

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT
JON GOODWIN : J.D. OF LITCHFIELD
V. : AT TORRINGTON
RAYMOND J. MILOT, ET AL : ~~JANUARY 23, 2023~~
FEBRUARY 5, 2024

PLAINTIFF'S REPLY TO
DEFENDANT MILOT'S REQUEST FOR A PROTECTIVE ORDER

1. Plaintiff herewith replies to Defendant Milot's Request for a Protective Order (EN: 165.00) as follows:

Introduction

2. Plaintiff is entitled to discovery of defendant Milot to further his prosecution of this action. For the reasons described herein, none of Plaintiff's document requests are "highly inappropriate and irrelevant" or "baseless, completely without merit, and irrelevant to the matters" stated in the Complaint in this action.

3. Defendant Milot's outrageous conduct necessitates Plaintiff's requesting documents that include: (a) souvenirs and other records of his abuse of children and of Ms. Jowdy; (b) records of arrests that defendant Milot falsely denied occurred, under penalty of perjury in written interrogatories submitted to Plaintiff, (c) documents illustrating a campaign undertaken by defendant Milot to cause the spoliation of evidence to undermine Plaintiff's claims, (d) documents showing behavior by defendant Milot causing the impairment of the morals of his children, etc. as further described below.

4. Plaintiff's frame of reference regarding defendant Milot's and his lawyer's, Rebecca Mayo Goodrich, characters is summed up by an offer from defendant Milot made through Rebecca Mayo Goodrich that defendant Milot will allow Ms. Jowdy¹ visitation with her youngest two children if she drops the companion lawsuit² to this action. That defendant Milot and Rebecca Mayo Goodrich would offer to trade the affections of Ms. Jowdy's children is abhorrent. Children only grow up once. Parents can only experience their children growing up once. Because of defendant Milot's cruel conduct, which has been enabled by Lawyer Rebecca Mayo Goodrich, who gloated about "winning" a juvenile case for defendant Milot, in which he and Ms. Jowdy were respondents to a petition by the Connecticut Department of Children and Families ("DCF") alleging they neglected their three (3) children, Ms. Jowdy has already missed over four (4) years of her children's lives. For her conduct in representing defendant Milot, as further described herein, Lawyer Rebecca Mayo Goodrich should be sanctioned and referred to the Statewide Grievance Committee for investigation.

5. Ms. Jowdy informed Plaintiff on or about October 18, 2023, that defendant Milot and Rebecca Mayo Goodrich misled Judge Heidi Winslow regarding defendant Milot's motivation for destroying, and causing the destruction of text message evidence related to this action,

¹ Christine M. Jowdy is the Plaintiff in *Jowdy v. Milot et al*, Dkt. No. LLI-CV-22-5014373-S (March 24, 2022), which is the companion case to this action.

² *Id.*

Ms. Jowdy's civil action against defendant Milot (fn. 1, *supra*) , the action filed December 12, 2019, by DCF against defendant Milot and Ms. Jowdy, referenced above, and defendant Milot's and Ms. Jowdy's divorce action styled in J.D. Danbury, styled *Milot v. Milot*, Dkt. No. DBD-FA18-6026439-S (April 20, 2018) (the "Jowdy-Milot Divorce Case") which she believed was a material factor in Judge Winslow taking away her custodial rights with respect to one of her children.

6. Plaintiff asked Ms. Jowdy why her lawyer, Mark Shiffrin, did not bring up a text message sent by one of her children elucidating that the child was informed by defendant Milot of imminent litigation. Ms. Jowdy informed Plaintiff, that Lawyer Shiffrin was not prepared. She wanted to fire him and complete the case *pro se* but, Lawyer Shiffrin was refusing to withdraw.

7. Plaintiff informed Ms. Jowdy she should demand Lawyer Shiffrin immediately file a motion for a new hearing based on defendant Milot's and Rebecca Mayo Goodrich's frauds to corrupt Judge Heidi Winslow's deliberations. Ms. Jowdy told plaintiff that Lawyer Shiffrin would not do that, she believed, because it would expose Rebecca Mayo Goodrich's part in the fraud. Ms. Jowdy was devastated by Judge Winslow's ruling. To console her, Plaintiff informed Ms. Jowdy he would help her prepare the motion, she could ask Lawyer Serafinowicz to review it, then enter an appearance *pro se* and file it herself. Ms. Jowdy informed Plaintiff she explained that to Lawyer Shiffrin and he still wouldn't assist her. That is why Plaintiff wrote the email to Lawyer Shiffrin demanding he tell Rebecca Mayo Goodrich to file a motion to vest custody of Ms. Jowdy's youngest children with Ms. Jowdy and retain Dr. Christine Cocchiola, DSW, LCSW to assist them

to undo the damage caused their children by defendant Milot's coercion of them, including his using their youngest child to threaten that he would "poison" Ms. Jowdy and Plaintiff (*see* original Complaint at ¶ 42(f)).

8. Lawyer Mayo Goodrich has contorted Plaintiff's communications to Mark Shiffrin into Plaintiff threatening "consequences" which is false. As a lawyer, it's presumed Mayo Goodrich understands that when she, her associates and clients engage in unlawful conduct that their victims may pursue legal claims against them. Accordingly, Lawyer Mayo Goodrich and defendant Milot's allegedly informing law enforcement of "consequences" that Plaintiff never threatened is pure artifice.

9. Plaintiff has never been arrested. As more fully described below, defendant Milot and Ms. Jowdy both have been arrested for violent acts. And their lawyers, Rebecca Mayo Goodrich ("Goodrich") (representing defendant Milot),³ Steven Howard Levy ("Levy")⁴ (also representing defendant Milot) and Robert Serafinowicz⁵ (representing Ms. Jowdy) all have records of participating in violent acts and/or behavior meant to incite violence against opposing parties or

³ Plaintiff notified Rebecca Mayo Goodrich and Steven Howard Levy, on October 19, 2023, of his intent to sue them for their conduct in this and related matters and he has also notified them of his intent to also file grievance complaints regarding their abominable, unlawful conduct.

⁴ *Id.*

⁵ Plaintiff filed a grievance complaint against Lawyer Serafinowicz on January 18, 2024, informing the Statewide Grievance Committee of Serafinowicz conflict of interest, failure to obey a court order, misrepresentations, fraud, etc. while representing Ms. Jowdy and Plaintiff.

counsel. Plaintiff has no record of violent conduct-- ever. And, in 42 years, as an adult (he's sixty years old), has an exemplary record. If anyone needs physical protection, it's Plaintiff.

10. While Plaintiff will take defendant Milot's deposition at Lawyer Steven Levy's and Rebecca Mayo Goodrich's offices, at 355 Prospect Street in Torrington; because, of their histories of violence, assaults and conduct intended to incite violence, as further described herein, Plaintiff respectfully requests this Court assist him to identify or secure a location to take defendant Milot's deposition where defendant Milot, Lawyer Steven Levy and Lawyer Rebecca Mayo Goodrich will have to pass through a metal detector and where witnesses can be present or the entire deposition recorded to deter unlawful conduct by them. Perhaps an empty courtroom or conference room in the J.D. Litchfield Courthouse at Torrington could be made available?

Backgrounds Regarding the Parties, Their Counsel and Referenced Third Parties

Plaintiff Goodwin

11. Plaintiff has bachelor's and master's degrees in accounting. Worked in investment banking and private equity investing much of his career. He has withstood rigorous background checks for a securities license, a commercial driver's license with multiple endorsements, including hazardous materials, and firearms permits. Plaintiff has never been arrested as an adult, nor has he ever been convicted of a misdemeanor or felony.

12. Despite investigations, fraudulently instigated by defendant Milot and his associates, Plaintiff has never been accused of neglecting or abusing a child by law enforcement or

even DCF. In fact, DCF formally cleared Plaintiff of any wrongdoing with respect to his restraining a Jowdy-Milot Child when he attempted to maim his sister with bolts taped between his fingers and attempted to break Ms. Jowdy's arm, DCF sent Plaintiff a letter stating "DCF finds that you do not pose a risk to the health, safety or well-being of children." *See Exhibit A*, hereto. And, since sending Plaintiff that letter, DCF has never notified Plaintiff of any change in their opinion.

Lawyer Robert A Serafinowicz

13. Lawyer Robert A. Serafinowicz ("Serafinowicz") represents Christine M. Jowdy in *Jowdy v. Milot*, DN: LLI-CV22-5014373-S. For his services, he received a cash retainer and a contingent interest in any judgement obtained against defendant Milot or the Sands defendants.

14. Lawyer Serafinowicz also represents Ms. Jowdy and Plaintiff in another matter and received a cash retainer for his services.

15. Lawyer Serafinowicz has a recent history of violence, scrapes with the law and violations of the Rules of Professional Responsibility as follows:

- a. On March 6, 2013, Lawyer Serafinowicz was suspended from practicing law for 120 days and ordered to "take and complete 1 course in legal ethics and professional responsibility," *Disciplinary Counsel v. Robert Serafinowicz*, Docket No. UWY-CV13-6018974, (Taylor, J);

- b. On August 12, 2016, Lawyer Serafinowicz was suspended 120 days, stayed after 10 days, *Disciplinary Counsel v. Serafinowicz*, Docket No. UWY-CV16-6032178-S, (Taylor, J);
- c. On September 7, 2022, Lawyer Serafinowicz was arrested for slapping another attorney outside the Derby courthouse and, on November 16, 2023, pled guilty to violating C.G.S. § 53a (Assault 3rd Degree) (*see State v. Serafinowicz*, Dkt. No. M09M-CR22-0189924-T);
- d. On November 29, 2022, Lawyer Serafinowicz was arrested and thereafter charged with violations of C.G.S. § 53a-181d(b)(3B) (Stalking), a Class A Misdemeanor and C.G.S. § 53a-183 (Harassment 2nd Degree), a Class C Misdemeanor, to which he pled *Nolo Contendere* and was found guilty (*see State v Serafinowicz*, DN: H14H-CR22-0753454-S); and
- e. On October 3, 2023, Lawyer Serafinowicz was suspended for failure to pay the Client Security Fund fee in accordance with Practice Book Section 2-70.

16. Plaintiff also found that a civil judgement was entered against Lawyer Serafinowicz on behalf of Bank of America, N.A. for \$14,425.33 which, after significant efforts by Bank of America to collect, remains unpaid. *See Bank of America v. Serafinowicz, Robert A*, Dkt. No. NNH-CV19-6089227-S. Lawyer Serafinowicz is projecting his “destitute” status on Plaintiff.

17. This Court can take judicial notice of Lawyer Serafinowicz's numerous criminal convictions, disciplinary cases, and the civil judgement against him.

18. Plaintiff filed a grievance complaint against Lawyer Serafinowicz alleging his failure to obey a court order, fraud or misrepresentation, conflict of interest, and failure to communicate which complaint is pending with the Statewide Grievance Committed and, on January 23, 2024, was forwarded to the Waterbury Grievance Panel. *See* Exhibits B and C, hereto.

19. Lawyer Serafinowicz is clearly an emotionally volatile individual who likely will be disbarred for his convictions and his unlawful conduct while representing Plaintiff in another matter and his representation of Ms. Jowdy in matters adverse to Plaintiff's interests.

20. Despite his having a conflict of interest, with his filing of the motion in the companion case styled "Plaintiff's Request for Protective Order Re: Christine Jowdy and Motion for Sanctions", Lawyer Serafinowicz is representing Ms. Jowdy in matters adverse to Plaintiff's interests. Accordingly, this Court should completely disregard Ms. Jowdy's request for a protective order and sanctions against Plaintiff and instead order sanctions against Lawyer Serafinowicz.

Lawyer Serafinowicz's and Ms. Jowdy's Aspersions

21. Lawyer Serafinowicz's and Ms. Jowdy's accusations and inferences that Plaintiff is: (1) squatting in her home, (2) intentionally not working, (3) attempting to coerce money from Ms. Jowdy by threatening to go to authorities regarding homemade child pornography featuring

defendant Milot, that Plaintiff found among hundreds of thousands of documents to which Ms. Jowdy provided plaintiff access, etc. are **patently false**, libelous and rebuttable with documentary and other evidence.

22. Plaintiff has not been contacted by law enforcement regarding Ms. Jowdy's alleged complaint that he is coercing her. If she and her lawyers have made such a complaint, Plaintiff will make certain they are held legally accountable for such a false report.

23. Finally, Lawyer Serafinowicz is a "deadender." He can't pay or is evading paying judgements against him. He has no future as a lawyer and is desperate. Accordingly, he will say anything he believes will advance his interests even at the expense of violating his client's rights.

Lawyer Rebecca Mayo Goodrich

24. Rebecca Mayo Goodrich ("Goodrich") has represented defendant Milot since November 2019, after Plaintiff notified defendant Milot on November 5, 2019, he intended to sue him for defamation and warned him not to cause the spoliation of evidence. *See Exhibit D*, at p. 5.

25. On or about December 12, 2019, defendant Milot and Ms. Jowdy were served petitions by DCF for neglecting their three children (the "Jowdy-Milot Children"). Thereafter, Lawyer Mayo Goodrich appeared on defendant Milot's behalf in that matter.

26. During the spring of 2020, Lawyer Mayo Goodrich and a male accomplice assaulted Plaintiff and attempted to draw him into a fight. Lawyer Mayo Goodrich made a video of the encounter which is further described paragraphs 80-83, *infra*.

27. Since her representation of defendant Milot in the juvenile court case, Lawyer Mayo Goodrich has represented him in this matter, the companion case, styled *Jowdy v. Milot et al.*, Dkt. No. LLI-CV22-5014373-S, and in defendant Milot's and his ex-wife's post-divorce case styled *Milot v. Milot*, Dkt. No. DBD-FA18-6026439-S (the "Jowdy-Milot Divorce Case").

Christine M. Jowdy

28. Christine M. Jowdy is the Plaintiff in *Jowdy v. Milot et al.*

29. Plaintiff and Ms. Jowdy have known each other since approximately 1995.

30. Ms. Jowdy was married to defendant Milot from approximately 2002 until June 20, 2019.

31. Plaintiff is informed Ms. Jowdy is taking psychotropic drug(s) to stabilize her emotions. An apparent side effect of the medication she is taking is they appear to diminish her reasoning abilities.

Defendant Milot

32. Defendant Milot allegedly works as a "Healthcare Solutions Architect" for a software company.

33. According to a conversation Plaintiff overheard between him and Lawyer Mayo Goodrich, on December 22, 2023, defendant Milot is or has been involved with trafficking illicit narcotics. During their conversation, defendant Milot specifically mentioned "500 hits of Blotter." According to the United States Drug Enforcement website, "Blotter," is a street name

for “Lysergic acid diethylamide (LSD) [a] potent hallucinogen that has a high potential for abuse[,] currently has no accepted medical use in treatment in the United States [and] is a Schedule I substance under the Controlled Substances Act”⁶ making it illegal to buy, sell or consume. Defendant Milot’s description of his involvement with illicit substances, on December 22, 2023, fits with what Ms. Jowdy described to Plaintiff regarding defendant Milot’s involvement with drugs, including his unlawful use of steroids during their marriage.

The Jowdy-Milot Children

34. During their marriage Ms. Jowdy and defendant Milot had three (3) children, “Jowdy-Milot Child V” for violent, “Jowdy-Milot Child M” for manipulative and “Jowdy-Milot Child C” for coerced.

35. Jowdy-Milot Child V is diagnosed with Disruptive Mood Dysregulation Disorder (“DMDD”), a psychiatric disorder characterized by severe and recurrent temper outbursts that are grossly out of proportion in intensity or duration to the situation. These outbursts are combined with persistent irritability or anger between the outbursts, significantly impacting individuals’ functioning in various settings. Because of DMDD, the child was constantly shadowed at school by a paraprofessional to prevent him from harming other children or himself. The child had many outbursts at home and at school, including one incident where he punched and broke a female

⁶ See <https://www.dea.gov/factsheets/lsd>

teacher's nose. DCF, law enforcement, defendant Milot and defendant Milot's lawyers have, at all times relevant, been aware of Jowdy-Milot Child V's clinical diagnosis and his propensity to violently erupt.

36. One of the Jowdy-Milot children is extremely manipulative ("Jowdy-Milot Child M"). Plaintiff Milot used this child to instigate violent conduct in Ms. Jowdy's residence on by communicating with the Jowdy-Milot Children.

37. Ms. Jowdy informed Plaintiff, in or about 2021, that Jowdy-Milot Child C, who has Asthma, complained to her regarding marijuana use in defendant Milot's home. While marijuana may not be unlawful to use under Connecticut state law, it remains a Schedule I substance under the federal Controlled Substances Act and is therefor illegal to buy sell or use in any state because federal law preempts state law (see: <https://www.dea.gov/drug-information/drug-scheduling>).

Lawyer Mark Shiffrin

38. Lawyer Mark Shiffrin was originally hired by Ms. Jowdy to investigate and file a lawsuit against DCF relating to its prosecution of Ms. Jowdy for neglecting the Jowdy-Milot Children.

39. Upon her arrest on October 13, 2022, for domestic violence against Plaintiff (described below), Lawyer Shiffrin represented Ms. Jowdy in that matter and, has since represented her in the Jowdy-Milot Divorce Case.

40. During his representation of Ms. Jowdy Lawyer Shiffrin has used: 1) legal research conducted by Plaintiff in motions filed on behalf of Ms. Jowdy in the Jowdy-Milot Divorce Case; and 2) Plaintiff's investigation of defendant Milot's financial disclosures in the Jowdy-Milot Divorce Case as a basis to obtain further discovery from defendant Milot to determine if he deceived Ms. Jowdy regarding his financial position when they finally settled their financial separation on June 20, 2019.

41. Lawyer Shiffrin has refused to report Lawyer Goodrich's unlawful attempts to coerce Ms. Jowdy to drop the companion lawsuit to this action against defendant Milot and, to my knowledge, has not reported her for intentionally misleading Judge Winslow to believe defendant Milot's insurance deductible would be the same (\$1,500) whether defendant Milot is single or his domestic partner and former paramour, Jane Walsh, is included under his insurance policy. Lawyer Mayo Goodrich's and defendant Milot's misrepresentations to Judge Winslow are material to issues being litigated in the Jowdy-Milot Divorce Case.

42. From statements made to Plaintiff by Ms. Jowdy, and his refusals to hold Lawyer Mayo Goodrich accountable, Lawyer Shiffrin appears more interested in intercouraging with Lawyer Mayo Goodrich, than he does serving his client's interest which is why Plaintiff has dressed him down.

Heather Anne Walsh (nee Slater) and Eric Walsh

43. Ex-convict and substance abuser Heather Walsh and her husband Eric Walsh are Ms. Jowdy's and Plaintiff's immediate neighbors at 12 Church Terrace in North Canaan. The Walshes are foreign substance addled, delusional, nut-jobs who constantly express irrational paranoia. They have threatened Mr. Goodwin and Ms. Jowdy, on multiple occasions, and have caused third parties to threaten Mr. Goodwin. In the past, the Walsh's anti-social conduct was so bad, Heather Walsh's parents requested the Connecticut Department of Children and Families ("DCF") intervene to protect their grandchildren.

44. On September 11, 2022, Plaintiff discovered drug paraphernalia stashed on the property he occupies with Ms. Jowdy. When Plaintiff asked Heather Walsh, who was standing near Plaintiff, if she knew what an item of the drug paraphernalia Plaintiff found was used for, she informed Plaintiff it was her property and demanded Plaintiff give it to her.

45. After Plaintiff's discussion with Heather Walsh and a related conversation with Eric Walsh the Walshes initiated a broad defamation and harassment campaign against Plaintiff and Ms. Jowdy, in an extortionate effort to cause them to pay for a professional arborist to trim and remove trees overhanging their property that defendants are responsible for maintaining. When Plaintiff and Ms. Jowdy refused to give into the Walsh's coercion, they escalated their campaign with the not-so-subtle aim of causing Plaintiff and Ms. Jowdy to discontinue inhabiting their residence.

46. Mr. Goodwin and Ms. Jowdy are not the Walsh's only victims. Defendant Heather Walsh has bullied and waged "war" with other of her neighbors, a construction worker and at least one business located in North Canaan.

Lawyer Steven Howard Levy

47. Defendant Milot is also represented by Lawyer Steven Howard Levy ("Levy"). And, Lawyer Levy also represents Heather Walsh and Defendant Eric Walsh in a related action.

48. The Connecticut Statewide Grievance Committee found in *Gina Bunch, Complainant vs. Steven Levy, Respondent*; Grievance Complaint #04-0871 that Levy repeatedly made: "false statements of material fact," "asserted fabrications" and disrespected the rights of third parties and reprimanded him for violating Rules of Professional Conduct 4.1(1) and 4.4 (). This Court can take judicial notice of Levy's past pattern of making false statements, asserting fabrications, and disrespecting the rights of third parties.

49. During a deposition of a fact witness in another matter, at the office of Mr. Goodwin's and Ms. Jowdy's former counsel on August 22, 2023, Lawyer Levy acted threateningly and provocatively toward Mr. Goodwin. When Mr. Goodwin informed Lawyer Levy he was aware that he had been reprimanded by the Statewide Grievance Committee, Lawyer Levy mockingly replied "oh, you can read," then called Mr. Goodwin a "creep." Lawyer Levy demanded Plaintiff not record the deposition so that he could continue acting offensively toward Plaintiff.

50. Cognizant of the accusation that Lying Lawyer Levy burned an opposing party with a cigarette, and because of Lawyer Levy's attempt to instigate an altercation, prior to the start of the deposition, Mr. Goodwin requested Lawyer Levy keep his hands in a place where Mr. Goodwin could see them. Approximately one-half hour after Mr. Goodwin requested Levy's cooperation, Levy placed a briefcase on his lap, opened it, moved his hands inside and fumbled with something in a manner which was clearly orchestrated to cause Mr. Goodwin to suspect Levy was loading a gun. When Mr. Goodwin did not react to Lawyer Levy's theatrics, Levy contorted his face at Mr. Goodwin multiple times, then falsely told everyone in the room that Mr. Goodwin was acting creepily toward him.

Lawyer Mayo Goodrich's Confederation with Lawyer Steven Levy to Further Plaintiff's Injuries Using the Walsh Defendants

51. Lawyer Levy and Lawyer Mayo Goodrich are enabling the Walshes defamation and harassment campaign to attempt to fraudulently further defendant Milot's interests.

52. Despite knowing Plaintiff was not a party to the DCF child neglect case brought against Ms., Jowdy and Mr. Milot and knowing Plaintiff was cleared by DCF, Lawyer Mayo Goodrich and Lying Lawyer Levy have furthered the fraudulent, libelous narrative, promoted by the Walshes, using Facebook, that Plaintiff and Ms. Jowdy are both "in trouble for abusing his (his gf's) children."

53. The Walshes are using false statements, *inter alia*, that Plaintiff and Ms. Jowdy are child abusers to solicit and direct threats at Plaintiff including:

- a. On April 6, 2023, a friend of the Walshes, John Kunkiewicz, directed a threat at Plaintiff by responding to a Facebook post of Heather Walsh as follows: "[a]t some point, it just becomes worth it to get on probation or go to jail for a little bit to just have them never look your way again. Knowing is half the battle, violence is the other half." Kunkiewicz and Heather Walsh appear to be infatuated with each other. She responded to Kunkiewicz's threat with a thumbs-up emoji (Ex. E and F);
- b. In early April 2023, a person identifying as "Mark Anthony Corsi," responding on Facebook to a post by Heather Walsh regarding Plaintiff threatened "asspipe will get his, you'll see" to which Heather Walsh responded with a heart emoji (Id.) (Ex. G).

54. Lawyer Levy's endorsement of the Walsh's statements that Plaintiff is a child abuser, is made through his filing an answer on their behalf in *Goodwin v. Walsh et al*, LLI-CV23-6033167-S (EN: 132), denying that statement is false which denial, Lawyer Levy knows is not true.

55. Lawyer Levy's fraudulent conduct has furthered the harm caused by the Walshes who are continuing their campaign of harassment and defamation of Plaintiff and Ms. Jowdy.

Selected History

February 18, 2018: Ms. Jowdy Photographs Herself with a Black Eye

56. Ms. Jowdy informed Plaintiff that, at various times during her relationship with defendant Milot, he sexually and physical abused her. Ms. Jowdy rationalized staying in the marriage with defendant Milot because she wanted to make sure her children were financially secure, and do not have to take out loans for their college educations. She further informed Plaintiff that defendant Milot threatened not to bear any child rearing or higher education expenses if she crossed him. According to Ms. Jowdy, defendant Milot told her he would go “flip pizzas” for a living and pay her nothing.

57. While reviewing files provided to him by Ms. Jowdy in mid-December 2023, Plaintiff found photographs of Ms. Jowdy with a black eye. *See e.g.*, Exhibit H. The photographs that, according to their metadata, were taken on February 18th and 19th, of 2018, appear to be self-taken.

April 20, 2018: Defendant Milot Files for Divorce

58. Defendant Milot filed for divorce from Ms. Jowdy on April 20, 2018.

July 9, 2018: Defendant Milot is Arrested for Unlawfully Restraining Ms. Jowdy

59. According to New Milford Police Department records, obtained by Plaintiff, defendant Milot was arrested on July 9, 2018, and charged with violating C.G.S. § 53A 96 for unlawfully restraining Ms. Jowdy in their residence on June 27, 2018. *See Exhibit I, hereto.*

60. Despite having been arrested, when asked in Interrogatories propounded by Plaintiff dated August 31, 2023, “[if] you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest,” on November 13, 2023, defendant Milot responded “[n]o knowledge of any of these allegations. *See Exhibit J*, at p. 17, #90. Defendant Milot’s response is a lie.

61. Plaintiff is informed the record of defendant Milot’s arrest is in DCF’s file to which, Lawyer Mayo Goodrich has access because of her representation of him regarding the neglect petitions filed against defendant Milot and Ms. Jowdy by DCF. Plaintiff is also informed that Lawyer Mayo Goodrich obtained reports relating to police responses to defendant Milot’s and Ms. Jowdy’s address at 95 Indian Trail in New Milford which, include reports relating to defendant Milot’s arrest. Accordingly, Lawyer Mayo Goodrich is aware of defendant Milot’s arrest. Despite such knowledge, on November 13, 2023, Lawyer Mayo Goodrich filed a “Notice of Compliance for Interrogatories and Production Request” in this case (EN: 163) wherein she states “... the Defendant, through undersigned counsel respectfully states that he has provided Responses to the Plaintiff’s Request for Interrogatories and Production dated August 31, 2023. *See Exhibit K*. To make such representations to this court, Lawyer Mayo Goodrich would have had to review defendant Milot’s Interrogatory responses. Accordingly, Lawyer Goodrich knew defendant

Milot had lied, under oath, in his interrogatory responses and, despite that knowledge, furthered defendant Milot's attempt to deceive Plaintiff.

June 20, 2019: Defendant Milot and Ms. Jowdy Finalize their Divorce

62. Defendant Milot and Ms. Jowdy executed a separation agreement and a parenting plan to finalize their divorce.

October 2019: Plaintiff and Ms. Jowdy Begin Cohabiting

63. Plaintiff and Ms. Jowdy began cohabitating at her residence at 95 Indian Trail in New Milford, Connecticut.

64. From, in or about, October 2019 through March of 2020, Plaintiff assisted Ms. Jowdy with her three children including cooking meals, repairing damage to her home caused by her children, monitoring her children's whereabouts, and protecting Ms. Jowdy and her children from violent conduct by her youngest and middle children, which conduct was directly or indirectly incited by defendant Milot. Because of his assisting Ms. Jowdy and her children, Plaintiff was subjected to assaults, threats, stalking, invasions of privacy, defamation, false reports to law enforcement, investigations by government officials and persons obligated by law to report possible child abuse or neglect, all of which were directly or indirectly instigated by defendant Milot.

November 1, 2019: Defendant Milot Instigates Violence in Ms. Jowdy's Home

65. During the early evening of November 1, 2019, Jowdy-Milot Child V and M were in Ms. Jowdy residence interacting pleasantly.

66. Beginning at 17:24, defendant Milot had the following conversation via text messaging with Jowdy-Milot Child M:

- a. Defendant Milot to Jowdy-Milot Child M: "Hi sweetie ... Hi ... Please talk to me" (Ex L);
- b. Jowdy-Milot Child M replied: "Why'd u leave ... Where are you ... [Jowdy-Milot Child V] said to say hi" (*Id.*);
- c. Defendant Milot replied "in lake club" (*Id.*);
- d. Jowdy-Milot Child M replied: "Can you come say hi" (*Id.*);
- e. Defendant Milot replied "Sure ... can you come outside" (*Id.*);
- f. Jowdy-Milot Child M replied: "Yeah bottom or top" (*Id.*), meaning the top entrance to Ms. Jowdy's residence or the bottom entrance which was on Indian Trail;
- g. Defendant Milot replied "Top" (*Id.*);
- h. Jowdy-Milot Child M replied "Ok" (*Id.*); and
- i. Defendant Milot replied "Be there in 1".

67. Without Ms. Jowdy's permission, defendant Milot met with Jowdy-Milot Child M in his vehicle.

68. After meeting defendant Milot in his vehicle, Jowdy-Milot Child M returned to Ms. Jowdy's residence and immediately began instigating conflict with Jowdy-Milot Child V, *inter*

alia accusing him of stealing a piece of her Halloween candy. Jowdy-Milot Child M continued agitating Jowdy-Milot Child V for over an hour, refusing to quit.

69. At approximately 19:30, Jowdy-Milot Child V attempted to attack Jowdy-Milot Child M with three furniture bolts, he placed and taped between his fingers allowing the thread ends to protrude out from the face of his fist.

70. Ms. Jowdy caught Jowdy-Milot Child V before he could hit Jowdy-Milot Child M with his improvised “brass knuckles” as he referred to them. Upon catching Jowdy-Milot Child M, Ms. Jowdy asked Plaintiff to assist her. While she held Jowdy-Milot Child V, Plaintiff removed the bolts from Jowdy-Milot Child V’s hand, after which, Plaintiff took over restraining Jowdy-Milot Child V thereby freeing Ms. Jowdy to call the police.

71. Upon Plaintiff taking over restraining Jowdy-Milot Child V, Jowdy-Milot Child M popped up and began videoing Plaintiff’s restraint.

72. After videoing Plaintiff, at 19:32:22 on November 1, 2019, Jowdy-Milot Child V transmitted the video to defendant Milot through a text message (Ex. L, p. 2).

73. At 20:14 on November 1, 2019, defendant Milot asked Jowdy-Milot Child M: “Do [the police] know you have a video?” to which Jowdy-Milot Child M replied: “[t]hey saw a picture”.

74. According to a New Milford Police Department report, after the incident on November 1st, defendant Raymond Milot spoke to a police officer on the telephone informing the

officer he had been contacted by Jowdy-Milot Child M and “wanted to make a complaint that Jon Goodwin had put his hands on [Jowdy-Milot Child V].” Defendant Milot “was upset that Goodwin [Plaintiff] was in the home, and said he should never put his hands on his ... [defendant Milot’s] kids ... [defendant Milot] was advised that in this incident, it was the belief of Officers that Goodwin was restraining [Jowdy-Milot Child V] to prevent [Jowdy-Milot Child V] from hurting himself and/or others and said restraint was stopped once [Jowdy-Milot Child V] calmed down ... [defendant Milot] was advised that DCF would be contacted ... [defendant Milot] said he would follow up with that agency to see how he could keep Goodwin [Plaintiff] away from his kids.”

75. Defendant Milot intentionally using Jowdy-Milot Child V’s disability to cause him to violently attack Jowdy-Milot Child M, with an improvised weapon, to set Ms. Jowdy and Plaintiff up to be arrested or investigated by DCF is extremely deranged. Either of the Jowdy-Milot Children involved, Ms. Jowdy or Plaintiff could have received disfiguring or life-threatening injuries. Defendant Milot’s conduct amounted to assault and battery by proxy and child abuse.

November 5, 2019: Mr. Goodwin Notifies Defendant Milot of His Intent to Sue

76. Plaintiff notified defendant Milot on November 5, 2019, of his intent to sue him and demanded he not to cause the spoliation of evidence (Ex. D, p. 5).

September 6, 2019, through February 2, 2020: Defendant Milot Causes the Spoilation of Evidence

77. From as late as September 6, 2019, through February 2, 2020, defendant Milot instructed Jowdy-Milot Child M to delete text messages she exchanged with him to conceal his use of his children to steal property belonging to Ms. Jowdy, video Ms. Jowdy and Plaintiff, instigate violent reactions from Jowdy-Milot Child V thereby endangering Ms. Jowdy, her children and Plaintiff and cause authorities to be summoned to Ms. Jowdy's residence, stalk Plaintiff and Ms. Jowdy, etc.

78. Examples of defendant Milot causing the spoliation of evidence as follows:

- a. On September 6, 2019, Jowdy-Milot Child M, informed defendant Milot in a text message: "Ok I deleted all" then stated, "And I'll delete all of these messages" (Ex. M);
- b. On October 19, 2019, defendant Milot instructed Jowdy-Milot Child M, "you should delete these texts" (Ex. N);
- c. Again, on October 19, 2019, defendant Milot instructed Jowdy-Milot Child M, who was uploading a video recorded in Ms. Jowdy's home, "[your Mom] isn't going to be happy [you] recorded her ... [y]ou may want to delete your messages" to which the child replied "Ok" (Ex. O);

- d. On October 29, 2019, Jowdy-Milot Child M asked defendant Milot “[w]hen will you be able to get full custody[?]”, indicating the child was informed by Milot of his plan to continue litigating against Ms. Jowdy and was causing the spoilation of evidence to deprive her of claims and defenses against him (Ex. P);
- e. On November 2, 2019, defendant Milot instructed Jowdy-Milot Child M “[y]ou should not save texts to me sweets” to which the child replied “Ok ... I’ll just delet (sic) the whole conversation” to which defendant Milot replied with a thumbs-up emoji (Ex. Q);
- f. On November 8, 2019, texting with a friend, Jowdy-Milot Child M informed them “[defendant Milot] had to pause messages because my mom keeps taking my phone and looking through my messages to try and sue my dad” (Ex. R);
- g. On November 25, 2019, defendant Milot asked Jowdy-Milot Child M “[did y]our mom explode?” then five seconds later instructed the child to “[d]elete that” (Ex. S);
- h. On November 25, 2019, defendant Milot instructed one of his children “make sure you turn your phone off and hide it -- and delete this” to which the child replied “Ok.” (Ex. T); and

- i. On February 2, 2019, defendant Milot, referring to text messages with Jowdy-Milot Child M, instructed “best to clear this conversation” (Ex. U).

79. During a deposition, defendant Milot was asked: “have you ever told your kids to delete any messages that they send—that they exchange with you?” Defendant Milot falsely answered: “I don’t recall but, no.”

Spring 2020: Rebecca Mayo Goodrich and an Accomplice Assault Mr. Goodwin

80. Because of her representation of defendant Milot in the DCF neglect case against him, Lawyer Mayo Goodrich was aware from DCF’s file they had cleared Plaintiff of any wrongdoing (*see* ¶12, *supra*) and, from information in DCFs’ file and in defendant Milot’s possession including videos and photographs, she became aware of Plaintiff’s identity, background and even the make, model and that the state of registration of his vehicle is Wyoming.

81. During the late spring of 2020, while Plaintiff was loading lumber on to the top of his vehicle with Wyoming license plates at Home Depot in New Milford, Lawyer Mayo Goodrich, and a male accomplice began harassing Plaintiff. When Plaintiff told them to leave him alone, Lawyer Mayo Goodrich began videoing Plaintiff with her phone while her accomplice menaced Plaintiff, threatening to physically attack him. Plaintiff told Lawyer Mayo Goodrich’s accomplice to back off. He asked Plaintiff if Plaintiff had a gun. Plaintiff did not respond to his question but demanded again he “back off.” Fortunately, the male accomplice backed off. Plaintiff informed

Lawyer Mayo Goodrich she could not record him to wit she responded she was legally allowed to. After confronting Lawyer Mayo Goodrich, she and her accomplice disappeared.

82. When Plaintiff saw Lawyer Mayo Goodrich in court in J.D. Danbury in December of 2023, in person, without a mask or seated behind a camera during a remote hearing, he knew immediately she was the person from Home Depot who participated in assaulting him. It's now clear that Mayo Goodrich's scheme was to attempt to cause Plaintiff to assault or engage in a physical altercation with her male accomplice to have him arrested to facilitate obtaining custody of the Milot Children for defendant Milot through the juvenile court.

83. Plaintiff demanded defendant Milot produce all images and videos of Plaintiff. *See* Exhibit J at p. 18, #2. Defendant Milot failed to produce any photographs or videos of Plaintiff in his possession or control, including the video Lawyer Mayo Goodrich made of Plaintiff while her accomplice menaced him.

October 22, 2022: Christine M. Jowdy is Arrested for Attacking Plaintiff

84. On October 13, 2022, Ms. Jowdy awoke unconsolably upset that Lawyer Shiffrin had not filed a lawsuit against DCF she contracted with him to file and wanting Plaintiff to find a solution to Shiffrin's alleged procrastination. Because Plaintiff was not a party to Ms. Jowdy's relationship with Lawyer Shiffrin, he informed Ms. Jowdy he could not advise her as to why Shiffrin had not filed the complaint. Plaintiff walked away from Ms. Jowdy to let their dogs out. Ms. Jowdy followed, crying, and loudly proclaimed she was going to commit suicide. Ms. Jowdy's

upset caused her dog, Elvis, to bolt out of her yard for more peaceful surroundings. Plaintiff called his dog in, then retreated to his office, leaving Ms. Jowdy distracting from her suicidal ideation to figure out how to recover Elvis who was headed west at a gallop. Upon realizing Plaintiff had not put, Elvis' electronic collar on him, Ms. Jowdy ambushed Plaintiff in his office then threw Elvis' electronic collar at him. The buckle of Elvis' electronic collar clipped Plaintiff's ear and broke one of Plaintiff's computer monitors.

85. Because of Ms. Jowdy's suicidal ideation and violent attack, Plaintiff called 911 to assist him to deescalate the situation. Troop B of the Connecticut State Police responded. Ms. Jowdy was arrested and charged, with violations of C.G.S. § 53a-182 (Disorderly Conduct) and C.G.S. § 53g 117 (Criminal Mischief) in relation to her assaulting and battering Plaintiff.

86. Despite a court order being in place requiring her not to retaliate against Plaintiff, Ms. Jowdy terminated Plaintiff's health insurance.

December 2023: Plaintiff Discovers What Appears to be Homemade Child Pornography Featuring Defendant Milot

87. While reviewing documents possessed by Ms. Jowdy, for relevance in respect of the matters underlying this action, Plaintiff found photographs of defendant Raymond J. Milot, Jr., naked, appearing to have sex with a naked child. The child was seated with its buttocks positioned over defendant Milot's genitals. The child was looking down. Defendant Milot appeared to be concentrating as if he were engaging in intercourse. After seeing the photos, Plaintiff reported them

to the FBI and the Center for Missing and Exploited Children (“CMEC”). Plaintiff is informed CMEC contacted the Connecticut State Police who referred Plaintiff’s report to the New Milford Police Department.

88. Lawyer Serafinowicz alleges law enforcement have concluded their investigation into defendant Milot’s homemade child pornography. The last information Plaintiff has is that Ms. Jowdy refused to cooperate with investigators and accordingly did not allow them to inspect her computer for the images Plaintiff saw. After communicating with New Milford Police Department officials, Plaintiff agreed to subpoena defendant Milot’s homemade child pornography so investigators can determine whether a crime occurred. This is the reason Plaintiff stated in the request for production “Note that plaintiff will request the New Milford Police Department have an officer present at your deposition to receive such media.” If defendant Milot or Ms. Jowdy do not turn over all the images Plaintiff saw among Ms. Jowdy’s files, Plaintiff will report that to investigators as well.

December 2023: Ms. Jowdy Files a Motion to Open the Jowdy-Milot Divorce Case Based on Defendant Milot’s Alleged Misrepresentations in his Financial Affidavits Discovered by Plaintiff

89. On January 5, 2024, Lawyer Shiffrin filed a Motion to Open (Family Matters) on behalf of Ms. Jowdy in the Jowdy-Milot Divorce Case (EN: 203.00), based on defendant Milot’s alleged “misrepresentations” in that action.

90. On January 8, 2024, Lawyer Shiffrin filed a case flow request on behalf of Ms. Jowdy in the Jowdy-Milot Divorce Case (EN: 205.00) stating: “[o]n 12/15 and 12/22/23, at a hearing before Judge Winslow on child support, it became apparent that Plaintiff [defendant Raymond J. Milot, Jr. in this action] had materially misrepresented his Financial Affidavit filed 11/30/2023. An examination of his Financial Affidavits shows that only one, his first executed before his then counsel Attorney Peter Herger in 2018, disclosed restricted stock units, specifically those appearing as having been sold in the prior tax year as a capital gain, though it disclosed no other stock. His subsequent Financial Affidavits, executed before judgement before Attorney Laurie Gallo and after judgement before Attorney Mayo-Goodrich, have not disclosed any sale or existence of any stock, and he started his VMWare job in 2010. The VMWare Equity Plan compensated employees with stock, and this compensation was referenced in both his Broadcom employment letter and testimony.”

Plaintiff's Failure to Include Lawyer Mayo Goodrich in the Certificate of Service was an Unintentional Error

91. Plaintiff has never been to Lawyer Rebecca Mayo Goodrich's office. He obtained her address from her website which states she maintains an office at “42 Main Street” in “New Milford, CT 06776.” *See* Exhibit V, hereto. Given the reptilian way Lawyer Mayo Goodrich conducts herself, Plaintiff also mailed the notice to “PO Box 1420, New Milford, CT 06776” via certified mail (Ex. W). This address is also listed on Lawyer Mayo Goodrich's website (Ex. V). If,

as she warrants in the Motion for Protective Order (“MPO”), she has not had an office there in “10 years,” then, for the past “10 years,” she has been falsely advertising she maintains an office at said address.

92. Plaintiff concedes he did not include Mayo Goodrich’s address in the certification. It was a mistake. He in fact emailed He emailed the notice to her contemporaneous with emailing it Lawyer John Williams and Lawyer Kocienda. And, Plaintiff mailed it to her (Ex. X) to ensure she received it which, she obviously did because she responded.

93. Regarding Lawyer Mayo Goodrich’s affiliation with “The Law Offices of Conti, Levy, Salerno & Antonio, LLC,” she is not listed on that firm’s website (Ex. Y) and apparently continues to use her “rmg@mayogoodrichlaw.com” email address instead of a “contilevylaw.com” email address.

Evidence Sought from Defendant Milot

94. Described above, defendant Milot has engaged in a wide pattern of conduct designed to prevent Plaintiff from asserting his claims, including lying under oath, intentionally causing the spoliation of evidence, refusing to answer interrogatories regarding his conduct and answering falsely, abusing, and using the Jowdy-Milot Children as proxies to assault and battery Ms. Jowdy, Plaintiff and his own children, and impairing the morals of his children.

95. More fully described below, the evidence Plaintiff is seeking from defendant Milot challenges his credibility, showing he projects or deflects his own misconduct onto others. That he

habitually lies under oath. That he makes false accusations, to divert attention from his own actions which have included impairing the morals of his minor children, abusing his former spouse, Ms. Jowdy, and abused his children by, *inter alia*, weaponizing one of his three (3) children's mental handicap to cause that child to violently attack Ms. Jowdy and other of their children in Ms. Jowdy's home, requiring Plaintiff to intervene to protect Ms. Jowdy and her children from being critically injured or disfigured. Such evidence also supports that defendant Milot's false accusations regarding Plaintiff were made maliciously.

96. The materials Plaintiff has requested defendant Milot produce are not "highly inappropriate and irrelevant." What is "highly inappropriate" is defendant Milot being naked around children, appearing to have sex with a child, photographing the encounters and distributing the photos of himself. What is highly inappropriate is defendant Milot sexually and physically abusing Ms. Jowdy. That's not only highly inappropriate, but it's also disgusting.

97. Photos of defendant Milot naked around children, appearing to have sex with a child and photographs of Ms. Jowdy with bruises inflicted by him are evidence that he projects his own misconduct onto others, including Plaintiff and explain his stalking Plaintiff and the baseless defamation campaign defendant Milot has pursued against him as fear resulting from projections of his own conduct.

98. Defendant Milot's mobile phone records, the text messages requested by Plaintiff as well as the messages from the Our Family Wizard system: (a) can provide concrete evidence of

the fact and timing of defendant Milot's communications related to Plaintiff's claims, (b) might reveal communications with potential witnesses who could have information related to Plaintiff's claims, (c) can help establish a timeline of events, showing when certain statements were made or when the defendant Milot was in contact with key individuals related to the case, (d) could contain evidence of the defendant Milot's intent or malice, (e) might contradict defendant Milot's claims regarding his whereabouts, (f) could provide evidence of the publication of defamatory statements, (g) might contradict defendant Milot's claims regarding his interactions with third parties regarding Plaintiff or his involvement in the dissemination of defamatory statements, (h) may reveal involvement or collusion with third parties regarding Plaintiff's claims, including spreading the defamatory statements, indicating a broader conspiracy or concerted action, and (i) can provide context for the defamatory statements, possibly revealing if they were part of a larger pattern of harassment or abuse.

99. Plaintiff's request for defendant Milot's financial information is also appropriate because, as described in paragraphs 89-90, *supra*, it has the potential to show his dishonesty in the Jowdy-Milot Divorce Case, his willingness to lie under oath to deceive courts of law, and his former spouse, to deprive her of property, alimony, and child support in their divorce and provide a basis for challenging defendant Milot's credibility.

100. Contrary to Lawyer Mayo Goodrich's representation to this court, Plaintiff was not in the courtroom when the Court in the Jowdy-Milot Divorce Case scheduled a hearing for

February 2, 2024. Lawyer Mayo Goodrich should have emailed me asking for an alternative date, which she did not.

101. WHEREFORE, the Plaintiff, respectfully requests the Court deny defendant Raymond J. Milot's request for a protective order and that the location of the deposition take place at the Superior Court for the Judicial District of Litchfield, at Torrington, or another agreed upon secure place, and that Plaintiff be allowed to video record the entire deposition in order to deter defendant Milot and his lawyers from engaging in further unlawful conduct toward him.

**PLAINTIFF,
JON GOODWIN, ET AL**

By: /s/ *Jon Goodwin*

Jon Goodwin
12 Church Terrace
North Canaan, CT 06018
jgoodwin@protonmail.ch

CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on February 5, 2024, to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Fabulist Rebecca Mayo-Goodrich
Of Conti Levy Salerno Antonio LLC
Counsel to Defendant Raymond J. Milot, Junior
P.O. Box 239
Torrington, CT 06790
rmg@mayogoodrichlaw.com

John R. Williams
Counsel to Jon A. Goodwin
51 Elm Street, Ste 409
New Haven, CT 06510
jrw@johnrwilliams.com

Jonathan A. Kocienda
Counsel to Joanne Iuratto
Capitol Place / Ste 700
Hartford, CT 06106

/s/ **Jon A. Goodwin**
Jon A. Goodwin
Plaintiff in pro se

Connecticut Department of Children and Families
NOTIFICATION OF INVESTIGATION RESULTS

DCF-2210
07/16 (Rev.)



Page 1 of 1

To (Name): Jon Goodwin	Date: 12/13/2019
Address: 95 Indian Trail New Milford CT 06776	LINK #: 341719
	Re: Investigation Dated: 12/13/2019

The Department of Children and Families (DCF) recently investigated reported allegation(s) that you abused or neglected a child or children. The purpose of this letter is to inform you of the decision made regarding that investigation.

DCF has concluded the following: (NOTE: For every child, list all allegations and select the disposition for each allegation)

Child's Name	Allegation	Disposition
Noah Milot	Physical Abuse	Unsubstantiated
	(Select One)	(Select One)
	(Select One)	(Select One)
	(Select One)	(Select One)
	(Select One)	(Select One)
	(Select One)	(Select One)



DCF finds that you do not pose a risk to the health, safety or well-being of children.



DCF finds that you pose a risk to the health, safety or well-being of children and is recommending that you be placed on the Child Abuse and Neglect Central Registry.

Persons whom DCF finds pose a risk to the health, safety or well-being of children are recommended for placement on the Central Registry. Names remain on this list indefinitely. The Central Registry may be checked by current or prospective employers whose work involves contact with children and by federal, state and local licensing authorities that regulate activities that involve children. Placement on the Central Registry may therefore affect your ability to work in jobs, obtain licenses or engage in activities that involve contact with children.

If you have been recommended for placement on the Central Registry your name will be placed on the Central Registry unless you exercise your right to appeal this finding. While the appeal is pending your name will not be disclosed to anyone except as permitted by law.

If you disagree with the finding that you abused or neglected a child, you may appeal the finding by signing and mailing the enclosed DCF-2210b, "Request for Appeal of Substantiation Findings" to DCF at the address provided on the form. This will begin an appeal process that may result in the DCF's finding being changed. Please be advised that you may also request, in writing, to have your appeal deferred pending the disposition of any criminal court proceeding arising from the above stated allegations of abuse and/or neglect. (If you request that your hearing be deferred, you must notify DCF within five years to request that it be reinstated. If you do not request reinstatement within five years, the substantiation and Central Registry finding, if applicable, will be automatically upheld.)

Please note that your request must be received within thirty (30) days of the date of this notice in order for your appeal to be considered. An internal review will be completed within thirty (30) days of DCF's receipt of your request. You will be notified in writing of the results of that review, and of further appeal actions available to you if the results are not satisfactory to you.

Sincerely,

Social Worker/Investigator

Jennifer Avila-Gonzalez

(203) 207-5154

Email:

jennifer.avila-gonzalez@ct.gov



Christopher L. Slack
Statewide Bar Counsel

Jennifer A. Gagosz
Elizabeth M. Rowe
First Assistant Bar Counsel

CERTIFIED
RETURN RECEIPT

STATEWIDE GRIEVANCE COMMITTEE

Tel: (860) 296-3848
Fax: (860) 296-3847

www.jud.ct.gov/sqc
Fifth Floor

999 Asylum Avenue, Hartford, Connecticut 06105

JON ALAN GOODWIN
12 CHURCH TERRACE
NORTH CANAAN CT 06018

01/23/2024

RE: GRIEVANCE COMPLAINT #24-0037
GOODWIN vs. SERAFINOWICZ
NOTICE OF ASSIGNMENT

Dear Jon A. Goodwin:

The grievance complaint which you filed against Attorney Robert A. Serafinowicz has been received and referred to the Waterbury Grievance Panel.

The Panel can be contacted, in care of its counsel, as follows:

Attorney Danielle S. Rado
ONE CARRIAGE PLACE, SUITE 16
WATERBURY, CT 06702
Telephone: (203) 755-4465

Please be sure to notify both the undersigned and the grievance counsel noted above of any change of address or of your telephone number during the pendency of proceedings on your complaint. You are not required to retain an attorney to represent you in connection with the grievance complaint. If you do, however, retain an attorney, please direct the attorney to file an appearance with the grievance panel and with the Statewide Grievance Committee.

If on the Complaint Against Attorney form you listed any persons having knowledge of the subject of the complaint, please request those individuals to submit in writing to the panel counsel indicated above any relevant information they have regarding your complaint.

If at any time you have any questions about the grievance procedures, please contact the undersigned or the grievance counsel listed above.

Sincerely,

Christopher L. Slack

cc: Attorney Robert A. Serafinowicz

Plaintiff's
Exhibit B



**STATE OF CONNECTICUT
JUDICIAL BRANCH**

**WATERBURY JUDICIAL DISTRICT
GRIEVANCE PANEL**

Danielle S. Rado, *Grievance Counsel*

*One Carriage Place, Suite 16
Waterbury, CT 06702
(203) 755-4465
Danielle.Rado@jud.ct.gov*

January 27, 2024

Jon Alan Goodwin
12 Church Terrace
North Canaan, CT 06018

Robert A. Serafinowicz
Law Offices of Rob Serafinowicz, LLC
520 South Main Street
Naugatuck, CT 06770

Re: Grievance Complaint #24-0037, Goodwin v. Serafinowicz

Dear Mr. Goodwin and Attorney Serafinowicz:

The above referenced grievance complaint has been assigned to the Waterbury Grievance Panel (hereinafter, "Grievance Panel"). I am counsel to the Grievance Panel. My responsibilities include preparing the grievance complaint for review by the Grievance Panel and providing the Grievance Panel with legal advice. In addition, I am available to assist you with any procedural questions you may have regarding the grievance process, however, I cannot provide you with legal advice. Although it is not necessary for you to be represented by an attorney, you have the right to retain an attorney to represent you throughout these proceedings. If you do retain an attorney, your attorney must file an appearance with this office and the Office of the Statewide Bar Counsel at 99 Asylum Avenue, Fifth Floor, Hartford, CT 06105.

The Respondent must file a response to the grievance complaint within **thirty (30) days** of notification unless an extension of time to file a response is granted by the grievance panel. A request for extension of time to respond should be directed to the undersigned. Pursuant to Practice Book §2-32(a)(1) and Rule 8.1 of the Rules of Professional Conduct, the failure to file a response to the complaint may lead to a finding of misconduct in addition to any other findings of misconduct on the underlying allegations of the complaint. If the fee agreement has not been provided by the Complainant, the Respondent must include a copy of the written fee agreement

Plaintiff's
Exhibit C-1

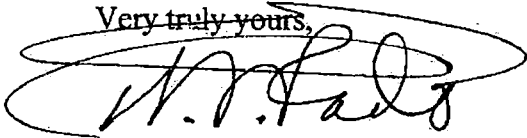
Attorney Goodwin and Attorney Serafinowicz:
January 27, 2024
Page 2

with the response or an explanation of why there is no written fee agreement. This provision does not apply to prosecutors, public defenders, or counsel appointed by the Office of the Public Defender.

A copy of the Respondent's answer will be sent to the Complainant and the Complainant will be given an opportunity to respond. Further submissions will be at the discretion of the Grievance Panel. The Grievance Panel will review and consider the grievance complaint at one of its meetings. These meetings are not open to the public. Thereafter, you will be notified of the Grievance Panel's decision. Please keep me advised of any change in your address.

Please remember that you must send an original and six copies of all submissions sent to this office. If you do not do so, your submission will not be considered. **As an alternative to sending an original and six copies, you may send an original and one copy provided you also email a pdf copy of your submission to the following email address: danielle.rado@jud.ct.gov. This is the preferred method.** Pursuant to Practice Book §4-7, no submission to the Grievance Panel may include personal identifying information, such as an individual's date of birth, mother's maiden name, motor vehicle operator's license number, Social Security number, health insurance identification number or any financial account number. If you have evidence containing personal identifying information, you may redact it and submit the redacted copy.

Very truly yours,



Danielle S. Rado
DSR/sjt

Plaintiff's
Exhibit C-2

JON GOODWIN

November 4, 2019

Via Federal Express

Mr. Raymond Joseph Milot, Jr.
38 Sullivan Farm
New Milford, CT 06776

Mr. Milot:

I've never met or communicated with you. I write concerning your slander of me to Joanne Iurato Ph.D. MSW LCSW, Kristie Liotta, MA, LPC, Officer McIntyre of the New Milford Police Department, Jennifer Avila-Ganzhi, LMSW and others, including Hannah Milot ("Hannah") and Noah Milot ("Noah"). The terms "you" and "your" in this letter shall collectively refer to you and your agents.

The slanderous statements I'm aware you've made regarding me include that I'm "dangerous," a "psycho," "unstable" and that I have abused your and Christine Jowdy's ("Christine") children, Noah Milot ("Noah") and Hannah Milot ("Hannah"). Your statements regarding me are false and defamatory per se.

You are aware that Noah and Hannah are extremely aggressive toward each other and Christine. Like you, your daughter Hannah abuses her mother. Last week, Hannah attempted to physically assault Christine. To thwart her attack I stepped between Hannah and her mother. Hannah was not touched by me rather, in her effort to strike her mother with her fists, Hannah ran into me.

Sunday morning Christine took a phone Hannah uses. When Hannah discovered her mother had the phone, she barged into her Mother's bedroom and assaulted her, prying the phone from Christine. At Christine's direction, I attempted to take the phone from Hannah; however,

95 Indian Trail • New Milford, Connecticut 06776

Plaintiff's
Exhibit D-1

physical harm, he was released and Christine called the New Milford Police Department. The responding Sargent and officers spoke to all parties and determined there was no evidence of a crime by an adult.

Noah's violent behavior is not confined to Christine's and your respective homes. He has had multiple violent episodes requiring him to be restrained at school and in his therapist's office. I'm informed you are aware of all of these incidents and that reports relating thereto are available from Noah's school and law enforcement authorities.

I'm informed that, in addition to law enforcement authorities, the foregoing have been reported to the Connecticut Department of Children and Families ("DCF"), Noah's therapist and, with the exception of the incidents this past weekend, to Hannah's therapist. You have been made aware of all of the incidents, have access to all of the reports and, I'm informed, have spoken with Noah's and Hannah's therapists. I'm also aware that, upon concluding their investigation at Christine's residence last Friday, you spoke with the New Milford Police Officer who responded to the incident and informed you there was no evidence of a crime having at Christine's residence.

Despite your awareness of the facts regarding my assisting Christine to restrain Noah, prevent Hannah from attacking Christine and ensure your children do not physically harm themselves or each other, you persist in slandering me as part of a broader scheme to unjustly separate Noah, Hannah and Cameron from Christine. Toward this end, you have engaged in a pattern of fraudulent communication with Noah, Hannah and Cameron to cause them to denigrate, disrespect, bully and act violently toward their mother and to show unwarranted fear of me. Your continuing psychological manipulation of your children is despicable.

To manufacture a foundation on which to justify your false and defamatory statements, you've made false reports of child abuse to government agencies, all the while refusing to obtain therapeutic services i.e., "Intensive In-Home Child & Psychiatric Service" ("IICAPS") for Hannah and Noah

Jon Goodwin

Plaintiff's
Exhibit D-4

November 4, 2019

Milot, Raymond Joseph, Jr.

Page 5 of 5

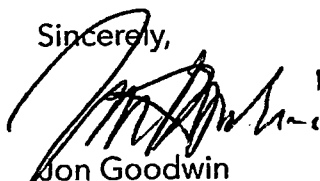
pursuant to recommendations of their therapists to help them deal with your continuing abuse. Your abuse of government and legal process will not be tolerated.

Sadly, your pathetic actions are not the least bit surprising given your abuse of illicit drugs, including anabolic steroids, your abuse of Christine during and after your marriage to her and carrying on a multi-year sexual affair with Jane Walsh during your marriage to Christine. I'm also informed you've made threats against me. Your abuse of me will be dealt with.

As stated above, I've never met or communicated with you. Nor do I care to be associated with someone who abuses women, children and drugs. You've been warned by Christine's counsel regarding your defamation of her. This letter serves as notice I'm filing a lawsuit against you. Pursuant to law, you must preserve all evidence related to my claims against you. Any attempt by you to cause the spoliation of such evidence will be dealt with.

Have your legal counsel contact me at his or her earliest convenience to arrange service of the complaint and summons on you. Your counsel can reach me at +1 (212) 372-4803.

Sincerely,



Jon Goodwin

cc: Norm Pattis, Esq.
William J. Quinn, Esq.
Michael G. Martin, Esq.
Christine M. Jowdy

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

Plaintiff's
Exhibit D-5

Below is a publication he made..... I started at the last bit and worked my way up. My kids and Eric are...well...it's something to read. Jon Goodwin copies & pastes his 'citations'. It's sad. He's really fucked up. You'll see.....

FILE.WIKILEAKS.ORG
file.wikileaks.org



9 comments

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Most relevant ▼



John Kunkiewicz

At some point, it just becomes worth it to get on probation or go to jail for a little bit to just have them never look your way again. ...

Knowing is half the battle, violence is the other half... GI JOE.

Like 1d



Heather Walsh

John Kunkiewicz he is a delusional nutjob. I can't believe what I was told...what I've found.... He's insane. Really.

Plaintiff's
Exhibit E



John Kunkiewicz

At some point, it just becomes worth it to get on probation or go to jail for a little bit to just have them never look your way again.

Knowing is half the battle, violence is the other half... GI JOE.

Like 3d



Heather Walsh

John Kunkiewicz he is a delusional nutjob. I can't believe what I was told I've found.... He's insane. Really.

Like 3d



1

Heather Walsh

Plaintiff's
Exhibit F



Mark Anthony Corsi

Heather Walsh This guy is a waste of space.. self important prick with nothing better to do

Like 1w



Heather Walsh

Mark Anthony Corsi pretty much lol.

Like 1w



Mark Anthony Corsi

Heather Walsh asspipe will get his, you'll see ...

Like 1w



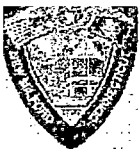
1

Heather Walsh

Plaintiff's
Exhibit G



Plaintiff's
Exhibit H



Arrest Report

01/23/2019

Arrest #: 18-15432-AR
Call #: 18-15432
Warrant #: 18-150-WA
Incident #: 18-15432-OF

Date/Time Reported: 06/28/2018 @ 1516
Arrest Date/Time: 07/09/2018 @ 1015
Booking Date/Time: 07/09/2018 @ 1030
Docket #: 18-150-WA
Involves: Juveniles, Domestic Violence

Court: TORRINGTON (L18W)
Court Date: 07/10/2018 @ 0930
Reporting Officer: OFFICER RONALD KURTZ
Assisting Officer: OFFICER RYAN LYNCH
Booking Officer: OFFICER RONALD KURTZ
Approving Officer: SERGEANT LEE CRABNER

Signature: _____

Bail For Court: TORRINGTON (L18W) Set: 06/29/2018 @ 1000
Surety Bail Set 15000.00
Surety Bail Set
Bail Set By: GA18 GA 18 Court Set Bond
Bail Payment: 07/09/2018 @ 1145 by SURETY OTHER \$15000.00
Bail Paid By: Giannone, Frank A
Released: 07/09/2018 @ 1146

Signature: _____

#	DEFENDANT(S)	SEX	RACE	AGE	SSN	PHONE
---	--------------	-----	------	-----	-----	-------

1	MILOT, RAYMOND J					
---	------------------	--	--	--	--	--

#	OFFENSE(S)	ATTEMPTED	TYPE
---	------------	-----------	------

LOCATION TYPE: Residence/Home/Apt./Condo Zone: SECTOR 3
INDIAN TRL
NEW MILFORD CT 06776

1	UNLAWFUL RESTRAINT 2ND	N	Misdemeanor
	53A 96		
	OCCURRED: 06/27/2018 2100		

#	VICTIM(S)	SEX	RACE	AGE	SSN	PHONE
---	-----------	-----	------	-----	-----	-------

Plaintiff's
Exhibit I-1

Arrest Report

01/23/2019

Arrest #: 18-15432-AR
Call #: 18-15432
Warrant #: 18-150-WA
Incident #: 18-15432-OF

#	OTHER PROPERTIES	PROPERTY #	STATUS
---	------------------	------------	--------

1: NONE

Stolen

QUANTITY: 1

VALUE: \$0.00

SERIAL #: NOT AVAIL

DATE: 07/09/2018

Plaintiff's
Exhibit I-2

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**DEFENDANT'S RESPONSES TO PLAINTIFF'S
REQUEST FOR INTERROGATORIES AND PRODUCTION**

The undersigned, on behalf of the Defendant, Raymond Milot, Jr, hereby responds to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023 as follows:

BY WAY OF INTERROGATORIES:

1. What is your full name and any other name(s) by which you have been known?

ANSWER: Raymond Joseph Milot

2. What is your date of birth?

ANSWER: August 30, 1968

3. What is your present job title and what are your present job duties?

ANSWER: Healthcare Solutions Architect – enable ISV partners to develop/test on VMware products.

4. Describe your relationship with the plaintiff and any interactions you've had with the plaintiff within the past five (5) years.

ANSWER: No relationship of any kind, have never spoken to Plaintiff.

5. Identify the dates, times, and locations of the alleged statement(s) made by you and/or the minor children that form the basis of the slander, libel, and/or defamation claims.

ANSWER: No knowledge of any of these allegations.

6. Describe in detail the events leading up to, during, and immediately after the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of any of these allegations.

7. Provide verbatim transcripts or detailed descriptions of the alleged slanderous, libelous and/or defamatory statement made by you and/or the minor children.

ANSWER: No knowledge of any of these allegations.

8. Explain your understanding of the meaning and implications of the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of any of these allegations.

Plaintiff's
Exhibit J-2

9. Identify any witnesses who were present or who can attest to the circumstances when the alleged slanderous, libelous and/or defamatory statement(s) were made, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

10. State the reasons or contexts in which you made the alleged slanderous, libelous and/or defamatory statement(s), including any conversations, events, or circumstances leading up to it/them.

ANSWER: No knowledge of any of these allegations.

11. Did you make any written or verbal statements regarding the plaintiff to third parties around the time of the alleged slanderous, libelous and/or defamatory statement(s)? If yes, provide details, including the content, recipients, and dates of these statements.

ANSWER: No knowledge of any of these allegations.

12. Provide information about your knowledge of the plaintiff's reputation within the community prior to making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: No knowledge of Plaintiff's reputation.

13. Describe any statements or actions you took to retract, correct, or mitigate the alleged slanderous, libelous and/or defamatory statement(s) after they were made.

ANSWER: Not applicable.

14. Identify any sources of information or reasons you had for making the alleged slanderous, libelous and/or defamatory statement(s).

ANSWER: Not applicable

15. Identify the dates, times, and locations of any incident(s) or communication(s) that form the basis of the false light invasion of privacy claims.

ANSWER: No knowledge of any of these allegations / not applicable

16. Describe in detail the events leading up to, during, and immediately after the incidents or communications.

ANSWER: No knowledge of any of these allegations.

17. Explain any actions, statements, or representations you made that you believe are relevant to the plaintiff's claim of false light invasion of privacy.

ANSWER: No knowledge of any of these allegations.

18. Identify any witnesses who were present during the incident or communication, including their names, addresses, and contact information.

ANSWER: Not applicable.

19. Describe your intent, motive, or purpose for your actions, statements, or representations that the plaintiff claims created a false light.

ANSWER: No knowledge of any of these allegations.

20. Provide a detailed account of any statements, images, or representations you made during the incident or communication, including verbatim quotes if possible.

ANSWER: No knowledge of any of these allegations.

21. Provide information on any publication, distribution, or dissemination of the allegedly false information, images, or representations.

ANSWER: No knowledge of any of these allegations.

22. Identify the date, time, and location of the alleged batteries that form the basis of the claims.

ANSWER: No knowledge of any of these allegations.

23. Describe in detail the events leading up to, during, and immediately after the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

24. Explain your actions or conduct that you believe constitute the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

25. Explain the actions or conduct of the minor children that you believe constitute the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

26. Identify any witnesses who were present when the alleged battery(ies) occurred, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

27. State the context in which the alleged battery(ies) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER: No knowledge of any of these allegations.

28. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

29. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

30. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

31. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

32. Provide your understanding of the reasons or motivations for the minor children(s) actions during the alleged battery(ies).

ANSWER: No knowledge of any of these allegations.

33. Identify the date, time, and location of the alleged assaults that form the basis of the claim(s).

ANSWER: No knowledge of any of these allegations.

34. Describe in detail the events leading up to, during, and immediately after the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

35. Explain your actions or conduct that you believe constitute the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

36. Explain the actions or conduct of the minor children that you believe constitute the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

37. Identify any witnesses who were present when the alleged assault(s) occurred, including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

38. State the context in which the alleged assault(s) occurred, including any conversations, events, or circumstances leading up to it.

ANSWER: No knowledge of any of these allegations.

39. Describe any prior incidents or interactions between you and the plaintiff that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

40. Describe any prior incidents or interactions between you and the minor children that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

41. Describe any prior incidents or interactions between the minor children and the plaintiff that might be relevant to the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

42. Provide your understanding of the reasons or motivations for your actions prior to, during or after the alleged assault(s).

ANSWER: No knowledge of any of these allegations.

43. Describe your relationship with each of your minor children during the time frame of the claims and your role as their parent or guardian.

ANSWER: Normal father/child relationship at all time

Plaintiff's
Exhibit J-8

44. Identify any interactions you had with the minor children related to the claims during the relevant time frame.

ANSWER: Normal parenting interactions when the children were with me.

45. Explain your knowledge of your minor children's activities, whereabouts, and actions on the date(s) of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

46. Describe any instructions, rules, or limitations you had in place for your minor children's behavior at the times of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

47. State whether you were aware that your minor children engaged in the alleged tortious conduct and provide details of your awareness.

ANSWER: No knowledge of any of these allegations.

48. Provide any information on the minor children's upbringing, discipline, and education that might be relevant to the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

49. Identify any witnesses who have knowledge of your children's behavior, actions, or activities around the time of the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

50. Describe any steps you took to prevent or control your children's involvement in the alleged tortious conduct.

ANSWER: No knowledge of any of these allegations.

51. Identify all electronic devices by model number, any associated telephone number and/or serial number and the owner of each such device that you and your minor children used or to which you had access during around the time of the alleged tortious conduct.

ANSWER: Children have had various phones and devices over the past 4+ years

52. Identify all applications installed on each electronic device identified in Interrogatory 51 that you and your minor children used or to which you had access around the time of the alleged tortious conduct.

ANSWER: No knowledge of this.

53. Identify all services provisioned on each electronic device identified in Interrogatory 51 and the identity of the person who paid for such services.

ANSWER: No knowledge of this.

54. Identify the evidence that you are alleged to have intentionally spoliated or caused to be intentionally spoliated.

ANSWER: No knowledge of any of these allegations.

Plaintiff's
Exhibit J-10

55. Describe the circumstances under which the alleged spoliation of evidence occurred.

ANSWER: No knowledge of any of these allegations.

56. Explain your actions or conduct that the plaintiff claims constitute intentional spoliation of evidence.

ANSWER: No knowledge of any of these allegations.

57. Identify any witnesses who have knowledge of the alleged spoliation of evidence and their contact information.

ANSWER: No knowledge of any of these allegations.

58. State your reasons, motivations, or intent for allegedly spoliating the evidence.

ANSWER: No knowledge of any of these allegations.

59. Describe any communications, agreements, or discussions you had with third parties regarding the evidence in question before or after its alleged spoliation.

ANSWER: No knowledge of any of these allegations.

60. Provide a detailed account of any instructions, policies, or procedures you had in place for handling and preserving evidence at the relevant time.

ANSWER: No knowledge of any of these allegations.

Plaintiff's
Exhibit J-11

61. Identify any documents, emails, correspondence, reports, or other evidence related to the alleged spoliation of evidence that you possess or have access to.

ANSWER: No knowledge of any of these allegations.

62. Identify the business relationships or expectations that you are alleged to have interfered with.

ANSWER: No knowledge of any of these allegations.

63. Describe in detail your actions or conduct that the plaintiff claims constitute tortious interference with their business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

64. Identify any witnesses who have knowledge of your actions or involvement in the alleged interference.

ANSWER: No knowledge of any of these allegations.

65. State the reasons or motives for your actions in allegedly interfering with the plaintiff's business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

66. Provide a detailed account of any communications, agreements, or discussions you had with third parties regarding the plaintiff's business relationships or expectations.

ANSWER: No knowledge of any of these allegations.

67. Explain any knowledge or awareness you had of the plaintiff's existing or prospective business relationships or expectations before your alleged interference.

ANSWER: No knowledge of any of these allegations.

68. Identify any documents, emails, correspondence, reports, or other evidence related to your actions or involvement in the alleged interference that you possess or have access to.

ANSWER: No knowledge of any of these allegations.

69. Provide any information regarding your understanding of the legal or ethical implications of your actions in relation to the plaintiff's business relationships or expectations.

ANSWER: No knowledge.

70. Identify the date(s), time(s), and location(s) of the incident(s) that form the basis of the negligent infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

71. Describe in detail the events leading up to, during, and immediately after the incident related to the negligent infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

Plaintiff's
Exhibit J-13

72. Identify any witnesses who were present during the incident(s) related to the negligent infliction of emotional distress claim(s), including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

73. Provide a detailed account of your actions or omissions that you believe are relevant to the plaintiff's claim of negligent infliction of emotional distress.

ANSWER: No knowledge of any of these allegations.

74. Were you aware of the plaintiff's presence or proximity at the time of the incident?
If so, explain how you became aware of their presence.

ANSWER: No knowledge of any of these allegations.

75. Explain any precautions you took or safety measures you followed to prevent the incident from occurring.

ANSWER: No knowledge of any of these allegations.

76. Describe any training, qualifications, or certifications you possess that relate to the actions or responsibilities relevant to the incident.

ANSWER: No knowledge of any of these allegations.

77. Detail any communications you had with the plaintiff, witnesses, or others regarding the incident or its aftermath.

ANSWER: No knowledge of any of these allegations.

78. Identify the dates, times, and locations of the incidents that form the basis of the intentional infliction of emotional distress claim(s).

ANSWER: No knowledge of any of these allegations.

79. Describe in detail the events leading up to, during, and immediately after the incident(s).

ANSWER: No knowledge of any of these allegations.

80. Explain your actions or conduct that you believe are relevant to the plaintiff's claim(s) of intentional infliction of emotional distress.

ANSWER: No knowledge of any of these allegations.

81. Describe any intent, purpose, or motive you had for your actions or conduct prior to and/or during the incident(s).

ANSWER: No knowledge of any of these allegations.

82. Identify any witnesses who were present during the incident(s), including their names, addresses, and contact information.

ANSWER: No knowledge of any of these allegations.

Plaintiff's
Exhibit J-15

83. Provide a detailed account of any statements or gestures you made prior to and/or during the incident(s), including verbatim quotes if possible.

ANSWER: No knowledge of any of these allegations.

84. Describe any prior knowledge or awareness you had of the plaintiff's sensitivities, vulnerabilities, or psychological state before the incident(s).

ANSWER: No knowledge of any of these allegations.

85. Identify any and all written or recorded statements which you have made to any person regarding any incident alleged in the Complaint?

ANSWER: No knowledge of any of these allegations.

86. Identify all persons who have any knowledge or information sufficient to make them potential witnesses at the trial of this case.

ANSWER: No knowledge of any of these allegations.

87. As to each individual named in response to Interrogatory 86, identify any and all written or recorded statement or statements, concerning the subject matter of this lawsuit or of your defense(s) to this lawsuit, which such individual has made.

ANSWER: No knowledge of any of these allegations.

88. If you claim that any plaintiff committed any crime in connection with any of the events described by you in answer to any of the preceding interrogatories or in connection with any of the events alleged in the Complaint, state exactly and in detail what crime or crimes you claim were committed, how you claim such crime or crimes were committed, and upon what basis you make your claims.

ANSWER: No knowledge of any of these allegations.

89. If any electronic or photographic record was made of any part of any of the events alleged in the complaint or your answer thereto, or in your answers to the preceding interrogatories, identify the person or persons having present custody or same and state the exact present location of each.

ANSWER: No knowledge of any of these allegations.

90. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER: No knowledge of any of these allegations.

91. If you have ever been arrested and/or convicted of any crime whatsoever, identify by name and description the nature of each such offense, the date on which same occurred, and the location and disposition of any prosecution arising out of any such arrest.

ANSWER: No knowledge of any of these allegations.

92. Have you, at any time since the first incident described in the Complaint, used, or consumed any illicit drugs, narcotics, controlled substances, or any other illegal substances as defined by federal or state law? If yes, please provide details regarding: a. The specific drug(s) used. b. The frequency and duration of use. c. The dates and locations of use. d. Any method of consumption or administration. e. The dates and results of any drug tests taken by you.

ANSWER: No knowledge of any of these allegations.

BY WAY OF PRODUCTION

1. Provide copies of any communications, documents, reports, photographs, videos, metadata, or other evidence related to the incident(s), including the alleged assaults, batteries, defamatory statements, and other tortious conduct identified in the Complaint, or the aftermath of the incident(s) that you possess or to which you have access.

ANSWER: Not available.

2. Provide copies of any communications, documents, reports, photographs, videos, metadata, or other evidence related to the plaintiff, his property, or properties he has occupied since the first incident set forth in the Complaint, that you possess or to which you have access.

ANSWER: N/A

3. All hospital records relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to injuries, diseases or defects to which reference is made in the answers to Interrogatories, or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said hospital records. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A.

4. All reports and records of all doctors and all other care providers relating to treatment received by you or your minor children resulting from any incident described in the Complaint, and to the injuries, diseases or defects to which reference is made in the answers to Interrogatories or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said reports. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A.

5. All medical bills that are claimed to have been incurred relating to treatment received by you or your minor children resulting from any incident described in the Complaint or written authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA), to inspect and make copies of said medical bills. Information obtained pursuant to the provisions of HIPAA shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A

6. A copy of all records of drug screens taken by you referred to in answer to Interrogatory 92, or a signed authorization, sufficient to comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA) or those of the Public Health Service Act, whichever is applicable, to obtain the same. Information obtained pursuant to the provisions of HIPAA, or the Public Health Service Act shall not be used or disclosed by the parties for any purpose other than the litigation or proceeding for which such information is requested.

ANSWER: N/A

7. Provide all data, metadata, backups, documents, agreements, or evidence from and/or related to each electronic device identified in your answer to Interrogatory 51 that you possess or to which you had access around the time of the tortious conduct alleged in the Complaint.

ANSWER: N/A

8. Provide a copy of each and every recording of surveillance material discoverable under Practice Book Section 13-3 (c), by film, photograph, videotape, audiotape or any other digital or electronic means, of any party to this action concerning this action or the subject matter thereof, including any transcript of such recording.

ANSWER: N/A

9. Provide a copy of all messages, message attachments, message drafts, calendar records and expense items from the Our Family Wizard system used by you and Christine Jowdy Milot during the time of the tortious conduct alleged in the Complaint.

ANSWER: Christine has access to all of this.

10. A copy of all nonprivileged statements, as defined in Practice Book Section 13-1, of any party in this action concerning this action or its subject matter.

ANSWER: N/A

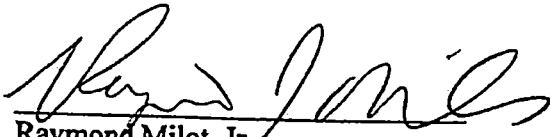
THE DEFENDANT

By: /s/ 419782
Rebecca Mayo-Goodrich
His Attorney

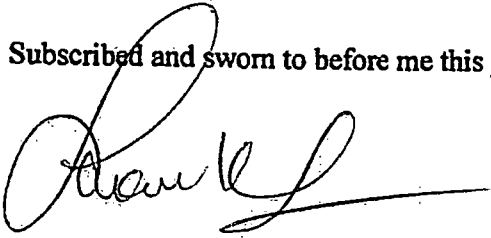
Plaintiff's
Exhibit J-21

DEFENDANT'S ACKNOWLEDGMENT

I, RAYMOND MILOT, JR., hereby certify that I have reviewed the above Interrogatories and responses thereto and that they are true and accurate to the best of my knowledge and belief.


Raymond Milot, Jr.

Subscribed and sworn to before me this 13th day of November, 2023.



Sarah K. Fegan
Notary Public/ January 31, 2025
Commissioner of the Superior Court



Plaintiff's
Exhibit J-22

1992年12月15日

(Signature)

(Signature)

Re: Supervisors' Liability Insurance Policy



Plaintiff's
Exhibit J-23

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent to the following counsel and/or pro se parties of record by first class mail, postage prepaid, and/or fax or email this the 13th day of November, 2023: John R. Williams, Esq, 51 Elm Street, New Haven, Connecticut 06510 and Email: jrww@johnrwilliams.com and Jon Goodwin, Email: jgoodwin@protonmail.com.

/s/ 419782

Rebecca Mayo-Goodrich
Commissioner of the Superior Court

DOCKET NO.: LLI-CV-21-5014019-S : SUPERIOR COURT
GOODWIN, JON A. : JUDICIAL DISTRICT OF LITCHFIELD
VS. : AT TORRINGTON
MILOT, RAMOND J., JR. : NOVEMBER 13, 2023

**NOTICE OF COMPLIANCE FOR
INTERROGATORIES AND PRODUCTION REQUEST**

Pursuant to Connecticut Practice Book Sections 13-7 and 13-10, the Defendant, through undersigned counsel, respectfully states that he has provided Responses to the Plaintiff's Request for Interrogatories and Production dated August 31, 2023.

THE PLAINTIFF

By: /s/ 419782
Rebecca Mayo Goodrich
Her Attorney

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent to the following counsel and/or pro se parties of record by first class mail, postage prepaid, and/or fax or email this the 13th day of November, 2023: John R. Williams, Esq, 51 Elm Street, New Haven, Connecticut 06510 and Email: jrw@johnrwilliams.com and Jon Goodwin, Email: jgoodwin@protonmail.com.

/s/ 419782

Rebecca Mayo-Goodrich
Commissioner of the Superior Court

you need to let your mom know what time to pick you up today
sweetie. I have a very important conference call

Hannah

you need to respond

Hannah your mom will be picking you up this afternoon at 4 PM

11/1/19, 3:06 PM

Hannah can you let me know you got this?

Hi sweets

I did now

11/1/19, 5:24 PM

Hi sweetie

Hi

Why'd u leave

Please talk to me

Where are you

Noah said to say hi

In lake club

Can you come say hi

Sure

Can you come outside

Yeah bottom or top

Top

Ok

Be there in 1

Plaintiff's
Exhibit L-1

11/1/19, 7:28 PM



Noah said to cal the police and mom got hit multiple times by Noah

<https://share.icloud.com/photos/0oKpUCzm9WsVtmZiDAp77PmCw>

Are you ok Hannah?

Is Noah ok

Yes we are in moms room but we can't stay here forever

We?

Me and Noah

Police?

Yep they are here

Did they call

Not yet

I asked them to

Where is Cam?

Not sure

I have them your number but I think they're leaving without anything happening

John has also put his hands on Noah's neck according to Noah

That's ok sweetie

Did the police talk to Noah?

Yes

Do they know you have a video?

They saw a picture

Plaintiff's
Exhibit L-2

Meeting started already

Bye

9/5/19, 6:42 PM

How was your day sweetie

Not good because mom is feeding us fake meat

It is ground meat and it looks stringy and it isn't the right color either

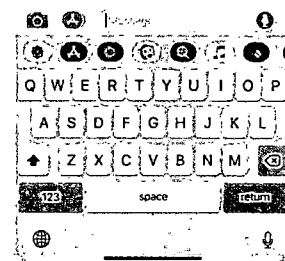
So I have nothing to eat

And it is called "lean meat"

She thinks I'm going to eat it but I'll get sick if I do because it is disgusting

9/6/19, 7:29 PM

Ok I deleted all



That was it

And I'll delete all of these messages

Can you unpause the rest of my apps?

Please

Plaintiff's
Exhibit M

And you should delete these texts

No because they weren't hers in the first place and I did

Well I have to pick up Cameron later, will have to figure it out

When do you pick Cameron up??

Maybe in an hour

Ok

Probably not a good idea sweetie

Heading over that way sweetie, I want to check on the ballfies

Are you sleeping

Nope but I'm going to walk Elvis up to the ballgueld

Well I may see you then! As well as Elvis

Are you sure you can control him?

Yep

I'm on my way to the ballfield

I'm at the ballfield

I have to pick up Cameron soon

I'm coming by dellifields

10/19/19, 6:50 PM

What are you guys doing? I'm heading back with Cameron. The movie was awful

Not much mom is home now

Did you eat dinner?

Yep

And I also had desert

Oh? Something sweet?

Plaintiff's
Exhibit N

Is John involves?

Just now

Good

Is Noah ok?

Nope

Yeah he is now

She isn't going to be happy recorded her

Oh well she was doing something wrong

It's uploading still

You may want to delete your messages

Ok

But it hasn't finished sending

10/19/19, 10:03 PM

Sleeping sweetie

Nope

Everything ok there?

Yep

Can u turn off my downtime tonight

Can u turn off downtime on my computer pleaseeeee

10/20/19, 1:19 PM

What you doing sweets

Watching tv

10/20/19, 2:34 PM

I'm going to be picking you up at 5:30. Turns out you have to come to the meeting

Plaintiff's
Exhibit O

Time for bed

Goodnight but can I have it for a little longer

You need to sleep

I know

10/29/19, 6:45 AM

Are you on bus?

Yes just got on

You need to calm down

So does mom

She literally had no common sense

This will not make your mom act appropriately

Did you speak to bus driver?

but what would you rather?? Me putting my cup in the sink or me going to school

Not yet I will this afternoon when I get on

That's not an argument you should even be having sweetie. You should just put the cup in the sink and go to school

But if I was going to be late

You have to make some compromises Hannah

So does she!!!!
She isn't fair at all!!

I don't want her to be my mom because she's not being a good one

I would rather anyone else at this point.

When will you be able to get full custody

10/29/19, 7:05 PM

When you pick me up tomorrow at hill and plain can u bring my black ripped jeans??

Plaintiff's
Exhibit P

Nope living room

But I saw it

Will he take it??

It certainly appears so, he said no worries

Ok

He didn't

He did isn't give me a grade at least not yet

It's a 0

For the practice log

I know sweets, but he said no worries. So hope for the best. If he wasn't going to except it I am certain he would've said so

Make sense?

What is everyone doing?

He may except it but not for this marking period so my grade could be low for the first marking period

I'm not sure

Where is Cameron

Upstairs maybe

Ok

You should not save texts to me sweets

Some of the things you said about your mom she should not see, would hurt her feelings

Ok

I'll just delet the whole conversation

Plaintiff's
Exhibit Q-1



11/2/19, 6:07 PM

Hi sweets

Make sure you get soccer gear together tonight

11/2/19, 8:31 PM

Goodnight sweets

Ok

Literally get me out of moms house

John thinks he can tell me what to do and he is so rude and mean

I despise him and as long as he's at moms I'm not coming back

Sorry sweetie, you ok?

Not with him here

Is everything calm there?

When is the soonest I can leave

Just stay away

You have a soccer game tomorrow

I am but it doesn't mean that he's not mean

And basketball practice at 6

Can you bring me to both

I don't think so unless your mom asks

Could you ask her

11/3/19, 6:14 AM

Dad please answer

Plaintiff's
Exhibit Q-2

2019-11-08 22:35:02 EST

?

2019-11-08 22:35:26 EST

And he had to pause messages too because my mom keeps taking my phone and looking through my messages to try and sue my dad

2019-11-08 22:35:53 EST

WTH

2019-11-08 22:36:06 EST

Yep 🙄

2019-11-08 22:36:37 EST

And the cops had showed up twice at my moms house when we were there last weekend and they had to get my phone from her and give it to my dad

2019-11-08 22:37:03 EST

Wow

2019-11-08 22:37:45 EST

She's living with some crazy dude that is mean and stuff and my little brother has like anger problems and he's diagnosed with something and John had illegally restrained him and yeah

2019-11-08 22:38:04 EST

Kinda sucks 🙄

2019-11-08 22:38:09 EST

Restrained?

2019-11-08 22:38:55 EST

Like when he's trying to hit and hurt people he held my little brother back in a way that could've broken his neck

2019-11-08 22:39:35 EST

Well that's me so wbu

Plaintiff's
Exhibit R

11/21/19, 8:12 PM

Hannah, Jane will be picking you up around 820 - make sure you are looking for her

11/22/19, 4:01 PM

Hi sweets

Are you here

What time will u be here

Now

I am here

11/24/19, 5:29 PM

Hi Dad

11/25/19, 6:55 AM

Hi sweets

Hey dad

I came in to look for my pencils but I couldn't find them

I'm on the bus now

They were on the counter next to sink

Why did you come here?

Bus at your moms

To get them and I forgot to tel my bus driver

Your mom explode?

Delete that

No

Cool

All calm?

Plaintiff's
Exhibit S

Yes

Could you bring them to school maybe 🙏

No sweets

Busy day

Ok

Does your mom know about practice today?

Yes

She is picking you up?

Yep

Cool

Have a great day sweets

11/25/19, 8:51 AM

Why are you calling me? 🤔

11/25/19, 3:01 PM

Hi sweets

Hey dad

Hi sweets

I didn't mean to my class was playing kahoot

on the bus?

its ok

Yep

make sure you turn your phone off and hide it - and delete this

Ok

I'm serious

Plaintiff's
Exhibit T

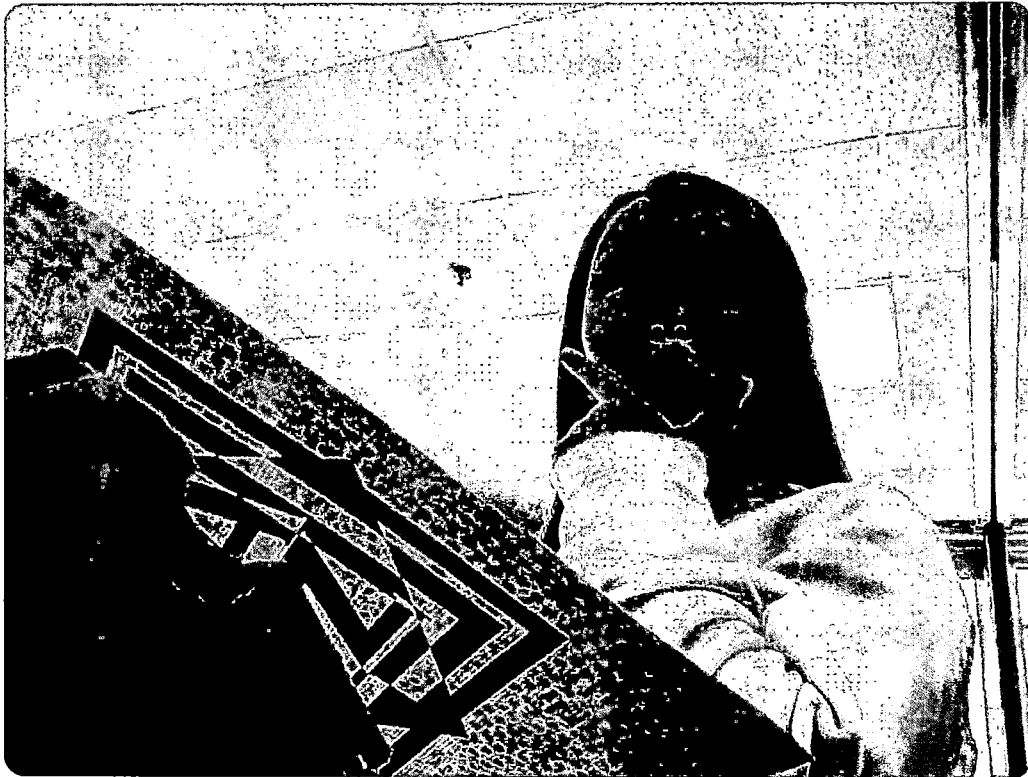
bye bye

best to clear this conversation

carl is here

love you

hi Carl!



she's not here

i'm eating for her

waiting*

Ok sweets

she's still not here

Plaintiff's
Exhibit U

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Plaintiff's
Exhibit V



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Mon 01/22/2024

Certified Mail® \$4.35

Tracking #:

70221670000204747825

Return Receipt \$3.55

Tracking #:

9590 9402 7168 1251 8882 25

Total \$8.56

Grand Total: \$8.56

Debit Card Remit \$8.56

Card Name: VISA

Account #: XXXXXXXXXXXX9505

Approval #

Transaction #: 173

Receipt #: 014834

Debit Card Purchase: \$8.56

AID: A0000000980840

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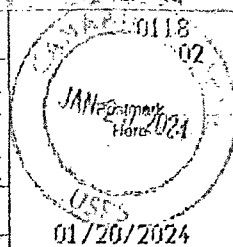
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PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions



Plaintiff's
Exhibit W



With more than 90 years of combined experience, the attorneys at The Law Offices of Conti, Levy, Salerno & Antonio, LLC, are prepared to provide the sound advice and effective representation you require. At all times during your case, you will be represented by an experienced negotiator and trial lawyer who is looking out for your best interests.

Attorney William A. Conti has more than 40 years of legal experience. He is a past president of the Litchfield County Bar Association and served for several years as a court advocate (prosecutor) in juvenile court. His areas of practice include criminal

Plaintiff's
Exhibit X-1

defense, personal injury, workers' compensation, civil litigation, residential and commercial real estate transactions, probation litigation, and juvenile and school law.

Attorney Steven H. Levy has more than 30 years of legal experience. Mr. Levy has participated as a special master in the Litchfield, Waterbury and Hartford Judicial Districts as well as the Regional Family Trial Docket in Middletown, Connecticut.

Attorney Levy has been responsible for the operation of the Special Masters Pretrial Program in the Litchfield Judicial District since 2005. His practice areas include family law, civil litigation, residential real estate transactions and probate litigation.

Attorney Robert A. Salerno has over 9 years of legal experience. Mr. Salerno serves as Court Liaison for the Connecticut Criminal Defense League Association for Litchfield County as well as Co-Chair of the Criminal Law Society for the Litchfield County Bar Association. Attorney Salerno is also an

Plaintiff's
Exhibit X-2

active member in the Connecticut Trial Lawyers Association and National Italian American Bar Association. His practice areas include criminal law, juvenile law, civil litigation and workers compensation.

More information about our attorneys can be found at the links below.

- [William A. Conti Esq.](#)
- [Steven H. Levy Esq.](#)
- [Robert A. Salerno Esq.](#)
- [Melissa Ann Antonio Esq.](#)

Contact A Lawyer At Our Firm

To schedule a free initial consultation about your matter of concern, [contact](#) The Law Offices of Conti, Levy, Salerno & Antonio, LLC, in Torrington, Connecticut.

Plaintiff's
Exhibit X-3