honorable Lynda Munro

The Honorable Robert E. Holzberg

Honorable Dannel P. Malloy—State of Connecticut

Andrew McDonald Esq.

Gerald Fox Esq.—Co-Chair of the Judiciary Committee

Eric Coleman Esq.—Co-Chair of the Judiciary Committee

Attorney General George Jepsen—State of Connecticut

Chief State Attorney Kevin T. Kane—State of Connecticut

Attorney J. Paul Vance—Claims Commissioner State of Connecticut

Assistant Attorney General Philip Miller—State of Connecticut

Attorney Michael Bowler—Statewide Grievance Committee

Attorney Veronica Reich

Bai, Pollock, Blueweiss and Mulcahey P.C.

Virginia Watkins

Dr. Kenneth Robson

Dr. Frank Stoll LLC

Dr. Harry Adamakos

VERIFIED COMPLAINT
JURY TRIAL DEMANDED

January 4, 2013

I. Introduction

1. Michael Nowacki, hereafter, "the plaintiff," affirms that he is a resident of the State of Connecticut since 1992 and resides in the Town of New Canaan in Fairfield County, an incorporated municipality within the jurisdiction of the United States District Court in Connecticut.

2. The plaintiff asserts that the defendants, as jurists, are currently, and for all times relevant to this complaint, intentionally and irrationally deprived the plaintiff's access to his parental rights without providing the plaintiff his lawful access to the equal protection and due process clause of the Fourteenth Amendment to the Constitution of the United States.

3. The plaintiff, as a self-represented party, asserts his parental rights are grounded firmly in common law, and are subject to "due process" and "equal protection" defined in the Fourteenth Amendment as incorporated the phrase "life, liberty and property" referenced in the Constitution of the United States and these deprivations have resulted in an unlawful "custody coup" of his two minor children (T.N. born in November 1994 and K.N. born in November 1996) on two occasions.

4. The interests of the "care, custody and control of one's children" by a parent have been well-established as a fundamental "liberty" interest protected by the Ninth (The enumeration in the Constitution of certain rights shall not be construed to deny or disparage others retained by the people) and Fourteenth Amendments (defined as "life, liberty and property") and such parental

rights are subject to the equal protection and due process clause of the 14th Amendment of the Constitution of the United States.

5. The plaintiff asserts he has been and continues for all times relevant to this complaint to be deprived of the access to the protections of his Fourteenth Amendment rights to due process and equal protection for the scheduling of hearings to lawfully filed motions in Stamford and Middletown family courts.

6. The plaintiff claims in this federal complaint, specific “rules” of the Connecticut Practice Book, as constructed by the members of the Connecticut judiciary since 1969, and applied in docket FST FA 04 0201276S, are discriminatory to the plaintiff as a self -represented part , and herein alleges such deprivations of rights and constitute violations of the Fourteenth Amendment pursuant to 42 U.S.C. Section 1983, 42 U.S.C. Section 1985, and 42 U.S.C. Section 1986.

7. The plaintiff files this complaint as a Private Attorney General seeking legal review from the federal court as to whether the adoption and promulgation of certain Connecticut Practice Book Rules, as defined in this complaint, should be declared unconstitutional and thereby unenforceable as applied in docket FST FA 04 0201276S.

8. The plaintiff seeks injunctive relief from the federal court from further impingements on the plaintiff’s fundamental rights of equal protection and due process rights to lawful discovery protected by the 14th Amendment to the Constitution of the United States involving undeclared “foreign assets” held by Suzanne Sullivan since 2006 which have been obstructed from discovery in sworn financial affidavits filed by Suzanne Sullivan and Attorney Kevin Collins in family court docket FST FA 04 0201276S.

9. The plaintiff alleges in all relevant times in Connecticut family court docketed case FST FA 04 0201276S, post-judgment, that the payments of the following “discretionary appointments” for “private contractors” were based upon income based discrimination criteria in violation of 42 U.S.C. Section 1983 and the 4th Amendment of the Constitution’s protections from the unlawful seizure of property: Attorney for Minor Children (Attorney Veronica Reich), a Guardian Ad Litem (Dr. Harry Admakos) and a court appointed psychiatrist/psychologist (Dr. Kenneth Robson and Dr. Frank Stoll).

10. Plaintiff alleges the appointments and extortions of the egregious payments to these “discretionary appointments” of “private contractors” name as the defendants (Attorney Veronica Reich, Dr. Harry Adamakos, Dr. Kenneth Robson and Dr. Frank Stoll) constituted violations of the federal Racketeering and Corrupt Practices Act, 18 U.S.C. Section 1961, 18 U.S.C. Section 1962 and 18 U.S.C. Section 1964 because the respective services rendered by these practitioners as “private contractors” was knowingly fraudulent and abridged the Rules of Professional Conduct for Attorneys in the State of Connecticut (Attorney Veronica Reich and the law firm of Bai, Pollock, Blueweiss and Mulcahey).

11. The plaintiff alleges that the State of Connecticut and its legislature has been negligent in defining any minimum standards for the conduct those who are appointed as “private contractors” for appointments in the State of Connecticut who conduct court appointed psychological evaluations. The plaintiff alleges there requirements that these court appointees are “judicial officers” as noted in Article VI of the Constitution and thereby required to take an oath or affirmation to protect the rights of all parents to equal protection and due process rights affirmed in the 14th Amendment.. The plaintiff alleges there is no required endorsement of these

court appointed private medical practitioners in the State of Connecticut to adhere to ethics of the American Psychiatric Association and the American Psychological Association.

12. To remedy these impingements on “life, liberty and property” by the employees of the State of Connecticut, the plaintiff seeks compensatory damage and punitive damages be awarded in a jury trial against the State of Connecticut as an employer of certain defendants, reasonable court costs and attorney fees commensurate with provisions in 42 U.S.C. Section 1988.

13. The plaintiff seeks injunctive relief compelling the defendants as jurists to cease and desist applying certain authorities derived from unlawfully acquired power and jurisdiction from Connecticut Practice Book Rules.

14. The plaintiff alleges the jurists in the State of Connecticut who conducted hearings in Stamford, Connecticut and Middletown, Connecticut in docket FST FA 04 02 01276S interfered with the contractual rights of joint parenting plan defined in the Separation Agreement and failed to properly assess the presumption in post-judgment motions for modification of joint legal and physical custody as stated in 46b-56 a (b) (2007):

“There shall be a presumption, affecting the burden of proof, that joint custody is in the best interests of the minor child where the parents have agreed to an award of joint custody or so agree in open court at a hearing for the purpose of determining the custody of the minor child or children of the marriage. If the court declines to enter an order awarding joint custody pursuant to the subsection, the court shall state in its decision the reasons for denial of an award of joint custody.”

15. From the date of January 18, 2005 to December 2, 2009, the plaintiff in this federal complaint shared joint legal and physical custody of the two minor children T.N. born 11/1/94 and K.N. born 11/8/96 without the interference of the jurists in the State of Connecticut.

16. On the dates of December 2, 2009, May 19, 2011, July 1, 2011, and October 25, 2011, there was “no compelling interest of the state” which provided the State of Connecticut the right to interfere with the “equal protection” and “due process” rights of the plaintiff to preservation of “joint legal and physical custody” parental rights.

17. The plaintiff seeks the review of the Memorandum of Decision of October 25, 2011 issued by The Honorable Harry E. Calmer and to determine whether certain provisions of this decision should be declared invasions of privacy and unconstitutional abridgments of personal freedoms of the plaintiff.

18. Plaintiff seeks reimbursement of all fees associated with the filing of this complaint pursuant to the application of 42 U.S.C. Section 1988.

Jurisdiction

19. Jurisdiction of this court is invoked under the provisions of Sections 1331, 1343 (3) and 1367 (e) of Title 18 of the United States Code and Sections 1983, 1985, 1986 and 1988 of Title 42 of the United States Code.

20. Jurisdiction is established in the federal court to be awarded to the plaintiff to the plaintiff for conduct alleged as set forth in this complaint pursuant to the applications of Sections 1961, 1962, 1964, and 1969 (e) of Title 18 Chapter 96 of the Racketeer Influenced and Corrupt Organizations.

21. Jurisdiction is established in the federal court for damages to be assessed for retaliations suffered by the plaintiff pursuant to the applications set forth by Title 18, Part 1, Chapter 73, Part 1, Section 1513 (e).

22. Jurisdiction is established in the federal court for self-represented parties to be notified of all proceedings as established in the Justice for All Act of 2004, Pub. L. No. 108-405, 118 Stat.

2260 as set forth in Section 3771 (a) (b) and (c) applying 18 U.S.C. section 3771 (d) (1) and 18 U.S.C. Section 3771 (e) (1).

23. Jurisdiction is established in the federal court by the Bank Secrecy Act of 1970 and Section III, Article for matters of controversy between two states, involving the wire transfer of assets an undisclosed foreign country to avoid payment of inheritance taxes in the State of New Jersey, and as alleged, the awarding of inheritance assets sent overseas to avoid discovery by the trustee (Attorney Eliot Cohen) of the Estate of Jane Mulligan (who died on March 21, 2003) which was distributed in 2006 to three undisclosed offshore accounts to three heirs: Suzanne Sullivan, who resided in the State of Connecticut, to Stacy Sullivan, who resides in the State of New York and Richard Mulligan Jr. who resided in the State of Wyoming.

24. Plaintiff seeks the Speedy Trial Act be applied the defendants pursuant to the provisions set forth in Title 18 Section 3771 (a) (7).

Parties

25. The State of Connecticut—is named as a defendant, and consists of an executive, legislative and judicial branch governed by a Constitution and a set of laws to be enforced by The Governor, The Attorney General and the Office of Chief State Attorney

26. The Honorable Chase Rogers—is named as a defendant in her official capacity as an employee of the State of Connecticut appointed since 2006 to the position of Chief Justice of the Supreme Court of the State of Connecticut

27. The Honorable Peter Zarella—is named as a defendant in his official capacity as an employee of the State of Connecticut and appointed as an appointed member of the Supreme Court of the State of Connecticut and is named as a defendant in his official administrative capacity as a public official serving as the Chair of the Rules Committee of the Judiciary from 2006-2010

28. The Honorable Dennis Eveleigh—is named as a defendant in his official capacity and as employee of the State the Connecticut as am appointed member of the Supreme Court of the State of Connecticut and is named as a defendant in his official administrative capacity as a public official serving as the Chair of the Rules Committee of the Judiciary effective January 1, 2011

29. The Honorable Alexandra Depentima—is named as a defendant in her official capacity as an employee of the State of Connecticut and as an appointed member of the Appellate Court of the State of Connecticut and is named as a defendant in her official administrative capacities as a public official as the Co-Chair The Advisory Committee on Appellate Rules

30. The Honorable Christine Vertefeuille—is named as a defendant in her official capacity as an employee of the State of Connecticut and an appointed member of the Appellate Court of the State of Connecticut and is named as a defendant in her official administrative capacities as a public official as co-chair of the administrative committee of the Judiciary—The Advisory Committee on Appellate Rules

31. The Honorable Michael Sheldon—is named as a defendant in his official capacity as an employee of the State of Connecticut as an appointed member of the Appellate Court of the State

of Connecticut and is named as a defendant in his administrative capacities as a member of the Rules Committee of the Judiciary

32. The Honorable Eliot Solomon—is named as a defendant in his official capacity as an employee of the State of Connecticut as an appointed member of the Superior Court of the State of Connecticut and is named as a defendant in his administrative capacities as a member of the Family Commission and the Chair of the Task Force on Use of Videoconferencing Hearings in the State of Connecticut

33. Honorable Barbara Quinn--is named as a defendant in her official capacity as the appointed Chief Court Administrator of the State of Connecticut as an employee of the State of Connecticut and is named as a defendant in her official administrative capacity to have conducted “training” of judges upon the adoption of the Code of Judicial Conduct which became effective on January 1, 2011

34. The Honorable Judge Jane Emons—is named as a defendant in her official capacity as an appointed Superior Court Judge employed by the State of Connecticut and is currently serving as the chief presiding judge in family matters in Stamford, CT

35. The Honorable Judge Robert Malone—is named a defendant in his official capacity as an appointed Superior Court Judge in the State of Connecticut and is named as a defendant in his capacity as the former presiding judge of family matters in the the Stamford jurisdiction

36. The Honorable Judge Marylouise Schofield—is named as a defendant in her official capacity as an appointed Superior Court Judge employed in the State of Connecticut and is named as a defendant in her capacity as the former presiding judge of family matters in the Stamford, Connecticut jurisdiction

37. The Honorable Judge Taggart Adams—is named as a defendant in his official capacity as a Trial Judge Referee and an employee of the State of Connecticut and is named as a defendant in his former official capacity as Chief Administrative Judge in the Stamford, Connecticut jurisdiction

38. The Honorable William Wenzel—is named as a defendant in his official capacity as an appointed Superior Court judge and an employee of the State of Connecticut and is named as a defendant in his former capacity as a family court judge in the State of Connecticut in the Stamford, Connecticut jurisdiction

39. The Honorable Michael Shay—is named as a defendant in his official capacity as an appointed Superior Court judge as an employee of the State of Connecticut

40. The Honorable Gary White—is named as a defendant in his official capacity as an appointed Superior Court judge and the Chief Administrative Judge as an employee of the State of Connecticut

41. The Honorable Harry E. Calmar—is named as a defendant in his official capacity as an appointed Superior Court Judge and an employee of the State of Connecticut

42. The Honorable Lynda Munro—is named as a defendant in her official capacity as the Chair of Family Matters as an appointed Superior Court Judge and an employee of the State of Connecticut and is named as a defendant in her administrative capacities as the Chair of the Family Commission of the Connecticut Judiciary

43. The Honorable Robert E. Holzberg—is named as a defendant in his former official capacity as the appointed Chief Administrator Judge as an employee of the State of Connecticut formerly employed in Middlesex Courthouse

44. Honorable Dannel P. Malloy—is named as a defendant in his capacity as Governor of the State of Connecticut, whose responsibilities are defined by an oath of office and the Constitution of the State of Connecticut

45. Andrew McDonald Esq.—is named as a defendant in his capacity as General Counsel to the Governor of the State of Connecticut and is an employee of the State of Connecticut and is named as a defendant in his capacity as a State Senator in the State of Connecticut and in his former administrative capacity as Chair and Co-Chair of the Judiciary Committee of the General Assembly

46. Michael Lawlor Esq.—is named as a defendant in his capacity as Undersecretary of State as an employee of the State of Connecticut and is named as a defendant in his capacity as a member and Co-Chair of the Judiciary Committee of the General Assembly

47. Gerald Fox Esq.—is named as a defendant as a State Representative of the General Assembly of Connecticut and employee of the State of Connecticut and is named as a defendant in his administrative capacities the Co-Chair of the Judiciary Committee, Connecticut Legislature

48. Eric Coleman Esq.—is named as a defendant as a State Senator of the General Assembly of Connecticut and employee Co-Chair of the Judiciary Committee, Connecticut Legislature

49. Attorney General George Jepsen—is named as a defendant as the elected Attorney General and an employee of the State of Connecticut
50. Chief State Attorney Kevin T. Kane—is named as a defendant as the appointed public official as the Chief State Attorney and an employee of the State of Connecticut
51. J. Paul Vance Esq.—is named as a defendant as an appointed public official as Claims Commissioner State of Connecticut and an employee of the State of Connecticut
52. Philip Miller Esq—is named as a defendant as an appointed public official in the State of Connecticut as an Assistant Attorney General and an employee of the State of Connecticut
53. Attorney Michael Bowler—is named as a defendant as an appointed public official in office Statewide Bar Counsel with responsibilities to properly sanction lawyers who operate outside of the Rules of Professional Conduct
54. Attorney Veronica Reich—is named as a defendant as an individual lawyer who has operated outside of the Rules of Professional Conduct in her appointment as the Attorney for the Minor Children in family case FST FA 04 0201276S
55. Bai, Pollock, Blueweiss and Mulcahey P.C.—is named as a defendant as a law firm operating as a private corporation in the State of Connecticut with responsibilities to enforcing the and upholding the Rules of Professional Conduct within those lawyers employed by the firm
56. Virginia Watkins—employee of the State of Connecticut
57. Dr. Kenneth Robson-is named as a defendant as an individual who is governed by the State of Connecticut and its licensing authority to operate within specified guidelines for medical practitioners

58. Dr. Frank Stoll LLC—is named as a defendant as a limited liability corporation and is governed as a licensed psychologist in the State of Connecticut

59. Dr. Harry Adamakos—is named as a defendant as a licensed medical practitioner in the State of Connecticut and governed by the Ethics Standards of the American Psychological Association

Specific Facts Supporting Allegations

In

Verified Complaint

60. On January 18, 2005, the parents of T.N. and K.N. signed a stipulation referenced in family case FST FA 04 0201276S as a “Parenting Plan, which was accepted by the court as an agreement for joint legal and physical custody.

61. On June 29, 2005, the parents of T.N. and K.N. signed a Separation Agreement and an order for the Dissolution of the Marriage of Suzanne Nowacki and Michael Nowacki that was entered on June 29, 2005 (Tierney K. J.) , which incorporated the joint legal and physical custody parenting plan as an order of the court operating in the best interests of the children.

62. For the period of time of June 20, 2005 until the plaintiff’s custody rights were unlawfully severed without a hearing, on December 2, 2009 the Parenting Plan signed on January 18, 2005 served the “best interests” of the two minor children who enjoyed the equal access to the love, care and companionship of both of their parents.

63. The Separation Agreement contained no provisions which prohibited a change or changes in the allocation of the expenses agreed upon by the parents. The legal standard in the State of Connecticut for a modification in “children’s related expenses” are based upon “a substantial

change in circumstances: with the burden of proof resting with the party who files a motion for modification.

64. On September 12, 2008, the father of the two minor children filed a Motion for Modification which was based upon a substantial change of income for Suzanne Sullivan, the mother of the two minor children based upon the promotion of Suzanne Sullivan to the position of Vice President of Fox Broadcasting in March 2008.

65. In February 2009, the father of the two minor children became aware of the existence of a foreign account at the Swiss Bank Corporation held by Suzanne Sullivan which was not disclosed on Suzanne Sullivan's financial affidavit. This undisclosed "foreign dividend income" and undisclosed "foreign assets" which was believed to have been derived from inheritance assets from the maternal grandmother (Jane O'Donnell Mulligan) of Suzanne Sullivan.

66. By virtue of a discovery order issued on or about August 12, 2009 by The Honorable Robert Malone, the discovery provided by Suzanne Sullivan on September 10, 2009 verified the existence of an undisclosed asset of Suzanne Sullivan, held in a "foreign based account" delivering "foreign dividend income totaling \$14,402 on the tax returns in 2008 of Suzanne Sullivan and her husband David Barrington.

67. On October 13, 2009, A Motion for Contempt was filed in Stamford Superior Court which was labeled Motion 217.0—which asked for sanctions to be applied to Suzanne Sullivan and her counsel, Attorney Kevin F. Collins, for filing knowingly false information in a sworn financial affidavit.

68. Despite 17 reclaims and ready markings of Motion 217 from October 13, 2009 to December 2, 2009 which were properly docketed for hearings in the Stamford, Connecticut court clerk's

office or the Middletown court clerk's offices and scheduled for either date specific or short calendar status hearing, the plaintiff has been denied his due process and equal protection right to have Motion 217 heard.

69. As recently as December 19, 2012 in a decision rendered by The Honorable Jane Emons, the presiding judge of family matters in Stamford, Connecticut, the plaintiff's due process and equal protection rights of the 14th Amendment of the Constitution of the United States to fair hearings was again obstructed by employees of the State of Connecticut

70. On May 10, 2010, based upon a substantial change in circumstances for the employment of the father of the children, a Motion for Modification on the Children's Expenses was filed in Stamford, Superior Court—identified as Motion 258.0 on docket FST FA 04 0201276 with a fee paid of \$175.00 payable to the State of Connecticut

71. On ten different occasions since May 10, 2010, Motion 258.0 was marked ready for hearing in both the Stamford, Connecticut Court Clerk's office or the court clerk's office in Middletown, Connecticut and at no point in time has the Motion 258.0 been subject to a docketed hearing and such discriminations in the scheduling of motions is alleged to be a violation of the due process and equal protection clause of the 14th Amendment to the Constitution in family case FST FA 04 0201276S.

72. The equal protection and due process clause of the 14th Amendment to the Constitution of the United States provides that there can be no discriminatory conduct in any state involving a class of citizens. However, the allegations set forth in this complaint alleges egregious and pernicious discrimination in the hearing of the motions filed by the self-represented party (the plaintiff in this federal pleading) in Connecticut family court docket FST FA 04 0201276S.

73. Since October 13, 2009, the following defendants in this federal complaint have failed to protect the equal protection and due process rights of the plaintiff to the lawful discovery in family court docket FST FA 040201276S of the source of the undisclosed “foreign dividend income” and undeclared “foreign asset” on the financial affidavits of Suzanne Sullivan filed in the Superior Courts in both Stamford and Middletown, Connecticut: The Honorable Marylouise Schofield, The Honorable Michael Shay, The Honorable Robert Malone, The Honorable Taggart Adams, The Honorable William Wenzel, The Honorable Gary White, The Honorable Harry Calmar, the Honorable Robert Holzberg, the Honorable Jane Emons, The Honorable Alexandra Depentima, Attorney Veronica Reich, Dr. Kenneth Robson and Dr. Harry Adamakos. The plaintiff in this federal pleading alleges the failure to disclose this foreign asset is believed to be linked to the unlawful sequestration of inheritance assets that were sent overseas prior to the death of Suzanne Sullivan’s maternal grandmother Jane O’Donnell Mulligan, who died on March 21, 2003 with the intent to avoid paying lawful inheritance taxes in the United States.

74. The plaintiff submitted substantial evidence which has been ignored by the defendants named in item 62 *supra* who were provided access to the evidence to support of the existence of the undisclosed “foreign account” for Suzanne Sullivan and who individually and or severally refused/or obstructed the review of the evidence of this alleged criminal conduct and avoidance of payment of inheritance taxes by the heirs of the estate of Jane O’Donnell Mulligan.

75. In February 2009, the United States Department of Justice collected a \$780 million fine from UBS for aiding and abetting U.S. investors who were encouraged to move assets to UBS to avoid paying taxes. It should be noted that the Swiss Bank Corporation who issued a wire transfer to Suzanne Sullivan date Jan

76. Despite repeated written requests and one verbal request noted by the plaintiff in this federal pleading, The Honorable Lynda Munro, as the Chair of the Family Commission has refused in her administrative role to consider adding “foreign dividend income” and “foreign assets” to the standard financial affidavit forms of the State of Connecticut currently under review for use in all court proceedings.

77. The Chief Justice of the Supreme Court, the Honorable Chase Rogers, is a former partner of the largest estate and trust law firm in the State of Connecticut, Cummings and Lockwood.

78. The Chief Justice of the Supreme Court, The Honorable Chase Rogers, along with Supreme Court Justice Peter Zarella, engineered prior to June 21, 2007 Annual Judge Meeting the creation of a resolution which circumvented the public’s rights, including the plaintiff’s, to attend public legislative hearings mandated by C.G.S. 51-14 (a), (b) and (c) concerning the modifications and creation of Connecticut Practice Book Rules.

79. C.G.S. 51-14 (a) states clear and unambiguous language which restricted the creation and modifications of Connecticut Practice Book Rules:

“Such rules shall not abridge, enlarge or modify any substantive right or the jurisdiction of any of the courts”

80. This complaint alleges the judges of the Superior Court of the State of Connecticut have subverted the intent of the Connecticut Practice Book which was established solely to establish “procedural” rules of the courts—not rules of self-empowerment.

81. This complaint alleges the judges of the Superior Court and the Chairs of the Judiciary Committee of the General Assembly, including Andrew McDonald, Esq., Michael Lawlor Esq.,

Gerald Fox Esq. and Eric Coleman Esq. since 2007 engaged in the abridgment of the powers of separation of government, and engaged in egregious “self-empowerment” in their administrative capacities by circumventing the mandates of C.G.S. 51-14 (a), (b) and (c).

82. The plaintiff appeared before the Rules Committee of the Judiciary in the chambers of the Supreme Court Chambers on the date of May 31, 2011, and spoke about the unconstitutionality of adoption of videoconferencing hearings as a matter of “judicial discretion.”

83. Judge Michael Sheldon was captured on videotape at the Rules Committee meeting of May 31, 2011 which followed by a Rules Committee meeting and made the following statement which was captured on camera: “I don’t think it is the responsibility of the Rules Committee to test the constitutionality of practice book rules before they are adopted.” In short, Attorney Sheldon, was suggesting that Rules Committee had no responsibility to uphold his oath or affirmation required by Article VI of the Constitution of the United States to ‘support this Constitution’ as “the supreme Law of the Land” and that the “Judges in every state shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.”

84. The plaintiff wrote to the 187 members of the General Assembly in the State of Connecticut, on or about June 8, 2011 about the abuse of the limited lawful authority of the Rules Committee to circumvent the legal mandate which required legislative hearings prior to the adoption of modifications of the Practice Book and the plaintiff received no response from a single member of the legislature.

85. At the beginning of the legislative session commencing on or about February 15, 2012, the plaintiff renewed his campaign to hold the members of the General Assembly and the judiciary

committee to the mandate of C.G.S. 51-14 (a), (b) and (c) and properly conduct hearings on the proposed practice book rules before the end of the abbreviated session of the judiciary committee meetings which ended in early April 2012.

86. The plaintiff instead became the first person in the history of the legislature on the date of February 22, 2012 for speaking at a judicial confirmation hearing concerning the legal misconduct of Attorney Maureen Murphy, for speaking for more than three minutes. The speaker before the plaintiff spoke for 19 minutes and the speaker after the plaintiff spoke for over six minutes.

87. However, after addressing the judiciary committee, the Supreme Court for the first time in 43 years conducted a scheduled public hearing on March 4, 2012.

88. At the hearing, the plaintiff addressed four Supreme Court jurists including the Chair of the Rules Committee, The Honorable Dennis Eveleigh and The Honorable Peter Zarella. The plaintiff read the following excerpt of testimony delivered by the Chief Administrator Judge, The Honorable Barbara Quinn, on proposed House Bill 6630, delivered to the General Assembly, in which a “threat” was issued if the bill was passed to transfer the authority back to the legislature to control the adoption and promulgation of Connecticut Practice Book Rules:

“For the past thirty years, the Judicial Branch has been providing copies of all of the rules changes made during the preceding year to the General Assembly in order to promote cooperation and avoid a constitutional confrontation. This does not mean the judiciary has acquiesced and ceded its authority with regard to the adoption of procedural rules for the courts. During that time, the Judiciary Committee has never held a hearing on the rules submitted, as required by statute, nor has the Legislature ever declared a rule to be void pursuant to the statute. If those events were to occur, the Judicial Branch might very well raise the issue of a statute’s constitutionality. If you decide that the Legislature should have control over the procedural rules, I would submit that a constitutional amendment is necessary.”

89. Such comments from the Chief Administrator Judge of the State of Connecticut (who was not under orders to testify under subpoena to the General Assembly) to attempt to intimidate a legislature which is comprised of 60% of its members who are employed as practicing attorneys in the State of Connecticut, is alleged by this plaintiff to constitute an abridgment of the powers of separation of government.

90. During the past three years, in both criminal and civil court matters, the plaintiff has been a victim of unlawful discrimination which has been egregious qualifying as “wanton”, “reckless” or “malicious” conduct in the abuse of administrative authority acquired through the circumvention of the limited authority granted the judiciary to modify the Connecticut Practice Book Rules as mandated by C.G.S. (a), (b) and (c).

91. C.G.S. 51-14 when enacted in 1953 was not envisioned as a method to increase the self-empowerment of the judiciary whose limited authority was originally established as Article Fifth, Section 1 of the Constitution of the State of Connecticut enacted in 1818 and then revised in 1982 to Article XX:

“The judicial power of the state shall be vested in a supreme court, an appellate court, a superior court and such lower courts as the general assembly shall from time to time establish. The powers and jurisdiction of these courts shall be defined by law.”

92. During the course of family court proceedings in Stamford and Middletown, Connecticut, in docket FST FA 04 0201278S, the plaintiff has been deprived access to such fundamental rights to depose witnesses, to cross examine witnesses, to have a compulsory process to call witnesses to one’s favor, to have access to a writ of habeas corpus, to be protected from motions or elements of surprise.

93. Even the Connecticut Law Review printed an expose concerning the discriminatory applications of the Connecticut Code of Evidence published in February 2010 under the title of: “The Connecticut Evidence Code and the Separation of Powers”

94. The plaintiff in this federal complaint claims the Connecticut Practice Book Rules are festooned with rules which abridged the powers of separation of government as defined in the Constitution of the United States and the Constitution of the State of Connecticut due in no small part to the lack of supervision by the legislature since 1969 were adopted without following the protocols specifically enacted to ensure the Connecticut Practice Book to conduct “hearings” and required the judiciary to conduct “public hearings” prior to the adoption and promulgations of rules which in fact “abridge, enlarge, or modify substantive rights” held by citizens.

95. The plaintiff in this federal complaint files claims that specific Connecticut Practice Book Rules, as applied to the plaintiff in family case FST FA 04 0201276S should be viewed as discriminatory in their construction and application violated plaintiff’s rights of access to the due process an equal protection clause of the 14th Amendment to the Constitution of the United States.

96. The plaintiff in this federal complaint files claims for the restitution of his parental rights which have been abridged by deprivations of due process and equal protection rights of the 14th Amendment to the Constitution of the United States.

97. The plaintiff in this federal complaint files claims that the Governor of the State of Connecticut, The Honorable Dannel Malloy has engaged in conduct which is “wanton”, “reckless” or “malicious” to ignore a responsibility defined in the Constitution of the State of Connecticut “to faithfully uphold the laws of the State of Connecticut” including C.G.S. 46b-

129a(2) which requires counsel appointed for the child abide by the Rules of Professional Conduct which provides a statutory responsibility that the “informed consent” of children as minors is respected.

100. The Statewide Bar Counsel, and Attorney Michael Bowler, is named as a defendant in this suit for obstructing the proper investigation into the conduct of Attorney Veronica Reich based upon a sworn complaint filed in September 2010 that Attorney Reich had violated the the rights of “plaintiff’s” minor children to have their “informed consent” and “the intelligently articulated objectives of representation honored” as defined in the Rules of Professional Conduct in Rule 1.0.

101. The Attorney General of the State of Connecticut, George P. Jepsen, and Chief State Attorney, Kevin T. Kane, are named as defendants in this complaint for their refusal to enforce the provisions of C.G.S. 51-14 (a), (b) and (c) to investigate the legislature and judiciary for the abridgments of the powers of separation of government.

102. The plaintiff claims in this pleading to the federal court there are no standards which have been enacted in the State of Connecticut to regulate the practice of psychiatric examinations by court appointed psychiatrists and psychologists which are designed to ensure such examinations are conducted with respect to the equal protection and due process rights to the “care, custody and companionship” of parents to a relationship with their children.

103. Dr. Kenneth Robson was a court appointed to conduct a “psychological evaluation of both parents” in family docket FST FA 04 0201276S. A battery of standard psychological tests was performed by Dr. Frank Stoll of both parents and Dr. Robson issued his report to the Attorney for the Minor Children on or about January 12, 2012.

104. Dr. Robson received hundreds of pages of documents from the plaintiff to be used to reference Suzanne Sullivan's second appointment with Dr. Robson. Dr. Robson conducted two appointments totaling less than four hours with the plaintiff in this pleading. Dr. Robson conducted only one appointment with Suzanne Sullivan despite providing assurances to the plaintiff that he would review the documents provided to him. Dr. Robson was never subject to sworn testimony examinations by this plaintiff until May 19, 2011. Dr. Robson admitted under oath on May 19, 2011 that he never inspected the list of documents provided to him in December 2009.

105. Dr. Robson provided specific credentials to the court on January 22, 2010 under oath. It was discovered in November 2011. Dr. Robson had been misrepresenting his "hospital appointments" with the Hartford Healthcare Corporation since 2004 in his "credentials" presented in courts of law in the State of Connecticut.

106. Dr. Robson testified in Connecticut family law case FA 09 4037658 *Liberti v. Liberti* case conducted in Middletown, Connecticut on August 25, 2011 and August 26, 2011 that he could complete a psychiatric evaluation of a patient in "three minutes or less." An Axis II evaluation must be completed over an extended period of time of six months to one year according to guidelines set forth by the American Psychological Association.

107. Dr. Robson testified on May 19, 2011 in a family court hearing in Middletown, Connecticut on docket FST FA 04 0201276S that as a psychiatrist he was not bound to abide by the Ethical Principles of the American Psychological Association regarding child custody evaluations.

108. Dr. Robson is not a member of the American Psychological Association but practices psychological evaluations as a licensed psychiatrist in the State of Connecticut.

109. Dr. Robson conducted an psychological update on the plaintiff in a meeting which lasted less than three minutes and violated the plaintiff's HIPPA rights in speaking to Virginia Watkins, an employee of the State of Connecticut.

110. The plaintiff was refused by The Honorable Marylouise Schofield the right to have a deposition conducted of Dr. Kenneth Robson and Dr. Frank Stoll's evaluations of the plaintiff and his ex-spouse.

111. Dr. Harry Adamakos, a court appointed Guardian Ad Litem, refused to inspect state decisional law and federal constitutional law regarding the parental rights of parents are protected as "liberty interest".

112. Dr. Harry Adamakos, the court appointed Guardian Ad Litem, was not an "independent" representative of his clients and delivered testimony which directly conflicted with his notes taken during his interviews with the children. Dr. Adamakos provided no written report of his meetings at trial and failed to abide by the Ethical Principles for Psychologists established by the American Psychological Association.

113. The plaintiff asserts in this pleading that he has been denied his 14th Amendment equal protection and due process rights for more than three years to provide proper discovery regarding the non-disclosure of an inheritance asset bequeathed by the estate of Jane O'Donnell Mulligan in the egregious deprivation of these jurists named in item 12 supra, who have obstructed the scheduling of hearing on Motion 217 (Motion for Contempt filed on October 15,

2009), Motion 258 (Motion for Modification filed on May 10, 2010) and Motion 483 (Motion for Contempt filed on December 30,2011).

114. The plaintiff asserts in this complaint, that the Honorable Jane Emons, the presiding judge of family matters in Stamford, Connecticut on the date of December 19, 2012 and December 21, 2012, denied the plaintiff, a due process and equal protection right to standard items of discovery demanded of the plaintiff by opposing counsel in FST FA 04 0201276S .

116. The plaintiff was denied a due process and equal protection right for a scheduled hearing without oral argument on the reclaim of three Motions filed by the Plaintiff, including for Modification for children's related expenses, which was filed by the plaintiff on May 10, 2010, based upon a substantial change in the plaintiff's income. Judge Emons claimed in the denial of the scheduling of the plaintiff's motions that they "stale" (see Exhibit 1), per practice book, without providing such a cite in her written orders to deny discovery.

117. For the last 30 months, in family case FST FA 04 0201276S the Motion for Modification (Motion 258) for children's related expenses had been reclaimed and scheduled for hearing over a dozen times and again the plaintiff's rights for a due process and equal protection hearing on matters of standard discovery was obstructed from scheduled hearing.

118. The plaintiff's alleges in this pleading he has been deprived access to the equal protection and due process rights of his parental rights pursuant to the application of the 14th Amendment and 42 U.S.C. Section 1983, 42 U.S.C. Section 1985, and 42 U.S.C. Section 1986.

119. The plaintiff has been an active observer of the administrative proceedings of the Family Commission since 2010 in which the plaintiff has written to the member of the Family Commission challenged the constitutional authority of judges to write laws of self-empowerment

and then provide them to the Chief Court Administer, The Honorable Barbara Quinn, for submission to the legislative judiciary committee for consideration. The plaintiff claims such conduct by judges of the Family Commission violate the powers of separation of government and Article VI of the Constitution of the United States, which defines the Constitution of the United States as the “supreme Law of this Land” and requires an oath of affirmation for “judiciary officers” in the several states to support the Constitution of the United States.

120. The Honorable Lynda Munro submitted testimony on judicial stationery to oppose legislative action introduced as House Bill 6651 (submitted by Connecticut House of Representative Bill Carter). This legislation would have provided the opportunity for children over 12 to provide testimony in child custody cases and exposed that Attorneys representing Minor Children and Guardian Ad Litem have been providing misleading statements on behalf of their clients in courts of law in the State of Connecticut, such as Attorney Veronica Reich and Dr. Harry Adamakos.

121. This February 22, 2010 letter sent Judge Lynda Munro, as the Chief Judge for Family Matters, to use the “bully pulpit” of her office to oppose further consideration House Bill 6651 to support a the employment of lawyers and others as Attorneys for Minor Children and Guardians Ad Litem is an example of “wanton”, “reckless” and “malicious” conduct by a jurist in an administrative capacity which is alleged to violate the oath of office mandated by Article VI of the Constitution of the United States. The Honorable Lynda Munro’s written testimony dated February 22, 2012 submitted to the legislature was not filed under the power of subpoena by the legislature.

122. Plaintiff notes that the federal courts have maintained jurisdiction of matters involving Constitutional rights abuses since 1803. Chief Justice John Marshall, speaking for a unanimous Court, referring to the Constitution as the “fundamental and paramount law of the nation”, declared in **Marbury v. Madison 1 Cranch 137, 177**, “It is emphatically the province and duty of the judicial department to say what the law is.”

123. This majority opinion written by Justice Marshall declared that the basic principle that the federal judiciary is supreme in the exposition of the application of the principles set forth as law in the Constitution, have been respected as an indelible and indispensable feature of the constitutional system of the United States.

124. The Plaintiff asserts the federal courts maintain proper jurisdiction on any public official who wars against the Constitution. In 1809, Justice Marshal again in **Untied States v. Peters, 5 Cranch 115, 136**, issued a unanimous opinion on behalf of the Supreme Court in affirming:

“If the legislatures of the several states may, at will, annul the judgments of courts of the United States, and destroy the rights acquired under these judgments, the constitution becomes a solemn mockery”.

125. In 1932, Chief Justice Hughes, on behalf of a unanimous Supreme Court, articulated in **Sterling v. Constantin, 287 U.S. 378**:

“A governor who asserts a [358 U.S. 1, 19} power to nullify a court order is similarly restrained.”

126. Chief Justice Hughes continued his articulations regarding a Governor who

might ignore the Constitution of the United States as the superceding law of the country and serves as a mandate to Governor's responsibility to properly have oversight of the protection of Constitutional rights in any state, including the "Constitution State" in Sterling v. Constantin supra, on pages 397-398:

"it is manifest that the fiat of the state Governor, and not the Constitution of the United States would be the supreme law of the land; that the restrictions of the Federal Constitution upon the exercise of state power would be but impotent phrases".

125. Plaintiff seeks compensatory damages under Reparation Act of 1996, as deemed appropriate for the egregious nature of the abridgment of the Constitutional and civil rights of this parent based upon the specific allegations and counts as noted herein:

Count 1: The speech delivered to the Connecticut Bar Association and the address to the judges of the Superior Court in June 2012, referencing "pro se" or "self-represented parties" as "problems" for the judiciary system of the State of Connecticut was a statement by Chief Justice Chase Rogers, in an administrative capacity, that violated 42 U.S.C. Section 1983—which prohibits discrimination against any class of citizens.

Count 2: The email sent by Supreme Court Justice Peter Zarella sent to the Superior Court judges of Connecticut in regards to a "proposed resolution" to approve members of the Rules Committee to meet in non-public meetings with specified members of the legislative judiciary committee circumvented the powers of separation of government defined in Articles I, II and III of the Constitution of the United States and Article VI of the Constitution which required all judges in the states to support this constitution as the "supreme Law of the Land" and abridged Article VI of the Constitution of the United States that "...Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution."

Count 4: Supreme Court Justice Peter Zarella and Supreme Court Justice Dennis Eveleigh, deprived the plaintiff access to the due process and equal protection clause of the 14th Amendment as it applied the Freedom of Information Act of Connecticut, when they obstructed on March 4, 2012 the rights of the plaintiff to videotape the first announced public hearing conducted in 43 years in the State of Connecticut on the Practice Book Rules in accordance with C.G.S. 51-14 (c).

Count 5: Supreme Court Justice Peter Zarella, in his administrative capacities as the Chair of the Rules Committee abused his oath of office by promising Judge Michael Sheldon (between November 2010 and December 20, 2010) the next Appellate Court seat opening in order to induce Judge Sheldon to remove his objections to “videoconferencing rules” that Judge Sheldon opposed at the November 2010 Rules Committee meeting (which was presided by The Honorable Ian McLachlan).

Count 6: In endorsing the adoption and promulgation of Practice Rule Boo Rule 23-68, which provided “judicial authority” to grant video conference hearings without consent of a self-represented party, Supreme Court Justice The Honorable Christine Vertefeuille, Appellate Court Chief Justice The Honorable Alexandra Depentima, Superior Court Judge The Honorable Eliot Solomon and The Chief Judge of Family Matters, The Honorable Lynda Munro, and the Chief Administrative Judge in Middlesex, The Honorable Robert Holzberg violated Article VI of the Constitution of the United States and Article I, Section 9 of the Constitution of the United States which grants only the President of the United States the authority to deny a writ of habeas corpus..

Count 7: The letter dated February 22, 2010 sent by Judge Lynda Munro sent on judicial stationery in opposition to legislation on House Bill 6651 (which if sent to the judiciary committee would have provided children rights to testify to their preferences in custody matters) abridged the powers of separation of government and Article VI of the Constitution of the United States.

Count 8: Practice Book Rule 7-19 (which grants powers of applications of subpoenas to Superior Court judges) as applied by The Honorable Marylouise Schofield, The Honorable Robert Malone, The Honorable Harry E. Calmar, The Honorable Robert Holzberg, and The Honorable Jane Emons in family docket FST FA 04 0201276S deprived the plaintiff of equal protection and due process rights of the 14th Amendment and the 6th Amendment of the Constitution to have a compulsory process to have witnesses in his favor, including his two minor children.

Count 9: The failure of the Connecticut Judiciary Committee and the judiciary of the State of Connecticut from 1969 through 2011 to conduct mandated hearings in accordance with C.G.S. 51-14 (a), (b) and (c) violated the plaintiff's substantive rights as a citizen to testify in open televised hearings in opposition to the use of the Practice Book Rules to "abridge, enlarge or modify any substantive right or the jurisdiction of any of the courts."

Count 10: The adoption of Connecticut Practice Book Rule 25-62 and 25-62a (requiring training seminars for GAL's and AMC's in the State of Connecticut under the supervision of the judiciary) is unconstitutional inasmuch as this rule abridges the separation of powers of government defined in the Constitution of the United States in Articles I, II and III and

incorporated in Article VI of the Constitution of the United States which requires an oath or affirmation to be “bound” to the federal constitution as the “supreme Law of the Land.”

Count 11: Connecticut Practice Book Rule 9a (allowing for non-public meetings between the judiciary and legislature that circumvented provisions in C.G.S. 51-14 (a), (b) and (c), as adopted and promulgated, is an unconstitutional abridgment of the powers of separation of government and violates Articles I, II and III of the Constitution of the United States as incorporated in Article VI of the Constitution of the United States which requires an oath or affirmation to be “bound” to the federal constitution as the “supreme Law of the Land”).

Count 12: Connecticut Practice Book Rule 9a is alleged to violate the Racketeering and Corrupt Organizations Statutes as defined in Title 18, Chapter 96, Sections 1961, 1962, 1964 and 1968 to because such meetings conducted to endorsed the unlawful abridgment, enlargement and modification of Connecticut Practice Book Rules and the adoption of Practice Book Rule 9a was designed to circumvent the rights of public participation mandated by C.G.S. 51-14 (a), (b) and (c).

Count 13: The Statewide Bar Counsel and its grievance counsel overseer Attorney Michael Bowler have engaged in the unlawful construction of a “legal cabal” in failing to properly enforce C.G.S. 46b-129a (2) in violation of Title 18, Chapter 96, Sections 1961, 1962, 1964 and 1968,

Count 14: The appointment and payments extorted from the plaintiff filed by Attorney Veronica Reich, Dr. Kenneth Robson, Dr. Harry Adamakos and Dr. Frank Stoll LLC in family case FST FA 04 0201276S represented an egregious conspiracy to defraud the plaintiff of assets based upon the application of Title 18, Chapter 96, Sections 1961, 1962, 1964 and 1968 and

constituted an unlawful seizure of assets by the government which were awarded to Attorney Veronica Reich, Dr. Kenneth Robson, Dr. Harry Adamakos and Dr. Frank Stoll LLC.

Count 15: The filing of Ex Parte Motions for Order for Custody Modifications on December 2, 2009 and February 28, 2009 and billing for such services by “judicial officers” of the law firm of Bai, Pollock, Blueweiss and Mulcahey LLP and Attorney Veronica Reich were intended to deprive the plaintiff of the equal protection and due process rights defined in the Fourteenth Amendment of the Constitution of the United States and violated Article VI of the Constitution of the United States.

Count 16: The granting of an Emergency Ex Parte Motion for Order for custody modification filed by Attorney Veronica Reich on December 2, 2009 by The Honorable Marylouise Schofield and the Honorable Taggart Adams and the failure to schedule an evidentiary hearing required within 14 days of the granting of an Ex Parte Motion for order, represented an abridgment of the equal protection and due process clause of 14th Amendment of the Constitution of the United States.

Count 17: The suspension of the hearing of Motion 217 in family case FST FA 04 0201276S on January 22, 2010 by the Honorable Marylouise Schofield, without providing notice to the parties of the suspension of motions for a self-represented , and the refusal by nine jurists (The Honorable Marylouise Schofield, The Honorable Taggart Adams, The Honorable William Wenzel, The Honorable Michael Shay, The Honorable Robert Malone, The Honorable Jane Emons, the Honorable Gary White, The Honorable Harry Calmar, The Honorable Robert Holzbert) to schedule a hearing on Motion 217, which involved a contempt motion on the sequestration of an undisclosed “foreign asset” constituted a violation of the plaintiff’s due

process and equal protection clause of the 14th Amendment and abridged the Bank Secrecy Act of 1970 which included language to make it unlawful to move assets overseas to avoid paying lawful taxes in the United States.

Count 18: The removal of the rights of self-representation by the Honorable Marylouise Schofield on January 22, 2010 deprived the plaintiff parental rights as defined by the due process and equal protection clause of the 14th Amendment and also abridge the plaintiff of his lawful Sixth Amendment rights of self-representation.

Count 19: The denial of the Appellate Court Chief Justice Alexandra Depentima of an appeal on a “temporary custody award” in March 2010 because the December 2, 2009 was not a final order of the court was a deprivation of the equal protection and due process clause of the 14th Amendment to the Constitution of the United States by the State of Connecticut.

Count 20: The adoption and promulgation of the Code of Evidence in the State of Connecticut in 2000 was unconstitutional because such rules of evidence were not approved by the legislature, there were no public hearings conducted as required by C.G.S. 51-14 (a), (b) and (c), and therefore the Code of Evidence, was an unconstitutional expansion of “jurisdiction” by the court prohibited by the narrow language of Article XX of the Constitution of the State of Connecticut which indicated the powers and jurisdiction of the courts are defined by laws.

Count 21: State of Connecticut, Senator Andrew McDonald, State of Connecticut Representative Michael Lawlor, Representative Gerald Fox, State of Connecticut Senator Eric Coleman, Chief State Attorney Kevin T. Kane, Attorney General George Jepsen, Assistant Attorney General Philip Miller and the Honorable Governor Dannel Malloy engaged in “wanton”, “reckless” or “malicious” conduct as public officials in circumventing knowingly and

willfully the mandates of C.G.S. 51-14 (a), (b) and (c) to promote the legal profession at the expense of the rights of citizens to be protected from the unlawful acquisition of “judicial self-empowerment” to further their own personal careers in the legal profession at the expense of the plaintiff’s constitutional and civil rights to due process and equal protection of rights to public hearings to be conducted and to properly limit the use of the Connecticut Practice Book to “rules of procedure” subject to limitations to “abridge, enlarge or modify any substantive right or the jurisdiction of any of the courts.”

Count 22: The bi-annual, non-public meetings between the legislative judiciary committee and the Rules Committee, including the Chief Justice of the Supreme Court The Honorable Chase T Rogers, as defined by Practice Book Rule 9a, are alleged to be an abridgment of the powers of separation of government which circumvented and deprived the plaintiff’s rights as a citizen to the public participation in the legislative mandates required by C.G.S. 51 (a), (b) and (c) and is alleged herewith to abridge the oath or affirmation of Article VI of the Constitution of the United States.

Count 23: The conduct of The Honorable Taggart Adams, The Honorable Marylouise Schofield and Attorney Veronica Reich to engage in a conspiracy to the deprive the parental rights of the plaintiff on December 2, 2009 are alleged in this complaint to violate 42 U.S.C. 1983, 1985 (3) and 1986.

Count 24: The conduct of The Honorable Harry E. Calmar and the Honorable Robert Holzberg, and Attorney Veronica Reich to conspire to conduct a “videoconference” hearing on April 15, 2011 is alleged to have abridged plaintiff’s access the due process and equal protection clauses of the 14th Amendment and such conduct by these public officials is alleged to be in conflict with

Article 1, Section 9 of the Constitution of the United States and is alleged to violate 42 U.S.C. Section 1983..

Count 25: The conduct of The Honorable Harry E. Calmar and the Honorable Robert Holzberg and Attorney Veronica Reich to conspire to conduct a “videoconference” hearing on May 10, 2011 is alleged to have abridged the plaintiff’s access to the due process and equal protection clauses of the 14th Amendment and such conduct by these public officials is alleged to be in conflict with Article 1, Section 9 of the Constitution of the United States and also a violation of 42 Section 1983.

Count 26: The plaintiff alleges the medical records information exchanged without the consent of the plaintiff on the date of May 4, 2011 at the Osborn Correctional Facility between Virginia Watkins and Dr. Kenneth Robson was a violation of the Health Information Privacy and Portability Act.

Count 27: The plaintiff alleges in this complaint that the Defendants named above acted under the color of state law, C.G.S. 4-165 when they abused their administrative authority as elected and appointed public officials in a “wanton”, “reckless” or “malicious” abuse of authority in failing to conduct proper hearings and public hearings required by C.G.S. 51-14 (a), (b) and (c) and the State of Connecticut must be held liable for the damages to the integrity of the plaintiff’s family life.

Count 28: Counts 1-27 are incorporated into the claims for damages for the State of Connecticut for neglectful conduct by the Claims Commissioner, J. Paul Vance Jr. for refusing to enforce the provisions of C.G.S. 51-14 (a), (b) and (c).

Count 29: Counts 1-28 are incorporating into the claims for damages for Attorney General George Jepsen, Assistant Attorney General Philip Miller, Chief State Attorney Kevin T. Kane and The Honorable Dannel P. Malloy who were advised on April 4, 2011 of the unlawful adoption of Connecticut Practice Book Rules since 1969 and by ignoring the claims set forth on April 4, 2011, engaged in “wanton”, “reckless” or “malicious” conduct as public officials to promote the continuation of a Racketeering and Corrupt Organization practices in violation of federal law Title 18, Chapter 96, Section 1961, 1962, 1964 and 1968.

Count 30: The plaintiff seeks damages pursuant to claims 1-29 pursuant to the application of 42 U.S.C. Section 1983, 1985 (3), and 1986 and the due process and equal protection clause of the 14th Amendment.

Count 31: The plaintiff seeks a hearing for injunctive relief for the restoration of the plaintiff’s joint legal and physical custody rights within 30 days of the filing of this complaint.

The plaintiff verifies that the statements in this pleading are an accurate assessment of facts to the best of his recollections.

Respectfully Submitted,

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Certification:

A copy of this pleading has been provided by first class mail, postage paid to all parties of record in these proceedings.

Michael J. Nowacki

Date