

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

-----X  
Susan Skipp,

Gabrielle Anderson Tittle, a minor  
By her next friend and parent  
Susan Skipp

Wyatt Griffin Tittle, a minor,  
By his next friend and parent  
Susan Skipp

Plaintiffs,

VS.

Defendants:

State of Connecticut

The State of Connecticut Judicial Branch

Chase T. Rogers,  
In her individual and official capacity

Barbara Quinn  
In her individual and official capacity

Lynda B. Munro  
In her individual and official capacity

Robert T. Resha,  
In his individual and official capacity

Lloyd Cutsumpas,  
In his individual and official capacity

Mark Taylor,  
In his individual and official capacity

Maureen Murphy  
In her individual and official capacity

March 25, 2014

Case No. 314 CV-141

**JURY TRIAL DEMANDED**

Patrick J. Carroll, III, )  
 In his individual and official capacity )

Sandra Lugos Gines )  
 In her individual and official capacity )

Stephen Grant, )  
 In his individual and official capacity )

Debra Kulak, )  
 In her individual and official capacity )  
 )

Laurie Anton, )  
 In her individual and official capacity )  
 )

Christopher Haddad, )  
 In his individual and official capacity )  
 )

Mary Piscatelli Brigham, Attorney at Law, LLC )  
 )

Mary Brigham )  
 In her individual and official capacity )  
 )

Connecticut Resource Group, LLC )  
 )

Sidney S. Horowitz, Ph.D., )  
 In his individual and official capacity )  
 )

Howard Kreiger, Ph.D., )  
 In his individual and official capacity )  
 )

Tracy Barraco, )  
 In her individual and official capacity )  
 )

Martin Libbin )  
 In his individual and official capacity )

Rosemary Guilliano, )  
 In her individual and official capacity )  
 )

Christopher Hite )  
 In his individual and official capacity )  
 )

James D. Hirschfield )  
 In his individual and official capacity )

Visitation Solutions LLC	)
	)
Laura C. Ernhardt	)
In her individual and official capacity	)
The Connecticut Chapter of the Association of	)
Family and Conciliatory Courts,	)
a sub-regulatory corporation	)
The State of Connecticut Office of	)
Governmental Accountability, Judicial Review	)
Council	)
The Connecticut Grievance Panel, Statewide	)
Bar Council	)
_____	)

**AMENDED COMPLAINT**

The Plaintiff brings suit against the named defendants for violations of her rights which occurred between November 2010 and present, during the pendency of a family court proceeding in the State of Connecticut Superior Court.

**JURISDICTIONAL BASIS**

1. Plaintiff claims federal jurisdiction pursuant to Art.III § 2 that extends the jurisdiction to cases arising under the US Constitution.

2. Plaintiff brings this suit pursuant to 42 U.S.C. § 1983 for certain protections guaranteed to her by the First, Fourth, Fifth, Eighth, Ninth, and Fourteenth Amendments of the federal constitution, deprived by the named defendants acting under color of law.

3. Plaintiff brings this suit pursuant to 42 U.S.C. § 1985 for certain protections guaranteed to her by the First, Fourth, Fifth, Eighth, Ninth and Fourteenth Amendments of the federal constitution, deprived by the conspiratorial enterprise of

named defendants acting under color of law with discriminatory purpose and denying the plaintiff to present case without intimidation of obstruction.

4. The plaintiff Brings this case under U.S.C. 1986 action for neglect to prevent... when the government officials have the power to stop the legal abuse but won't.

5. Attorneys are sworn to oaths that they have violated under C.G.S. 1-25 Forms of oaths.

6. Members of the General Assembly, Executive and Judicial Officers swear and oath to uphold the Constitution.

7. Plaintiff brings this suit pursuant to 42 U.S.C. § 1986 for negligent failure of named defendants to act to prevent the deprivation of rights guaranteed by the First, Fourth, Fifth, Eighth, Ninth, Tenth and Fourteenth Amendments of the federal constitution.

8. 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.

9. Plaintiff brings this suit pursuant to Title II of the Americans With Disabilities Act of 1990, as amended by the ADAAMA of 2008, codified at 42 U.S.C. § 12131 – 12165.

10. Plaintiff brings this suit pursuant to § 504 of the Rehabilitation Act of 1973, codified at 29 U.S.C. § 701 et seq.

11. Plaintiff brings forth this suit pursuant to 42 U.S.C. § 1383a for negligent failure of named defendants enabling them to defraud the plaintiff from assets and finances.

12. 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).

13. 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).

14. Plaintiff brings a claim of coercion 42 U.S.C. § 12101 (a) (2); 42 U.S.C. § 12101 (a) (3) and 42 U.S.C. 12203 “Prohibition of retaliation and coercion by the Courts official officers.”

15. Plaintiff brings a claim under 18 USC §664, Theft or embezzlement of employee retirement or benefit plan.

16. Plaintiff brings this action under 18 USC § 242, Deprivation of Rights under Color of Law.

17. 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).

18. Plaintiff brings this suit under 42 U.S.C. § 13031—a provision of the Victims of Child Abuse Act of 1990—all covered professionals who learn of suspected child abuse while engaged in enumerated activities and professions on federal land or

in federal facilities must report that abuse, regardless of where the suspected victim is cared for or resides.

19. Plaintiff brings this suit under 42 U.S. Code § 5119c in which the state is receiving federal funding under 42 U.S. 5106a to prevent child abuse, yet allows its Judicial Branch of government and its actors to engage and promote it.

20. Plaintiff brings this suit under the fundamental right guaranteed by the Fourteenth Amendment Due Process Cause with many federal precedents protecting the rights of educating of ones' children.

21. 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.

22. The plaintiff brings this case under 18 U.S.C. Conspiracy against rights

23. The plaintiffs brings this case under 18 U.S.C. Deprivation of Rights

24. Plaintiff brings this complaint under 42 U.S.C. 2000d, Title VI and CR Title IX, as federal funding is used in a discriminatory basis.

25. Plaintiff claims supplemental federal jurisdiction pursuant to 28 U.S.C. § 1367, which permits the federal court to hear additional claims substantially, related to the original claim.

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

## **PARTIES**

27. Susan Skipp is an individual who resides in the town of Litchfield, within the county of Litchfield, within the State of Connecticut. She is a 45-year old woman with a disability and who is also perceived as having a disability that she does not have. In September of 2009, Ms. Skipp filed for divorce and was plaintiff in case UWY-FA09-4020608-S. This case was dismissed in April of 2010. In August of 2010, Ms. Skipp's former spouse filed for divorce and she was the defendant in case UWY FA10-4022992-S

28. Gabrielle Anderson Tittle, a minor child who is 13 years old and resides in Connecticut who is perceived to have a disability.

29. Wyatt Griffin Tittle, a minor child who is 11 and resides in Connecticut who is perceived to have a disability.

30. Defendant, the State of Connecticut, ratifies acts of legislation that violate rights of fundamental rights of equal protection and due process to legal discovery protected under 14<sup>th</sup> amendment.

31. The State of Connecticut Judicial Branch is the branch of government here in Connecticut responsible for the administration of justice. Its administrative offices are located at 231 Capitol Avenue, Hartford, CT 06106;

32. Defendant Chase T. Rogers is an individual who serves as a Judge for the State of Connecticut Supreme Court. As the Chief Justice of the Connecticut Supreme Court, she is deemed to be the head of the Connecticut Judicial Branch. She is sued in her individual and official capacity.

33. Defendant Lynda B. Munro is an individual who serves as a Judge for the State of Connecticut Superior Court. Her principle office and place of business is

located in the city of New Haven, within the county of New Haven, within the State of Connecticut. She is sued in her individual and official capacity. She also has three other LLCs. She is sued in the capacity in the capacity of the LLC(s) that provide consulting.

34. Defendant Robert T. Resha is an individual who serves as a Judge for the State of Connecticut Superior Court. His principle office and place of business is located within the city of Waterbury, in the county of New Haven, within the State of Connecticut. He is sued in his individual and his official capacity.

35. Defendant Lloyd Cutsumpas, an individual who serves as a Judge for the State of Connecticut Superior Court. His principal office and place of business is located at 300 Grand Street, Waterbury, CT 06702, in the county of New Haven, within the State of Connecticut. He is sued in his individual and official capacity.

36. Defendant Mark Taylor is an individual who serves as a Judge for the State of Connecticut Superior Court. His principal office and place of business is located at 300 Grand Street, Waterbury, CT 06702, in the county of New Haven, within the State of Connecticut. He is sued in his individual and official capacity.

37. Defendant Maureen Murphy is an individual who serves as a Judge for the State of Connecticut 300 Grand Street Waterbury Connecticut 06702, in the county of New Haven. Her principal office and place of business is located at 300 Grand Street, Waterbury, CT 06702, in the county of New Haven, within the State of Connecticut. He is sued in his individual and official capacity

38. Patrick J. Carroll, III is an individual who is employed as the Chief Court Administrator of the Connecticut Judicial Branch. His office and principal place of

business is located in the city of Hartford, within the county of Hartford, within the State of Connecticut. He is sued in his individual and official capacity.

39. Stephen Grant is an individual who serves as the Executive Director of the Court Support Services Division of the Connecticut Judicial Branch. His principle office and place of business is located with the town of Wethersfield, within the county of Hartford, within the State of Connecticut. He is sued in his individual and his in official capacity.

40. Debra Kulak is an individual who is employed by the Connecticut Judicial Branch as a Regional Manager of Family Relations. Her office and principal place of business is in the town of Wethersfield, within the county of Hartford, within the State of Connecticut. She is sued in her individual and official capacity. Ms. Kulak is also a principal in Defendant Association of family and Conciliatory Courts. She is sued in this capacity as well.

41. Laurie Anton is an individual who is employed by the Connecticut Judicial Branch as a Clerk of Court. On information and belief, she resides in the town of Wolcott, within the county of New Haven, within the State of Connecticut. Laurie Anton is sued in her individual capacity, and also in her official capacity as an employee of the State of Connecticut Judicial Branch.

42. Christopher Haddad is an individual who is employed by the Connecticut Judicial Branch. His principle office and place of business is located at 300 Grand Street, Waterbury, CT 06702, in the county of New Haven, within the State of Connecticut. He is sued in his individual and official capacity.

43. Ms. Sandra Lugo-Gines, the ADA Coordinator, Court Planner according to resume, for the judicial branch, based on information and belief, lives in the town of Wethersfield in the county of Hartford having a place of business. She is sued in her individual and official capacity.

44. Mary Piscatelli Brigham Attorney at Law, LLC is a domestic limited liability company doing business in the city of Waterbury, within the county of New Haven, within the State of Connecticut.

45. Mary Brigham is an individual residing in the town of Litchfield, within the county of Litchfield, within the State of Connecticut. Mary Brigham is an attorney who is licensed in the state of Connecticut. Mary Brigham is sued in her individual capacity, and also in her official capacity as a court-appointed guardian ad litem from Sept 9, 2010 to March 28, 2011. She acted as GAL following this date, but had no legal standing. She was not appointed, she served a necessary witness for the plaintiff's former husband against the plaintiff twice and the plaintiff's stipulated agreement provided defendant Howard Krieger handle post judgment issues.

46. Connecticut Resource Group, LLC is a domestic limited liability company doing business in the city of Waterbury, within the county of New Haven, within the State of Connecticut.

47. Sidney S. Horowitz, Ph.D. is an individual who, on information and belief, resides in the city of New Haven, within the county of New Haven, within the State of Connecticut. Sidney S. Horowitz, Ph.D. is sued in his individual capacity, and also in his official capacity as a court-appointed psychologist.

48. Howard Kreiger, Ph.D. is an individual who, on information and belief, resides in the town of Woodbridge, within the county of New Haven, within the State of Connecticut. Howard Kreiger is sued in his individual capacity, and also in his official capacity as a court-appointed psychologist.

49. Tracy Barraco is an individual who, on information and belief, resides in the town of Thomaston, within the county of Litchfield, within the State of Connecticut. Tracy Barraco is sued in her individual capacity, and also in her official capacity as an employee of the State of Connecticut Judicial Branch.

50. Martin Libbin, an attorney, is Director of Legal Services for Superior Court Operations and an individual, who on information and belief, resides in the city of West Hartford within the county of Hartford within the State of Connecticut. Martin Libbin is sued in his individual capacity, and also in his official capacity as an employee of the State of Connecticut Judicial Branch.

51. Rosemary Giuliano is an individual who, on information and belief, resides in the town of Southbury, within the county of New Haven, within the State of Connecticut. Rosemary Giuliano is an attorney licensed in the state of Connecticut. Rosemary Giuliano is sued in her individual capacity.

52. Christopher Hite is an individual who, on information and belief, resides in the town of Tolland, within the county of Tolland, within the State of Connecticut. Christopher Hite is an attorney who is licensed in the state of Connecticut. Christopher Hite is sued in his individual capacity.

53. James D. Hirschfield is an individual who, upon information and belief, resides in the town of Southbury, within the county of New Haven, within the State of

Connecticut. James D. Hirschfield is an attorney who is licensed to practice in the state of Connecticut. He is sued in his individual capacity.

54. Visitation Solutions LLC is a domestic limited liability company doing business in the town of Brookfield, within the county of Fairfield, within the State of Connecticut. The Connecticut Department of Commerce and Trade does not recognize “parent supervisor” as a trade. This practice is unregulated.

55. Laura Ernhardt PhD is an individual whose place of business is 246 Federal Road, Brookfield, in the county of Fairfield CT Unit CL-41. Ms. Ernhardt provides supervision for visitation therapists as well as therapeutic supervised visitation, an experimental practice with no established protocols or published studies.

56. The Connecticut Chapter of the Association of Family and Conciliatory Courts, having a place of business in the 385 Orange Street, New Haven, in the county of New Haven, Connecticut. It is a sub-regulatory business.

57. The State of Connecticut Office of Governmental Accountability, Judicial Review Council, 505 Hudson Street, 1<sup>st</sup> floor, Hartford Connecticut. This office is to investigate and resolve complaints alleging judicial misconduct.

58. The Statewide Grievance Panel, Statewide Bar Council having a mailing address of 287 Main Street second floor East Hartford Connecticut. Its function is to review and adjudicate complaints about attorneys in the State of Connecticut.

### **NATURE OF THE CASE**

59. The plaintiff alleges that she has suffered multiple deprivations of her constitutional rights as follows:

- a. Deprivation of fundamental right to care, custody, and management of two minor children, without due process of law, in violation of the First, Fifth, Eighth, and Ninth amendments to the federal constitution, in that she was denied all access to her children secondary to unlawful conditions being placed on her access by persons acting under color of law.
- b. Deprivation of personal liberty without due process of law, in violation of the Fourteenth amendment to the federal constitution, in that she has been deprived of her right to make independent healthcare decisions without the undue influence of persons acting under color of law.
- c. Deprivation of the right to due process of law, in violation of the Fourteenth amendment to the federal constitution, in that she was deprived of assets, income and child custody secondary to ex parte hearings, conferences, and orders.
- d. Deprivation of the right to due process of law, in violation of the Fourteenth amendment to the federal constitution, in that she was denied meaningful access the court when she was denied reasonable accommodations pursuant to the American With Disabilities Act of 1990, as amended by the ADA of 2008, by persons acting under color of law.
- e. Deprivation of equal protection of the laws, in violation of the Equal Protection Clause of the Fourteenth amendment to the federal constitution, in that, based on her status as a disabled person, laws and procedures fair on their face were administered with an evil eye and heavy hand, by persons acting under color of law.

f. Plaintiff was coerced to sign documents that impinge her fundamental rights with the threat of incarceration and loss of liberty.

g. Plaintiff minors have been denied fundamental rights of familial access, subjected to severe emotional duress and physical abuse.

h. Plaintiff has been denied income and assets by persons acting under the color of law.

60. In addition to the federal claims, the plaintiff also states the following substantially related claims:

a. Intentional Infliction of Emotional Distress, in that the named defendants committed the violations outlined above, and knew or should have known that the plaintiffs would suffer severe emotional distress as a consequence to their activities.

b. Civil Conspiracy, in that a group of two or more persons conspired to engage in unlawful activity with the intent to deprive the plaintiff of care and guardianship of her children and other substantial rights for their own financial and professional gain.

c. Civil Conspiracy and Criminal Conspiracy, in that a group of two or more persons conspired to engage in unlawful activity with the intent to deprive the plaintiff of financial assets and income and other substantial rights for their own financial and professional gain.

d. Civil Conspiracy, in that a group of two or more persons conspired to engage in unlawful activity with the intent to commit and allow child abuse for their own personal and financial gain.

e. Civil Conspiracy and Criminal Conspiracy in that a group of two or more persons conspired in unlawful activity with the intent to conceal illegal weapons.

61. The Plaintiff petitions Under 28 U.S.C. § 517, “[t]he Solicitor General, or any officer of the Department of Justice, may be sent by the Attorney General to any State or district in the United States to attend to the interests of the United States in a suit pending in a court of the United States, or in a court of a State, or to attend to any other interest of the United States.”

62. The plaintiff petitions Under 28 C.F. R. Section 0.85, “ the unlawful use of force ...against persons or property to intimidate or coerce...civilian populations, ... in furtherance of social agendas. By definition, the Family Court in the Judicial Branch engages in Domestic Terrorism as defined. The FBI needs to investigate such domestic terrorism to curtail terrorism by a branch of one’s own local government.

63. The plaintiff brings this claim under Article VI of the Constitution Supremacy Clause, oaths of judges to the Constitution, right to an impartial trier and right to petition court.

### **COUNT ONE – 42 U.S.C. § 1983 CLAIM**

64. **Defendants Brigham, Horowitz, Anton, Kulak, Carroll, Libbin, Grant, Rogers, Munro, Cutsumpas, Resha and Murphy**, acting in their official capacities as state actors, deprived the plaintiff of her constitutional right to the care and custody of

her two minor children, without due process of law, in violation of the First, Fifth, Sixth Eighth, Ninth and Tenth Amendments to the Federal Constitution.

65. The policies, customs and practices of the State of Connecticut Judicial Branch, the Court Support Services Division of the Judicial Branch, and the Family Relations Division of the Court Support Services Division create an environment wherein wrongful interference with the constitutional rights of fit parents is commonplace.

66. The State of Connecticut Judicial Branch has an established policy of attempting to influence and change family dynamics rather than respect the fundamental rights of family members that walk into the court on a daily basis.

67. The State of Connecticut Judicial Branch has created the Court Support Services Division whose mission statement is “to provide effective support services within the Judicial Branch by working collaboratively with system stakeholders to promote compliance with court orders and instill positive change in individuals, families and communities.”

68. The Judicial Branch does not recognize the individuals who are at the mercy of the courts as stakeholders.

69. The Judicial Branch has aligned itself with a large number of community providers who have become the primary stakeholders in judicial matters.

70. The community providers with whom the Judicial Branch has aligned itself become witnesses in the cases the Judicial Branch is charged with resolving, creating an inherent conflict of interest in addition to an enhancement of the customs and policies which violate the rights of citizens who are referred to the community providers.

71. The community providers are deemed harmless by the Judicial Branch and individuals are referred to these providers without regard for the legality of the referral itself or the harm that may result from such referrals.

72. The policies, practices and customs of the Judicial Branch and the Court Support Services Division convey a lack of regard for the fundamental constitutional premise that the state may only intervene in a child custody matter where a reasonable basis exists to believe that a child is in imminent risk of serious harm. Even when such risk exists, the state must provide notice and provide the parent with the process that is due pursuant to the federal constitution.

73. The policies, practices and customs of the Judicial Branch and the Court Support Services Division contribute to a belief by court employees that the court itself and community providers who are associated with the court have a superior knowledge of and interest in the welfare of other people's children.

74. The policies, practices and customs of the Judicial Branch and the Court Support Services Division lead court employees and affiliated community providers to wrongfully interfere with the protected interests of fit parents.

75. The policies, practices and customs of the Judicial Branch and the Court Support Services Division led to a gross deprivation of the plaintiff's rights.

76. The policies, practices and customs of the Judicial Branch and the Court Support Services Division created an environment wherein Defendant Judge Lynda B. Munro was allowed, and encouraged, to establish a unique program to train community associates on how to effectively intervene in the lives of families who were filing cases in the family court.

77. Judge Lynda B. Munro hand-selected a select group of professionals to run this training program, which was deemed by the legislature to be required training for all persons who might serve as guardian ad litem in Connecticut family courts.

78. Among the individuals selected by Judge Lynda Munro were Defendants Sidney Horowitz, Ph.D. and Howard Kreiger, Ph.D. of the Defendant, Connecticut Resource Group.

79. Among the individuals who took the mandatory training class was Defendant Mary Brigham.

80. Defendant Rogers knew or should have known that the practices and policies of the Court Support Services Division family relations division create an environment wherein the state and its affiliated providers are interfering in private family matters absent a finding of imminent risk of serious harm.

81. The Chief Court Administrator, Defendant Patrick L. Carroll, is the individual responsible for overseeing the administration of the Connecticut Judicial Branch and the Court Support Services Division. Prior to his appointment as Chief Court Administrator in 2013, he was the deputy chief for a period of six years.

82. Martin Libbin, an attorney and Director of Legal Services received numerous communications from the plaintiff complaining of the unlawful atmosphere of the court.

83. Defendant Steven Grant is the Executive Director of the Court Support Services Division. He is responsible for overseeing all aspects of the Court Support Services Division.

84. Defendant Debra Kulak is the Regional Manager for the Family Services Division of the Court Support Services Division. She is responsible for supervision, training and oversight of the family services workers of the Court Support Services Division for the northern portion of the state. Ms. Kulak is also a principal owner in co-defendant Connecticut Association of Family and Conciliatory Courts, a private stock company.

85. Defendants Libbin, Carroll, Grant, and Kulak were involved in both creating and enforcing the policies, customs and practices of the Court Support Services Division within the family services unit of the Connecticut Judicial Branch.

86. Defendants Libbin Carroll, Grant, and Kulak had full knowledge and awareness of Defendant Munro's involvement in the creation of the training-program and her hand-selected community providers.

87. Defendants Carroll, Grant, and Kulak were instrumental in insuring that the values taught in Defendant Munro's training class were carried out in the work of the family relations office of the Court Support Services Division.

88. Defendants Carroll, Grant, and Kulak knew or should have known that the practices, customs and policies of the family services division created an environment where parents' constitutional rights were violated.

89. Defendant Munro knew or should have known that if the methods taught in her training class were implemented, unwarranted intrusion into private matters of family life would result.

90. The plaintiff seeks the review of the Memorandum of Decision of October 16, 2012 issued by The Honorable Lynda Munro and to determine whether certain

provisions of this decision should be declared invasions of privacy and unconstitutional abridgments of personal freedoms of the plaintiff.

91. Defendant Munro knew or should have known that her involvement in the creation and implementation of this training program would create a conflict of interest were she to be the presiding judge on a case where her trainers or her students were involved in assessing the family.

92. Defendant Brigham knew or should have known that implementing the strategies and practices taught in the training program would result in unreasonable intrusion into the private family life of any family subjected to the process.

93. Defendant Brigham knew or should have known that she did not have any right to interfere in the private family life of the plaintiff unless and until she had cause to believe that the children were at imminent risk of serious harm.

94. Defendant Brigham interfered with 2 DCF investigations involving the children's father much to the detriment of the plaintiff minor's safety.

95. Defendant Brigham interfered in the private family matters of the plaintiff without any legal basis to do so.

96. Defendant Brigham failed to advise the court that laws would be violated if she were to proceed as instructed.

97. Defendant Brigham failed to advise the Plaintiff that she had a right to family privacy.

98. Defendant Brigham provided Defendants Resha, Cutsumpas, and Munro without standing her opinion that the plaintiff should be deprived of her children.

99. Defendants Resha, Cutsumpas, and Munro accepted the recommendations of Defendant Brigham without evaluating the legal standing and whether accepting the recommendations would interfere with the plaintiff's constitutional right to the care and custody of her minor children.

100. Defendants Resha, Cutsumpas, Munro, Hite, Hirschfield, Brigham, Guliano, Haddad, Doherty, Baracco, Anton, Horowitz, Krieger, Libbin, The Judicial Review Committee and The Statewide Grievance panel knew or should have known that defendant Brigham was not duly appointed the guardian ad litem post March 28, 2011 and had no legal standing to render any opinion.

101. Defendant Anton knew or should have known that the plaintiff had an interest in her children that was superior to the interest of the Defendant Brigham, who was not appointed as the guardian ad litem for the children.

102. Defendant Anton knew or should have known that the plaintiff had an interest in her children that was superior to the interest of the Defendant Horowitz, who was appointed as a therapist for the children.

103. Defendant Anton knew or should have known that the actions of Defendant Brigham and Defendant Horowitz were interfering with the parental rights of the plaintiff.

104. Defendant Anton knew or should have known that the only legal basis to interfere with the plaintiff's right to the care and custody of her children would have been an allegation that the children were at imminent risk of serious harm.

105. Defendant Anton knew or should have known that the children were not at risk of any serious harm under the care of the plaintiff.

106. Defendant Horowitz knew or should have known that the plaintiff had a right to be fully informed about her minor children and their participation in therapy.

107. Defendant Horowitz withheld pertinent information about the children from their mother, the plaintiff Susan Skipp.

108. Defendant Horowitz was instructed by Defendant Brigham to withhold this information.

109. Defendant Horowitz knew or should have known that he had no right to withhold this information from the plaintiff.

110. As a result of the actions of Defendants Horowitz and Brigham, the minor child and plaintiff, Gabrielle Tittle of the plaintiff was improperly diagnosed with a major psychiatric disorder for over a year before the plaintiff-mother or Gabrielle was made aware of it.

111. Defendants Brigham and Horowitz knew or should have known that the plaintiff had an interest in her children that was superior to the interests of the defendants.

112. The design, evolution and implementation of the various policies, customs and practices within the Court Support Services Division by Defendants Munro, Kulak, Carrol, Grant and Haddad were all done under color of law, in that the named defendants believed that they had the legal authority to create this type of environment.

113. Defendants Resha, Cutsumpas, Libbin and Munro knew or should have known that Defendants Brigham, Anton, Haddad and Horowitz were engaging in actions which were violating the constitutional rights of the plaintiff.

114. Defendant Resha entered court orders that deprived the plaintiff of her constitutional right to the care and custody of her minor children based on information provided by other defendants in this action. He also deprived her of assets and property.

115. Defendant Cutsumpas entered court orders that deprived the plaintiff of her constitutional right to the care and custody of her minor children based on information provided by other defendants in this action. He also deprived her of assets and property.

116. Defendant Munro was the judge who rendered the final decision depriving the plaintiff of all contact with her children, based on information provided by other defendants in this action.

117. Defendants Brigham and Horowitz both testified in the case on the basis of training they had received in the class that Defendant Munro designed.

118. No defendant acknowledged a conflict of interest at any point in time.

119. No defendant stated or alleged that the minor children of the plaintiff were in imminent risk of serious harm.

120. The plaintiff was never advised by any defendant that the state was taking action to protect her children from abuse or neglect.

121. Each and every named defendant is a mandatory reporter of child abuse or neglect under the laws of the State of Connecticut.

122. No defendant ever filed a report with the Connecticut Department of Children and Families alleging that the plaintiff's minor children were being abused or neglected.

123. The plaintiff disclosed to all defendants, with the exceptions of Sandra Lugos Gines, Chase Rodgers, Steven Grant and Peter Carroll that her children were abused.

124. Defendants Brigham and Anton failed to disclose to the court that they had no basis to believe the children were at imminent risk of serious harm by the plaintiff.

125. Defendants Munro, Cutsumpas, Resha and Murphy failed to consider whether the children were at imminent risk of serious harm prior to entered orders that deprived the plaintiff of her parental rights.

126. The result of the foregoing was a deprivation of the plaintiff's right to the care, custody and management of her children because various defendants acting under color of law believed they had a superior knowledge about and interest in the care and well-being of the plaintiff's children.

127. As a result of the actions of the named defendants, the plaintiff's access to her children and co-plaintiff's was repeatedly disrupted between March 2010 and October 2012.

128. As a result of the actions of the named defendants, the plaintiff has been deprived of all contact with her children since October 2012.

129. As a result of the actions of the named defendants, the mother has been physically, mentally, emotionally and financially harmed.

130. As a result of the actions of the named defendants, the co-plaintiff minor children have been deprived of a relationship with their mother since October 16, 2012.

131. The plaintiff has been denied the fundamental right to raise and educate her children.

**COUNT TWO – 42 U.S.C. § 1983 CLAIM**

132. **Defendants Brigham, Anton, Munro, Cutsumpas, Rogers, Kulak, Libbin, Earnhardt, Guiliano, Libbin, Carroll and Grant**, acting in their official capacities as state actors, deprived the plaintiff of her personal liberty, in the form of the liberty to make independent healthcare decisions, in violation of the fourteenth amendment to the federal constitution.

133. The plaintiff has been under the care of a single psychiatrist from 2010 to the present.

134. The plaintiff's psychiatrist has diagnosed the plaintiff with attention-deficit disorder and post-traumatic stress disorder.

135. The plaintiff is now and has always been satisfied with the care provided to her by her treating psychiatrist.

136. The plaintiff has never and does not now believe that she needs any psychiatric care beyond that which she is receiving.

137. The treating psychiatrist informed the court of the same.

138. Defendant Brigham believes that the plaintiff has an unidentified mental health condition that is as of date, untreated.

139. Defendant Brigham states that the plaintiff should not have access to her children until such unidentified condition is a) identified and b) treated, by someone other than the plaintiff's selected healthcare provider.

140. Defendant Anton and defendant Haddad stated that the plaintiff has an unidentified mental health condition that as of August 2012, was unidentified and untreated.

141. Defendant Anton believes that the plaintiff should be deprived of the care and custody of her minor children until the condition is a) identified and b) treated, by someone other than the plaintiff's current healthcare provider.

142. In August 2012, Defendants Brigham and Anton conveyed to the court their belief that the plaintiff suffers from an unidentified mental health condition.

143. In August 2012, Defendants Brigham and Anton conveyed to the court their belief that the plaintiff should be deprived of the care and custody of her children until the condition was 1) identified and 2) treated.

144. Neither Defendant Brigham nor Defendant Anton are trained mental health professionals.

145. Neither Defendant Brigham nor Defendant Anton relied upon any formal assessment of the plaintiff in formulating their lay opinions.

146. Both Defendant Brigham and Defendant Anton conveyed to the court their "desire for the [plaintiff-mother] to get treatment."

147. Defendant Brigham having no standing in court and not a party joined in suit filed over thirty motions of contempt to harass the plaintiff.

148. Defendants Brigham, Guiliano, Hite, Hirschfield, Resha, Cutsumpas, Munro allowed these numerous violations of due process.

149. Defendants Brigham, Haddad and Anton were under the belief that Connecticut law and the customs and policies of the family relations division gave them the authority to determine that the mother's mental health care was not adequate.

150. Defendants Brigham and Anton believed that their interpretation of the mother's mental health care needs was superior to the health care provider of the defendant.

151. Defendants Brigham, Haddad and Anton were acting under color of law when they made recommendations to deprive the mother of access to her children conditioned upon mental health treatment that they themselves thought she needed.

152. In October 2012, Defendant Munro ordered, with no statutory basis, that the mother would be deprived of all access to her children unless she engaged in treatment with a psychologist chosen exclusively by Defendant Munro.

153. The psychologist selected by Defendant Munro does not have any knowledge of or connection to the plaintiff.

154. The psychologist Harry Adomakas selected by Defendant Munro does have an extensive history of being appointed to work with persons who are going through divorces in Connecticut family courts.

155. The psychologist selected by Defendant Munro has participated in Defendant Munro's court-sponsored training program, either as a hand-selected trainer or a participant in the class or in both respects.

156. Defendant Munro ordered that plaintiff could only see her children with defendant Laura Erhardt PhD at Visitation Solutions via therapeutic visitation through her with the children could be three hours a month at a substantial sum at provider to see her children. Therapeutic Supervision has no protocols and is not recognized as a therapy. Visitation Solutions and Erhardt are frequent appointed providers in family court, absent statute.

157. The psychologist selected by Defendant Munro expected a substantial sum of money to consult with the plaintiff.

158. The plaintiff contacted the provider selected by Defendant Munro and the provider appeared to be expecting the call although the plaintiff had never heard of this provider before.

159. The plaintiff declined to see the provider ordered by Defendant Munro, and true to the intent of Defendant's Brigham, Munro and Anton, the plaintiff has been and continues to be deprived of all contact with her minor children until she complies with the court order, despite its unlawful nature.

160. The plaintiff has filed many times for visitation to see her children. Defendants Resha, Cutsumpas, Munro, and Murphy abuse the children and put them at psychological risk denying them a fit loving parent.

161. Defendant Munro knew or should have known that she did not have the legal authority to order the plaintiff to participate in treatment with a provider selected by the court.

162. Defendant Munro believed that she did have this authority, as she was acting under the color of law as she understood it to be, due to the policies, practices, and customs of the Family Relations Division of the Court Support Services Division of the Connecticut Judicial Branch.

163. The purpose of Defendant Munro's order was compel and coerce the plaintiff into seeking mental health care from a provider who was aligned with the Connecticut Judicial Branch and aligned with named defendants, rather than continue in treatment with a provider who was aligned solely with his patient, the plaintiff.

164. Defendants Rogers, Kulak, Libbin, Carroll and Grant knew or should have known that Defendant Munro had been given authority to hand-pick providers to align with the court.

165. Defendants Rogers, Kulak, Libbin, Carroll and Grant knew or should have known that the policies, customs and practices of the Court Support Services Division would support and encourage this type of alignment between service providers and the court.

166. Defendants Rogers, Kulak, Libbin Carroll and Grant knew or should have known that people entering the courtroom under the care of their own physicians could be compelled to engage with providers who had been hand-selected by Defendant Munro.

167. Defendants Rogers, Kulak, Libbin Carroll and Grant knew or should have known that the policies, customs and practices of the Court Support Services Division would result in a deprivation of the rights of individuals to select health care provider.

168. Defendants Rogers, Kulak, Libbin Carroll and Grant knew or should have known that the plaintiff was deprived of her liberty right to choose her own mental health care provider.

169. Between October 2012 and February 2014, the plaintiff has made multiple requests to the court to remove the contingency on contact with her children and to allow her to satisfy the court by engaging with her psychiatrist of choice.

170. Defendants Munro, Cutsumpas, and Murphy have refused to lift the illegal order coercing and compelling the plaintiff to consult with a court-affiliated provider prior to contacting her children.

171. Defendants Munro and Cutsumpas knew or should have known that the State of Connecticut does not have the right to force the plaintiff to choose a particular health care provider that is aligned with the court itself.

172. Defendants Munro and Cutsumpas knew or should have known that the plaintiff has a constitutional right to be free from forced or coerced health care.

173. Defendants Munro, Cutsumpas and Murphy knew or should have known that the plaintiff has a federal liberty interest, and that the liberty interest was being disregarded.

174. Defendants Munro, Guiliano, Brigham and Cutsumpas knew or should have known that the plaintiff was refusing to see the identified court-aligned provider.

175. Defendants Guiliano, Brigham, Munro and Cutsumpas knew or should have known that the plaintiff was alleging that the order making access to children contingent upon seeing and paying this provider was illegal.

176. Defendants Munro, Brigham, Cutsumpas and Murphy knew or should have known that the plaintiff has not seen her children in over 18 months due to her refusal to participate in the illegal scheme of being forced to pay a court-aligned provider for unwanted service in order to access her children.

177. The actions described above amount to using coercion and duress to force the plaintiff to engage in a health treatment that the plaintiff neither wants nor needs, as her psychiatric needs are already being addressed by a licensed provider of her choosing.

178. As a result of the defendants' actions outlined in this count, the plaintiff has suffered physical, mental, emotional and financial harm.

**COUNT THREE – 18 U.S.C. § 241**

179. **Defendants Brigham, Anton, Barraco, Giuliano, Hite, Resha and Hirschfield** deprived the plaintiff of her right to due process of law, in violation of the fourteenth amendment to the federal constitution, in that they conspired to orchestrate ex parte hearings and conferences where the plaintiff was deprived of assets, income and child custody.

180. Defendant Barraco was responsible for calendaring court and hearing dates related to the plaintiff's divorce case.

181. Defendant Barraco had access to the calendar system for the entire Superior Court for the Judicial District of Waterbury, Connecticut.

182. Defendant Resha told Ms. Skipp on Monday November 7, 2011 when she appeared to have her motions, marked ready the week before, heard, that he changed the calendar changed Friday at 5 and apologized no one told her.

183. Defendant Barraco knew or should have known that the plaintiff was entitled to be present at all court hearings.

184. Defendant Barraco was responsible for notifying the plaintiff of upcoming court dates and also of any modifications to those dates.

185. Policy and procedures within the Superior Court for the Judicial District of Waterbury require all parties to be notified of any changes to the court schedule.

186. Defendants Giuliano, Hite, Hirschfield and Brigham had regular and ongoing contact with Defendant Barraco.

187. Defendants Giuliano, Hite, Hirschfield and Brigham had independent obligations to notify the plaintiff of any changes to court dates.

188. Defendants Giuliano, Hite, Hirshfield and Brigham had independent obligations to be truthful in their communications with Defendant Barraco.

189. Defendant Barraco worked with Defendants Giuliano, Hite, Hirshfield and Brigham on a regular basis and these four defendants routinely addressed scheduling matters with Defendant Barraco.

190. Defendants Giuliano, Hite, Hirshfield, and Brigham found the plaintiff difficult to deal with and preferred to have court dates where the plaintiff did not arrive.

191. On multiple occasions between February 2010 and August 2012, scheduling of numerous court dates impeded the plaintiff's employ.

#### **COUNT 4 – ADA/ADAAA VIOLATIONS Title II and III**

192. **Defendants Connecticut Judicial Branch, Rodgers, Munro, Resha, Cutsumpas, Taylor, Hite, Hirschfield, Guiliano, Gines, Brigham, Anton and Hadadd** deprived the plaintiff of the right to due process of law in that she was denied meaningful access the court when she was denied reasonable accommodations pursuant to the American With Disabilities Act of 1990, as amended by the ADAAA of 2008, by persons acting under color of law.

193. On November 3, 2010, the Plaintiff's former spouse submitted a Motion For Mental or Physical Examination in the parties' dissolution action raising the issue of the Defendant's Mental Health. Once this issue was raised it was the responsibility of the trial court to refer the Defendant to the ADA Coordinator For Reasonable Accommodations should they be necessary; however, this was never done.

194. On September 13, 2011, December 28, 2011, February 2, 2012, and February 10, 2012 and on numerous other resulting decision dates and hearing dates

which the Plaintiff is not listing due to economy, Judge Robert Resha denied the Plaintiff her constitutional rights, human rights, and due process rights by opening a stipulated agreement without jurisdiction. Further, Judge Resha denied the Plaintiff her Title II Federal ADA rights by discriminating against her based upon the perception that she had a disability she does not have, referring to her as “bizarre” and “unstable”.

195. On April 9, 2012, Susan Skipp obtained an ADA Advocate. On behalf of Ms. Skipp, the advocate submitted a “Request For Accommodation” form JD-ES-264 requesting three forms of reasonable modifications.

196. On April 18, 2012, the ADA Advocate sent a letter to Susan Skipp indicating that all three of these requests for accommodation were denied even though they did not substantially alter the policies and procedures of the court, did not cost the court any money, and were shown clearly to be necessary.

197. Family Relations refused any type of accommodation and discriminated against Ms. Skipp calling her unstable and stating she had some unknown mental illness, despite testimony and prior conversations to the contrary from Ms. Skipp’s treating psychiatrist.

198. Item #c of the Request for Accommodation dated April 9, 2012 was that the trial Court allow the Plaintiff “the assistance of a disability advocate” at the Plaintiff’s own expense. The CT Judicial Branches’ denial of this accommodation directly interfered in the work of an ADA Advocate in violation of 42 USC Sec. 12203 which prohibits any interference with any individual on account of his aiding any individual in the exercise or enjoyment of, any rights granted or protected by the ADA. The CT

Judicial Branch continued to obstruct the ADA advocate's ability to assist Ms. Skipp throughout her involvement in the case.

199. On May 29, 2012, the ADA Advocate again submitted another Request For Reasonable Accommodations with very similar requests to the earlier one, which was again denied.

200. On June 22, 2012, Judge Lynda Munro denied these modifications. The form where the modification is denied shows clearly that the trial court judge is the person approving, denying and qualifying Ms. Skipp's modifications. This places Judge Munro in a position without immunity for administrative tasks and also provides her with ex parte communication that can bias her either for or against Ms. Skipp.

201. At this point, Ms. Susan Skipp filed a grievance appealing the denial of her reasonable modifications, but that grievance was also denied by defendant Gines.

202. From December 6, 2011 up until April 25, 2012, Ms. Susan Skipp was forced to participate in meetings with the Family modifications she required on the following dates: December 30, 2011, January 24, 2012, January 31, 2012, February 24, 2012, March 9, 2012 and April 20, 2012.

203. During the course of this legal proceeding, Ms. Susan Skipp was required to participate in numerous court hearings without any form of modification. She was also coerced into agreements with threats of incarceration and loss of access to her children.

204. The dates at which these hearings occurred were: February 7, 2011, February 23, 2011, August 29, 2011, August 30, 2011, August 31, 2011, September 10, 2011, September 11, 2011, September 12, 2011, September 13, 2011, November 28, 2011, December 19, 2011, February 7, 2012, June 6, 2012, August 13, 2012, August

14, 2012, August 15, 2012, August 16, 2012, August 17, 2012, August 20, 2012, September 5, 2012, December 4, 2012 and June 2013, September 26 and 27, 2013.

205. On May 7, 2012, the ADA advocate on behalf of Ms. Susan Skipp requested audio recordings for her private use only of the court hearings held in her case stating that such recordings are “an important part of [Ms. Skipp’s] being able to recall what happened in court going forward, as her memory is heavily affected under stress.”

206. That same day, Ms. Sandra Lugo-Gines, the ADA Coordinator responded, “Ms. Skip [sic] can request the audio recordings from a judge and the judge can grant them for good cause shown.”

207. Ms. Skipp’s ADA advocate responded, “My understanding of the administrative process is that as it is related to [Ms. Skipp’s] disability, I would ask you, and you would grant or deny the request, and a judge would not have to receive a motion. This creates additional expense for [Ms. Skipp], and the disabled individual is not supposed to have to bear the financial expense for a level playing field.” Despite this, Ms. Skipp was forced to file a motion to obtain the audio recordings and that motion was denied on June 12, 2012 to present.

208. The Connecticut Judicial Branch has not taken steps on a consistent basis to obtain real time transcription, which is what litigants such as Ms. Susan Skipp require. Thus far, they have only included M-cart once.

209. The fact that the Connecticut Judicial Branch allowed this accommodation once, is evidence that the Judicial Branch acknowledged that Ms. Susan Skipp was a disabled person in need of accommodations and/or modifications.

210. In the summer of 2013, Defendant Judge Carroll's committee of the Access Committee issued a report to Defendant Chase Rodgers, who accepted it. Since January 26, 1992 no reports have been issued concerning ADA compliance. This includes Defendant Chief Justice Chase T. Rodgers failure as the legal expert for Connecticut to ensure even State Law along with the Failure to implement Compliance with the ADA and ADA2008.

211. The period of time of lack of reports covers the plaintiff's first entrance to court that as a litigant, who would later be perceived as a having a disability she does not have and it was used to discriminate against her.

212. Under Program Accessibility, 35.149, Mrs. Rodgers in her Supervisory Capacity is really required to sit down with individuals face to face to settle ADA complaints.

213. The State statutes do not comply with Federal ADA Law. Chase Rogers in her supervisory capacity is responsible for these mandates to date.

- a. **Sec. 46a-77. (Formerly Sec. 4-61j). Cooperation with commission required of state agencies. Compliance with Americans with Disabilities Act.** (a) All state agencies shall cooperate with the Commission on Human Rights and Opportunities in their enforcement and educational programs.
- b. All state agencies shall comply with the commission's request for information concerning practices inconsistent with the state policy against discrimination and shall consider its recommendations for effectuating and implementing that policy.

c. Each state agency shall comply in all of its services, programs and activities with the provisions of the Americans with Disabilities Act (42 USC 12101) to the same extent that it provides rights and protections for persons with physical or mental disabilities beyond those provided for by the laws of this state.

d. The commission shall continue to augment its enforcement and education programs which seek to eliminate all discrimination.

e. **Sec. 46a-78. (Formerly Sec. 4-61k). Annual agency reports to Governor. Review by commission.** (a) All departments, agencies, commissions and other bodies of the state government shall include in their annual report to the Governor, activities undertaken in the past year to effectuate sections 46a-70 to 46a-78, inclusive, defendant, State of Connecticut Judicial Branch.

214. On June 2, 2011 Ms. Susan Skipp had a major accident which subsequently required facial surgery. This involved a head injury and soft tissue damage. This surgery was conducted on June 27, 2011.

215. On June 20, 2011, Dr. Frederic Newman submitted a letter to the trial court indicating that Ms. Skipp should be excused from court proceedings until the recovery period was over, minimally on July 7, 2012.

216. Nonetheless, on July 5, 2011, Ms. Susan Skipp was forced to appear at a hearing without appropriate accommodation where important decisions were under consideration such as whether Ms. Skipp's would be required to undergo a proposed psychological evaluation.

217. At the end of the session, she was required to assess and sign a legal agreement when she still had not fully recovered from her accident when she could not even look down to read the document. In fact, she wasn't even able to stand due to a reaction to the stress of being presented with the document.

218. Ultimately, Ms. Skipp was required to take this psychological examination, under threat of a motion of contempt, again when she had not yet fully recovered from the accident. The psychological evaluation would need to be court ordered. Defendant Krieger gave false statements and created a fraudulent contract.

219. Defendant's Brigham, Anton and Guiliano threatened plaintiff with contempt of court motion if she did not take this unlawful psychological evaluation by defendant Kreiger.

220. Next, on May 3, 2012, Susan Skipp submitted an ADA request for accommodation to the ADA Coordinator Jonathan Fields asking for a "freeze" in the proceedings temporarily in Ms. Skipp's case in order to provide her with more time to assess Ms. Skipp's ADA needs; however, on May 9, 2012, this request was denied. Also, the Mr. Field's indicated that the request was brought directly to Judge Munro who denied it herself. This was another unwarranted interference in an administrative matter.

221. On May 23, 2012, Ms. Susan Skipp submitted a letter from her physician, Dr. Alan Sholomskas requesting a 90 day continuance in order to coordinate the care Ms. Skipp required for her disability. This request was denied by Judge Munro.

222. On June 11, 2012 after additional requests, the judge ordered a continuance in this case, but it came as the result of concerns related to trial preparation as established in the CT Practice Book, and not in response to ADA considerations.

223. This continuance was only for 60 days and not for the 90 days which Ms. Skipp requested and which her physician thought was necessary.

224. On August 15, 2012, Judge Lynda Munro, in violation of Connecticut Procedures for obtaining accommodations cited above, violated Ms. Skipp's confidentiality, exposed her private medical information in open court in the presence of her adversaries, allowed the adversary to opine on the private medical information and assumed the role of the ADA Access Coordinator. Judge Munro repeated this kind of behavior during other court hearings as well.

225. Throughout these proceedings, despite numerous requests, Ms. Susan Skipp has been denied access to the medical records from mental health professionals assigned to her case.

226. She has also been denied the right to see the results of her psychological examination and the results of the family relations study in her case. Without access to these documents Ms. Skipp has been seriously hindered from responding to the concerns these professionals had in regard to her disability, because she was not allowed to see what they said about her disability, nor were her treating physicians or psychiatrist able to review them.

227. On October 16, 2012, Judge Lynda Munro produced a Memorandum of Decision that made unfounded hints that Ms. Susan Skipp has some other deeper, as yet unnamed psychiatric problem that has not yet been documented despite the fact that the nature and extent of Ms. Skipp's disabilities have been well documented, and she has been in the care of a medical doctor for those disabilities and on the record.

228. Based upon Judge Lynda Munro's false description of Ms. Susan Skipp as being mentally ill, she opened a stipulated agreement and denied Ms. Skipp custody of her children and ordered her to a specific therapist, absent state statute and in violation of her fundamental human right to decide her own medical care, and absent statute to therapeutic supervised visitation, under conditions that in essence completely denied her access to her children under color of law due and by economic harm of the court ordered visitation which required \$ 2,350.00 per month on a teacher's salary of \$3,980 per month. Ms. Skipp has subsequently filed for bankruptcy.

229. Ms. Skipp can only assume that the hints regarding an unnamed psychiatric problem could possibly have their origin in the Brigham and Guiliano's family relations report, despite the record of her disability, and the psychological examination the trial court has not allowed her or her doctor to review.

230. Further, any diagnosis not specified, and/or these exaggerated hints and subtle speculations located in the Memorandum of Decision are a result of misinformation, judicial discretion ignoring evidence and generated by the fact that Ms. Skipp was consistently not allowed to have the reasonable accommodations that she requested which she required to function effectively so she could have testimonial and participatory access to the legal proceedings.

231. As a result, combined with the unwarranted bias against her based upon her disabilities, the lack of accommodations under ADA led to a pattern of discrimination against her. Thus, she was perceived as having a worse mental health condition than she actually has and was denied her fundamental right to due process and equal access to legal services as a consequence.

232. In June 2013, in a public hearing, Judge Mark Taylor discussed the Plaintiff's disability diagnosis and modification needs in front of everyone present in violation of the Plaintiff's confidentiality and created a hostile environment.

233. In hearings on September 26, 2013, September 27, 2013 Judge Lloyd Cutsumpas refused to provide the Plaintiff, Ms. Susan Skipp with the reasonable modifications which she requested, causing her severe distress. He also demanded that she answer inappropriate questions regarding how often she was seeing her psychiatrist and what medication she was taking in violation of the Plaintiff's right to confidentiality and created a hostile environment.

234. In his decision dated October 8, 2013, Judge Lloyd Cutsumpas made unfounded statements in regard to her mental health implying instability and a need for treatment with a mental health professional who closely works with Ms. Skipp and who testified in her case does not agree exists.

235. The actions of the Connecticut Judicial Branch in fabricating a mental health diagnosis that the Plaintiff does not have and then using it to discriminate, in refusing to provide the reasonable modifications which the Plaintiff requested based upon the disability she does have, caused the Plaintiff severe distress and anguish, the loss of her financial base, and her relationship with her children. The Judicial Branch has done this at least 1000 times to other litigants.

236. The actions of the judges listed in this Complaint in fabricating a mental health diagnosis that the Plaintiff does not have and then using it to discriminate and put her on display, humiliate and degrade her in public, and the actions of the judges in denying the Plaintiff her reasonable modification for the disability she does have

resulted in severe mental anguish, and resulted the children living with their abuser, leaving her children unable to have a relationship with their mother for 18 months and continuing, and since losing her job in August 2013, impact her current efforts at becoming employed.

237. This and the unsubstantiated statements in Memoranda of Decision have been devastating to the Plaintiff's professional reputation, psychological well-being, sense of stability and pursuit of happiness.

238. Title II of the ADA provides that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity. 42 U.S.C. Sec. 12132; 28 C.F.R. Sec. 35.130(a).

239. Title II of the ADA requires state and local governments to make reasonable modifications in policies, practices, and procedures as necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. 42 U.S.C. Sec. 12132; 28 C.F.R. Sec. 35.130(b)(7).

240. The Connecticut Judicial Branch of which the Superior Court at 300 Grand Street, Waterbury, CT 06702 is a part, and the Regional Complex Docket at Superior Court, 1 Court Street, Middletown, CT 06457 is a part, is a "public entity" under Title II of the ADA, and the Employees of the Branch are required to follow the requirements of ADA law under Title II.

241. The actions of the Superior Court at 300 Grand, Waterbury, CT 06702, and the Regional Complex Docket at Superior Court, 1 Court Street, Middletown, CT

06457, which are all a part of the Connecticut Judicial Branch, as described in this complaint have excluded the Plaintiff, Susan Skipp from participatory and testamentary access to the services, programs and activities of the Judicial Branch and constitute discrimination under Title II of the ADA.

242. The Connecticut Judicial Branch is likely to continue to deny or limit the Plaintiff's rights under Title II of the ADA. Such denials and limitations are as follows:

- a. The Connecticut Judicial Branch repeatedly refused to acknowledge that the Plaintiff, Ms. Susan Skipp is a qualified individual under Prong I, Prong II, and Prong III of the ADA despite her repeated applications to the judicial branch requesting that it do so.
- b. The Connecticut Judicial Branch discriminated against the Plaintiff, Ms. Susan Skipp, and refused to provide her with reasonable modifications which she requested. The result was that she was excluded from participation in, and/or denied access to the benefits and services of the court system and to due process in violation of 42 U.S.C. Sec. 12132.
- c. The Connecticut Judicial Branch was unable to show why the reasonable modifications the Plaintiff, Susan Skipp requested would fundamentally alter the nature of the service, program or activity as required by Title II of federal ADA law. 28 C.F.R. Sec. 35.130 (b)(7).
- d. The Connecticut Judicial Branch violated the Plaintiff, Ms. Susan Skipp's right to privacy and her 5th Amendment right to not be asked to testify against herself by insisting that she discuss her diagnosis and her treatment in open court before an audience, rather than allowing her to

speak to a Designated Responsible Employee administratively in regard to her needs under Title II of federal ADA law.

e. The Connecticut Judicial Branch, including certain judges and family relations personnel, insisted upon branding the Plaintiff, Ms. Susan Skipp, with an unspecified disability she does not have and using it as the basis for discriminating against her and denying her the right to access to the legal proceedings to which she is entitled under Title II of federal ADA law.

243. Title II of the ADA provides that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity. 42 U.S.C. Sec. 12132; 28 C.F.R. Sec. 35.130(a).

244. Title II of the ADA requires state and local governments to make reasonable modifications in policies, practices, and procedures as necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. 42 U.S.C. Sec. 12132; 28 C.F.R. Sec. 35.130(b)(7).

245. Judge Lynda Munro in adjudicating the Plaintiff's case was acting as an employee of the Connecticut Judicial Branch which is a "public entity" under Title II of the ADA and as such as required to obey the requirements of Title II of the ADA.

246. Judge Lynda Munro's judicial actions as described in this complaint, including denying the Plaintiff reasonable modifications which she requested and also declaring that the Plaintiff has an unidentified mental health illness she does not have

without any evidence of doing so represents direct discrimination in violation of Title II of the ADA.

247. A Judge is not immune for tortious acts committed in a purely Administrative, non-judicial capacity. *Forrester v. White*, 484 U.S. at 227-229, 108 S.Ct. at 544-545; *Stump v. Sparkman*, 435 U.S. at 380, 98 S.Ct. at 1106. *Mireles v. Waco*, 112 S.Ct. 286 at 288 (1991).

248. When Judge Lynda Munro denied the Plaintiff, Ms. Susan Skipp, her requests for reasonable modifications under title II of the ADA, she was acting in an Administrative Capacity and is, therefore, liable for those actions.

249. Judge Lloyd Cutsumpas' judicial actions as described in this complaint, including denying the Plaintiff reasonable modifications which she requested, demanding she discuss confidential issues in relation to her disability out loud in open court, and also declaring that the Plaintiff has an unidentified mental health illness she does not have without any evidence which is direct discrimination in violation of Prong III of Title II of the ADA.

250. Judge Mark Taylor's judicial actions as described in this complaint, including demanding that the Plaintiff, Ms. Susan Skipp, discuss her disability during an open hearing in court, and debate over the reasonable modifications which she requested, was a violation of her confidentiality which she is entitled to under of the ADA.

251. Defendants Brigham, Brigham LLC, Hite, Haddad, Baracco, Libbin, Hite, Hirschfield, Anton, The Statewide Grievance Panel, The Judicial Review Committee, Horowitz, Krieger, Guiliano actions violate title III of ADA

## COUNT FIVE – 1983 for Violations of Equal Protection

252. **Defendants Connecticut Judicial Branch, Rogers, Carroll, Grant, Haddad, Resha, Munro, Cutsumpas, Brigham, Anton, Libbin and Kulak** deprived the defendant of the equal protection of the laws, in violation of the Equal Protection Clause of the fourteenth amendment to the federal constitution, in that, based on her status as a disabled person, laws and procedures fair on their face were administered with an evil eye and heavy hand, by persons acting under color of law.

253. Defendants Rogers, Libbin, Carroll, Grant, Kulak and Hadad created and implemented customs and practices within the Connecticut Judicial Branch that create an environment wherein discrimination against persons with mental illness is tolerated and encouraged.

254. Defendants Rogers, Libbin, Carroll, Grant, Kulak and Hadad created and implemented customs and practices within the Connecticut Judicial Branch that encourage lower level court employees to apply additional scrutiny to parents with mental illnesses.

255. The procedures and practices within the family relations division of the Court Support Services Division of the Connecticut Judicial Branch are applied with zeal when a parent with mental illness is seeking custody of children.

256. Defendants Rogers, Libbin, Carroll, Grant, Kulak and Haddad failed to implement training or educational programs to counter the stigma associated with mental illness.

257. Defendants Rogers, Libbin, Carroll, Grant, Kulak and Haddad perpetuated policies and practices wherein deprivation of parental rights from parents with mental illness is viewed as necessary for the protection of children.

258. The stigma associated with mental illness and perceived mental illnesses are perpetuated by the named defendants include the perceptions that persons with mental illness are incompetent, violent, or disdainful.

259. The stigma associated with mental illness or persons with perceived mental illness are perpetuated by the named defendants include the perception that other people need to be protected from the mentally ill person or a person perceived with a mental illness.

260. Employees of the judicial branch are permitted and encouraged to substitute their own judgments and perceptions of people for the judgment of medical professionals.

261. Employees of the judicial branch are encouraged to believe that the Judicial Branch itself has the power and authority to “heal” people of their mental illness through the authority of the Court Support Services Division, such as Sidney Horowitz Phd and Howard Krieger Phd).

262. Plaintiff alleges the appointments and extortions of the egregious payments to these “appointments” (Brigham was not appointed as the parties contract March 28, 2011 did not stipulate such.) of “private contractors” name as the defendants (Mary Brigham, JD, Sidney Horowitz Phd, Howard Krieger Phd) 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 Mary Brigham, Attorney Rosemary Guliano, Attorney James Hirshfield, Attorney Christopher Hite of Rosenberg and Press.

263. 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 some like Sidney Horowitz, do not have contracts, others like Howard Krieger have not signed the portion of the contract that is a standard non-discriminatory and protection of research subjects clause. The plaintiff alleges their 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 14<sup>th</sup> 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.

264. Defendants Resha, Cutsumpas, Guiliano, Brigham, Horowitz, Krieger and Anton have treated the plaintiff with ridicule, scorn, and contempt. On February 14, 2014, Cutsumpas denigrated the plaintiff by describing her case as “celebrated” in a condescending tone during a public hearing for his re-nomination before the Legislative Judiciary Committee, which was televised.

265. Defendants Resha, Cutsumpas, Guiliano, Brigham, Krieger and Anton have disregarded legitimate concerns raised by the plaintiff and attributed her legitimate concerns to delusion, fantasy, and malice.

266. Defendants Resha, Cutsumpas, Guiliano, Brigham, Haddad, Horowitz and Krieger and Anton's dismissal of the plaintiff's concerns as delusional, fantastical, and malicious stems from the system-wide stigmatism of people with mental illness or perceived mental illness.

267. Defendants Resha, Cutsumpas, Guiliano, Brigham and Anton concluded that the plaintiff should be deprived of her children because of their perception that the plaintiff was making up stories of grandeur and delusion for the malicious purpose of gaining custody of her children.

268. Defendants Guiliano, Brigham and Anton believed that they had the power to "stop" the plaintiff from "harming" her children.

269. Because of the erroneous description of plaintiff by the named defendants, the plaintiff was deprived of the fair assessment of family dynamics that is ordinarily provided to a family court litigant.

270. Because of the erroneous description of plaintiff by the named defendants, the plaintiff was deprived of fair trials and hearings.

271. Because of the erroneous description of the plaintiff by the named defendants, the plaintiff was prematurely prevented from exercising reasonable parental decision-making.

272. The bias and prejudice of Defendants Brigham and Anton was noticeable during their testimony in court.

273. Defendants Resha, Munro and Cutsumpas relied on the presentation of Defendant's Anton and Brigham that the plaintiff, as a result of her mental illness, was unfit to parent and that she should be compelled to undergo "treatment."

274. Defendants Resha, Munro and Cutsumpas have perpetuated harm upon the plaintiff by abusing the power of the court to compel the plaintiff to "get better" before she can have access to her children.

275. Defendants Resha, Munro and Cutsumpas knew or should have known that the deprivation of parental rights was harmful to the plaintiff minors.

276. Defendants Resha, Munro and Cutsumpas knew or should have known that the deprivation of parental rights conditioned upon treatment was illegal.

277. Defendants Resha, Munro and Cutsumpas knew or should have known that the recommendations of Defendants Guiliano, Brigham and Anton were rooted in discriminatory practices and stigma.

278. Defendants Resha, Munro and Cutsumpas knew or should have known that as a person with mental illness, the plaintiff was entitled to equal protection of the laws.

279. As a result of the defendants' actions in this count, the plaintiff has suffered physical, mental, emotional and financial harm.

#### **COUNT SIX – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

280. **The aforementioned actions of Defendants Connecticut Judicial Branch, Rogers, Libbin, Munro, Resha, Cutsumpas, Taylor, Anton, Brigham, Horowitz, Krieger and Barraco were intentional** and done with the foreseeable

consequence that the plaintiff would and has suffered severe emotional distress and injury as a result.

281. The actions of the Connecticut Judicial Branch in denying her access to their services, programs and activities was intended to cause or reckless or consciously disregarded the probability of causing the Plaintiff severe and significant emotional and physical distress.

282. The actions of Judge Lynda Munro in creating a hostile environment towards the Plaintiff because of her prejudice towards her as a person with a disability, her refusal to allow the Plaintiff's ADA advocate to do her job, and her refusal to allow her reasonable modifications was intended to cause or recklessly or consciously disregard the probability of causing the Plaintiff severe and significant emotional distress.

283. The conduct of Judge Lynda Munro against the Plaintiff was extreme and outrageous.

284. The actions of Judge Robert Resha in creating a hostile environment towards the Plaintiff because of his prejudice towards her as a person with a disability, his insistence upon reopening stipulations that had been established by agreement despite his lack of jurisdiction, and his refusal to allow the Plaintiff reasonable modifications under Title II of federal ADA law was intended to cause or recklessly or consciously disregard the probability of causing the Plaintiff severe and significant emotional distress.

285. The conduct of Robert Resha is reckless and outrageous. The actions of Judge Lloyd Cutsumpas in creating a hostile environment towards the Plaintiff because

of his prejudice towards her as a person with a disability, his refusal to allow her reasonable modifications to which she is entitled to under Title II of Federal ADA law, his insistence that she speak about her disability in open court in violation of her right to confidentiality, and the fact that Judge Cutsumpas acted on the basis of the idea that the Plaintiff had a mental health disability she does not have in violation of Prong II of Title II of Federal ADA law was intended to cause or recklessly or consciously disregard the probability of causing the Plaintiff severe and significant emotional distress.

286. The conduct of Judge Lloyd Cutsumpas is both extreme and outrageous. The actions of Judge Mark Taylor in creating a hostile environment towards the Plaintiff by demanding she speak of her disability and the reasonable modifications she was requesting in open court in violation of her right to privacy under Title II of federal ADA law was intended to cause or recklessly or consciously disregard the probability of causing the Plaintiff severe and significant emotional distress.

287. The actions of Laurie Anton in dismissing the plaintiff as an unstable and unfit mother on the basis of a perception that the plaintiff suffered from a mental illness that she did not have; her actions in perpetuating a scheme wherein the plaintiff was to secure mental health services from a court-affiliated provider; her actions wherein the defendant recommended that the plaintiff be deprived of access to her children while knowing that the mother did not pose an imminent threat to the health of her children; her actions in conspiring with Defendant Brigham to deprive the plaintiff of access to the court – these actions were all intentional and done with the intent to cause severe and significant emotional distress. Her actions were both extreme and outrageous.

288. The actions of Mary Brigham were extreme and outrageous. Her actions of interfering with parental rights and decision making; willful interference with the plaintiff's relationship with the children's school and health care providers; malicious interference with access to the court; malicious pursuit of fees under threat of incarceration; malicious maligning of the plaintiff in the presence of her children; malicious and intentional pursuit of the severance of all relationship between the mother and her children – these actions were all intentional and done with the intent to cause severe and significant emotional distress.

289. Resha and Cutsumpas allowed Brigham to file in excess of 30 pleadings against plaintiff in violation of state statutes and case law.

290. The actions of Sidney Horowitz were extreme and outrageous. His actions in refusing to disclose the children's health records, wrongful diagnosis of a child with a serious psychiatric condition; wrongful billing to the child's insurer; resignation from the case under the false pretense that the mother was a threat when in reality the threat was a request for billing records – these actions were intentional and done with the intent to cause severe and significant emotional distress to the plaintiff and/or with a reckless disregard for the same.

291. The actions of Howard Krieger are unlawful and outrageous. Krieger was in a stipulated agreement to provide parent counseling for post judgment matters. Krieger created a contract that was for services, Co-parent coordinator that were to be court ordered, but they were not. It should be noted that co-parent coordination is a violation to fundamental rights of family court litigants.

292. The actions of Tracy Barraco in denying the plaintiff access to the court and in permitting hearings to be conducted ex parte were intentional, extreme and outrageous. These actions were done with the intent to cause severe and significant emotional distress to the plaintiff and/or with a reckless disregard for the same.

#### **COUNT SEVEN – CIVIL CONSPIRACY**

293. **Defendants Hite, Guiliano, Brigham, Resha, and Baracco** conspired among themselves to deprive the Plaintiff of income and assets on December 19, 2011 provided to her in a stipulated agreement between herself and former spouse. Absent service of a motion to modify, absent calendar date, Defendant Resha had no jurisdiction to open the agreement and remove the Plaintiff's settlement. Judge Resha had not the jurisdiction to adjudicate a wrongful termination of the plaintiff's former spouse and name her the cause, absent any evidence or appearance by the plaintiff's former spouse's employer, where he is still employed. Further, Defendant Resha nor Cutsumpas would hear the Plaintiff's motions on lack of subject matter jurisdiction, which can be addressed at anytime, and the order is void on its face. Further, defendant Resha made it a temporary order, then with a clarification two and a half years later, changed the terms of the original stipulated agreement. This is violation of due process and equal protection.

#### **COUNT EIGHT – CIVIL CONSPIRACY**

294. **Defendants Resha, Guiliano, Munro, Horowitz, Krieger and Brigham** conspired amongst themselves, as members of a broader conspiratorial enterprise, to

engage in an unlawful act or in a lawful act by unlawful means for purposes of their own financial gain, resulting in serious mental, emotional and financial harm to the plaintiff.

295. 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. Lynda Munro stated that the children could not testify because the Guardian ad litem and the father said no. This is not a fact. "All citizens, even minors are required to do civic acts." By not allowing the children to testify to their needs and wants and domicile safety, Lynda Munro was exhibiting her own bias and protection of the collusion to impinge on the rights of families, as found in the mission statement of CSSD.

296. The plaintiff alleges the jurists in the State of Connecticut who conducted hearings in Waterbury, Connecticut and Middletown, Connecticut in docket 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."

297. Defendant Munro was given authority by the Connecticut Judicial Branch to organize a training program for guardian ad litem in the State of Connecticut.

298. Defendant Munro was given authority to hand-pick professionals from the area to act as trainers for her training program.

299. Defendant Munro identified Defendant Horowitz as a preferred person who would help design and implement the training program.

300. Defendant Brigham was one of the first persons to attend the new training program.

301. At some point, Defendant Munro also identified other service providers in the community, including Dr. Henry Adamakos and various providers of supervised visitation services.

302. At some point, Defendant Munro conspired with Defendant Horowitz to insure that litigants referred to his office came out of that process with a recommendation for supervised visitation.

303. At some point, Defendant Munro conspired with Defendant Brigham and others who had taken training, to insure that when litigants were referred to providers, they were referred to the providers that Defendant Munro had personally identified.

304. At some point, Defendant Munro conspired with Defendant Brigham and others similarly situated to insure that when the GAL sent persons to the identified providers, and when those identified providers sent persons to identified supervised visitation centers, that the GAL would be paid by the litigant so referred.

305. It became the policy and practice of Mary Brigham to refer parents for psychological evaluations and/or parent training with the psychological providers identified by Defendant Munro.

306. It became the policy and practice of Defendant Horowitz to find mechanisms to bill insurance for the clients referred to him.

307. It became the policy and practice of Defendant Horowitz to recommend that one parent be subjected to supervised visitation.

308. It became the policy and practice of Defendant Munro and other judges similarly situated, to enforce payment of GAL fees by parents by the use of criminal contempt proceedings and the threat of incarceration for non-payment.

309. The purpose of the conspiracy was to secure income for Defendant Munro, to secure income for Defendant Horowitz and other similarly situated members of the conspiracy, to secure income for providers of supervised visitation services who were members of the conspiracy, to secure income for Defendant Brigham and other similarly situated members of the conspiracy, and to secure all of this income at the expense of parents who are or were litigants in the State of Connecticut Superior Court.

310. The plaintiff, Susan Skipp was forced to pay for the services of Mary Brigham despite not having any desire to use her services, Mary Brigham having no legal standing in her case by stipulated agreement that post-judgment parenting issues were to be handled by Howard Krieger, her children were referred by Mary Brigham to Dr. Horowitz who billed insurance for a condition the child did not have, Dr. Horowitz and Mary Brigham both recommended that the mother be referred to a supervised

visitation provider, and Defendant Munro later entered an order that the mother was responsible for payment of thousands of dollars in fees.

311. The plaintiff has been unable to use the services of the supervised visitation company, except for December 2013, were Visitation Solutions refused to provide the service, and the plaintiff moved for another supervisor and was denied by Murphy and consequently, she has been denied all access to her children since October 2012. The plaintiff has moved several times for a supervisor only to have it denied by Munro. A supervisor impinges on the right to privacy and the fundamental rights provided in the Fourteenth Amendment to raise and care for ones' children.

312. The foregoing amounts to an act of civil conspiracy under Connecticut law.

313. The plaintiff has been harmed in that she is purported to owe thousands of dollars in fees to Defendant Brigham who was involved without due process and equal protection, she has been denied access to the medical records maintained by Defendant Horowitz, she has been deprived of all access to her children contingent upon her paying for the services of another conspiracy member, Dr. Henry Adomakas, and she has been deprived of all access to her children contingent upon her paying for the services of another conspiracy member, a supervised visitation agency.

314. From the dates of January 4, 2008- September 13, 2011 the plaintiff had sole residential custody and parties shared joint legal custody when the plaintiff cared for the children as their father worked in Michigan. The parties shared joint legal custody, with the plaintiff having sole physical custody from the July 9, 2010 to September 13, 2011, the plaintiff in this federal complaint shared joint legal and physical

custody of the two plaintiff minor children G.T. (2000) and W.T.(2002) without the interference of the jurists in the State of Connecticut.

315. On the dates of September 13, 2011, December 19, 2011, February 10, 2012, and October 16, 2012, 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. Further, the movant on Feb 10, 2012 was not joined in suit with the plaintiff and had no standing as movant, December 19, 2011 hearing date was held without service and not calendared and September 13, 2011 the court lacked jurisdiction to change custody of the plaintiff’s children as the parents had a binding agreement. The Connecticut family Court had no jurisdiction to change custody as they adjudicated the plaintiff with “harm” but no evidence or support was given, further the family court lacks jurisdiction in removing child from a parent. The juvenile court has jurisdiction to remove custody in the presence of parental unfitness; none had been adjudicated for the Plaintiff. Thus the Connecticut court violates equal protection and right to due process.

316. It is common practice for GAL to arrange a parenting plan that cannot work, especially with abusers, See Sauder’s Report commissioned by the DOJ. Plaintiff sent this document to many of the defendants.

317. The plaintiff specifically alleges that as a result of this civil conspiracy, she has suffered deprivation of her legal right to the care and custody of her children; severe emotional distress due to being separated from her children as well as threatened with incarceration; an invasion of her right to self-determination and control over her own

health care; financial harm in the thousands of dollars; embarrassment and humiliation; and unreasonable pain, suffering and anguish.

318. Defendant Munro submitted testimony on judicial stationary to oppose legislative action as introduced to as House Bill 6651 (Submitted by Connecticut House of Representatives, Dan Carter in 2007. This legislation would have provided the opportunity for children over 12 to provide testimony in custody cases and exposed fraudulent guardian ad litem. In testimony in August 2012, defendant Munro stated the the Plaintiff minor children could not testify because the father and Guardian ad litem (who was not appointed) said they could not. This was actually the Defendant Munro acting on her own bias, and she recused with cause from this case for this and other acts of impropriety such as surfing the net, Fox news and Expedia, while the Plaintiff was on the stand providing testimony.

319. The defendants The Statewide Grievance Committee and the Judicial Review Counsel knew about these issues and the plaintiff made proper grievances.

### **COUNT NINE CIVIL-CRIMINAL CONSPIRACY**

**320. Defendants, Resha, Brigham, Guiliano, Anton, Horowitz, Krieger and Baracco** conspired to conceal illegal weapons, considered an unlawful act under 18 USC § 922 unlawful acts, that belonged to Ms. Skipp's former spouse. In February 2011 on two occasions, Defendant Brigham was ordered to obtain serial numbers for nine fire arms. Six of them were hand-guns. They were to be registered, stored in accordance to Connecticut statutes. On March 29, 2011 the plaintiff brought the weapon order not followed to the attention of the ordering judge, defendant Resha. Resha instructed the defendant that it's post judgment and it doesn't count.

321. On Ms. Skipp filed an ex parte motion March 23, 2011 in which Judge Sheedy at the Waterbury Superior Court ordered that Ms. Skipp's former spouse's visitation stopped for the plaintiff minor children pending the outcome of his DUI and proof of the order concerning the February 2011 weapons was followed.

322. This order was not followed nor a hearing had. Defendants Brigham, Horowitz, Krieger, Guiliano and Resha knew that Ms. Skipp had claimed many times that her former spouse threatened her life with fire arms. In addition, all knew that the plaintiff minor children had access to both weapons and ammunition.

323. In a hearing that was to have taken place July 5, 2011 referenced earlier in the pleading, the issue did not go before a judge. Defendants Anton and Brigham took advantage of the plaintiff's incapacitated state and wrote an agreement that visitation resume. They told her the weapons would be dealt with later.

324. In July 2011, Ms. Skipp found it necessary to take out a restraining order for an incident that one of the plaintiff minor children witnessed. Ms. Skipp did not want to put her son in the position of "telling" on his father. The protective orders provided for a weapons' surrender, much to the plaintiff's relief. However, the case was transferred from Litchfield court, the file "lost" for five days and ending up before the bench of Defendant Resha.

325. At the hearing for this PRO, Defendants Resha, Brigham, Guiliano conspired to conceal this illegal action. Despite Ms. Brigham ordered over six months earlier to obtain serial numbers, check to see the weapons, now ten, as the plaintiff recalled another weapon, were stored to statute. The plaintiff provided the statutes to

Defendants Brigham, Horowitz and Krieger. When asked if the weapons were legal, Defendant Brigham replied, "I don't know."

326. Defendants The Grievance Committee and the Judicial Review Counsel have known about this as well and dismissed the issue.

327. In August of 2012, a weapons check was made and the Redding Police found one weapon. The following day, before the bench of Defendant Munro, Ms. Skipp's former spouse claimed he had no weapons.

328. Two of the hand-guns were reported stolen in Michigan and one hand gun never had a bill of sale or legal transfer. Defendants Horowitz, Brigham and Krieger were all given the private investigator report to substantiate this.

#### **COUNT TEN CIVIL AND CRIMINAL CONSPIRACY**

329. On March 23, 2012, the Plaintiff was order to pay GAL fees to Mary Brigham. The threat was made, a marshal with shackles stood next to the plaintiff. Defendants Brigham, Guiliano, Hirshfield and Resha Ms. Brigham colluded and conspired to illegally deprive the plaintiff of her State of Connecticut Teacher's pension. This is a criminal violation under USC 18 1589 §664. If she did not sign to an agreement, she would go to prison in 25 minutes. This agreement made under such duress is void. The effect of this would not able to work the following week and lose her job and not see the children that weekend who the Plaintiff was only seeing 4 days a month. This was due to Ms. Brigham's, not a party joined in suit filings two modifications of custody. She was not appointed to the case at this point. This is further lack of due process and equal protection and violations of Title II and III of ADA as well. It should be noted that the defendant's Hircshfield, Guiliano and Brigham serve as GALs and know or should have

known, "It is not the province for Guardian Ad Litem to file papers." GALs are only allowed to ask for a status conference. The plaintiff has satisfied the monies owed to Ms. Brigham, about \$22,000.00 for her appointed period September 9, 2010- March 18, 2011.

### **COUNT ELEVEN ACT OF DOMESTIC TERRORISM**

330. 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 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 year to the general assembly in order to promote cooperation and avoid 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 in the rules submitted, as required by statute. If those events were to occur, the Judicial Branch might very well raise the issue of a statute's constitutionality. If you decide the legislature should have control over the procedural rules, I would submit that a constitutional amendment is necessary."

331. Such comments by the Chief Administrative 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. The plaintiff alleges that this constitutes an abridgment of

the powers of separation of government as well as fall under the criteria of domestic terrorism Under 28 C.F. R. Section 0.85, “ the unlawful use of force ...against persons or property to intimidate or coerce...civilian populations, a government... in furtherance of social agendas. By definition, the Family Court in the Judicial Branch engages in Domestic Terrorism as defined.

### INJURY

332. The plaintiff has been deprived of access to information concerning the health, safety, education and welfare of her minor children since October 2012.

333. The plaintiff has suffered severe emotional distress as a consequence of not seeing or knowing about the welfare of her children.

334. The plaintiff has suffered the loss of companionship of her children.

335. The plaintiff has suffered from severe mental anguish as a consequence of the loss of companionship of her children.

336. The plaintiff has suffered an injury of PTSD documented from February 2012 to present to be a result of court action.

337. The plaintiff has suffered a financial loss.

338. The plaintiff has suffered severe emotional distress as a consequence of her loss of assets and income and periods of threatened physical safety.

339. The plaintiff has suffered a loss of ability to work and earn a meaningful living secondary to her severe emotional distress.

340. The plaintiff has incurred significant medical expenses for treatment of her severe emotional distress and physical injury.

341. The Plaintiff minor children have been deprived of all contact with their fit loving mother since October 2012.

342. The plaintiff minor children have been deprived of their mother's interaction in their lives concerning the health, safety, education and welfare since October 2012.

343. The plaintiff minor children have suffered severe emotional distress as a consequence of not seeing or knowing about the welfare of their mother.

344. The plaintiff minor children have suffered the loss of companionship of their fit and loving mother from September 2011 to the present.

345. The plaintiff minor children have been denied "informed consent" as a Gaurdian ad litem who is an attorney must follow attorney code of conduct. C.G.S. 46b-129(b) requires informed consent is respected for minors. Informed consent to the minor children would be for Mary Brigham to have told them she would not be truthful in her representations to the court concerning the children's wishes, she would not fulfill her duties as a mandated reporter to file a complaint with child protective services for the abuses they reported to her, that she would impede 2 child protective services investigations against their father to their detriment, and that she planned to sever their relationship to their mother. She would have told them that they would continue to live in abuse and that she herself condones child abuse. She would have told them that she would construct a parenting plan that is set up to harm the children and their mother. Such informed consent to the plaintiff minor children was not provided.

346. The plaintiff minor children have suffered from severe mental anguish as a consequence of the loss of companionship, parenting and guidance of their mother.

347. The plaintiff minor children have lost the valuable education plan provided in the stipulated agreement that the state, through defendants Munro, Anton, Guiliano and Brigham, interfered in.

348. The children's education provided in the plaintiff and former spouse's stipulated agreement is federally protected, the Judicial Branch had no standing to impinge upon that right as found in *Wisconsin v Yoder*, 1972. 406 US 205.

## REQUEST FOR RELIEF

WHEREFORE, Plaintiff prays that this Court enter an order that grants the following relief and seeks damages under the Act of 1996, appropriate for the abridgement of Constitutional and Civil Rights the Plaintiffs seek relief for the intentional emotional duress that has been forced on them.

- a) The plaintiffs beg the court give ***immediate injunctive relief*** of the plaintiffs from the State of Connecticut Judicial Branch, including plaintiff minor children re-enrolled at the school that the parents agreed to in their stipulated agreement, the children returned to their residence as stipulated in plaintiff's and her former spouse's agreement. The state had no standing to modify the protected right of a child's education that the parent's agreed to.
- b) The plaintiff seeks emergency injunctive and declaratory relief by the protections of the 14<sup>th</sup> Amendment.
- c) The plaintiff seeks that the Connecticut recognize removing a child absent abuse, neglect or parental unfitness via an ex-parte order is an abridgement of fundamental rights.
- d) 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.
- e) Declares that the discriminatory practices, policies, procedures, and administrative methods of the Connecticut Judicial Branch, as set forth above, violate Title II of the ADA, 42 U.S.C. Sections 12131-12134 and its implementing regulation at 28 C.F.R. pt. 35.
- f) Enjoins the Connecticut Judicial Branch, its officers, agents, and employees, and all other persons and entities in active concert or participation with the Connecticut Judicial Branch, from discriminating on the basis of disability;
- g) Orders that the Connecticut Judicial Branch bring the program, services, and activities of the Judicial Branch within the requirements of Title II of the ADA and its implementing regulation at 28 C.F.R. pt. 35;
- h) Orders the Connecticut Judicial Branch to provide reasonable modifications

Under Title II of the ADA, not simply reasonable accommodations under Title I, and that the Connecticut Judicial Branch provide the name and address of the Designated Responsible Employee for Title II of the ADA, 28 C.F.R. Sec. 35.107(a), and establish a meaningful Grievance Procedure under Title II, 28 C.F.R. Sec. 35.107(b);

- i) Orders the Connecticut Judicial Branch to provide its services, facilities, privileges, advantages, and accommodations to persons with disabilities in a nondiscriminatory manner, including using a broader and more inclusive basis for making decisions on whether an individual is a qualified individual under the ADA, informing litigants of their procedural rights under the ADA such as the right to confidentiality of the documents they provide to establish their qualifications under the ADA, and in their right to privacy in regard to discussing their need for reasonable modification so that they do not feel obligated to discuss it in open court, and also in regard to providing reasonable modifications in a meaningful and consistent manner.
- j) Orders that Judge Lynda Munro, Judge Robert Resha, Judge Lloyd Cutsumpas, and Judge Mark Taylor who were fully informed of the Plaintiff, Ms. Susan Skipp's disability and who were informed of her requests for reasonable modification, be disciplined for failing to consistently allow the Plaintiff to exercise her right to reasonable modification, for acting with full knowledge of the harm that they inflicted on the Plaintiff, and acted on the basis of prejudice towards the Plaintiff in the exercise of their Administrative duties.
- k) Orders for compensatory damages, punitive damages, along with attorneys' fees and costs from the judicial branch, from Judge Lynda Munro, Judge Robert Resha, Judge Lloyd Cutsumpas, Maureen Murphy and Judge Mark Taylor representing the plaintiffs denied access to her children from the Connecticut Judicial Branch, \$10,000.00 per day, now over 500 days from each Judge Defendant in this case which represents, to date, each day the Plaintiff has been denied access to her children as a direct result of being unable to defend herself due to the blatant disregard of her rights under

ADA.

- l) Orders for compensatory damages and punitive damages from the State of Connecticut Judicial Branch of 500,000,000.00 representing under a million dollars each day the plaintiff has been denied access to her co-plaintiffs minor children.
- m) Orders such other appropriate relief as the interests of justice may require in the opinion of this Honorable Court.
- n) Compensatory damages for the deprivation of rights alleged herein.
- o) Compensatory damages for mental and emotional pain and suffering of co-plaintiff minor children totaling \$500,000,000.00 for the plaintiff minor children to be put in trust for educational use prior to 18<sup>th</sup> birthdays, higher education and upon 30<sup>th</sup> birthday receive the trust. The executrix of the trust to be plaintiff mother.
- p) Punitive damages as allowed under law, plaintiff requests \$10,000.00 per day from each judge the children have not had their mother. At this time it is well over 500 days.
- q) Such other relief at law or in equity as the Court deems just and proper under all of the circumstances.
- r) Punitive Damages as allowed under law for the minor children co-plaintiffs
- s) Connecticut State Statutes are not compatible to the ADA; the plaintiffs should be given immediate injunctive relief and protected from the State of Connecticut's Judicial Branch.
- t) Immediate remedy of the individual discrimination in this case by full overturn of the cases and return of full equity as called for in the ADA.
- u) A RICO investigation to the practices in the Connecticut Judicial Branch that allows its policy makers to own businesses that influence programing that they are also to oversee that includes the vendors and Mary Brigham.

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that she is the plaintiff in the above action, that she has read the above complaint, and that the information contained therein is true and correct.

Executed at 2:06pm, on March 25, 2014,  
2014.

The Plaintiff,



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Susan Skipp