

DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	
JON GOODWIN	:	J.D. OF LITCHFIELD
	:	
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL	:	FEBRUARY 4, 2026

**PLAINTIFF’S OBJECTION TO DEFENDANT RAYMOND J. MILOT JR’S
MOTION FOR SUMMARY JUDGMENT**

The Plaintiff, Jon Goodwin, appearing pro se and as co-counsel with Attorney John R. Williams, objects to Defendant Raymond Milot’s Motion for Summary Judgment dated January 5, 2026 (EN. 182), and states as follows:

I. INTRODUCTION

Defendant seeks summary judgment by denying intent, malice, causation, and damages. The record contains direct documentary evidence—including Defendant’s own text messages, third-party republication, and undisputed police and DCF findings—showing pre-incident instigation, reckless exploitation of known vulnerabilities, false public accusations, intentional evidence destruction, and severe, continuing community harm. (*Goodwin Aff.* ¶¶ 3–10, 24–38, 39–48.)

When viewed in the light most favorable to Plaintiff, genuine issues of material fact abound. Summary judgment is improper. *Stuart v. Freiberg*, 316 Conn. 809, 820 (2015).

Independently, Defendant’s instruction to delete evidence and refusal to produce his own text messages bar summary judgment under Practice Book § 17-47.

II. SUMMARY-JUDGMENT STANDARD

Summary judgment may be granted only where there is no genuine issue of material fact and the movant is entitled to judgment as a matter of law. Practice Book § 17-49.

The Court must view the evidence in the light most favorable to the nonmoving party and may not resolve issues of credibility, intent, or motive. *Maltas v. Maltas*, 298 Conn. 354, 365 (2010).

III. MATERIAL FACTS (DISPUTED)

A. Police and DCF Found No Abuse

Police responded on November 1, 2019, and determined that no adult committed any crime. (*Goodwin Aff.* ¶¶ 22–23.)

On December 12, 2019, DCF issued a written determination stating:

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

(*Goodwin Aff.* ¶ 32.; Ex. A)

B. Pre-Incident Instigation and Foreseeability

Immediately before the November 1, 2019, incident, Defendant summoned his minor daughter outside the residence at 95 Indian Trail:

“Can you come outside” → “Top” → “Be there in 1.”

(*Goodwin Aff.* ¶¶ 3–6; Ex. B)

Minutes later, she returned inside and provoked N.M., who had documented psychiatric conditions, making dysregulation foreseeable. (*Goodwin Aff.* ¶¶ 7–10.)

C. Defendant’s Public Accusations Despite Clearance

Despite police and DCF clearance, Defendant publicly yelled that Plaintiff was:

“abusing his children,” “dangerous,” and a “psycho.”

These accusations were yelled outdoors in the residential neighborhood, in the presence of Defendant’s minor children, N.M. and H.M., and in front of a uniformed police

officer, and were loud enough to be heard by others in the community. (*Goodwin Aff.* ¶¶ 24–29; Ex. C, D, E.)

These statements were false. (*Id.* ¶ 30.)

D. Republication and Community Harm

Defendant’s accusations foreseeably spread within the community.

A stranger later yelled at Plaintiff that he was a “child abuser.” (*Id.* ¶ 35.)

Thereafter, Heather Walsh publicly posted on Facebook that Plaintiff and Christine Jowdy were: “in trouble for abusing her children.” (*Id.* ¶ 36; Ex. F.)

This assertion of fact was false and repeated Defendant’s accusation. (*Goodwin Aff.* ¶¶ 37–38.)

As a result of ongoing hostility and assaultive conduct, Plaintiff was forced to leave the Candlewood Lake Club community in September 2021 and relocate to North Canaan, Connecticut, where additional harm occurred. (*Id.* ¶¶ 39–42.)

E. Defendant Instructed Deletion of Evidence and Refused Production

Recovered text messages show Defendant directly instructing deletion of evidence, including:

“And you should delete these texts.”

“You may want to delete your messages.”

“You should not save texts to me sweets.”

(*Goodwin Aff.* ¶ 46; Ex. G.)

The minor child confirmed compliance:

“Ok I deleted all.”

“And I’ll delete all of these messages.” (*Goodwin Aff.* ¶ 46; Ex. G.)

Defendant continued these instructions after knowing police were involved. (*Goodwin Aff.* ¶ 47.)

Defendant has refused to produce his own text messages, leaving only partial records recovered from a child's device. (*Goodwin Aff.* ¶ 48.)

IV. DISCOVERY IS INCOMPLETE — SUMMARY JUDGMENT IS BARRED (Practice Book § 17-47)

A. Evidence Destruction Independently Bars Summary Judgment

Practice Book § 17-47 provides that summary judgment must be denied or deferred where the nonmoving party cannot present facts essential to justify opposition.

Here, Defendant:

1. Instructed deletion of relevant evidence;
2. Benefitted from that deletion; and
3. Refused to produce his own communications, which bear directly on intent, motive, and credibility. (*Goodwin Aff.* ¶¶ 46–48.)

Connecticut courts repeatedly hold that summary judgment is improper where spoliation or discovery obstruction prevents full factual development.

- *Beers v. Bayliner Marine Corp.*, 236 Conn. 769, 777–78 (1996) (spoliation supports adverse inference and precludes dispositive rulings);
- *Riscica v. Riscica*, 101 Conn. App. 283, 285–86 (2007) (summary judgment inappropriate where discovery deficiencies affect material facts);
- *Brookfield v. Candlewood Shores Tax Dist.*, 201 Conn. 1, 7–8 (1986) (§ 17-47 protects parties who cannot yet marshal essential evidence);
- *Barasso v. Rear Still Hill Rd., LLC*, 64 Conn. App. 9, 16 (2001) (court must deny summary judgment where further discovery may yield material facts).

A party cannot destroy evidence and then seek summary judgment based on an incomplete record.

B. Depositions and Motions to Compel Remain Outstanding

Fact-witness and party depositions have not been completed.

Plaintiff previously filed a motion to compel, which the Court denied without prejudice. Plaintiff has since met and conferred with opposing counsel and intends to file an amended motion to compel seeking Defendant's withheld communications and related discovery. (*Goodwin Aff.* ¶ 48.)

Under § 17-47, summary judgment is procedurally premature.

V. ARGUMENT

A. Genuine Issues of Material Fact

Intent, malice, instigation, foreseeability, republication, and damages are jury questions. *Maltas*, 298 Conn. at 365.

B. No Privilege Applies

False accusations made after police and DCF clearance are not protected. *Gallo v. Barile*, 284 Conn. 459, 468 (2007).

C. Spoliation and § 17-47 Require Denial

Defendant's own conduct precludes summary judgment as a matter of law.

VI. CONCLUSION

For all of the foregoing reasons, Defendant's Motion for Summary Judgment should be DENIED in its entirety.

THE PLAINTIFF,

Appearing pro se and as co-counsel with:

John R. Williams, Esq.
Counsel for Plaintiff

By: /s/ Jon A. Goodwin

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CERTIFICATION OF SERVICE

I certify that a copy of this document was mailed or delivered electronically or non-electronically on February 4, 2026, 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.

Robert Salerno
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RAYMOND J. MILOT, ET AL	:	FEBRUARY 3, 2026

AFFIDAVIT

I, Jon A. Goodwin, being duly sworn, depose and state as follows:

Background

1. I am the Plaintiff in this action. I have personal knowledge of the facts set forth herein and could competently testify to them if called as a witness.

2. At all relevant times during the events described below, I resided with Christine Jowdy at 95 Indian Trail, New Milford, Connecticut, within the private Candlewood Lake Club community.

November 1, 2019, Incident and Pre-Incident Instigation

3. On November 1, 2019, prior to police involvement, Defendant's minor daughter, "M.M." met privately with Defendant Raymond J. Milot, Jr. in his vehicle outside the residence at 95 Indian Trail.

4. I personally observed the minor daughter leave the residence to meet with Defendant and then return inside immediately thereafter.

5. Upon returning from that meeting, M.M. immediately began verbally instigating and provoking her younger male sibling, "Y.M.", causing him to become dysregulated and escalated.

6. Text messages later confirmed the timing and substance of the minor child's meeting with Defendant immediately before the escalation, including Defendant's messages stating: "Can you come outside," followed by "Top," and the response "Be there in 1."

Documented Psychiatric Conditions of the Minor Child (Redacted)

7. Prior to November 1, 2019, N.M. had been evaluated by a board-certified child and adolescent psychiatrist and diagnosed with Disruptive Mood Dysregulation Disorder (DMDD), Attention-Deficit/Hyperactivity Disorder, and Sibling Relational Problems, as documented in a written psychiatric evaluation dated January 22, 2019.

8. The evaluation documented that N.M. has significant difficulty regulating emotions, a low tolerance for frustration, and a history of rapid escalation into aggressive behavior, particularly in response to interpersonal and sibling conflict.

9. The evaluation further documented that N.M.'s dysregulation is highly sensitive to provocation, and that escalation can occur suddenly and disproportionately when triggered.

10. Based on these documented conditions, it was foreseeable that provocation by a sibling—particularly immediately following a private meeting with Defendant—could trigger rapid and dangerous dysregulation.

Plaintiff's Safety-Driven Intervention

11. During the ensuing incident, Christine Jowdy requested that I assist her in restraining N.M. due to his dysregulated state and immediate safety concerns.

12. Before restraining N.M., I removed bolts that had been taped between his fingers.

13. While I was assisting in restraining N.M., N.M. kicked and struck me repeatedly.

14. These actions occurred while I was attempting to prevent harm and de-escalate the situation at Ms. Jowdy's request.

15. I did not strike, abuse, or assault N.M. or any other child at any time.

Non-Consensual Video Recording and School Dissemination

16. During or immediately following the November 1, 2019, incident, the M.M. recorded a video of me without my consent inside the residence.

17. I did not consent to being recorded, and the recording was not made for safety, emergency, or evidentiary purposes.

18. M.M. later showed that video to school staff, outside my presence and without my consent.

19. The video was presented in a manner intended to portray me falsely as abusive or dangerous.

20. The dissemination of the video to school personnel instigated a report to the Connecticut Department of Children and Families ("DCF").

21. The DCF investigation that followed was based, in material part, on the false narrative promoted through that non-consensual video and Defendant's accusations.

Police Response and Lack of Criminal Findings

22. New Milford police officers responded to the residence on November 1, 2019, and spoke with the parties present.

23. After investigating, police determined that there was no evidence of any crime committed by an adult at the residence.

Defendant's Public Accusations on November 3, 2019

24. On or about November 3, 2019, Defendant yelled false accusations that I was "abusing his children," was "dangerous," and was a "psycho" on the street near 95 Indian Trail.

25. Defendant made these accusations outdoors in a dense residential neighborhood within the private Candlewood Lake Club.

26. Defendant yelled these accusations in the presence of a uniformed New Milford police officer and his minor children.

27. Defendant's yelling was loud enough to be audibly heard by neighbors.

28. Defendant's accusations were not confined to a private or cooperative discussion with law enforcement.

29. Despite having been informed that police found no evidence of any crime, Defendant continued yelling that I was abusing his children and was dangerous.

30. Defendant's accusations were false.

Notice, DCF Findings, and Continued Dissemination

31. On November 4, 2019, I sent Defendant a written letter identifying his defamatory statements, explaining why they were false, demanding that he cease such conduct and preserve evidence, and notifying him of impending litigation.

32. On December 12, 2019, DCF issued a written determination stating:

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

33. Despite the police determination, the DCF finding, and receipt of my notice letter, Defendant continued to disseminate false accusations.

Republication and Foreseeable Harm

34. Shortly after Defendant's yelling, Christine Jowdy sent Defendant a written letter informing him that she personally heard his accusations.

35. Months later, Brian Giordano, whom I did not previously know, yelled at me that I was a "child abuser."

36. On a later date, Heather Walsh publicly posted on Facebook that Christine Jowdy and I were "in trouble for abusing her children."

37. Ms. Walsh's statement asserted as fact that Christine Jowdy and I had abused children, which was false.

38. These statements repeated and amplified the same false child-abuse narrative Defendant had publicly yelled and were a foreseeable result of Defendant's conduct.

Relocation, Continued Harm, and Community Impact

39. As a result of Defendant's conduct and the resulting hostility within the Candlewood Lake Club community, I was subjected to ongoing hostility and assaultive behavior.

40. In September 2021, I was forced to leave 95 Indian Trail due to safety concerns arising from that hostility.

41. Thereafter, Christine Jowdy and I moved to 12 Church Terrace, Canaan, Connecticut.

42. Heather Walsh was our neighbor in Canaan, and her conduct caused further problems in that community, continuing the harm initiated by Defendant's false accusations.

43. I have sued Heather Walsh and her husband, Eric Walsh for defamation. The Walshes are represented by the same law firm representing Defendant Raymond Milot in this matter.

Recovered Text Messages, Motive, and Evidence Destruction

43. I reviewed text messages recovered from an iPad owned by Christine Jowdy and used by M.M.

44. Those messages show Defendant Raymond Milot repeatedly monitoring my presence and activities, including messages such as "Is Jon there?" and "Isn't Jon going out?"

45. The messages reflect custody-related motive, including the question: "When will you be able to get full custody?"

46. Defendant agreed with the creation of recordings while directing deletion of written communications, including "And you should delete these texts" and "You should not save texts to me sweets."

47. Defendant continued these instructions after knowing police were present.

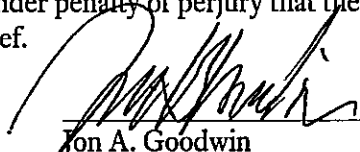
48. Defendant has continually refused to produce his own text messages relating to these events.

Damages and Malice

49. As a direct result of Defendant's accusations and their republication, I experienced hostility, stigma, and fear for my personal safety.

50. Defendant acted with reckless disregard for the truth and with knowledge that his accusations were false.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Jon A. Goodwin

Subscribed and sworn to before me on this 3rd day of February 2026.



Notary Public / Commissioner of the Superior Court



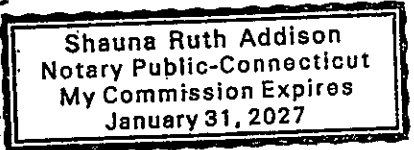


EXHIBIT A

December 13, 2019, Letter to Goodwin, Jon from
DCF Stating Abuse Allegations Unsubstantiated

to

Plaintiff's Objection to
Defendant Raymond J. Milot Junior's Motion for
Summary Judgment

Goodwin, Jon A. v. Milot, Raymond J., Jr.
Dkt. No. LLI-CV21-5014019-S

NOTIFICATION OF INVESTIGATION RESULTSDCF-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.

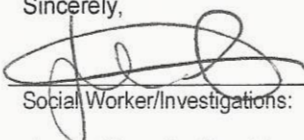
Persons whom DCF finds pose a risk to the health, safety or well-being of children are recommended for placement on the Central Registry. Names remain on this list indefinitely. The Central Registry may be checked by current or prospective employers whose work involves contact with children and by federal, 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/Investigations:

Telephone:

Email:

Jennifer Avila-Ganzhi

(203) 207-5164

jennifer.avila-ganzhi@ct.gov

EXHIBIT B

M.M.'s November 1, 2019
Text Messages with Raymond Milot

to

Plaintiff's Objection to
Defendant Raymond J. Milot Junior's Motion for
Summary Judgment

Goodwin, Jon A. v. Milot, Raymond J., Jr.

Dkt. No. LLI-CV21-5014019-S

2019-11-01 16:04:04 EDT

I did now

2019-11-01 17:24:00 EDT

Hi sweetie

2019-11-01 17:24:15 EDT

Hi

2019-11-01 17:25:24 EDT

Why'd u leave

2019-11-01 17:25:24 EDT

Please talk to me

2019-11-01 17:25:29 EDT

Where are you

2019-11-01 17:25:36 EDT

Noah said to say hi

2019-11-01 17:25:43 EDT

In lake club

2019-11-01 17:25:52 EDT

Can you come say hi

2019-11-01 17:26:11 EDT

Sure

2019-11-01 17:26:35 EDT

Can you come outside

2019-11-01 17:26:45 EDT

Yeah bottom or top

2019-11-01 17:27:00 EDT

Top

2019-11-01 17:27:08 EDT

Ok

2019-11-01 17:27:10 EDT

Be there in 1

2019-11-01 19:28:35 EDT

2019-11-01 19:28:35 EDT

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

2019-11-01 19:32:22 EDT

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

2019-11-01 20:09:31 EDT

Are you ok Hannah?

2019-11-01 20:09:39 EDT

Is Noah ok

2019-11-01 20:09:56 EDT

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

2019-11-01 20:10:05 EDT

We?

2019-11-01 20:10:12 EDT

Me and Noah

2019-11-01 20:10:24 EDT

Police?

2019-11-01 20:10:32 EDT

Yep they are here

2019-11-01 20:10:38 EDT

Did they call

2019-11-01 20:10:45 EDT

Not yet

2019-11-01 20:10:51 EDT

I asked them to

2019-11-01 20:11:41 EDT

Where is Cam?

2019-11-01 20:13:32 EDT

Not sure

2019-11-01 20:13:53 EDT

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

2019-11-01 20:14:10 EDT

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

2019-11-01 20:14:15 EDT

That's ok sweetie

2019-11-01 20:14:24 EDT

Did the police talk to Noah?

2019-11-01 20:14:33 EDT

Yes

2019-11-01 20:14:40 EDT

Do they know you have a video?

2019-11-01 20:15:13 EDT

They saw a picture

EXHIBIT C

November 4, 2019 Letter to Raymond J. Milot, Jr.
from Jon Goodwin In Re: Milot's Anti-social
Conduct; False Abuse Allegations; Preservation of
Evidence

to

Plaintiff's Objection to
Defendant Raymond J. Milot Junior's Motion for
Summary Judgment

Goodwin, Jon A. v. Milot, Raymond J., Jr.
Dkt. No. LLI-CV21-5014019-S

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,

her grip on it was too tight. Rather than having me force Hannah to relinquish the phone, Christine decided to allow Hannah to take it. At my suggestion, Christine called the New Milford Police to intervene. I'm informed that thereafter, Hannah contacted you. You instructed her not to give the phone to Christine, then rushed to Christine's residence to retrieve the phone, no doubt to conceal evidence of your using Hannah and her siblings as conduits for the defamation campaign you are waging against me, the alienation campaign your are waging against Christine as well as your encouraging your daughter to engage in behavior that could put her safety at risk. As you are aware, Officer McIntyre of the New Milford Police Department, responded to Christine's home, retrieved the phone and gave it to you.

Noah, as you are aware, has been diagnosed with disruptive mood dysregulation disorder ("DMDD") which has manifested in physical attacks on his siblings, his mother, his therapist and school authorities.

During the first incident I witnessed, Noah attempted to push his mother down the stairs and threw large wood blocks at her from the second floor. Upon Noah coming down the stairs, he resumed his attack on his mother, striking her and pulling her hair. Christine wrestled him to the floor and sat on him. Because Noah was punching his mother, at Christine's request, I held Noah's arms against the floor so he could not hurt her. Your and Christine's son, Cameron Milot ("Cameron") assisted by holding Noah's legs and feet. Together, we restrained Noah until he calmed down.

Later that week, Noah attacked his mother by, once again, attempting to push her down the stairs. This time, instead of blocks, Noah threw two large rocks at Christine from the second floor. When Christine retreated to the Kitchen, Noah pursued her grabbing and throwing kitchen items at her, including glass jars. I understand from Christine that Noah previously attacked her with two sharp kitchen knives clenched in his fists. Fearing harm to Christine, and acting at her request, I restrained Noah by holding him against the dryer in the closet adjacent to Christine's kitchen. Noah slid to the floor and kicked me several times. To mitigate his continuing

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attack, I restrained his legs until he calmed down. Fortunately Noah did not succeed in harming his mother. Equally as important, my restraint of Noah prevented him from being cut by broken glass.

During the evening of Friday, November 1st, Hannah chided and berated Noah to provoke him to attack her. When Noah did not respond to her verbal onslaught, Hannah escalated her vitriol by accusing him of "stealing" a piece of her Halloween candy. For over two hours, Hannah screamed at Noah and Christine. When Christine and I offered to buy Hannah a piece of candy to replace the one Noah purportedly "stole" from her, Hannah refused, insisting Christine and me punish Noah.

Angered by his sister's accusations which, he claimed were false, and her insistence he be punished, Noah retreated first to Christine's vehicle, then to the second floor of her residence. Out of sight of Christine, me and his siblings, Noah engineered a weapon using three bolts he removed from a piece of furniture. The heads of the bolts are capped in plastic. Noah placed the capped bolt heads against his right palm and the bolt shanks between his index, middle, ring and pinky fingers, allowing the thread ends of the bolts to protrude out from between his fingers over three quarters of an inch. Noah then taped the bolts between his fingers. Thereafter, he came downstairs and, with the bolts protruding through the face of his fist, attempted to punch Hannah. Luckily, Christine caught and restrained Noah before he could harm his sister.

Afraid Noah would punch her with his improvised weapon, which he referred to as "brass knuckles," Christine requested I assist her. I removed the bolts from Noah's hand whereupon he became further enraged and twice attempted to kick his mother in the face with his left knee, narrowly missing both times only because I was working to restrain Noah, at Christine's request.

Had Noah succeeded in punching his sister or mother with his "brass knuckles," he could have caused severe damage to their eyes and faces. After Noah agreed to stop attempting to cause his mother and sister

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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

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November 4, 2019

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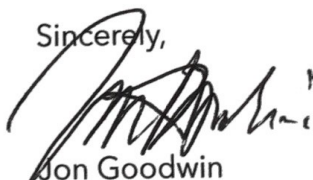
pursuant to recommendations of their therapists to help them deal with your continuing abuse. Your abuse of government and legal process will not be tolerated.

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,

A handwritten signature in black ink, appearing to read 'Jon Goodwin', with a stylized flourish at the end.

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

EXHIBIT D

November 24, 2019 OFW Email Message to
Raymond J. Milot, Jr. from Christine Jowdy In Re:
False Allegations

to

Plaintiff's Objection to
Defendant Raymond J. Milot Junior's Motion for
Summary Judgment

Goodwin, Jon A. v. Milot, Raymond J., Jr.
Dkt. No. LLI-CV21-5014019-S

- Message: 327 of 867
- Date: 11/24/2019 9:24 PM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/24/2019 9:25 PM)
- Subject: Your disparagement of me - Sun Nov 24th
- Raymond,

When Noah came into my house this evening, the first words were "Dad told me you are suing him and you wrote a letter."

When Officer McIntyre assisted me in taking Hannah's phone from her, the morning of November 3rd, you rushed to the house and sat in my driveway in your car. Noah and Hannah rushed out to you and sat in your car while the officer spoke to Jon Goodwin and me. Officer McIntyre then went to your car and spoke with you. In front of Officer McIntyre, Noah and Hannah you stated that Jon and me are "unstable," "abusive," that Jon is a "psycho," you are obtaining a restraining order against Jon, and the children should not go back into my house because it was not safe. Later that morning Jon and I learned from Cameron you informed him that you told Noah and Hannah to lock themselves in Cameron's room to protect themselves from Jon and me.

Noah and Hannah have variously reported to me and Jon, on several occasions, after visiting with you that you told them you are obtaining a restraining order against Jon.

According to our divorce agreement on page 17, at #18. "Each party shall exert his or her best efforts to refrain from doing anything to estrange the children from the other party, or to act in a such a way as to hamper the free and natural development of love and respect between parent and child. Neither parent shall use the children as a sounding board to air grievances against the other parent."

On page 17 at #19 the divorce agreement states "The Mother and Father shall not make any statement derogatory or critical of the other in the minor children's presence and shall not use the minor children as intermediaries for communications. The parents shall not disparage each other on social media , nor in the community."

Clearly your disparaging statements to our children are meant to create conflict between them and me and for them to fear Jon. You have no basis for obtaining restraining orders against Jon or me because there is no basis. All of your statements and innuendo to that affect are disparaging and defamatory. Moreover, it's outrageous you're continuing to poison my relationship with our children.

This course of conduct must stop immediately.

Christine

EXHIBIT E

November 26, 2019 1 OFW Email Message to
Raymond J. Milot, Jr. from Christine Jowdy in Re
False Report by Milot to DCF

to

Plaintiff's Objection to
Defendant Raymond J. Milot Junior's Motion for
Summary Judgment

Goodwin, Jon A. v. Milot, Raymond J., Jr.
Dkt. No. LLI-CV21-5014019-S

- Message: 314 of 867
- Date: 11/26/2019 11:28 AM
- From: Christine Jowdy-Milot
- To:
 - Raymond Milot (First View: 11/26/2019 11:35 AM)
- Subject: Dr. Khalil and Noah
- Raymond,

DCF informed me yesterday that Noah went to his psychiatrist, Dr. Khalil's, on Saturday. I was not informed of that appointment, nor was it posted in OFW.

An appointment with Dr. Khalil is extremely important. Not informing me of the children's psychiatrist appointments is a violation of our Final Parenting Plan. See p. 14, ¶¶ 14-15, therein.

DCF also informed me they received another fraudulent report instigated by you. This time, it was regarding the incident on Saturday, November 15th during which Noah attempted to break my arm. Jon Goodwin was here. He called the police who instructed him to restrain Noah to allow me to retreat into my home. Acting in my interest and with my consent, Jon did restrain Noah. At no time did Jon hang Noah over the porch by his ankles as you alleged to DCF. This is another false story you assisted or have induced Noah to fabricate.

When the police arrived, they investigated and of course found no cause to believe there was any abuse or neglect. The officers then called for an ambulance to transport Noah to Danbury Hospital where he was admitted and treated him for Intermittent Explosive Disorder and Anxiety.

You were well aware of the situation at my home because you were on the phone with Dr. Khalil and me, while the police were investigating and speaking with Noah, Jon and me. I also updated you and I let you know when Noah was released by the hospital.

DCF also informed me that your fraudulent DCF report stated that Noah is not an aggressive child. This too is false. You are fully aware Noah is diagnosed with Disruptive Mood Dysregulation Disorder (DMDD) that causes him to act out violently. Certainly, you're also aware that false reporting to DCF is a crime. See CGS § 17a-101e.

Christine

EXHIBIT F

March 2023 False and Defamatory Facebook
Postings by Facebook Troll, and Conti, Levy Salerno,
Goodrich Client, Heather Walsh (*nee Slater*)

to

Plaintiff's Objection to
Defendant Raymond J. Milot Junior's Motion for
Summary Judgment

Goodwin, Jon A. v. Milot, Raymond J., Jr.
Dkt. No. LLI-CV21-5014019-S

i am not like other girls, i'm worse



Heather Walsh (Slater)

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Heather's Post



Like 3d Edited



Heather Walsh

Jon Goodwin keeps throwing glass and trash in our yard. Last night half a broken bottle was discovered on our steps to our terrace out back. It wasn't there the night prior. We checked the cameras. He's also purposely trying to avoid being seen on our security cameras to do these things. He's a psycho.

They also are both in trouble for abusing her (his gf's) children. Trying to claim the kids and ex husband are all in cohorts and just drumming up things to record to make them look abusive. Right. Kids do things like that - they aren't little demons. And these two "adults" have already proven what pathological liars they are. The cops are well aware and they're not going to let this go on.

He's also making claims to have cameras pointed in our backyard. That's illegal voyeurism. My cameras don't even look at HIS backyard. Because I'm not a creepy stalker.

I'm really worried about my youngest son.

Do you know several months ago we were all our star watching in the driveway, and this creep was walking through the woods (like none of us know what a bumbling person sounds like tromping on dead leaves) and just watched us??? Fucking WEIRDO! He's complaining about privacy - but deliberately removed all the lush privacy between

...

EXHIBIT G

Compendium of Text Messages between Raymond J. Milot, Jr. and his Minor Daughter Evidencing Milot Grooming his Daughter to Destroy Incriminating Evidence

to

Plaintiff's Objection to
Defendant Raymond J. Milot Junior's Motion for
Summary Judgment

Goodwin, Jon A. v. Milot, Raymond J., Jr.
Dkt. No. LLI-CV21-5014019-S

2019-09-05 19:09:57 EDT

So I have nothing to eat

2019-09-05 19:12:04 EDT

And it is called "lean meat"

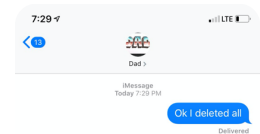
2019-09-05 19:12:45 EDT

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

2019-09-06 19:29:26 EDT

Ok I deleted all

2019-09-06 19:29:52 EDT



2019-09-06 19:29:52 EDT

That was it

2019-09-06 19:29:58 EDT

And I'll delete all of these messages

2019-09-06 19:44:15 EDT

Can you unpause the rest of my apps?

2019-09-06 19:49:30 EDT

Please

2019-10-19 13:41:19 EDT

Whatchadoin

2019-10-19 14:00:31 EDT

Nothing much but mom has left for apple picking

2019-10-19 14:16:24 EDT

What are you and Cameron doing

2019-10-19 14:16:36 EDT

Just playing on our devices

2019-10-19 14:16:58 EDT

Did John go with your mom

2019-10-19 14:17:15 EDT

Nope

2019-10-19 14:17:43 EDT

But I can still bring the kites somewhere for u

2019-10-19 14:17:55 EDT

Don't you think your mom will figure it out and get very angry at you

2019-10-19 14:18:03 EDT

And you should delete these texts

2019-10-19 14:18:18 EDT

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

2019-10-19 14:18:57 EDT

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

2019-10-19 14:19:11 EDT

When do you pick Cameron up??

2019-10-19 14:20:39 EDT

Maybe in an hour

2019-11-02 14:25:46 EDT

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

2019-11-02 14:25:49 EDT

It's a 0

2019-11-02 14:26:08 EDT

For the practice log

2019-11-02 14:26:29 EDT

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

2019-11-02 14:26:39 EDT

Make sense?

2019-11-02 14:26:59 EDT

What is everyone doing?

2019-11-02 14:27:03 EDT

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

2019-11-02 14:27:07 EDT

I'm not sure

2019-11-02 14:27:17 EDT

Where is Cameron

2019-11-02 14:27:30 EDT

Upstairs maybe

2019-11-02 14:27:50 EDT

Ok

2019-11-02 14:28:10 EDT

You should not save texts to me sweets

2019-11-02 14:28:47 EDT

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

2019-11-02 14:28:59 EDT

Ok

2019-11-02 14:29:14 EDT

I'll just delet the whole conversation

2019-11-02 14:29:24 EDT



2019-11-02 18:07:11 EDT

Hi sweets

2019-11-02 18:08:19 EDT

Make sure you get soccer gear together tonight

2019-11-02 20:31:44 EDT

Goodnight sweets

2019-11-02 20:44:28 EDT

Ok

2019-11-02 20:44:29 EDT

Literally get me out of moms house

2019-11-02 20:45:09 EDT

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

2019-11-02 20:45:28 EDT

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

2019-11-02 20:50:31 EDT

Sorry sweetie, you ok?

2019-11-25 06:55:56 EST

Hi sweets

2019-11-25 06:56:06 EST

Hey dad

2019-11-25 06:56:19 EST

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

2019-11-25 06:56:24 EST

I'm on the bus now

2019-11-25 06:56:43 EST

They were on the counter next to sink

2019-11-25 06:56:51 EST

Why did you come here?

2019-11-25 06:56:58 EST

Bus at your moms

2019-11-25 06:57:09 EST

To get them and I forgot to tel my bus driver

2019-11-25 06:57:22 EST

Your mom explode?

2019-11-25 06:57:28 EST

Delete that

2019-11-25 06:57:31 EST

No

2019-11-25 06:57:42 EST

Cool

2019-11-25 06:57:48 EST

All calm?