

DOCKET NO: LLI-CV21-5014019-S : SUPERIOR COURT  
JON GOODWIN : J.D. OF LITCHFIELD  
V. : AT TORRINGTON  
RAYMOND J. MILOT, ET AL : APRIL 9, 2026

**PLAINTIFF’S MOTION FOR DISCLOSURE PURSUANT TO  
RULE 2.11 AND FOR RECUSAL INQUIRY**

**I. INTRODUCTION**

Pursuant to the:

- Connecticut Code of Judicial Conduct Rule 2.11;

and

- Connecticut Code of Judicial Conduct Rule 2.9

Plaintiff respectfully moves that the Court disclose on the record any information that the Court believes the parties or their counsel might reasonably consider relevant to the question of disqualification, and any *ex parte* communications or non-record information requiring disclosure.

This request is made:

- Respectfully
- Without accusation
- Solely to ensure a complete and transparent record

**II. LEGAL STANDARD**

Under Rule 2.11, a judge shall disqualify herself in any proceeding in which:

“the judge’s impartiality might reasonably be questioned.”

The Rule further requires disclosure of information that parties might reasonably consider relevant to that determination.

Under Rule 2.9:

- A judge shall not initiate, permit, or consider ex parte communications concerning a pending matter;
- If such communications occur, the judge must disclose them and allow the parties an opportunity to respond.

The governing standard is appearance-based, not dependent on proof of actual bias.

### **III. SCOPE OF REQUEST**

Without suggesting that any disqualifying circumstance exists, Plaintiff respectfully requests that the Court disclose whether it has any relationships, associations, or connections that could reasonably bear on impartiality, including:

#### **A. Relationships or Associations**

Whether the Court has any personal, social, residential, or professional relationships with:

- Defendant Raymond J. Milot, Jr.;
- Members of the Milot family;
- Individuals associated with Candlewood Lake Club;
- Attorneys affiliated with Conti, Levy, Salerno & Goodrich, LLC, including:
- Robert Salerno
- William Conti
- Rebecca Goodrich
- Steven Levy

#### **B. Judicial or Institutional Overlap**

Whether the Court has any involvement, coordination, or knowledge arising from:

- Related proceedings before other judicial officers, including but not limited to matters involving Judge Andrew Roraback or Walter A. Menjivar (“Judge”);
- Administrative or institutional interactions with Family Relations personnel involved in related matters.

#### **IV. ADDITIONAL BASIS FOR DISCLOSURE — RELATED FEDERAL LITIGATION**

Plaintiff further respectfully submits that disclosure is warranted due to the existence of a related federal civil rights action arising from the same underlying events and institutional actors.

Plaintiff has filed a civil action in the United States District Court for the District of Connecticut:

*Goodwin v. Egan, et al.*, No. 3:25-cv-01711 (VAB) (the “Federal Action”), attached hereto as Exhibit A.

##### **A. Nature of the Federal Action**

As set forth in the Amended Complaint, the Federal Action asserts claims under:

- 42 U.S.C. § 1983;
- Title II of the ADA;
- Section 504 of the Rehabilitation Act.

The action arises from allegations that Family Relations personnel:

- created, approved, and transmitted materially incomplete and misleading factual information, while omitting known exculpatory facts

The complaint further alleges that such conduct included:

- Fabrication or distortion of factual assertions;
- Omission of material exculpatory information;

- Transmission of those assertions to the Court for use in adjudication.

**B. Relationship Between This Case and the Restraining Order Proceedings**

The Federal Action concerns a separate restraining order proceeding initiated in March 2024.

That proceeding is distinct from the present action, *Goodwin v. Milot*. However, the two matters are factually and procedurally related in that:

- The restraining order proceeding arose during the pendency of this action;
- It involved overlapping participants, including individuals and counsel connected to matters related to this case;
- It relied on factual assertions concerning Plaintiff that are also relevant to issues in this action.

Accordingly, while the proceedings are separate, they involve interrelated facts, participants, and litigation context.

**C. Relevance to Rule 2.11 Disclosure**

Because:

- The Connecticut Judicial Branch is a named defendant in the Federal Action;
- Family Relations personnel involved in that action operate within the same judicial system;
- The conduct alleged includes fabrication and omission of material facts in connection with proceedings related to Plaintiff;

a reasonable person could question whether:



- Institutional relationships;
- Administrative connections;
- Or prior knowledge arising from those matters;

could bear on impartiality in this case.

#### **D. Limited and Proper Purpose of This Request**

Plaintiff does not assert:

- That the Court engaged in any wrongdoing;
- That any disqualifying relationship necessarily exists.

Rather, Plaintiff seeks only disclosure consistent with Rule 2.11.

#### **E. Requested Clarification**

Plaintiff respectfully requests that the Court disclose whether it has any involvement, knowledge, or connection arising from:

- The Family Relations personnel named in the Federal Action;
- The underlying events described therein;
- Administrative or institutional interactions relating to those matters;

to the extent such information falls within Rule 2.11.

#### **V. ADDITIONAL REQUEST— *EX PARTE* DISCLOSURE**

Pursuant to:

- Connecticut Code of Judicial Conduct Rule 2.9,

Plaintiff respectfully requests that the Court disclose on the record whether it is aware of any *ex parte* communications or receipt of non-record information relating to this matter that require disclosure.

**A. Limited Scope of Request**

Plaintiff does not seek:

- Disclosure of judicial deliberations;
- Inquiry into internal court processes.

Rather, Plaintiff seeks only confirmation of whether:

Any *ex parte* communication or non-record information has been received that is subject to disclosure under Rule 2.9.

**B. Purpose**

This request is made to:

- Ensure compliance with Rule 2.9;
- Preserve a clear and complete record;
- Provide the parties an opportunity to respond if required.

**C. Relief Requested**

Plaintiff respectfully requests that the Court:

1. State on the record whether any such *ex parte* communications or non-record information exist; and
2. If so, disclose them in accordance with Rule 2.9.

**VI. PURPOSE OF THIS MOTION**

This motion is filed to:

- Ensure transparency;
- Preserve appellate rights;
- Maintain confidence in the integrity of the proceedings;

and is not intended to assert bias or misconduct.

## **VII. RELIEF REQUESTED**

Plaintiff respectfully requests that the Court:

1. State on the record whether any such relationships, communications, or associations exist;
2. Provide a general description sufficient to allow the parties to assess whether further relief is appropriate; and
3. Disclose any *ex parte* communications or non-record information as required by Rule 2.9.

## **VIII. CONCLUSION**

Because both actual impartiality and the appearance of impartiality are essential to the integrity of judicial proceedings, Plaintiff respectfully requests that this motion be granted.

Respectfully submitted,

THE 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 April 9, 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.

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# **Exhibit A**

**Amended Complaint —**

*Goodwin v. Egan, et al.*, No. 3:25-cv-01711 (D. Conn. Apr. 5, 2026)

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

|                                                                                                                                                     |                  |                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------------------------------|
| JON GOODWIN,<br><i>Plaintiff,</i>                                                                                                                   | :<br>:<br>:      |                                      |
| v.                                                                                                                                                  | :                | Civil Action No. 3:25-cv-01711 (VAB) |
|                                                                                                                                                     | :                |                                      |
| MICHAEL EGAN, individually and in his official<br>capacity as a Family Relations Counselor I,                                                       | :<br>:<br>:      |                                      |
|                                                                                                                                                     | :                |                                      |
| LISA KILLIANY, individually and in her official<br>capacity as a Family Relations Counselor II,                                                     | :<br>:           |                                      |
| KATIE O’CONNOR, in her official capacity as<br>ADA Contact for the Litchfield Courthouse,<br>Family Services Division (IAR),                        | :<br>:<br>:      |                                      |
| SANDRA LUGO-GINES, in her official capacity<br>as Coordinator for Court Operations Division<br>and Program Manager, Centralized ADA<br>Office, and, | :<br>:<br>:<br>: |                                      |
| CONNECTICUT JUDICIAL BRANCH,<br><i>Defendants.</i>                                                                                                  | :<br>:           | April 5, 2026                        |

**AMENDED COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(NON-PRISONER; ADA; REHABILITATION ACT; 42 U.S.C. § 1983)**

**I. INTRODUCTION**

1. Plaintiff files this Amended Complaint in compliance with the Court’s Order.

This Complaint supersedes all prior versions and is the operative pleading.

2. This is a civil-rights action under Title II of the Americans with Disabilities Act, 42 U.S.C. § 12132, Section 504 of the Rehabilitation Act, 29 U.S.C. § 794, 42 U.S.C. § 1983, and Article I, §§ 4 and 14 of the Connecticut Constitution.

3. Plaintiff alleges that Defendants created, approved, and transmitted materially incomplete and misleading factual information, while omitting known exculpatory facts, in

connection with a restraining-order proceeding against Plaintiff, and that the court relied on that information.

4. Plaintiff further alleges that Defendants took these actions after Plaintiff engaged in protected activity, and failed to facilitate or support requested disability accommodations, resulting in Plaintiff's inability to meaningfully participate in the proceedings.

5. As a result, a restraining order issued against Plaintiff, he was forced from his residence, and he suffered additional harms, including impairment of his ability to pursue litigation and disruption of medical care.

6. The conduct challenged herein occurred before judicial decision and consisted of Defendants' own acts and omissions in gathering, preparing, approving, and transmitting information used in the proceeding.

7. Plaintiff alleges that each Defendant participated in specific conduct described below, including receiving Plaintiff's written communications, preparing or approving the factual narrative submitted in the restraining-order proceeding, and failing to correct known inaccuracies after being placed on notice of the exculpatory facts.

8. Defendants acted knowingly or with reckless disregard for the truth. At all relevant times, Defendants had access to contemporaneous records contradicting the Affiant's allegations and received repeated written and oral notice from Plaintiff identifying specific inaccuracies. Despite that knowledge, Defendants failed to correct or disclose those inaccuracies and permitted materially false or misleading assertions to be advanced despite notice of inaccuracies.

9. The factual basis for these claims is set forth below and in the referenced exhibits.

## **II. PARTIES**

10. Plaintiff Jon Goodwin, at times relevant hereto, was a resident of Connecticut.

11. Defendant Michael Egan was, at all relevant times, a Family Relations Counselor I employed by the Connecticut Judicial Branch.

12. Defendant Lisa Killiany was, at all relevant times, a Family Relations Counselor II employed by the Connecticut Judicial Branch.

13. Defendant Connecticut Judicial Branch is a public entity subject to Title II of the ADA and, to the extent applicable, Section 504 of the Rehabilitation Act.

14. Defendant Sandra Lugo-Gines is the ADA Coordinator for the Court Operations Division and Program Manager in the Centralized ADA Office of the Connecticut Judicial Branch. She is sued solely in her official capacity for prospective injunctive and declaratory relief.

15. Defendant Katie O'Connor is the ADA contact for the Litchfield Courthouse in the Family Services Division (IAR). She is sued solely in her official capacity for prospective injunctive and declaratory relief.

## **III. JURISDICTION AND VENUE**

16. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343.

17. Plaintiff's claims arise from Defendants' independent conduct in creating and transmitting materially incomplete and misleading information and failing to provide disability accommodations. *See* Exs. M, N, P, Q.

18. Plaintiff does not seek review or reversal of any state-court judgment, but instead seeks relief for injuries caused by Defendants' own actions.

19. Venue is proper in this District.



#### IV. THRESHOLD FACTUAL CONTEXT

20. The underlying complainant in the restraining-order proceeding is referred to herein as the “Affiant.”

21. Defendants Egan and Killiany were employed by the Connecticut Judicial Branch’s Family Relations Unit and were assigned to matters in the Litchfield Judicial District Superior Court. *See* Ex. E.

22. Upon information and belief, Family Relations Counselors assigned to domestic-relations matters, including restraining-order proceedings, interview the parties, collect and summarize information, and prepare factual materials or recommendations for judicial consideration.

23. In connection with *Affiant v. Goodwin*, No. [REDACTED], Defendant Egan interviewed Plaintiff, gathered information, and prepared a Family Relations report for use in the restraining-order proceeding, and Defendant Killiany reviewed and approved that report for submission to the Court. *See* Ex. P; *see also* Ex. T (Affiant Dep.) at 40, 45–46, 55–58.

24. In connection with the restraining-order proceeding, Defendants Egan and Killiany generated, selected, approved, and transmitted factual assertions for use by the Court, including through the preparation and authorization of a Restraining Order Hearing Family Services Report (JD-FM-258). *See* Ex. P.

25. The conduct alleged herein is attributed to each Defendant based on that Defendant’s own actions and omissions. Specifically, Defendant Egan conducted the interview of Plaintiff and prepared and transmitted the Family Relations report; Defendant Killiany reviewed, approved, and authorized that report and failed to correct known inaccuracies; Defendant O’Connor and Defendant Lugo-Gines were responsible for ADA coordination and failed to act

upon notice of Plaintiff's accommodation needs. Each Defendant is alleged to have personally participated in the violations described.

## **V. FACTUAL BACKGROUND**

### **A. Background**

26. On February 1, 2020, Plaintiff completed a Mental Health First Aid course in order to support his then-partner, the Affiant, and her three children during a period of significant family instability following her divorce, which included involvement by local law enforcement, emergency medical services (211), the Connecticut Judicial Branch Family Services Unit, and the Connecticut Department of Children and Families ("DCF"). *See* Ex. A.

27. On April 14, 2021, Plaintiff called emergency services after the Affiant expressed suicidal ideation, including stating that she "wanted to be dead," and attempted to access a firearm. Plaintiff secured the firearm. *See* Exs. B-1, B-2.

28. Law enforcement responded and began an emergency psychiatric evaluation under Conn. Gen. Stat. § 17a-503, which led to the Affiant being transported to New Milford Hospital. *See* Exs. B-1, B-2.

29. On July 31, 2022, Plaintiff again called emergency services due to a separate mental health crisis, which led to the Affiant's emergency commitment and transport to Charlotte Hungerford Hospital in Torrington, Connecticut. *See* Ex. C.

30. On October 12, 2022, the Affiant threw an electronic dog collar at Plaintiff's head, striking him and damaging Plaintiff's computer monitor. *See* Ex. D-1; *see also* Ex. T (Affiant Dep.) at 45.

31. Plaintiff contacted law enforcement. Connecticut State Troopers responded and arrested the Affiant, charging her with disorderly conduct, in violation of Conn. Gen. Stat. § 53a-182, and criminal mischief in the third degree, in violation of Conn. Gen. Stat. § 53a-117. *See* Exs. D-1, D-2.

32. On October 13, 2022, a family violence protective order was issued in Plaintiff's favor in connection with the Affiant's arrest. *See* Ex. D-5; *see also* Ex. L.

**B. Plaintiff's Communications with the Litchfield Family Services Unit in 2022**

33. Beginning in or about October 2022, Plaintiff communicated directly with Defendant Lisa Killiany, a Family Relations Counselor with the Connecticut Judicial Branch's Family Services Unit in the Litchfield Judicial District Courthouse, regarding matters arising from the October 12, 2022, incident and related proceedings. *See* Ex. E.

34. In the course of her duties, Defendant Killiany had access to, or the ability to obtain, Family Services records, court records, law-enforcement records, and related materials concerning the October 12, 2022, incident and the resulting criminal and family-court proceedings.

35. The Affiant was well known to the Connecticut Judicial Branch's Family Relations Unit because the Unit had previously prepared a detailed Family Relations Report in connection with her divorce and family litigation, and that report addressed, among other things, DCF involvement, family instability, allegations of suicidal and homicidal ideation, and other matters relevant to assessing her credibility and the accuracy of later claims.<sup>1</sup>

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<sup>1</sup> The comprehensive Family Relations materials reflect allegations that Affiant (i) threatened to "drive the car into the lake with [her children] in it," and (ii) made statements about "killing herself," including a child's account that she said she was "going to kill herself." Affiant denied these allegations to the Family Services evaluator who drafted the report.

36. On November 8, 2022, Plaintiff met with Defendant Killiany and provided written and oral information describing prior emergency incidents, the October 12, 2022, assault, his role in contacting emergency services, and his ongoing safety concerns. *See* Ex. E.

37. Plaintiff expressly explained that his conduct—including contacting law enforcement and addressing safety risks—was protective and responsive to emergency conditions, not threatening or abusive. *See* Exs. G-1, G-2.

38. Plaintiff further told Defendant Killiany that the Affiant's statements about him were inconsistent with contemporaneous records, including law-enforcement and court records concerning the October 12, 2022, incident. *See* Exs. G-1, G-2.

39. Plaintiff also informed Defendant Killiany, orally and in writing, that he would remove firearms from the residence so that any perceived safety concern could be addressed and de-escalated, and that he had no objection to the Affiant returning to the residence after the firearms were removed. *See* Exs. G-1, G-2; *see also* Ex. I.

**C. Court Imposed Compliance Requirements of the Affiant Following her October 2022 Attack on the Plaintiff**

40. Subsequent to her attacking the Plaintiff, the Affiant was required by the Court to:

- a. Follow all court orders, including all conditions of any Protective Order issued against you;
- b. [Commit] no acts of family violence and no new family violence arrests while this case is pending;
- c. Complete a Mental Health Evaluation and take part in any recommended treatment; and
- d. Verify counseling by 2/20/23.

*See Exs. H, J.*

41. Defendant Killiany of the Family Services Unit was assigned to monitor the Affiant's compliance. *See Exs. H, J.*

**D. Separation, Plaintiff's Protected Activity, and Subsequent Affidavit**

42. In or about October 2023, the Affiant voluntarily left the residence she owned and had shared with Plaintiff.

43. On the morning of November 23, 2023, the Affiant emailed Plaintiff that she intended to "stop at the house to get documents, personal items, and a pair of boots." *See Ex. M.*

44. On November 23, 2023, the Affiant entered the residence while Plaintiff was present without incident.

45. During the evening of November 23, 2023, the Affiant emailed the Plaintiff stating *inter alia*:

- "I love you... my love for you won't stop because we are not together";
- "Our relationship is complex due to the interference of other parties, the court, and the trauma and abuse... for over 20 years";
- "I know you were drawn into a terrible situation, and I don't blame you for any of it";
- "I know how hard you worked to help me, and I am grateful for everything"
- "Given the circumstances, I know you did your best";
- "I am most thankful for your kindness, friendship, and willingness to guide me forward during an incredibly difficult period";

- “I could/can not be in a relationship... because I am overwhelmed by the loss of my relationship with my children”;
- “Over time, it has become worse for me, not better”;
- “Therapy was not doing it...”;
- “You are welcome to stay at the home in Canaan”; and
- “I will always keep the door open for you; I consider you family.”

*See Ex. N.*

46. During late 2023 and early 2024, Plaintiff engaged in constitutionally protected activities, including but not limited to:

- a. Attending public proceedings involving the Affiant and her ex-husband (fall and winter 2024);
- b. Requesting the preservation of evidence by the Affiant’s ex-husband and other parties in related litigation (Oct. 2023);
- c. Reporting suspected child sexual abuse involving the Affiant and her ex-husband (Dec. 2024);
- d. Filing a grievance against one of the Affiant’s attorneys (Jan. 2024);
- e. Pursuing discovery in related matters, including noticing the Affiant’s deposition (Jan. 2024) (Exs. O; Q-13:18); and
- f. Initiating civil litigation against the Affiant (Feb. 2024).

**E. The March 4, 2024, Restraining Order Application**

47. On March 4, 2024, after Plaintiff had engaged in protected speech, petitioning, litigation, and related activity, the Affiant filed an Application for Relief from Abuse against Plaintiff together with a sworn affidavit (the “Affidavit”).

48. The affidavit contained statements alleging, among other things, that Plaintiff had told police the Affiant tried to obtain his gun during the October 12, 2022, incident, that Plaintiff refused to remove firearms from the residence, and that Plaintiff posed an immediate danger because of his alleged anger, mental state, and access to firearms. *See* Ex. T (Affiant Dep.) at 45:17-25, 45:1-8.

49. Those statements were inconsistent with Plaintiff's contemporaneous communications and with records concerning the October 12, 2022, incident and the earlier family-violence proceedings. *See* Exs. D-1-D-5; *see also* Ex. I.

50. Between March 4 and March 11, 2024, Defendants had sufficient time and opportunity to review the affidavit against the materials available to them or within their reach.

**F. The March 11, 2024, Proceedings**

51. A meeting with Family Services Unit counselors in the Litchfield Judicial District Courthouse and a hearing were scheduled for March 11, 2024, regarding the Affiant's restraining order application.

**1. Meeting with Defendant Egan of Family Services**

52. Prior to the scheduled hearing, Plaintiff met with Defendant Egan in his office in the Family Services Unit.

53. During that meeting, Plaintiff informed Defendant Egan that he suffered from a disabling autoimmune condition and needed accommodations, including additional time to obtain counsel, scheduling flexibility, and medical rest.

54. Plaintiff expressly requested such accommodations and explained that his housing stability and ability to limit stress were medically necessary components of managing his condition.

55. Plaintiff also informed Defendant Egan that the affidavit was materially inaccurate and that records existed that contradicted the allegations being advanced against him. *See* Exs. D-1 – D-5; *see also* Exs. G-1 – G-3, I.

56. Plaintiff specifically explained that Defendants had access to, or the ability to obtain, records contradicting the Affidavit’s allegations, including records relating to the October 12, 2022, arrest of the Affiant and the protective order issued in Plaintiff’s favor, which had been handled by Defendant Killiany. *See* Exs. D-1 – D-5, E; *see also* Ex. L.

57. Accordingly, at all relevant times, Defendants Egan and Killiany had actual knowledge of Plaintiff’s disability, his request for accommodations, and the need for such accommodations. They were further on notice that Family Services, law enforcement, and DCF-related materials accessible to them contained information regarding the Affiant’s history that contradicted her Affidavit. *See* Exs. F; G-1; G-2; G-3; I.

58. Defendant Egan did not alter the process to address Plaintiff’s accommodation request and did not undertake any apparent effort to verify the inconsistencies Plaintiff identified.

**2. *Defendant’s Fabricated Narrative that Plaintiff told Law Enforcement that the Affiant had Attempted to Obtain a Firearm During the October 2022 Assault***

59. The Affiant stated in the Affidavit that:

*[Plaintiff] called the police in 2022 and told them I was trying to get hold of his gun during an argument, which was not true, and led to misdemeanor family violence charges against me.*



60. The Affiant attributed the source of her information regarding this statement to Defendant Killiany as well, stating in the November 16, 2025, deposition that:

*Because that's what the social worker told me ... Lisa Killiany... the one in Litchfield that I had to go and see with Attorney Shiffrin.*

Ex. T (Affiant Dep.) at 45:17-25, 45:1-8.

**3. Defendant's Fabricated Narrative that Plaintiff Refused to Remove his Firearms from the Residence so the Affiant Could Return Home in 2022**

61. The Affiant stated in the Affidavit that, while she was subject to the family violence restraining order between October 13, 2022, and February 2, 2023, for having attacked Plaintiff with the dog collar:

*[she] had to leave [her] home for months because [Plaintiff] would not relinquish his firearms and [she] could not be around them while the case was pending.*

62. The Affiant testified in a deposition that she knew her statement in the Affidavit was true because Defendant Killiany told her so in a meeting. *See* Ex. T at 58:2-14.

63. Defendant Killiany's narrative was false. Plaintiff repeatedly informed Defendant Killiany that he would remove firearms from the residence to eliminate any perceived safety concern and facilitate de-escalation, including in writing on December 13, 2022. *See* Ex. I. Plaintiff further informed Defendant Killiany that he had removed his firearms to storage and had "no objection to [the Affiant] coming into [their] residence." *See* Ex. K.

**4. Fabricated Gaslighting Narrative**

64. The Affiant further asserted in her Affidavit that Plaintiff fabricated claims that she was suicidal and required medical or psychiatric intervention, stating:

*[Plaintiff] gaslights me by telling me and others that I am suicidal and need to be hospitalized, hire a psychologist, and need to take medication.*

65. Defendants knew this statement in the Affidavit was not true because they had access to:

- a. Law-enforcement records documenting that Plaintiff summoned emergency services in response to suicidal statements and conduct, which were independently documented by law enforcement and resulted in emergency psychiatric intervention on April 14, 2021, and July 31, 2022. *See* Exs. B-1, B-2, C;
- b. Family Services Unit records, including a December 2018 Family Services evaluation report addressing mental health concerns and recommending evaluation and treatment;
- c. Family Services Unit and court records reflecting that mental health evaluation and treatment were required as part of the conditions imposed following the October 12, 2022, incident. *See* Exs. H, J;
- d. Family Services Unit records reflecting that the Affiant reported that she was continuing to attend therapy “as requested.” *See* Ex. K; and
- e. Upon information and belief, DCF records reflecting reports of suicidal and homicidal ideation and recommendations for counseling.

66. The statements described above concerned the same core subjects—firearms, alleged danger, and Plaintiff’s conduct—and Defendants had access to contemporaneous records and prior Family Services materials directly bearing on those subjects, yet did not reconcile those records with the Affidavit’s allegations.

**G. Transmission of Fabricated Information to the Court**

67. Defendants had between March 4, 2024, and March 11, 2024, to review the Affiant's Affidavit and assess her sworn statements in light of records to which they had access and which were relevant to assessing the credibility of the Affiant's Affidavit.

68. Despite that access, Defendants failed to reconcile sworn allegations with available records and failed to correct or disclose materially false or misleading information reflected in the Affiant's sworn Affidavit despite knowledge of its inaccuracies.

**1. Defendants' Transmit the Fabrication, Omission, and Unsupported Risk Classification to the Court**

69. On March 11, 2024, Defendant Egan filed a "Restraining Order Hearing Family Services Report (JD-FM-258)." *See* Ex. P.

70. The report acknowledged that Plaintiff had no criminal history, no violent convictions, no outstanding warrants, and no history of protective or restraining orders. *See* Ex. P.

71. Despite these findings, Egan assigned Plaintiff a "Moderate Risk" classification without explanation or identified factual support. *See* Ex. P.

72. Upon information and belief, that classification was based on, or influenced by, information reflected in the Affidavit that Defendants knew was inaccurate or recklessly disregarded as false.

73. Defendants failed to include or disclose material information, including:

- (a) The basis for assigning Plaintiff a "Moderate Risk" classification;
- (b) The existence of a prior protective order issued in Plaintiff's favor against the Affiant on October 13, 2022 (*see* Ex. D-5; *see also* Ex. L);

- (c) Plaintiff's documented emergency calls seeking assistance for the Affiant (*see* Exs. B-1, B-2, C);
- (d) The absence of any record that Plaintiff reported that the Affiant attempted to obtain a firearm in the October 2022 incident (*see* Exs. D-1–D-4);
- (e) The Affiant's history of suicidal ideation and related concerns documented in law enforcement and Family Services records (*see* Exs. B-1, B-2, C);
- (f) Requirements imposed in connection with the October 2022 proceedings that the Affiant undergo mental health evaluation and treatment (*see* Exs. H, J); and
- (g) Evidence reflecting Plaintiff's engagement in protected activities (*see e.g.*, Ex. O, Ex. R).

74. By omitting material information and permitting reliance on false or misleading assertions reflected in the Affidavit, Defendants presented a materially incomplete factual record to the Court.

#### **H. The March 11, 2024, Hearing, Plaintiff's ADA Notice, and Continuance Request**

75. On March 11, 2024, Plaintiff informed the Court that he suffered from a disabling autoimmune disease and requested a continuance to obtain counsel. *See* Ex. Q (Mar. 11, 2024, Hr'g Tr.) at 2:23-26; 9:6-8; 17:16-19.

76. The March 11, 2024, hearing also reflected that the Affiant did not present the matter as one involving an immediate, continuing threat requiring exclusion of Plaintiff from the

residence under all circumstances, but instead contemplated that she could return to the home while Plaintiff remained present. *See* Ex. Q at 17:4-6; 18:2-7, 18:13-14.

77. During the hearing, the Affiant, through her attorney, stated:

*Your Honor, we will agree that if [Affiant] ... comes into her home and Mr. Goodwin is there, he will not be held in contempt for her presence in her home.*

*See* Ex. Q at 18:2-7.

78. The Affiant's request directly contradicted statements in her affidavit that:

*I can no longer conclude anything other than that I am in a dangerous situation that requires I ask for judicial help so can get back into my home safely and remain there safely.*

*I am highly concerned that given his mental state and anger, and his arsenal, he could quickly lose it altogether, and someone could get killed.*

79. The Court acknowledged that an order affecting Plaintiff's rights could enter and granted a continuance to permit Plaintiff to secure representation. *See* Ex. Q at 5:2-3.

80. Despite attending or having access to the March 11, 2024, hearing transcript, Defendants did not amend their Restraining Order Hearing Family Services Report (JD-FM-258). *See* Ex. P.

81. Defendants did not disclose that the Affiant's affidavit was materially inaccurate in material respects, including that her statements at the hearing were inconsistent with assertions of immediate danger reflected in the Affidavit.

82. The Court granted Plaintiff a continuance. *See* Ex. Q at 5:2-3.

**I. Plaintiff's March 19, 2024, Letter: Explicit Notice of Falsity, Retaliation, and Medical Harm**

83. After the March 11 hearing, Plaintiff sent a detailed written communication to counsel and copied Defendants Egan and Killiany, stating that the restraining-order proceeding was being used to remove him from the residence and interfere with related litigation. *See* Ex. R.

84. In that communication, Plaintiff again identified specific factual inaccuracies, reiterated that he suffered from a stress-induced autoimmune condition, and warned that removal from the residence would aggravate his condition and impair his ability to participate in related proceedings. *See* Ex. R.

85. Plaintiff further explained that the restraining-order proceeding was being used to remove him from his residence and interfere with ongoing litigation, including pending depositions and related civil actions. *See* Ex. R; *see also* Exs. O, Q-13:18.

86. Plaintiff identified specific factual inaccuracies, including allegations inconsistent with contemporaneous conduct and communications, and described steps he had taken to de-escalate and provide the Affiant property through appropriate channels. *See* Ex. R.

87. Plaintiff expressly advised Defendants that statements being presented to the Court were false or misleading and that the proceeding was being used as an improper litigation tool. *See* Ex. R.

88. Plaintiff also reiterated his medical condition, explaining that he suffered from a stress-induced autoimmune disease requiring proximity to medical care and the ability to rest multiple times per day. *See* Ex. R.

89. Plaintiff warned that forced displacement or escalation of proceedings would exacerbate his condition and cause serious harm. *See* Ex. R.

90. Plaintiff further explained that the proceedings were interfering with his ability to participate in other judicial matters, including attending hearings and pursuing discovery.

*See* Ex. R.

91. Despite the Defendants’:

- a. receiving this detailed and contemporaneous notice—including notice of factual inaccuracies, asserted retaliatory purpose, and medical harm that would result if a restraining order were imposed;
- b. having access to records contradicting the Affiant’s Affidavit; and
- c. the Affiant’s request to access the residence with Plaintiff present without additional restriction,

Defendants failed to correct the record, failed to disclose material information, and continued to rely on and advance inaccurate or incomplete information in connection with the proceedings, as reflected by their failure to amend the March 11, 2024, “Restraining Order Hearing Family Services Report (JD-FM-258).” *See* Ex. P; *see also* Ex. Q at 17:4-6, 18:2-7; 18:13-14.

**J. The March 25, 2024, Hearing and the Restraining Order Hearing Family Services Report**

92. On March 25, 2024, the Superior Court held a hearing on the Affiant’s restraining-order application. *See* Ex. S (Mar. 25, 2024, Hr’g Tr.).

93. The Court expressly limited its decision-making to the evidentiary record presented at the hearing, stating that it was “here to apply the statute” based on the evidence and testimony before it. *See* Ex. S 4:15-27, 5:1. As a result, any material omissions or distortions in the information presented—including those generated and transmitted by Defendants through

the Family Relations process—were necessarily incorporated into the Court’s decision-making framework. *See* Ex. S 4:15-27, 5:1; *see also* Ex. P.

94. Defendant Egan’s report acknowledged that Plaintiff had no criminal history, no violent convictions, no outstanding warrants, and no prior restraining-order history, but nonetheless classified Plaintiff as a moderate risk. *See* Ex. P.

95. Defendant Egan did not disclose in the report the specific materials Plaintiff had identified as contradicting the affidavit, including the prior protective order entered in Plaintiff’s favor, Plaintiff’s documented emergency calls on behalf of Affiant, and Plaintiff’s written communications concerning firearm storage and de-escalation to accommodate Affiant. *See* Exs. D-5; L; B-1, B-2, C; I; K.

96. Defendant Killiany reviewed, approved, or relayed information that was later incorporated into the narrative used in the restraining-order proceeding, despite being aware of Plaintiff’s contrary communications and the existence of records inconsistent with the affidavit. *See* Ex. T (Affiant Dep.) at 40, 45–46, 55–58, 60-61.

97. The record further reflects that key allegations underlying the restraining-order application were not based on direct observation or independent verification, but instead derived from statements supplied by third parties or counsel. *See* Ex. T (Affiant Dep.) at 60–61.

98. Defendants failed to conduct any independent investigation to verify the accuracy of the allegations presented and instead relied on unverified third-party assertions despite information previously provided by Plaintiff contradicting those assertions.

99. At no point during the hearing did Defendants disclose to the Court the existence of material information previously provided by Plaintiff, including written communications



identifying factual inaccuracies, contextual explanations, and evidence contradicting claims of harassment. *See* Exs. F; G-1; G-2; G-3; I; K; R.

100. Nor did Defendants inform the Court that Plaintiff had expressly advised them—prior to the hearing—that the restraining-order application was being used for retaliatory purposes in connection with ongoing litigation, including to interfere with scheduled depositions and court appearances. *See* Ex. R.

101. Defendants also did not disclose that Plaintiff had notified them of his disabling medical condition and the harm that would result from removal from his residence and restriction of access to medical care. *See* Exs. R; *see also* Q at 2:23-26; 9:6-7; 17:16-19.

102. Instead, Defendants advanced or ratified a one-sided narrative that omitted these material facts, thereby presenting a factual account that did not include information previously provided by Plaintiff.

103. It was reasonably foreseeable that the Court would rely on Defendants' submissions as neutral and authoritative in determining whether to issue and continue the restraining order, and the Court did so. *See* Ex. S 4:15-27, 5:1; *see also* Ex. P.

104. That reliance resulted in the issuance of the restraining order and the resulting deprivation of Plaintiff's liberty, housing stability, and ability to fully participate in ongoing litigation. *See* Ex. S at 136:8-20.

105. Defendants' conduct in presenting, adopting, or failing to correct materially incomplete and misleading information—while withholding known exculpatory facts—involved the preparation and transmission of factual material for use by the Court in deciding the application.

106. As a direct result of the order, Plaintiff lost access to his residence, experienced disruption to his medical care, disruption of his self-employment work, and suffered interference with his ability to pursue discovery and participate in related litigation.

**K. Unified Causal Chain**

107. Defendants' conduct forms a continuous and interrelated chain in which:

- (a) Plaintiff provided detailed, corroborated, and exculpatory information;
- (b) Defendant Killiany communicated or permitted knowingly false information;
- (c) Those statements were incorporated into sworn submissions presented to the court;
- (d) Defendant Egan assigned a "Moderate Risk" classification unsupported by objective evidence;
- (e) Defendants failed to disclose material inconsistencies between sworn allegations and contemporaneous conduct, including statements made during the March 11, 2024, hearing; and
- (f) Defendants proceeded without providing reasonable accommodations.

108. This sequence of conduct affected the information presented to the court and the information available for its decision.

109. The transmission, reliance, and causation described above are incorporated herein and form the basis of Plaintiff's claims.

## **VI. IMMUNITY AND PERSONAL INVOLVEMENT**

110. Defendant Egan personally participated in the challenged conduct by interviewing Plaintiff, preparing the Family Relations report, and transmitting it for judicial consideration.

111. Defendant Killiany personally participated by reviewing, approving, and relaying information despite notice of Plaintiff's contrary communications and the availability of records bearing on the affidavit's allegations.

112. Defendants advanced factual assertions not based on personal knowledge and without independent verification, and presented or allowed them to be presented as reliable and based on firsthand knowledge, despite access to information calling those assertions into question.

113. The conduct alleged consisted of gathering, selecting, approving, and transmitting factual assertions for use in the restraining-order proceeding.

114. Defendants did not adjudicate disputes or apply law to facts, but instead acted in an investigative and reporting capacity.

115. The conduct alleged involved the creation and transmission of factual material for use in a judicial proceeding, not the adjudication of disputes.

116. Plaintiff seeks relief based on Defendants' own conduct in creating and advancing the factual record, not on review of the state-court judgment itself.

## **VII. CLAIMS ARE INDEPENDENT OF ANY STATE COURT JUDGMENT**

117. Plaintiff does not seek appellate review of any state-court judgment, nor does he ask this Court to vacate, modify, declare void, or otherwise disturb any state-court order.

118. Plaintiff's claims challenge Defendants' own pre-adjudicative conduct in fabricating, omitting, distorting, and transmitting materially false factual assertions during a non-adversarial Family Relations process. *See* Exs. N, P, Q.

119. Plaintiff alleges that the injuries flowed from Defendants' pre-adjudicative conduct in creating and transmitting the allegedly misleading record, and that the state court's later order was entered on that record. *See* Exs. N, P, Q.

120. Adjudicating these claims will not require this Court to reverse or invalidate any state-court judgment.

121. Because Plaintiff complains of injuries caused by Defendants' independent conduct, not by the state-court judgment itself, this action falls outside the narrow scope of the Rooker-Feldman doctrine.

### **VIII. DISABILITY ACCOMMODATION AND MEANINGFUL ACCESS**

122. Plaintiff is a qualified individual with a disability within the meaning of Title II of the ADA and Section 504 of the Rehabilitation Act.

123. Plaintiff suffers from a disabling autoimmune condition that substantially limits major life activities, including managing stress, maintaining stable housing, and accessing consistent medical care. *See* Ex. Q at 2:23-26; 9:6-7; 17:16-19; *see also* R.

124. Plaintiff informed Defendant Egan, and later the court, that his condition required proximity to his physicians, the ability to rest periodically, and additional time to obtain counsel and prepare for hearings. *See* Ex. Q at 2:23-26; 9:6-7; 17:16-19; *see also* R.

125. Plaintiff requested specific accommodations, including a continuance, scheduling flexibility, and medically necessary breaks, to permit him to participate in the proceedings.

126. On March 11, 2024, the court granted Plaintiff a continuance to obtain counsel. *See Ex. Q* at 5:2-3.

127. Defendants Egan and Killiany had actual knowledge of Plaintiff's disability and his need for accommodation, including through Plaintiff's direct communications, written submissions, and statements made in connection with the proceedings. *See Ex. Q* at 2:23-26; 9:6-7; 17:16-19; *see also R*.

128. Defendants Egan and Killiany had the ability in their roles to support, recommend, or refrain from opposing reasonable accommodations in a process designed to inform judicial decision-making. Defendant Egan affirmatively opposed Plaintiff's requests, and Defendant Killiany failed to correct or mitigate that position despite knowledge of Plaintiff's condition and the consequences of proceeding without accommodation.

129. Upon information and belief, Defendants Lugo-Gines and O'Connor were responsible for ADA intake, routing, coordination, or oversight functions within the Judicial Branch, and received or should have received notice of Plaintiff's requested accommodations through court filings, communications, or internal reporting mechanisms.

130. Despite that notice and authority, Defendants Lugo-Gines and O'Connor failed to take reasonable corrective action, including implementing accommodations, modifying procedures, escalating Plaintiff's requests, or otherwise ensuring that Plaintiff could participate on equal terms.

131. As a result of Defendants' failure to provide reasonable accommodations, Plaintiff was unable to meaningfully participate in the March 2024 restraining-order proceedings.

132. The requested accommodations were reasonable and would not have imposed an undue burden or fundamentally altered the nature of the proceedings.

133. As a direct and proximate result of Defendants' conduct, Plaintiff was unable to meaningfully present evidence, obtain counsel, or defend against allegations on equal terms, and suffered deprivation of housing, disruption of medical care, and other damages. *See* Ex. Q at 2:23-26; 9:6-7; 17:16-19; *see also* R.

## **IX. CLAIMS FOR RELIEF**

### **Count One: Disability Discrimination**

(Title II of the ADA, 42 U.S.C. § 12132; Section 504 of the Rehabilitation Act, 29 U.S.C. § 794  
Against the Connecticut Judicial Branch)

134. Plaintiff incorporates by reference paragraphs 1 through 133 as if fully set forth herein.

135. Plaintiff is a qualified individual with a disability within the meaning of Title II of the ADA and Section 504 of the Rehabilitation Act.

136. Defendant Connecticut Judicial Branch is a public entity and, upon information and belief, a recipient of federal financial assistance.

137. Plaintiff required reasonable accommodations to obtain meaningful access to the restraining-order proceedings, including additional time to obtain counsel, scheduling flexibility, and medically necessary breaks and procedural accommodations.

138. Defendants knew, or should have known, of Plaintiff's disability and his need for accommodation through Plaintiff's communications and statements on the record.

139. Despite that knowledge, Defendants failed to provide reasonable accommodations, failed to modify procedures as needed, and failed to ensure that Plaintiff could participate on equal terms.

140. As a result of that failure, Plaintiff was denied meaningful access to the proceedings by reason of his disability.

141. Plaintiff suffered compensable damages, including loss of housing, disruption of medical care, and other consequential harms, as a direct and proximate result of Defendants' conduct.

**Count Two: Fabrication of Evidence and Denial of Due Process**  
(42 U.S.C. § 1983 — Against Egan and Killiany in their Individual Capacities)

142. Plaintiff incorporates by reference paragraphs 1 through 141 as if fully set forth herein.

143. Defendants Egan and Killiany participated in the gathering, selection, approval, and transmission of a materially false or misleading factual narrative in connection with the restraining-order proceeding.

144. That narrative omitted known exculpatory facts and was likely to influence the judicial decisionmaker.

145. Defendant Egan prepared and transmitted the factual narrative, including mischaracterizations of Plaintiff's conduct and omissions of contemporaneous records reflecting de-escalation and protective conduct.

146. Defendant Killiany reviewed, approved, and authorized that narrative despite actual knowledge of material inaccuracies and omissions.

147. Defendants knew that the narrative would be presented to and relied upon by a judicial officer in a setting lacking meaningful adversarial testing and that it was likely to result in coercive legal process.

148. At the time of Defendants' conduct, it was clearly established that government officials violate due process when they knowingly or recklessly fabricate or omit material facts likely to influence a judicial decision.

149. Defendants' conduct was intentional or, at a minimum, reckless.

150. The issuance and maintenance of the restraining order, and the resulting deprivation of liberty, housing, and access to the courts, were the foreseeable consequences of Defendants' conduct, including foreseeable interference with Plaintiff's ability to prosecute related civil actions.

151. Defendants' conduct violated Plaintiff's rights under the Due Process Clause of the Fourteenth Amendment.

152. Plaintiff suffered deprivation of liberty, loss of housing, reputational harm, and interference with access to judicial proceedings as a direct and proximate result of Defendants' conduct.

**Count Three: First Amendment Retaliation**

(42 U.S.C. § 1983 — Against Egan and Killiany in their Individual Capacities)

153. Plaintiff incorporates by reference paragraphs 1 through 152 as if fully set forth herein.

154. Plaintiff engaged in protected First Amendment activity by reporting suspected child sexual abuse, communicating with court personnel concerning safety concerns, attending court proceedings, seeking preservation of evidence, and pursuing related litigation.



155. Defendants were aware of Plaintiff's protected activity through his direct communications, deposition notice, and litigation filings.

156. After acquiring that knowledge, Defendants prepared and transmitted a factual narrative that characterized Plaintiff's conduct as threatening while omitting information favorable to him.

157. Defendants' knowledge of Plaintiff's protected activity, combined with their subsequent preparation and transmission of a narrative that recharacterized that activity as threatening conduct and omitted exculpatory facts, supports a plausible inference of retaliatory motive.

158. Defendants' conduct was a but-for cause of the adverse action, including issuance of the restraining order and resulting loss of housing and interference with Plaintiff's litigation.

159. Plaintiff suffered injury as a direct and proximate result of Defendants' retaliatory conduct.

**Count Four: Denial of Access to Courts**

(42 U.S.C. § 1983 — Against Egan and Killiany in their Individual Capacities)

160. Plaintiff incorporates by reference paragraphs 1 through 159 as if fully set forth herein.

161. Plaintiff had pending, nonfrivolous civil litigation, including claims against the Affiant and related parties, in which witness testimony concerning the factual basis of the restraining-order allegations and the Affiant's credibility was material.

162. The underlying litigation included claims concerning the Affiant's prior conduct, credibility, and factual assertions relating to the restraining-order allegations.

163. Plaintiff sought to obtain sworn testimony from Affiant, including testimony concerning the factual basis of the restraining-order allegations and her prior statements and conduct, before restrictions were imposed.

164. As a result of Defendants' conduct and the resulting restraining order, Plaintiff was unable to obtain sworn testimony from Affiant concerning the factual basis of her allegations, including the source of statements attributed to Plaintiff, her lack of firsthand knowledge, and the role of third parties in shaping those allegations.

165. That testimony was material to Plaintiff's pending civil claims because it bore directly on credibility, fabrication, and the factual foundation of the allegations asserted against him.

166. The testimony could not be fully recreated because it concerned contemporaneous statements, conditions, and motivations existing prior to the issuance of the restraining order and before positions became fixed through litigation.

167. Defendants' conduct violated Plaintiff's right of access to the courts under the First Amendment and the Fourteenth Amendment.

168. Plaintiff suffered litigation-related injury and damages as a direct and proximate result.

**Count Five: Connecticut Constitution (Art. I, §§ 4, 14)**  
(Against Egan and Killiany in their Individual Capacities)

169. Plaintiff incorporates by reference paragraphs 1 through 168 as if fully set forth herein.

170. Article I, §§ 4 and 14 of the Connecticut Constitution protect, among other things, the rights of free speech, petition, due process, and access to the courts.

171. Defendants retaliated against Plaintiff for engaging in protected speech, petitioning, reporting, and litigation activity by preparing, approving, and transmitting a knowingly false factual narrative to procure adverse judicial action.

172. Defendant Egan directly caused the alleged deprivation by preparing and transmitting the narrative.

173. Defendant Killiany caused or contributed to the alleged deprivation by knowingly approving and authorizing its use.

174. Defendants' conduct was willful, egregious, and an abuse of governmental authority.

175. Defendants' conduct was arbitrary, conscience-shocking, and an abuse of governmental power.

176. No adequate alternative remedy fully redresses the state constitutional violations alleged here.

177. Plaintiff suffered loss of housing, interference with access to the courts, reputational injury, and medical harm as a direct and proximate result of Defendants' conduct.

## **X. INJURIES AND RELIEF REQUESTED**

### **A. Injuries**

178. As a direct and proximate result of Defendants' conduct, Plaintiff suffered economic losses, including relocation and homelessness expenses, loss of income, and business interruption resulting from the loss of a stable residence required for Plaintiff's self-employment.

179. Plaintiff also suffered medical harm, including disruption of treatment, delayed care, and exacerbation of underlying medical conditions.

180. Plaintiff further suffered emotional distress, including severe anxiety, humiliation, isolation, and reputational injury.

181. Plaintiff also suffered legal harm, including the inability to timely obtain sworn testimony and impaired discovery in pending litigation.

182. Plaintiff also suffered constitutional deprivations, including violations of his rights to speech, petition, due process, meaningful access to the courts, and, to the extent properly alleged and supported, association and other related rights.

**B. Relief Requested**

183. Plaintiff respectfully requests that this Court enter judgment in his favor and grant the following relief:

- a. Compensatory damages against Defendants Egan and Killiany, in their individual capacities, under 42 U.S.C. § 1983 and applicable state law, and against the Connecticut Judicial Branch under Title II of the ADA and Section 504 of the Rehabilitation Act, in an amount to be determined at trial;
- b. Punitive damages against Defendants Egan and Killiany, in their individual capacities, in an amount to be determined at trial;
- c. Nominal damages on Plaintiff's constitutional claims where appropriate;
- d. A declaration that Defendants' conduct violated Plaintiff's clearly established constitutional and statutory rights, including that the use and maintenance of stigmatizing designations in official Family Relations records, absent adjudicated findings and without a meaningful opportunity to be heard, violates the Fourteenth Amendment and the First Amendment;

- e. Preliminary injunctive relief, pending final judgment, against appropriate state officials in their official capacities, including Sandra Lugo-Gines and Katie O'Connor, requiring:
  - i. Sequestration, restricted use, or clear labeling of inaccurate or unverified Family Relations records pending a name-clearing process;
  - ii. Cessation of reliance on stigmatizing or unverified characterizations in ongoing or future proceedings; and
  - iii. Compliance reporting every ninety (90) days describing steps taken to implement such measures;
- f. Permanent injunctive relief, following final judgment, requiring:
  - i. Implementation of policies, training, and supervisory controls to ensure accurate, complete, and non-stigmatizing Family Relations records;
  - ii. Provision of a prompt and constitutionally adequate name-clearing hearing;
  - iii. Removal, correction, or appropriate annotation of stigmatizing designations not supported by adjudicated findings; and
  - iv. Implementation of procedures ensuring meaningful, disability-accommodated access to judicial proceedings and related records;
  - v. Injunctive relief addressing the ongoing maintenance and use of Family Relations records and practices that continue to affect Plaintiff's legal rights and access to proceedings;

- g. An order requiring preservation of all relevant evidence, including Family Relations files, communications, and electronically stored information, with metadata preserved and routine deletion suspended, and directing the parties to confer and submit a joint ESI protocol within fourteen (14) days;
- h. Reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988, the ADA, and the Rehabilitation Act;
- i. Pre- and post-judgment interest as permitted by law; and
- j. Such other and further relief as the Court deems just and proper.

184. Plaintiff does not seek punitive or emotional-distress damages under Title II of the ADA or Section 504 of the Rehabilitation Act, and seeks such damages only under § 1983 and applicable state law.

## **XI. RESERVATION OF RIGHTS**

185. Plaintiff reserves the right to amend this Complaint to conform to the evidence and to add additional claims or parties as justice requires.

## **XII. JURY DEMAND**

186. Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,  
JON GOODWIN, PLAINTIFF

By: /s/ Jon Goodwin  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

|                     |   |                         |
|---------------------|---|-------------------------|
| JON GOODWIN,        | : |                         |
| <i>Plaintiff,</i>   | : |                         |
|                     | : |                         |
| v.                  | : | No. 3:25-cv-01711 (VAB) |
|                     | : |                         |
| MICHAEL EGAN, ET AL | : | April 5, 2026           |

**RULE 11 CERTIFICATION**

Pursuant to Rule 11 of the Federal Rules of Civil Procedure, I certify that I have read this Complaint; that to the best of my knowledge, information, and belief it is well-grounded in fact and warranted by existing law or by a good-faith argument for the extension, modification, or reversal of existing law; and that it is not interposed for any improper purpose.

Signed this 5th day of April 2026.

Respectfully submitted,

THE PLAINTIFF

JON GOODWIN

By: /s/ Jon Goodwin  
Plaintiff in Pro Se  
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Pinedale WY 82941  
Tel.: +1(212) 372-4803  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2026, a copy of the foregoing was electronically filed. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. Additionally, a copy of the foregoing will be e-mailed to Thadius Bochain at [Thadius.Bochain@ct.gov](mailto:Thadius.Bochain@ct.gov).

By: /s/ Jon Goodwin  
Jon Goodwin  
Plaintiff in Pro Se  
[jag@jongoodwin.com](mailto:jag@jongoodwin.com)  
<https://jongoodwin.com>



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

|                      |   |                                      |
|----------------------|---|--------------------------------------|
| JON GOODWIN,         | : |                                      |
| <i>Plaintiff</i>     | : |                                      |
|                      | : |                                      |
| v.                   | : | Civil Action No. 3:25-cv-01711 (VAB) |
|                      | : |                                      |
| MICHAEL EGAN, ET AL. | : |                                      |
| <i>Defendants</i>    | : |                                      |

**PLAINTIFF’S EXHIBIT PACKET IN SUPPORT OF THE  
AMENDED COMPLAINT**

Plaintiff respectfully submits the following exhibits in support of the Complaint.

The following exhibits are organized to reflect: (i) Plaintiff’s documented status as a protected party; (ii) contemporaneous notice to Defendants of instability and lack of danger; (iii) communications demonstrating the absence of fear; (iv) protected litigation activity preceding the restraining order; and (v) subsequent testimony confirming the absence of firsthand evidence and reliance on attorney-generated assertions.

| <b>Exhibit</b> | <b>Description</b>                                                                                                                              | <b>Date</b>   | <b>Referenced in Complaint</b> |
|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------|--------------------------------|
| <b>A</b>       | Mental Health First Aid Certificate issued to Plaintiff (Plaintiff trained to respond to crisis situations; non-aggressor context)              | Feb. 1, 2020  | ¶26                            |
| <b>B-1</b>     | New Milford Police Report – Suicide Attempt / Plaintiff Intervention (Corroborates crisis behavior and Plaintiff’s protective response)         | Apr. 14, 2021 | ¶¶ 27, 28, 65(a), 73(c), 95    |
| <b>B-2</b>     | New Milford Connecticut Police Department Report Supplemental Police Report – Same Incident (Confirms severity and repetition of crisis events) | Apr. 14, 2021 | ¶¶ 27, 28, 65(a), 73(c), 95    |
| <b>C</b>       | Connecticut State Police Emergency Intervention Report (Independent                                                                             | July 31, 2022 | ¶¶ 29, 65(a), 73(c), 95        |

| <b>Exhibit</b> | <b>Description</b>                                                                                                                                      | <b>Date</b>   | <b>Referenced in Complaint</b>   |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------------------------|
|                | corroboration of instability and emergency intervention)                                                                                                |               |                                  |
| <b>D-1</b>     | Uniform Arrest Report (Affiant)                                                                                                                         | Oct. 12, 2022 | ¶¶ 30, 31, 49, 55, 56, 73(d), 95 |
| <b>D-2</b>     | Arrest Appearance Bond (Affiant) (Initiation of criminal proceedings)                                                                                   | Oct. 12, 2022 | ¶¶ 31, 49, 55, 56, 73(d)         |
| <b>D-3</b>     | Conditions of Release (Affiant) (Family Violence Case)                                                                                                  | Oct. 12, 2022 | ¶¶ 49, 55, 56, 73(d)             |
| <b>D-4</b>     | Charging Document (Affiant)                                                                                                                             | Oct. 13, 2022 | ¶¶ 49, 55, 56, 73(d)             |
| <b>D-5</b>     | Criminal Protective Order Naming Plaintiff as Protected Person (Plaintiff formally designated as protected party)                                       | Oct. 13, 2022 | ¶¶ 32, 49, 55, 56, 73(b), 95     |
| <b>E</b>       | Family Relations Interview Notice (Killiany) (Establishes Defendants' prior involvement and knowledge)                                                  | Nov. 8, 2022  | ¶¶ 21, 33, 36, 56                |
| <b>F</b>       | Plaintiff Email to Killiany re: instability and safety concerns regarding Affiant (Direct notice to Defendants of crisis and risk)                      | Nov. 14, 2022 | ¶¶ 57, 99                        |
| <b>G-1</b>     | Email from Plaintiff (1:30 PM) to Defendant Killiany regarding Affiant escalating conditions and request for guidance                                   | Nov. 15, 2022 | ¶¶ 37, 38, 39, 55, 57, 99        |
| <b>G-2</b>     | Email from Plaintiff (2:07 PM) to Defendant Killiany regarding Affiant continued escalation and related concerns.                                       | Nov. 15, 2022 | ¶¶ 37, 38, 39, 55, 57, 99        |
| <b>G-3</b>     | Jon Goodwin Email (2:23 PM) to Defendant Killiany regarding Affiant confirming crisis and displacement risk (Immediate risk and housing impact warning) | Nov. 15, 2022 | ¶¶ 55, 57, 99                    |
| <b>H</b>       | Family Services Compliance Letter ( <i>State v. Affiant</i> )                                                                                           | Dec. 2, 2022  | ¶¶ 40, 41, 65(c), 73(f)          |
| <b>I</b>       | Email chain between Plaintiff and Lisa Killiany (December 2022 communications)                                                                          | Dec. 13, 2022 | ¶¶ 39, 49, 55, 63, 95, 99        |
| <b>J</b>       | Family Services Compliance Letter ( <i>State v. Affiant</i> , follow-up correspondence)                                                                 | Dec. 14, 2022 | ¶¶ 40, 41, 65(c), 73(f)          |

| <b>Exhibit</b> | <b>Description</b>                                                                                                                                                     | <b>Date</b>                    | <b>Referenced in Complaint</b>                              |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-------------------------------------------------------------|
| <b>K</b>       | Email thread between Plaintiff and Affiant regarding access to residence                                                                                               | Dec. 13, 2022<br>Dec. 20, 2022 | ¶¶ 63, 65(d), 95                                            |
| <b>L</b>       | Office of Victim Services Notice referencing criminal protective order (Independent confirmation Plaintiff Jon Goodwin was protected party)                            | Feb. 2, 2023                   | ¶¶ 32, 73(b), 95                                            |
| <b>M</b>       | Email from Affiant (7:28 AM) planning visit without fear (Affirmative evidence of no fear)                                                                             | Nov. 23, 2023<br>7:28 AM       | ¶43                                                         |
| <b>N</b>       | Email from Affiant (4:31 PM) describing Plaintiff as “like family” (Affirmative trust; contradicts threat narrative)                                                   | Nov. 23, 2023<br>4:31 PM       | ¶¶ 45, 118, 119                                             |
| <b>O</b>       | Notice of Deposition of Affiant (Protected litigation activity; temporal trigger for retaliation) Dated January 25, 2024 (document contains clerical year error)       | Jan. 25, 2024                  | ¶¶ 46(e), 73(g)                                             |
| <b>P</b>       | Family Services Report (JD-FM-258) Prepared for Restraining Order Hearing                                                                                              | Mar. 11, 2024                  | ¶¶ 23, 24, 69–71, 80, 91, 93, 94, 118, 119                  |
| <b>Q</b>       | Transcript Excerpts of March 11, 2024, Restraining Order Hearing (continued to March 25, 2024) (Contradicts fear; permits co-presence; demonstrates judicial reliance) | Mar. 11, 2024                  | ¶¶ 46(e), 75–77, 79, 82, 85, 91, 101, 123–124, 126–127, 133 |
| <b>R</b>       | Email to Attorney Participant Regarding Factual Assertions and Objections (cc: Defendants) (Final notice of falsity and retaliation before proceedings)                | Mar. 19, 2024                  | ¶¶ 83–90, 99–101, 127, 133                                  |
| <b>S</b>       | Transcript Excerpts from March 25, 2024, Hearing (Issuance proceedings; context if referenced)                                                                         | Mar. 25, 2024                  | ¶¶ 92–94, 103–104                                           |
| <b>T</b>       | Deposition Transcript Excerpts Affiant                                                                                                                                 | Nov. 16, 2025                  | ¶¶ 23, 30, 48, 60, 62, 96, 97                               |

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT A

**Title:** Mental Health First Aid Certificate Issued to Jon Goodwin

**Author(s):** National Council for Behavioral Health

**Date(s):** February 1, 2020

**Complaint Reference(s):** ¶26

# Youth Mental Health First Aid USA



YOUTH  
MENTAL  
HEALTH  
FIRST AID®

**Jon Goodwin**

Has completed the 8-hour course and is now certified in

## Youth Mental Health First Aid USA

And has been trained to provide initial help to young people experiencing problems such as depression, anxiety disorders, psychosis, and substance use disorders.

This certificate became effective on: 2/1/2020

Date

This certificate expires on: 2/1/2023

Date

Patricia Graham

Instructor

Paula Rego

Instructor

**NATIONAL COUNCIL**  
FOR BEHAVIORAL HEALTH  
STATE ASSOCIATIONS OF ADDICTION SERVICES  
*Stronger Together.*

National Council for Behavioral Health operates Mental Health First Aid in the USA. The National Council for Behavioral Health, the Maryland Department of Health and Mental Hygiene, and the Missouri Department of Mental Health founded Mental Health First Aid USA.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT B-1

**Title:** New Milford Police Department Initial Report  
Confirming Suicide Attempt by Affiant and  
Plaintiff's Intervention to Protect Her

**Author(s):** Officer Mark Bove

**Date(s):** April 14, 2021

**Complaint  
Reference(s):** ¶¶ 27, 28, 65(a), 73(c), 95

New Milford Police Department

NARRATIVE FOR OFFICER MARK BOVE

Ref: 21-6738-OF

**NEW MILFORD POLICE DEPARTMENT  
INITIAL REPORT**

Date Incident Reported: 04/14/2021

Time Incident Reported: 1712

Reporting Officer: Officer M. Bove

Date of Report: 04/14/2021

On 4/12/21 at approximately 1712 hours, Officer Stephen and I were dispatched to 95 Indian Trail for suicidal person.

Upon arrival I attempted to speak with a female party identified as [REDACTED] (DOB [REDACTED]) but she refused to talk to me or answer any questions. I instead spoke with the caller, Jon Goodwin (DOB [REDACTED]). Goodwin explained that his girlfriend [REDACTED] is having issues with her ex husband, and her 3 children. Goodwin explained that [REDACTED] is seeing a therapist because of these issues.

Goodwin said him and [REDACTED] had gotten into loud conversation about the issues that she was having. During the conversation [REDACTED] went into his office and started to rummage through the desk drawers. Goodwin said he often keeps a firearm in the desk and [REDACTED] is aware of this. While rummaging through the desk, [REDACTED] said she "just wanted to be dead". Goodwin said that he was carrying his firearm on him at the time.

After [REDACTED] made the above statement, Goodwin took the gun that was on him and another firearm located in the house and locked them in a safe. Goodwin then called 211 and was advised to call the police. Goodwin said that [REDACTED] has made comments before about wanting to be dead but had never seen her attempt to find a firearm or pursue other means of attempting to harm herself.

[REDACTED] was advised that she would need to go to the Hospital and speak with a doctor. Upon entering the ambulance, Officer Stephen heard her tell an EMT that she does not care about her own health and that she only cares about the health of her children. [REDACTED] was transported to New Milford Hospital without incident.

Due to the above facts and circumstances a 17a-503, Police Request for an Emergency Evaluation form was filled out and submitted. The form has been submitted with case jacket.

—End of Report—

COPY

NO SECONDARY DISSEMINATION

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT B-2

**Title:** New Milford Police Department; Police Report  
Confirming Suicide Attempt by Affiant and  
Plaintiff's Intervention to Protect Her

**Author(s):** Officer Mark Bove

**Date(s):** April 14, 2021

**Complaint  
Reference(s):** ¶¶ 27, 28, 65(a), 73(c), 95



## New Milford Police Department

Page: 3

Selective Search From: 01/01/2018 Thru: 05/12/2021 0000 - 2359 Printed: 06/03/2021

Narrative: 03/25/2020 1736 BAISLEY, JONATHAN  
Parties arrived on scene attempting to return previously  
stolen items.

Refer To Incident: 20-5137-OF

For Date: 04/14/2021 - Wednesday

21-6738 1712 911 - [REDACTED] Transported to Hospital

Primary Id: 496 - BOVE, MARK  
Location/Address: 95 INDIAN TRL  
Party Entered By: 04/14/2021 1715 725 - BAISLEY, JONATHAN  
Calling Party: GOODWIN, JON ALAN [REDACTED]

Party Entered By: 04/14/2021 1717 725 - BAISLEY, JONATHAN  
Involved Party: [REDACTED] @ 95 INDIAN TRL - NEW MILFORD, CT 06776 [REDACTED]

ID: 496 - BOVE, MARK  
Disp-17:16:35 Arvd-17:35:28 Cld-18:14:04  
ID: 481 - STEPHEN, CHAD  
Disp-17:16:37 Arvd-17:35:29 Cld-18:14:02

EMS Unit: UNIT1-UNIT 1 NM VOL AMBULANCE  
Disp-17:20:36 Eart-17:21:07 Arvd-17:55:19 Cld-18:13:04  
Hosp-18:28:07 CldHosp-18:38:03 InQrtsUnavl-18:38:03 InSrvce-18:38:03

Cleared By: 728 - WARNER, SCOTT  
EMS Unit: NMARESP-NM AMB 1ST RESPONDER  
Disp-17:20:36 Cld-18:12:09  
InQrtsUnavl-18:12:09 InSrvce-18:12:09

Cleared By: 728 - WARNER, SCOTT  
Narrative: 04/14/2021 1715 BAISLEY, JONATHAN  
Caller reports female attempted to take his handgun to  
commit suicide, female did not gain possession of the  
weapon, caller is securing firearms in locked box. Female  
currently unarmed and non-violent

Narrative: 04/14/2021 1741 BAISLEY, JONATHAN  
Unit 1 staging

Narrative: 04/14/2021 1812 WARNER, SCOTT  
BLS to 096.

Refer To Incident: 21-6738-OF

COPY - NO SECONDARY DISSEMINATION

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT C

**Title:** State of Connecticut, Department of Public Safety-  
Investigation Report (DPS-683-E)

**Author(s):** Wedge, Joshua D.; Badge No. 0896

**Date(s):** July 31, 2022

**Complaint  
Reference(s):** ¶¶ 29, 65(a), 73(c), 95



Report Type: Report #: 2200327017 - 00288615

Initial Report: ☒ Prosecutors Report: ☐ Supplement: ☐ Re-open: ☐ Assist: ☐ Closing: ☒

Attachments:

Statements: ☐ Teletype: ☐ Photos: ☐ Sketchmap: ☐ Evidence: ☐ Other: ☒

|                                                         |                             |                  |                                                 |      |                                     |                  |
|---------------------------------------------------------|-----------------------------|------------------|-------------------------------------------------|------|-------------------------------------|------------------|
| CFS NO<br>2200327017                                    | INCIDENT DATE<br>07/31/2022 | TIME<br>00:59    | INCIDENT DATE<br>07/31/2022                     | TIME | PRIMARY OFFICER<br>WEDGE, JOSHUA D. | BADGE NO<br>0896 |
| INVESTIGATING OFFICER<br>WEDGE, JOSHUA D.               |                             | BADGE NO<br>0896 | TYPE OF EXCEPTIONAL CLEARANCE<br>Not Applicable |      | CASE STATUS<br>Closed/Cleared       |                  |
| INCIDENT ADDRESS<br>00012 Church Ter North Canaan 06018 |                             |                  |                                                 |      | APARTMENT NO                        | TOWN CD<br>T100  |

|                     |                  |          |           |               |
|---------------------|------------------|----------|-----------|---------------|
| OFFENSE             | LOCAL X-REF CODE | IBR CODE | ATT/COMP  | OFFENSE DESC  |
| EMERGENCY COMMITTAL | 99-7             | INF      | Completed | Other/unknown |

|                                                                                                               |                   |     |      |            |           |                |
|---------------------------------------------------------------------------------------------------------------|-------------------|-----|------|------------|-----------|----------------|
| STATUS CODE C=COMPLAINANT V=VICTIM A=ARRESTEE J=JUVENILE H=OTHER M=MISSING W=WITNESS O=OFFENDER/ACCUSED T=TOT |                   |     |      |            |           |                |
| STATUS                                                                                                        | NAME              | SEX | RACE | D.O.B.     | TELEPHONE | OP STATE & NO. |
| ADDRESS                                                                                                       |                   |     |      |            |           |                |
| H                                                                                                             | [REDACTED]e       | F   |      | [REDACTED] |           | CT 037701599   |
| 95 Indian Trl New Milford CT 06776                                                                            |                   |     |      |            |           |                |
| C                                                                                                             | Goodwin, Jon Alan | M   |      | [REDACTED] |           | CT 069745699   |
| 95 Indian TI New Milford CT 06776                                                                             |                   |     |      |            |           |                |

**Date and Time of Incident:**

July 31st, 2022 at approximately 0059 Hours

**Type of Incident:**

Active Disturbance / Emergency Committal

**Location of Incident:**

12 Church TER, North Canaan CT

**Involved Parties:**

[REDACTED]  
[REDACTED]

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                             |                            |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|----------------------------|--|
| THE UNDERSIGNED, AN INVESTIGATOR HAVING BEEN DULY SWORN DEPOSES AND SAYS THAT: I AM THE WRITER OF THE ATTACHED POLICE REPORT PERTAINING TO THIS INCIDENT NUMBER. THAT THE INFORMATION CONTAINED THEREIN WAS SECURED AS A RESULT OF (1)MY PERSONAL OBSERVATION AND KNOWLEDGE: OR (2)INFORMATION RELAYED TO ME BY OTHER MEMBERS OF MY POLICE DEPARTMENT OR OF ANOTHER POLICE DEPARTMENT:OR (3)INFORMATION SECURED BY MYSELF OR ANOTHER MEMBER OF A POLICE DEPARTMENT FROM THE PERSON OR PERSONS NAMED OR IDENTIFIED THEREIN, AS INDICATED IN THE ATTACHED REPORT. THAT THE REPORT IS AN ACCURATE STATEMENT OF THE INFORMATION SO RECEIVED BY ME. |                             |                            |  |
| INVESTIGATOR SIGNATURE:<br><b>/TPR TRN JOSHUA D WEDGE/</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | INVESTIGATOR I.D.#:<br>0896 | REPORT DATE:<br>08/03/2022 |  |
| SUPERVISOR SIGNATURE:<br><b>/SGT ERIC R VERNON/</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | SUPERVISOR I.D.#:<br>0260   |                            |  |



**CSP Personnel on Scene:**

TPR Failla #499

TPR Wedge #896

**Action Taken:**

On July 31st, 2022 at approximately 0059 Hours, Troop B received a 911 call from a male party stating that his girlfriend [REDACTED] is off her psych medications, will not let him sleep, and is standing in front of his vehicle to prevent him from leaving the property.

At approximately 0106 hours, TPR Failla and I, TPR Wedge arrived at 12 Church TER. I first observed a female with no pants, socks or shoes on standing in front of a grey Toyota SUV in the garage. TPR Failla and I introduced ourselves and separated the two parties to speak with them individually.

[REDACTED] explained to me verbally that she was going through tough times as she had lost custody of her kids and is not allowed to have any contact with them. She further explained all she wanted was to talk to Jon about what was going on. [REDACTED] stated there was no physical contact, nor was there even an argument between her and Jon. Rather it was Jon lacking empathy and avoiding her that caused her to stand in front of his vehicle and prevent him from leaving.

Jon explained to me that [REDACTED] has suffered from mental health issues for the past couple years. In February, [REDACTED] made suicidal comments and attempted to gain access to Jon's gun, forcing him to call the police in New Milford and have [REDACTED] admitted to the hospital. Since then, [REDACTED] was prescribed anti-depression medication but had not been taking them because she didn't like how it made her feel. [REDACTED] has made suicidal comments multiple times over the last week and has told Jon she would kill herself if he left. Jon further explained that he had spent the past 12+ hours speaking with [REDACTED] and had even begun to lose his voice. After being completely exhausted, he attempted to go to sleep, but she refused to let him, which is when he gathered up his belongings, got in his car and attempted to leave. When [REDACTED] stood in front of his vehicle so he could not pull out of the driveway, he called 911. Jon stated he wants [REDACTED] to get the help she needs. At this time, North Canaan EMS was dispatched on a cold response for an EC.

TPR Failla and I then spoke with [REDACTED] again and informed her that we wanted her to get evaluated by EMS. [REDACTED] became very emotional at this time, yelling at us while crying hysterically. [REDACTED]

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                             |                            |  |
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| THE UNDERSIGNED, AN INVESTIGATOR HAVING BEEN DULY SWORN DEPOSES AND SAYS THAT: I AM THE WRITER OF THE ATTACHED POLICE REPORT PERTAINING TO THIS INCIDENT NUMBER. THAT THE INFORMATION CONTAINED THEREIN WAS SECURED AS A RESULT OF (1)MY PERSONAL OBSERVATION AND KNOWLEDGE: OR (2)INFORMATION RELAYED TO ME BY OTHER MEMBERS OF MY POLICE DEPARTMENT OR OF ANOTHER POLICE DEPARTMENT:OR (3)INFORMATION SECURED BY MYSELF OR ANOTHER MEMBER OF A POLICE DEPARTMENT FROM THE PERSON OR PERSONS NAMED OR IDENTIFIED THEREIN, AS INDICATED IN THE ATTACHED REPORT. THAT THE REPORT IS AN ACCURATE STATEMENT OF THE INFORMATION SO RECEIVED BY ME. |                             |                            |  |
| INVESTIGATOR SIGNATURE:<br><b>/TPR TRN JOSHUA D WEDGE/</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | INVESTIGATOR I.D.#:<br>0896 | REPORT DATE:<br>08/03/2022 |  |
| SUPERVISOR SIGNATURE:<br><b>/SGT ERIC R VERNON/</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | SUPERVISOR I.D.#:<br>0260   |                            |  |



stated we were not there to help her and we were only there to prevent her from ever getting custody of her kids. While [REDACTED] continued to speak with TPR Failla I returned to my cruiser to begin a Police Emergency Examination Request Form (MHCC-1). At this time [REDACTED] attempted to run from the garage into the house, which required TPR Failla to get in front of her to prevent her from gaining access to the residence. [REDACTED] then ran back into the garage and jumped into Jon's vehicles front seat. TPR Failla prevented her from closing the door. At this time, EMS arrived on scene and aided TPR Failla, Jon and I in convincing [REDACTED] to come out of the vehicle and go with EMS willingly. After nearly 10 minutes and several warnings, TPR Failla and I had to physically assist [REDACTED] out of the vehicle and onto the stretcher. At this time [REDACTED] began to calm down and accept that she was going to the hospital.

**Police Emergency Examination Request:**

Based on the above facts and circumstances, there was reasonable cause to believe [REDACTED] was a potential danger to herself and in need of immediate care and treatment. [REDACTED] was transported to Charlotte Hungerford Hospital per C.G.S section 17a-503 by North Canaan Ambulance. I prepared a Police Emergency Examination Request Form (MHCC-1) and provided a copy for both the EMS personnel and the Hospital staff. [REDACTED] was then transported to Charlotte Hungerford Hospital without incident.

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| THE UNDERSIGNED, AN INVESTIGATOR HAVING BEEN DULY SWORN DEPOSES AND SAYS THAT: I AM THE WRITER OF THE ATTACHED POLICE REPORT PERTAINING TO THIS INCIDENT NUMBER. THAT THE INFORMATION CONTAINED THEREIN WAS SECURED AS A RESULT OF (1)MY PERSONAL OBSERVATION AND KNOWLEDGE: OR (2)INFORMATION RELAYED TO ME BY OTHER MEMBERS OF MY POLICE DEPARTMENT OR OF ANOTHER POLICE DEPARTMENT:OR (3)INFORMATION SECURED BY MYSELF OR ANOTHER MEMBER OF A POLICE DEPARTMENT FROM THE PERSON OR PERSONS NAMED OR IDENTIFIED THEREIN, AS INDICATED IN THE ATTACHED REPORT. THAT THE REPORT IS AN ACCURATE STATEMENT OF THE INFORMATION SO RECEIVED BY ME. |                             |                            |  |
| INVESTIGATOR SIGNATURE:<br><b>/TPR TRN JOSHUA D WEDGE/</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | INVESTIGATOR I.D.#:<br>0896 | REPORT DATE:<br>08/03/2022 |  |
| SUPERVISOR SIGNATURE:<br><b>/SGT ERIC R VERNO/</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | SUPERVISOR I.D.#:<br>0260   |                            |  |

DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION  
DIVISION OF STATE POLICE

## CASE ATTACHMENT TRACKING FORM

1. Complete and attach this form to all supporting documentation associated with a case report.
2. Submit the completed form and documents to the Troop/Unit clerk for processing.
3. Documents received without this tracking form will be returned to the submitting trooper.
4. A case number shall be written on all attached documents.

Case Number: 2200327017

Document Number: 2200327017 - 00290981

Select the document associated with your attachments and provide a description for each respective document.  
Create a new row for each attachment.

Associated Document Number: 2200327017 - 00288615

Description of Attachment: 1.) Police Emergency Examination Request

TFC/TPR: /TPR TRN JOSHUA D WEDGE/ Badge Number: 0898 Date: 08/03/2022  
SGT/SUP: /SGT ERIC R VERO/ Badge Number: 0260 Date: 08/04/2022



Redaction Log

Total Number of Redactions in Document: 1

Redaction Reasons by Page

| Page | Reason      | Description                                                                                                           | Occurrences |
|------|-------------|-----------------------------------------------------------------------------------------------------------------------|-------------|
| 5    | 1-210(b)(2) | Personnel or medical files and similar files the disclosure of which would constitute an invasion of personal privacy | 1           |



Redaction Log

Redaction Reasons by Exemption

| Reason      | Description                                                                                                           | Pages (Count) |
|-------------|-----------------------------------------------------------------------------------------------------------------------|---------------|
| 1-210(b)(2) | Personnel or medical files and similar files the disclosure of which would constitute an invasion of personal privacy | 5(1)          |

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT D-1

**Title:** Affiant, Uniform Arrest Report  
**Author(s):** Ribadeneyra, Jeremy A (Trooper)  
**Date(s):** October 12, 2022  
**Complaint Reference(s):** ¶¶ 30, 31, 49, 55, 56, 73(d), 95

UNIFORM ARREST REPORT  
JD-CR-21(1) Rev. 3-21

FOR COURT USE ONLY

Uniform Arrest Report number

☒ CR  
☐ MV

Companion Uniform Arrest Report number

☐ CR  
☐ MV

SP03L0000415

Name of accused (Last, First, Middle)

Docket number

L18W  
0222-0186355-5Address of accused (Number, Street, PO box, City, State, Zip code)  
NORTH CANAAN, CT 06018

E-mail address of accused

|                                                    |           |                                                                                                   |                                                   |                             |                                                                                       |                                                                                                      |                                      |
|----------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------|---------------------------------------------------|-----------------------------|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|--------------------------------------|
| Sex<br>F                                           | Race<br>W | Hispanic<br><input type="checkbox"/> Yes                                                          | US Veteran<br><input type="checkbox"/> Yes        | Date of birth<br>[REDACTED] | Social security number<br>[REDACTED]                                                  | Alien registration number<br>[REDACTED]                                                              | Court date<br><b>10132022</b>        |
| Birth country<br>US                                |           | Birth state<br>CT                                                                                 | Birth city<br>DANBURY                             |                             | Alias / Maiden name                                                                   |                                                                                                      | Court location<br>TORRINGTON G.A. 18 |
| Operator's license number / State<br>[REDACTED] CT |           | MV <input checked="" type="checkbox"/> Boat <input type="checkbox"/> CDL <input type="checkbox"/> | Vehicle registration number / State<br>[REDACTED] |                             | MV <input type="checkbox"/> Boat <input type="checkbox"/> CV <input type="checkbox"/> | US DOT number / State<br><input type="checkbox"/> US DOT (D)<br><input type="checkbox"/> CT Only (C) |                                      |

|                                              |                                                                |                               |                                                                                                                                                                                |                              |
|----------------------------------------------|----------------------------------------------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| Arrest date and time<br><b>10122022 0926</b> | <input type="checkbox"/> A.M.<br><input type="checkbox"/> P.M. | Arresting agency name<br>B600 | Arrest town<br>NORTH CANAAN                                                                                                                                                    | PD case number<br>2200436544 |
| Arresting officer<br>RIBADENEYRA, JEREMY A   |                                                                | Shield number<br>0542         | Incident involved (Select all that apply)<br><input checked="" type="checkbox"/> FV <input type="checkbox"/> ALC <input type="checkbox"/> NAR <input type="checkbox"/> HAZ MAT | PD arrestee number<br>642566 |

|                                                            |                                            |                                                                                                                        |                                                     |
|------------------------------------------------------------|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| <input type="checkbox"/> No bond set                       | <input type="checkbox"/> Promise to appear | <input type="checkbox"/> Non-surety bond set (Amount)                                                                  | <input checked="" type="checkbox"/> Bond NOT posted |
| <input checked="" type="checkbox"/> Bond set (Amount) 1500 |                                            | <input checked="" type="checkbox"/> Surety / Cash <input type="checkbox"/> Cash only <input type="checkbox"/> 10% Cash | <input type="checkbox"/> Bond posted                |

|                                     |             |               |               |             |             |                                |
|-------------------------------------|-------------|---------------|---------------|-------------|-------------|--------------------------------|
| Department / Troop ORt<br>CTCSP0300 | SPBt number | Height<br>501 | Weight<br>150 | Hair<br>BRO | Eyes<br>BRO | Multi-Page UAR<br>Page 1a of 1 |
|-------------------------------------|-------------|---------------|---------------|-------------|-------------|--------------------------------|

| Offense date(s) | Town of offense | C/A/X | Statute number | Description of charge     | Number of counts |
|-----------------|-----------------|-------|----------------|---------------------------|------------------|
| 10122022        | NORTH CANAAN    |       | 53a-182        | DISORDERLY CONDUCT        | 1                |
| 10122022        | NORTH CANAAN    |       | 53a-117        | CRIMINAL MISCHIEF 3RD DEG | 1                |

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT D-2

**Title:** Affiant, Criminal Arrest Appearance Bond  
**Author(s):** State of Connecticut Superior Court, Torrington  
**Date(s):** October 12, 2022  
**Complaint Reference(s):** ¶¶ 31, 49, 55, 56, 73(d)

**CRIMINAL APPEARANCE BOND**

JD-CR-6 Rev. 3-22  
 C.G.S. §§ 53a-172, 53a-173, 54-2a to 54-2j  
 Sections 54-2a, 54-2b, 54-2c, 54-2d, 54-2e, 54-2f, 54-2g, 54-2h, 54-2i, 54-2j  
 P.S. §§ 36-1 to 36-3, 36-4 to 36-6, 36-7, 4-2

For information on ADA accommodations,  
 contact a court clerk or go to: [www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA)

STATE OF CONNECTICUT  
**SUPERIOR COURT**



**TO: Any Proper Officer of the State of Connecticut**

|                                                           |                                                          |                                                  |                                                   |
|-----------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------|---------------------------------------------------|
| From (Name of defendant)<br><b>Allet, Tawdy Christine</b> | Address of defendant<br><b>12 [redacted] North Green</b> | Zip code<br><b>06256</b>                         | Telephone number (Defendant)<br><b>[redacted]</b> |
| Judicial District or Geographical Area<br><b>GA 1B</b>    | Address of court<br><b>50 Field St. Torrington CT</b>    | E-mail address of defendant<br><b>[redacted]</b> |                                                   |

Crime(s) charged against defendant  
**53a-182 Dis. Con. 53a-117 Crim. Off.**

**Criminal Appearance Bond / Promise to Appear**

|                                     |                                                                                            |
|-------------------------------------|--------------------------------------------------------------------------------------------|
| Amount of bond<br><b>\$ 1500.00</b> | Appearance date and time (Less than 14 days from arrest date)<br><b>10/13/22 0900 A.m.</b> |
|-------------------------------------|--------------------------------------------------------------------------------------------|

I, the Defendant named above, promise to appear before (come to):

1. The Superior Court at the address listed above on the Appearance date and the time listed above;
2. The court on any other date and time that the court schedules a hearing in my case; and
3. Any other court where my case may be transferred (sent to), and

I understand that I am being released from custody on a:

- ☐ Non-Surety Bond      ☐ Surety Bond      ☐ 10% Cash Bond  
☐ Cash Bond      ☐ Real Estate Bond      ☐

in the Amount of Bond listed above to ensure my appearance in court as promised above until final judgment is rendered (my case is over). I understand that if I do not appear in court as I promised, I will be liable for the full Amount of Bond listed above, and may be subject to the other penalties listed in the Notice to Defendant on the back of this form.

I also promise to follow all of the Conditions of Release listed below, which were ordered by the court, bail staff, or a police officer.

I have read, or have had read to me, the Notice to Defendant on the back of this form, and I understand everything in that notice.

**A. Special Conditions of Release** (Do not commit a federal, state, or local crime)

**B. Modified Conditions of Release**

|                                             |                                |                                                           |                                  |
|---------------------------------------------|--------------------------------|-----------------------------------------------------------|----------------------------------|
| Signature (Defendant)<br><b>[Signature]</b> | Date signed<br><b>10-12-22</b> | Signed (Parent or guardian if minor)<br><b>[redacted]</b> | Date signed<br><b>[redacted]</b> |
|---------------------------------------------|--------------------------------|-----------------------------------------------------------|----------------------------------|

The above information and statements were subscribed and sworn to before me.

|                                                                                 |                                                   |                             |                                                  |
|---------------------------------------------------------------------------------|---------------------------------------------------|-----------------------------|--------------------------------------------------|
| Signature (Police Officer, Prob. Off., Asst. Clerk, etc.)<br><b>[Signature]</b> | Date and time signed<br><b>10-12-22 1301 P.m.</b> | Job title<br><b>Trooper</b> | Police department (if applicable)<br><b>CSRB</b> |
|---------------------------------------------------------------------------------|---------------------------------------------------|-----------------------------|--------------------------------------------------|

Fill out the Appropriate Section Below. If a Cash, 10% Cash or Surety Bond is Required:

|                                                         |                                                                                                             |                                                         |                                     |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|-------------------------------------|
| Amount of bond<br><b>\$1,500</b>                        | Type of bond<br><input checked="" type="checkbox"/> 10% Cash                                                | Amount deposited in words<br><b>One Hundred Dollars</b> | Amount in numerical<br><b>\$150</b> |
| Deposited by Defendant:<br><input type="checkbox"/> Yes | Name and address of Depositor (if not the Defendant)<br><b>Black A. Shiffon 2 Brewery Sq. New Haven, CT</b> | Receipt number<br><b>82728315</b>                       |                                     |

Cash Bond

|                                                                                 |                                                       |
|---------------------------------------------------------------------------------|-------------------------------------------------------|
| Signature (Police Officer, Prob. Off., Asst. Clerk, etc.)<br><b>[Signature]</b> | Date and time bond taken<br><b>10-12-22 1250 P.m.</b> |
|---------------------------------------------------------------------------------|-------------------------------------------------------|

I, the Depositor, understand that if the Defendant named above fails to appear in court as promised above, I will be liable for the full amount of bond, including the forfeiture (giving up) of any amount that I already deposited. I also understand that, if/when this bond is terminated or released, the amount deposited will be returned to the Depositor named above, less any fee that may be required by statute.

The above information and statements were subscribed and sworn to before me.

|                                                                                            |                                                   |                             |                                                  |
|--------------------------------------------------------------------------------------------|---------------------------------------------------|-----------------------------|--------------------------------------------------|
| Signature (Police Officer, Probation Officer, Assistant Clerk, etc.)<br><b>[Signature]</b> | Date and time signed<br><b>10-12-22 1250 P.m.</b> | Job title<br><b>Trooper</b> | Police department (if applicable)<br><b>CSRB</b> |
|--------------------------------------------------------------------------------------------|---------------------------------------------------|-----------------------------|--------------------------------------------------|

|                                     |                                        |                                       |
|-------------------------------------|----------------------------------------|---------------------------------------|
| Name of surety<br><b>[redacted]</b> | Address of surety<br><b>[redacted]</b> | Telephone number<br><b>[redacted]</b> |
|-------------------------------------|----------------------------------------|---------------------------------------|

|                                     |                                        |                                                       |                                                   |
|-------------------------------------|----------------------------------------|-------------------------------------------------------|---------------------------------------------------|
| License number<br><b>[redacted]</b> | Insurance company<br><b>[redacted]</b> | Initial amount of bond (minimum to give)<br><b>\$</b> | Total amount of bond (including fee)<br><b>\$</b> |
|-------------------------------------|----------------------------------------|-------------------------------------------------------|---------------------------------------------------|

I, the Surety named above, understand that if the Defendant named above fails to appear in court as promised above, I will be liable to the State of Connecticut for the above amount of bond.

|                              |                                                     |
|------------------------------|-----------------------------------------------------|
| Signed<br><b>[Signature]</b> | Date signed (Month, day, year)<br><b>[redacted]</b> |
|------------------------------|-----------------------------------------------------|

The above information and statements were subscribed and sworn to before me.

|                                                                                   |                                        |
|-----------------------------------------------------------------------------------|----------------------------------------|
| Signed (Police Officer, Probation Officer, Assistant Clerk)<br><b>[Signature]</b> | Date of signature<br><b>[redacted]</b> |
|-----------------------------------------------------------------------------------|----------------------------------------|

|                                |                                                        |                                                           |
|--------------------------------|--------------------------------------------------------|-----------------------------------------------------------|
| Job title<br><b>[redacted]</b> | Police department (if applicable)<br><b>[redacted]</b> | Insurance department (if applicable)<br><b>[redacted]</b> |
|--------------------------------|--------------------------------------------------------|-----------------------------------------------------------|



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT D-3

**Title:** Affiant Arrest, Conditions of Release

**Author(s):** State of Connecticut Superior Court, Torrington

**Date(s):** October 12, 2022

**Complaint  
Reference(s):** ¶¶ 49, 55, 56, 73(d)

**CONDITIONS OF RELEASE  
FAMILY VIOLENCE**  
JD-CR-148 Rev. 2/21  
C.O.S. § 54-20c

 STATE OF CONNECTICUT  
SUPERIOR COURT

Instructions to Police Officer

 Do not use this form if the defendant is a juvenile.  
Whenever possible, provide a copy to the defendant. Send original and a copy  
to the clerk of court along with the original Appearance Bond (JD-CR-4)  
if present to appear (JD-CR-132).

**ADA NOTICE**

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation to participate with the ADA, please contact the clerk of an ADA contact person. Please email at [redacted].

|                                                                          |                                                                                                                                                                                                                                               |     |   |      |   |     |            |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|---|------|---|-----|------------|
| Defendant's Name (Last, First, Middle)                                   | [redacted]                                                                                                                                                                                                                                    | Sex | F | Race | W | DOB | 11-15-1986 |
| Address of Defendant (Street, City, State, Zip)                          | North Canaan CT 06018                                                                                                                                                                                                                         |     |   |      |   |     |            |
| Defendant's relationship to alleged victim (Other parent or Grandparent) | <input type="checkbox"/> Spouse<br><input type="checkbox"/> Parent of Common Child<br><input checked="" type="checkbox"/> Party to a Civil Union<br><input checked="" type="checkbox"/> Intimate Cohabitant<br><input type="checkbox"/> Other |     |   |      |   |     |            |
| Name of alleged victim (Last, First, Middle)                             | Goodwin Jan A                                                                                                                                                                                                                                 | Sex | M | Race | W | DOB | 1-15-1986  |
| Address of alleged victim (Street, City, State, Zip)                     | North Canaan CT 06018                                                                                                                                                                                                                         |     |   |      |   |     |            |

 The following conditions of release that directly relate to the protection of the alleged victim apply to you:  
(Financial conditions may also apply)

- ☒ Do not assault, threaten, abuse, harass, follow, interfere with, or stalk the protected person. (CT01)  
☒ Stay away from the home of the protected person and wherever the protected person shall reside. (CT03)  
☒ Do not contact the protected person in any manner, including by written, electronic or telephone contact, and do not contact the protected person's home, workplace or others with whom the contact would be likely to cause annoyance or alarm to the protected person. (CT05)  
☒ Do not use or possess a dangerous weapon.  
☒ Do not use or possess an intoxicant or controlled substance. (alcohol or drugs)  
☐ Other nonfinancial conditions. (specify if applicable, e.g. restrictions on travel or place of abode)

This order stays in effect, and applies to you until you attend the court hearing on:

Hearing date: 10-13-22

But, if court is cancelled or you do not attend the court hearing on this date, this order stays in effect, and applies to you until you attend a court hearing for this arrest.

I, the defendant in this case, understand that I am being released from custody under the Conditions of Release checked above. I understand that I must follow all of the conditions checked above, which the police officer ordered as a condition of my release. I understand that if I do not follow any of these conditions, I may be arrested for violation of conditions of release. If court is cancelled or I do not attend the court hearing on the Hearing date, I understand that these conditions stay in effect, and apply to me until I attend a court hearing for this arrest. I also understand that I have the right to tell my story before the court issues a protective order in this case.

|                                    |                      |                         |                              |
|------------------------------------|----------------------|-------------------------|------------------------------|
| Signed (Defendant)                 | Date and time signed | Signed (Police Officer) | Date and time signed         |
| [Signature]                        | 10-12-22 12:22 P.m.  | [Signature]             | 10-12-22 12:22 P.m.          |
| Subscribed and sworn to before me. | Signed (Judge/Clerk) | Date and time signed    | Noted with Police Department |
| [Signature]                        | 10-12-22 12:22 P.m.  | 10-12-22 12:22 P.m.     | CSF                          |

Reasonable efforts were made to contact the bail commissioner or a Judicial Branch intake, assessment and referral specialist.

Factual basis relied upon by the police officer to impose the nonfinancial conditions of release (specify):

If the defendant is non-English speaking, the services of a translation service or interpreter were used. The police officer was contacted by the National Crime Information Center (NCIC) to determine if such defendant is listed in NCIC. The defendant was advised of translation penalties and furnished with a copy of the conditions of release.

|                                                                                      |                         |                        |                              |
|--------------------------------------------------------------------------------------|-------------------------|------------------------|------------------------------|
| I certify that the above statements are true to the best of my knowledge and belief. | Signed (Police Officer) | Name of Police Officer | Date and time signed         |
| Subscribed and sworn to before me.                                                   | Signed (Judge/Clerk)    | Date and time signed   | Noted with Police Department |
| [Signature]                                                                          | 10-12-22 12:22 P.m.     | 10-12-22 12:22 P.m.    | CSF                          |

DISTRIBUTION: Original and Copy 1 (for Defense Counsel) - Clerk of Court Copy 2 - Defendant Copy 3 - Police Copy 4 - [redacted]



CONDICIONES DE LA LIBERTAD EN  
CAUSAS DE VIOLENCIA INTRAFAMILIARJD-CR-145 Rev. 3/17  
C.B.S. 6-24-20

Este formulario es para el Agente de Policía.  
No utilice este formulario si el acusado es menor de edad.  
Este formulario debe ser llenado en español. Si el acusado es hispano o de ascendencia hispana, llene este formulario en español.  
Si el acusado es hispano o de ascendencia hispana, llene este formulario en español.  
Si el acusado es hispano o de ascendencia hispana, llene este formulario en español.

ESTADO DE CONECTICUT  
TRIBUNAL DE PRIMERA INSTANCIA

## FORMA PARA LA LEY 96A

La Ley 96A, que establece el derecho de los acusados a la libertad condicional, requiere que el juez determine si el acusado cumple con los requisitos para la libertad condicional. Este formulario es para el Agente de Policía llenarlo en español.

|                                                                        |                                                               |                                                                        |               |      |
|------------------------------------------------------------------------|---------------------------------------------------------------|------------------------------------------------------------------------|---------------|------|
| Nombre del acusado (Apellido, Nombre)                                  | Fecha de nacimiento (mes/año)                                 | Sexo                                                                   | Raza          | Edad |
| Dirección del acusado (Número, calle, número de apartamento)           | Ciudad                                                        | Estado                                                                 | Código postal |      |
| Calidad de violencia doméstica imputada                                | Relación del acusado con la persona víctima (Actual y pasada) |                                                                        |               |      |
|                                                                        | <input type="checkbox"/> Conyugal                             | <input type="checkbox"/> Familiarmente con el acusado o con el acusado |               |      |
|                                                                        | <input type="checkbox"/> Pareja en unión libre                | <input type="checkbox"/> Familiarmente con el acusado o con el acusado |               |      |
|                                                                        | <input type="checkbox"/> Pareja de hecho                      | <input type="checkbox"/> Otro                                          |               |      |
| Nombre de la persona víctima (Apellido, Nombre)                        | Fecha de nacimiento (mes/año)                                 | Sexo                                                                   | Raza          | Edad |
| Dirección de la persona víctima (Número, calle, número de apartamento) | Ciudad                                                        | Estado                                                                 | Código postal |      |

Las siguientes son las condiciones de su libertad en lo que se refiere a la protección de la persona víctima:

(Seleccione si puede o no cumplir con cada una de las condiciones siguientes)

☐ No puede agredir, amenazar, maltratar, acosar, seguir, acosar o interferir con la persona víctima o con la persona víctima.

☐ Mantenerse alejado de la residencia de la persona protegida o cualquier otro lugar donde la persona víctima pueda estar.

☐ No puede comunicarse con la persona protegida, incluida la comunicación por correo electrónico, teléfono, correo postal, correo electrónico, mensajes de texto, redes sociales, etc.

☐ No puede utilizar el correo postal para enviar mensajes a la persona víctima.

☐ No puede contactar al público o a los medios de comunicación para divulgar información sobre la persona víctima.

☐ Otras condiciones no monetarias: (Deberá especificar, como: ...)

Esta orden permanece vigente hasta que usted comparezca a la audiencia judicial el día:

Fecha de audiencia

No obstante, de comparecer la audiencia y en caso de que usted no se presente a la audiencia en la fecha indicada, la orden continuará vigente hasta que usted comparezca ante el tribunal por esta orden.

Yo, el acusado en el presente caso, entiendo que si yo me pongo en libertad bajo las Condiciones de Libertad indicadas arriba, estaré sujeto con todas las condiciones indicadas más arriba. Si yo me pongo en libertad bajo las Condiciones de Libertad indicadas arriba, estaré sujeto con todas las condiciones indicadas más arriba. Si yo me pongo en libertad bajo las Condiciones de Libertad indicadas arriba, estaré sujeto con todas las condiciones indicadas más arriba.

|                                |              |                                                               |              |
|--------------------------------|--------------|---------------------------------------------------------------|--------------|
| Firma (Acusado)                | Fecha y hora | Firma (Puede ser el Agente de Policía o el Agente de Policía) | Fecha y hora |
| Suscrito y presentado ante mí: | Fecha y hora | Cargo del Agente de Policía                                   |              |

Se hicieron extensiones de tiempo para comunicarse con el conserje de la corte o con un especialista de evaluación de riesgos de la corte, evaluaciones y determinaciones de la Rama Judicial (especifique):

Hechos antes que se ordenó al agente de policía para imponer las condiciones de libertad de carácter no monetario (especifique):

Si el acusado no habla inglés, se utilizaron los servicios de un agente de traducción o un intérprete. Si el agente de policía ha consultado con el Centro Nacional de Información sobre Delitos (NCIC) por sus datos en inglés para determinar si el nombre del mencionado acusado figura en su base de datos. El acusado ha sido notificado de las posibles sanciones relacionadas con la libertad y se le ha proporcionado una copia de las condiciones de su puesta en libertad.

|                                                                                        |                           |              |                             |
|----------------------------------------------------------------------------------------|---------------------------|--------------|-----------------------------|
| Declaro que las declaraciones que preceden son verdaderas a mi mejor saber y entender. | Firma (Agente de policía) | Fecha y hora | Cargo del Agente de Policía |
| Suscrito y presentado ante mí:                                                         | Firma (Agente de policía) | Fecha y hora | Cargo del Agente de Policía |

DISTRIBUCIÓN: 3 Copias (para el Agente de la Defensa) - 3 Copias (para el Tribunal) - 3 Copias (Acusado) - 3 Copias (Policía)



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT D-4

**Title:** State v Affiant Charging Document  
**Author(s):** State of Connecticut Superior Court, Torrington  
**Date(s):** October 13, 2022  
**Complaint Reference(s):** ¶¶ 49, 55, 56, 73(d)

JD-CR-71 LP REV. 7-05

STATE OF CONNECTICUT  
SUPERIOR COURT

DOB: 03/25/1967

ORIGINAL INFORMATION:

COURT DATE:

AT:

DISPOSITION DATE:

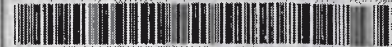
YES

10/13/2022

GA18 - TORRINGTON

DOCKET NO.: L18W-CR22-0186355-S

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that



12 CHURCH TERR, NORTH CANAAN, CT 06018

Did commit the offenses recited below:

Count: 1 DISORDERLY CONDUCT Type/Class: M/C At: NORTH CANAAN  
On or About: 10/01/2022 In Violation Of CGS/PA No: 53a-182Count: 2 CRIMINAL MISCHIEF 3RD DEG Type/Class: M/B At: NORTH CANAAN  
On or About: 10/01/2022 In Violation Of CGS/PA No: 53a-117SEE OTHER SHEETS  
FOR ADDITIONAL COUNTS

DATE

SIGNED (PROSECUTING AUTHORITY)

## COURT ACTION

DEFENDANT ADVISED OF RIGHTS BEFORE PLEA

(JUDGE)

(DATE)

BOND

\$1500

SURETY

10%

☐ CASH

ELECTION

☐ COURT☐ JURY☒ ATTY. ☐ PUB. DEFENDER

GUARDIAN

REDUCTION

S.O.

APPEAL

ELECTION WITHDRAWN DATE

☐ SEIZED PROPERTY

| COURT NO. | PLEA DATE | PLEA | PLEA WITHDRAWN DATE | NEW PLEA | VERDICT FINDING | FINE | JAIL | ADDITIONAL DISPOSITION |
|-----------|-----------|------|---------------------|----------|-----------------|------|------|------------------------|
| 1         |           |      |                     |          |                 |      |      | rolle                  |
| 2         |           |      |                     |          |                 |      |      | rolle                  |

DATE

OTHER COURT ACTION

JUDGE

CONTINUANCES

OCT 13 2022

Refer to Family Relations

Protective Order  
Issued/Modified

Pelosi J

DATE

PURPOSE

REASON

11-30-22 FS

12-13-22

Mot. to Modify PO  
denied

Pelosi J

2-2-23 FS

FINE PAID

RECEIPT NO.

MITTIMUS DATE

TRIAL TOWN

PROSECUTOR ON ORIGINAL DISPOSITION

REPORTER ON ORIGINAL DISPOSITION

SIGNED CLERK

SIGNED JUDGE

SEE REVERSE  
SIDE

Knight

Mitchell

KHS

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT D-5

**Title:** Affiant Arrest, Criminal Protective Order Naming  
Jon Goodwin as a Protected Person

**Author(s):** State of Connecticut Superior Court, Torrington

**Date(s):** October 13, 2022

**Complaint  
Reference(s):** ¶¶ 32, 49, 55, 56, 73(b), 95



**ORDER OF PROTECTION**

JD-CV-60 Rev. 10-21  
 C.G.S. §§ 29-36, 29-37, 29-38, 29-39, 29-40, 40b-15, 40b-16a,  
 40b-30(a)(1), 40b-30(a), 53a-217c, 53a-218, 53a-219,  
 53a-217a, 53a-223, 54-1a, 54-29a,  
 18 U.S.C. §§ 2251(a)(1), 2261, P.A. 21-28 §§ 2, 6, 7

For information on ADA  
 accommodations,  
 contact a court clerk or go to:  
[www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA)

**STATE OF CONNECTICUT  
 SUPERIOR COURT**
[www.jud.ct.gov](http://www.jud.ct.gov)

|                                                         |                              |                                                   |
|---------------------------------------------------------|------------------------------|---------------------------------------------------|
| Order type<br><b>Protective Order - Family Violence</b> | Case type<br><b>Criminal</b> | Superior court location<br><b>L1BW Torrington</b> |
| Related court information (if applicable)               |                              | Case number<br><b>L1FWCR2201963958</b>            |

**Protected Person**

|                                                                                   |                          |        |                                    |                    |                      |
|-----------------------------------------------------------------------------------|--------------------------|--------|------------------------------------|--------------------|----------------------|
| Last name<br><b>GOODWIN</b>                                                       | First name<br><b>JON</b> | Middle | Date of birth<br><b>[REDACTED]</b> | Sex<br><b>M</b>    | Race<br><b>White</b> |
| Home address<br><b>12 Church Ter</b>                                              |                          |        | City<br><b>Canaan</b>              | State<br><b>CT</b> | Zip<br><b>06018</b>  |
| Mailing address<br><input type="checkbox"/> Same as above<br><b>12 Church Ter</b> |                          |        | City<br><b>Canaan</b>              | State<br><b>CT</b> | Zip<br><b>06018</b>  |
| Work address                                                                      |                          |        | City                               | State              | Zip                  |

**Respondent (Defendant)****Respondent Identifiers**

|                                |                                 |        |                                    |                              |                      |
|--------------------------------|---------------------------------|--------|------------------------------------|------------------------------|----------------------|
| Last name<br><b>[REDACTED]</b> | First name<br><b>[REDACTED]</b> | Middle | Date of birth<br><b>[REDACTED]</b> | Sex<br><b>F</b>              | Race<br><b>White</b> |
| Address<br><b>[REDACTED]</b>   |                                 |        | Height                             | Weight                       | Eyes                 |
| City<br><b>Canaan</b>          |                                 |        | Hair                               | Phone<br><b>860-453-0634</b> |                      |
| State<br><b>CT</b>             |                                 |        | Zip<br><b>06018</b>                |                              |                      |

Caution/Warning: (if information is available):

**Allegedly holds a permit to carry a pistol or revolver**

Relationship to protected person (Please select one):

- ☐ Spouse or party to a civil union  
☐ Protected person's parent  
☒ Intimate cohabitant  
☐ Parent of common child  
☐ Other: \_\_\_\_\_

**Terms and Conditions of Protection**

You, the Respondent, must follow all the orders and conditions selected below:

- ☒ Surrender or transfer all firearms and ammunition.  
☒ Do not assault, threaten, abuse, harass, follow, interfere with, or stalk the protected person. (CT01)  
☒ Stay away from the home of the protected person and wherever the protected person shall reside. (CT03)  
☐ Do not contact the protected person in any manner, including by written, electronic or telephone contact, and do not contact the protected person's home, workplace, or others with whom the contact would be likely to cause annoyance or alarm to the protected person. (CT05)  
☒ Other: You may return to the protected person's home one time with police to retrieve belongings.

Additional terms and conditions are on the following pages:

|                                     |                                                                 |                                                 |
|-------------------------------------|-----------------------------------------------------------------|-------------------------------------------------|
| This order remains in effect until: | <input checked="" type="checkbox"/> Further order of the court. | Expiration date (if applicable)<br><b>1 / 1</b> |
|-------------------------------------|-----------------------------------------------------------------|-------------------------------------------------|

- ☒ The court had jurisdiction over the parties and the subject matter, and the respondent was provided with reasonable notice and opportunity to be heard. This order shall be enforced, even without registration, by the courts of any state, the District of Columbia, any U.S. Territory, and may be enforced by Tribal Lands (18 U.S.C. § 2285). Crossing state, territorial, or tribal boundaries to violate this order may result in federal imprisonment (18 U.S.C. § 2262).  
☒ State law provides penalties for unlawful possession of firearms, ammunition, or electronic defense weapons (General Statutes §§ 53a-217(a)(4) and 53a-217(a)(5)). Federal law also provides penalties for possessing, transporting, shipping, or receiving any firearms, ammunition while subject to a qualifying protective order (18 U.S.C. § 922(g)(1)).

|                                    |                       |
|------------------------------------|-----------------------|
| By the Court<br><b>[Signature]</b> | Date<br><b>4/5/26</b> |
|------------------------------------|-----------------------|

**NOTICE:** If a restraining order, protective order, or standing criminal protective order has been issued in your behalf or in behalf of your child, you may elect to give testimony or appear in a family court proceeding remotely, pursuant to 40b-15a. Notice the state is giving at least two days in advance of a proceeding if you choose to give testimony or appear remotely, and your physical appearance in the courthouse will not be required in order to participate in the court proceeding. You may use the Remote Testimony Request Form (JD-FM-285) to make this written request. You may use the same form with two days' advance notice to request that your testimony in the family proceeding be taken outside the presence of the respondent subject to a restraining order, protective order, or standing criminal protective order issued on your behalf and/or a child's behalf pursuant to 40b-15a.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT E

**Title:** Family Relations Interview Notice Reflecting Prior  
Involvement of Defendant Killiany

**Author(s):** Lisa Killiany

**Date(s):** November 8, 2022

**Complaint  
Reference(s):** ¶¶ 21, 33, 36, 56



STATE OF CONNECTICUT  
FAMILY SERVICES UNIT  
SUPERIOR COURT

ESTADO DE CONNECTICUT  
OFICINA DE SERVICIOS DE  
ATENCIÓN A LA FAMILIA  
TRIBUNAL DE PRIMERA INSTANCIA



## NOTICE OF INTERVIEW

Bring this notice with you when you come to the interview

TO:

JON GOODWIN  
12 Church Ter  
Canaan, CT 06018

## NOTIFICACIÓN DE ENTREVISTA

Presentar esta notificación el día de su entrevista

*Jon  
Please attend  
this appointment  
Your input  
is important  
LHC*

Name of case (Nombre del caso)

State vs. (Fiscalía vs.)

Date and time of interview

11/08/2022 at 2:30 PM

Address where interview will be held

50 Field Street  
Torrington, CT 06790

Fecha y hora de la entrevista

11/08/2022 at 2:30 PM

Dirección del lugar donde se celebrará la entrevista

50 Field Street  
Torrington, CT 06790

The court has referred the above-named case to the Family Services Unit and therefore has continued the hearing to the Court Continuance Date specified below. Prior to the Court Continuance Date, you are scheduled to appear for a conference with the Family Services Unit at the address indicated in the shaded area above. PLEASE NOTE THE ADDRESS FOR THE INTERVIEW IN THE SHADED AREA ABOVE, AS IT MAY BE DIFFERENT THAN THE ADDRESS OF COURT.

If you have any questions concerning this interview please call this office as soon as possible at the number given below.

Thank you for your cooperation in this matter.

El juez ha derivado el caso indicado arriba a la Oficina de Servicios de Atención a la Familia y ha aplazado la audiencia hasta la Fecha de Comparecencia señalada a continuación. Antes de la Fecha de Comparecencia, usted deberá asistir a una entrevista en la Oficina de Servicios de Atención a la Familia, la cual tendrá lugar en la dirección que se indica en la casilla sombreada. TENGA EN CUENTA QUE LA DIRECCIÓN INDICADA PARA LA ENTREVISTA EN LA CASILLA SOMBREADA PODRÍA SER DISTINTA DE LA DEL TRIBUNAL.

De tener alguna pregunta con respecto a esta entrevista, comuníquese con esta oficina tan pronto como sea posible llamando al número indicado a continuación.

Gracias por su colaboración en este asunto.

Appointment with (Family Relations Counselor)  
Entrevista con (Consejero de Relaciones de Familia)

Lisa Killiany

Telephone  
(Teléfono)

(860) 626-2180

Court continuance date  
(Fecha de comparecencia)

11/30/2022

### ADA NOTICE

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at [www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA).

### AVISO SOBRE LA LEY ADA

La Rama Judicial del Estado de Connecticut cumple con los requisitos de la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés). Si necesita un ajuste razonable acorde con la ley ADA, comuníquese con un empleado de la Secretaría o algún delegado de la ADA cuyos nombres aparecen en la página web [www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA).

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT F

**Title:** Email to Defendant Killiany Regarding Instability and Safety Concerns

**Author(s):** Jon Goodwin

**Date:** November 14, 2022

**Complaint Reference:** ¶¶ 57, 99

## Situation

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From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To lisa.killiany@jud.ct.gov

Date Monday, November 14th, 2022 at 12:42 PM

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Hi Lisa,

██████ has been ranting at me this morning via text message, accusing me of: "gaslighting" her, making the situation more difficult for her and her children, creating police reports against her, harassing her, etc.

As I explained to you, her ex-husband, through the divorce and in its wake, he manipulated and encouraged their children to engage in all sorts of anti-social and criminal conduct to harm ██████ and undermine her relationship with them. And since she and me reunited during the fall of 2019 he has targeted me. I've never gone against ██████ in any way. There were two other incidents. One last summer and another in 2021. During both incidents, ██████ expressed she wanted to commit suicide. In the first incident, she attempted to obtain a means to carry through on her suicidal threat. I called the police. They responded and she was transported by ambulance to New Milford Hospital and held overnight for observation. The second incident occurred at our home in North Canaan last summer. ██████ was very upset during the late evening. I attempted to leave our home to find a place to sleep. She stood in front of my vehicle so I couldn't leave the garage. I called the police. She made a statement to a responding officer that he interpreted to be a suicide threat. The officers called paramedics who transported her to the hospital in Torrington where she was held overnight.

I spoke to ██████ on the phone last night and she seemed okay. When she contacted me this morning, she informed me I'm wrong for calling authorities and my doing so was harassing to her, that I have no empathy for her and if I was supportive of her would not call the police. I'm not sure of the genesis of her distress this morning. Her not being able to spend time with or speak to her two younger children, the stress of the litigation against her ex-husband and the situation of her being out of our home I'm sure are all contributing factors. I think she's experiencing very severe emotional distress. She told me she was seeing a psychiatrist and taking medication. If that's true, whatever therapy she's receiving is not effective. Witnessing her in such distress is upsetting to me. I don't like seeing her in such agony. And, I don't want a repeat of prior incidents. I'm really uncomfortable. I don't have another place to go nor resources to move out of this residence on short notice and find another place to live.

Please advise.

Thank you,

Jon Goodwin

---

[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile



**1.74 KB** 1 file attached

publickey - jgoodwin@protonmail.ch - 0xB5786C5F.asc 1.74 KB

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT G-1

**Title:** Initial Email Providing Notice of Escalating Conduct,  
Prior Suicide-Related Police Interventions, and  
Request for Immediate Guidance (Nov. 15, 2022,  
1:30 PM)

**Author(s):** Jon Goodwin

**Date(s):** November 15, 2022

**Complaint  
Reference(s):** ¶¶ 37, 38, 39, 55, 57, 99

## Fw: Situation

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To lisa.killiany@jud.ct.gov

Date Tuesday, November 15th, 2022 at 1:30 PM

Hi Lisa,

██████ is escalating the behavior I described to you in my previous email. Did you receive that?

I called you yesterday and again today. Your phone mailbox is full. I'm very concerned and at this point don't know how to proceed. Should I be reporting this to the police or just you?

I know you are busy. Please get back to me when you can.

Thank you,

Jon Goodwin

----- Original Message -----

On Monday, November 14th, 2022 at 12:42 PM, Jon Goodwin <jgoodwin@protonmail.ch> wrote:

Hi Lisa,

██████ has been ranting at me this morning via text message, accusing me of: "gaslighting" her, making the situation more difficult for her and her children, creating police reports against her, harassing her, etc.

As I explained to you, her ex-husband, through the divorce and in its wake, he manipulated and encouraged their children to engage in all sorts of anti-social and criminal conduct to harm ██████ and undermine her relationship with them. And since she and me reunited during the fall of 2019 he has targeted me. I've never gone against ██████ in any way. There were two other incidents. One last summer and another in 2021. During both incidents, ██████ expressed she wanted to commit suicide. In the first incident, she attempted to obtain a means to carry through on her suicidal threat. I called the police. They responded and she was transported by ambulance to New Milford Hospital and held overnight for observation. The second incident occurred at our home in North Canaan last summer. ██████ was very upset during the late evening. I attempted to leave our home to find a place to sleep. She stood in front of my vehicle so I couldn't leave the garage. I called the police. She made a statement to a responding officer that he interpreted to be a suicide threat. The officers called paramedics who transported her to the hospital in Torrington where she was held overnight.

I spoke to ██████ on the phone last night and she seemed okay. When she contacted me this morning, she informed me I'm wrong for calling authorities and my doing so was harassing to her, that I have no empathy for her and if I was supportive of her would not call the police. I'm not sure of the genesis of her distress this morning. Her not being able to spend time with or speak to her two younger children, the stress of the litigation against her ex-husband and the situation of her being out of our home I'm sure are all contributing factors. I think she's experiencing very severe emotional distress. She told me she was seeing a psychiatrist and taking medication. If that's true, whatever therapy she's receiving is not effective. Witnessing her in such distress is upsetting to me. I don't like seeing her in such agony. And, I don't want a repeat of prior incidents. I'm really uncomfortable. I don't have another place to go nor resources to move out of this residence on short notice and find another place to live.

Please advise.

Thank you,

Jon Goodwin

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[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

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**1.74 KB** 1 file attached

publickey - jgoodwin@protonmail.ch - 0xB5786C5F.asc 1.74 KB

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

|                     |   |                                      |
|---------------------|---|--------------------------------------|
| JON GOODWIN,        | : |                                      |
| <i>Plaintiff,</i>   | : |                                      |
|                     | : |                                      |
| v.                  | : | Civil Action No. 3:25-cv-01711 (VAB) |
|                     | : |                                      |
| MICHAEL EGAN, ET AL | : |                                      |
| <i>Defendants.</i>  | : |                                      |

## EXHIBIT G-2

|                                |                                                                                                                                        |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>Title:</b>                  | Follow-Up Email Documenting Escalation, False Accusations, and Imminent Housing Disruption After Prior Notice (Nov. 15, 2022, 2:07 PM) |
| <b>Author(s):</b>              | Jon Goodwin                                                                                                                            |
| <b>Date(s):</b>                | November 15, 2022                                                                                                                      |
| <b>Complaint Reference(s):</b> | ¶¶ 37, 38, 39, 55, 57, 99                                                                                                              |

## Current Situation

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To lisa.killiany@jud.ct.gov

Date Tuesday, November 15th, 2022 at 2:07 PM

Hi Lisa,

Below is the message i sent you yesterday that didn't get through your email labyrinth.

Today [REDACTED] emotions have further escalated, continuing to falsely accuse me of: lying to the police, hating her children, etc. As discussed below, there's a record of police reports describing her suicidal threats which in one instance she made to a police officer. I don't hate her children. I'm afraid to be around them because they behave violently toward each other and [REDACTED] and engage in other anti-social behavior instigated by her ex-husband. I'm sure some of [REDACTED] heightened emotion has to do with anxiety about her interview with you. She's now demanding I pack my belongings and leave our home unless I retract my statements. She's clearly in significant distress and delusional. It's clear to me whatever therapy she is engaging in is not effective. [REDACTED] is staying at her mother's home. I have no relatives or family that I can stay with. My packing and leaving our home will be a major undertaking for which I have neither the time or resources.

I will call the victim advocate per your suggestion.

Thank you,

Jon Goodwin

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[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

----- Original Message -----

On Monday, November 14th, 2022 at 12:42 PM, Jon Goodwin <jgoodwin@protonmail.ch> wrote:

Hi Lisa,

[REDACTED] has been ranting at me this morning via text message, accusing me of: "gaslighting" her, making the situation more difficult for her and her children, creating police reports against her, harassing her, etc.

As I explained to you, her ex-husband, through the divorce and in its wake, [REDACTED] manipulated and encouraged their children to engage in all sorts of anti-social and criminal conduct to harm [REDACTED] and undermine her relationship with them. And since she and I reunited, during the fall of 2019, he has targeted me. I've never gone against [REDACTED] in any way. There were two other incidents. One last summer and another in 2021. During both incidents, [REDACTED] expressed she wanted to commit suicide. In the first incident, she attempted to obtain a means to carry through on her suicidal threat. I called the police. They responded and she was transported by ambulance to New Milford Hospital and held overnight for observation. The second incident occurred at our home in North Canaan last summer. [REDACTED] was very upset during the late evening. I attempted to leave our home to find a place to sleep. She stood in front of my vehicle so I couldn't leave the garage. I called the police. She made a statement to a responding officer that

he interpreted to be a suicide threat. The officers called paramedics who transported her to the hospital in Torrington where she was held overnight.

I spoke to [REDACTED] on the phone last night and she seemed okay. When she contacted me this morning, she informed me I'm wrong for calling authorities and my doing so was harassing to her, that I have no empathy for her and if I was supportive of her would not call the police. I'm not sure of the genesis of her distress this morning. Her not being able to spend time with or speak to her two younger children, the stress of the litigation against her ex-husband and the situation of her being out of our home I'm sure are all contributing factors. I think she's experiencing very severe emotional distress. She told me she was seeing a psychiatrist and taking medication. If that's true, whatever therapy she's receiving is not effective. Witnessing her in such distress is upsetting to me. I don't like seeing her in such agony. And, I don't want a repeat of prior incidents. I'm really uncomfortable. I don't have another place to go nor resources to move out of this residence on short notice and find another place to live.

Please advise.

Thank you,

Jon Goodwin

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[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT G-3

**Title:** Escalation Email Confirming Ongoing Crisis, Safety  
Risks, and Displacement Despite Prior  
Notifications (Nov. 15, 2022, 2:23 PM)

**Author(s):** Jon Goodwin

**Date(s):** November 15, 2022

**Complaint  
Reference(s):** ¶¶ 55, 57, 99

## Current Situation

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From Jon Goodwin <jio.barra@icloud.com>  
To lisa.killiany@jud.ct.gov  
CC Mr. Goodwin Jon<jgoodwin@protonmail.ch>  
Date Tuesday, November 15th, 2022 at 2:23 PM

---

Hi Lisa,

This message concerns my girlfriend, [REDACTED]

Below is the message i sent you yesterday that didn't get through your email labyrinth.

Today [REDACTED] emotions have further escalated, continuing to falsely accuse me of: lying to the police, hating her children, etc. As discussed below, there's a record of police reports describing her suicidal threats which in one instance she made to a police officer. I don't hate her children. I'm afraid to be around them because they behave violently toward each other and [REDACTED] and engage in other anti-social behavior instigated by her ex-husband. I'm sure some of [REDACTED] heightened emotion has to do with anxiety about her interview with you. She's now demanding I pack my belongings and leave our home unless I retract my statements. She's clearly in significant distress and delusional. It's clear to me whatever therapy she is engaging in is not effective. Christine is staying at her mother's home. I have no relatives or family that I can stay with. My packing and leaving our home will be a major undertaking for which I have neither the time or resources.

I will call the victim advocate per your suggestion.

Thank you,

Jon Goodwin

---

jgoodwin@protonmail.ch  
+1 (212) 372-4803 office  
+1 (307) 760-0315 mobile

----- Original Message -----

On Monday, November 14th, 2022 at 12:42 PM, Jon Goodwin <jgoodwin@protonmail.ch> wrote:

Hi Lisa,

[REDACTED] has been ranting at me this morning via text message, accusing me of: "gaslighting" her, making the situation more difficult for her and her children, creating police reports against her, harassing her, etc.

As I explained to you, her ex-husband, through the divorce and in its wake, [REDACTED] manipulated and encouraged their children to engage in all sorts of anti-social and criminal conduct to harm [REDACTED] and

undermine her relationship with them. And since she and I reunited, during the fall of 2019, he has targeted me. I've never gone against [REDACTED] in any way. There were two other incidents. One last summer and another in 2021. During both incidents, [REDACTED] expressed she wanted to commit suicide. In the first incident, she attempted to obtain a means to carry through on her suicidal threat. I called the police. They responded and she was transported by ambulance to New Milford Hospital and held overnight for observation. The second incident occurred at our home in North Canaan last summer. [REDACTED] was very upset during the late evening. I attempted to leave our home to find a place to sleep. She stood in front of my vehicle so I couldn't leave the garage. I called the police. She made a statement to a responding officer that he interpreted to be a suicide threat. The officers called paramedics who transported her to the hospital in Torrington where she was held overnight.

I spoke to [REDACTED] on the phone last night and she seemed okay. When she contacted me this morning, she informed me I'm wrong for calling authorities and my doing so was harassing to her, that I have no empathy for her and if I was supportive of her would not call the police. I'm not sure of the genesis of her distress this morning. Her not being able to spend time with or speak to her two younger children, the stress of the litigation against her ex-husband and the situation of her being out of our home I'm sure are all contributing factors. I think she's experiencing very severe emotional distress. She told me she was seeing a psychiatrist and taking medication. If that's true, whatever therapy she's receiving is not effective. Witnessing her in such distress is upsetting to me. I don't like seeing her in such agony. And, I don't want a repeat of prior incidents. I'm really uncomfortable. I don't have another place to go nor resources to move out of this residence on short notice and find another place to live.

Please advise.

Thank you,

Jon Goodwin

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT H

**Title:** Letter to Jon Goodwin Regarding Affiant Compliance  
with Court Order

**Author(s):** Defendant Lisa Killiany

**Date(s):** December 2, 2022

**Complaint  
Reference(s):** ¶¶ 40, 41, 65(c), 73(f)

STATE OF CONNECTICUT  
COURT SUPPORT SERVICES DIVISION  
**FAMILY SERVICES UNIT**  
SUPERIOR COURT  
[www.jud.ct.gov](http://www.jud.ct.gov)

Torrington Family Services  
50 Field Street  
Torrington CT 06790  
Telephone: (860) 626-2180  
Fax: (860) 626-2181



12/02/2022

JON GOODWIN  
12 Church Ter  
Canaan CT 06018

Re: State of Connecticut v. [REDACTED]  
Docket Number: L18W-CR22-[REDACTED]-S

Dear JON GOODWIN,

On 10/13/2022, the Superior Court ordered Court Support Services Division, Family Services Unit to monitor the above referenced case for compliance with the following court-imposed conditions:

- ☒ Follow all court orders, including all conditions of any Protective Order issued against you
- ☒ No acts of family violence and no new family violence arrests while this case is pending
- ☐ Successfully complete the ☐ Family Violence Education Program ☐ Explore Program, or ☐ Evolve Program
- ☐ Complete a Substance Abuse Evaluation and take part in any recommended treatment
- ☒ Complete a Mental Health Evaluation and take part in any recommended treatment
- ☐ Take part in counseling ☐ Individual, ☐ Family, ☐ Other \_\_\_\_\_
- ☐ Successfully complete Anger Management intervention
- ☐ Follow or take part in all recommended services at AIC
- ☐ Cooperate with the Department of Children and Families
- ☐ Contact your Family Relations Counselor: \_\_\_\_\_
- ☒ Other: Verify counseling by 2/20/23 \_\_\_\_\_

The defendant's next court date is scheduled for 02/02/2023 at 9:00 AM.

**If there are any new incidents of violence, threats, or harassment with the defendant, contact your local police department.** You may contact Family Services at any time while this case is pending to talk about any concerns that you may have and share information about the case. **However, it is important for you to know that any information you give to Family Services may be shared with the court.** If you have concerns or questions about your situation or the options and services that may be available to you, you should contact the Family Violence Victim Advocate at (860) 626-2530. **Any information that you share with the Family Violence Victim Advocate will not be given to the court or anyone else without you agreeing that the information can be shared.**

If you have any questions, please contact me at (860) 626-2180.

Sincerely,

Lisa Killiany  
Family Relations Counselor

**ADA NOTICE**

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at [www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA).

# EXHIBIT I

**Title:** Email Chain to Defendant Lisa Killiany Providing Continued Notice of Instability

**Author(s):** Jon Goodwin

**Date(s):** December 13, 2022

**Complaint Reference(s):** ¶¶ 39, 49, 55, 63, 95, 99

## Fw: Current Situation

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To lisa.killiany@jud.ct.gov

Date Tuesday, December 13th, 2022 at 12:50 AM

Hi Lisa,

This concerns [REDACTED]. I received your message yesterday. I visited with [REDACTED] Sunday and thought she was doing a bit better. Tonight, she slipped back into being angry at me which is disconcerting. I pray she's on the right track.

I don't mind if accesses our house. I need to take my firearms to storage and can't do that until next Saturday, at the earliest. Please note I have assessed all alternatives and, because I work in Massachusetts, taking them to storage is the only option. Assuming I can arrange that, [REDACTED] could come to the house next week. If the court would like to grant her motion, I suggest it leave the date up to me so that I can ensure all arrangements are made prior to her coming back.

Thank you,

Jon Goodwin

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[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

----- Forwarded Message -----

From: Jon Goodwin <jgoodwin@protonmail.ch>

Date: On Tuesday, November 15th, 2022 at 2:07 PM

Subject: Current Situation

To: lisa.killiany@jud.ct.gov <lisa.killiany@jud.ct.gov>

Hi Lisa,

Below is the message i sent you yesterday that didn't get through your email labyrinth.

Today [REDACTED] emotions have further escalated, continuing to falsely accuse me of: lying to the police, hating her children, etc. As discussed below, there's a record of police reports describing her suicidal threats which in one instance she made to a police officer. I don't hate her children. I'm afraid to be around them because they behave violently toward each other and [REDACTED] and engage in other anti-social behavior instigated by her ex-husband. I'm sure some of [REDACTED] heightened emotion has to do with anxiety about her interview with you. She's now demanding I pack my belongings and leave our home unless I retract my statements. She's clearly in significant distress and delusional. It's clear to me whatever therapy she is engaging in is not effective. [REDACTED] is staying at her mother's home. I have no relatives or family that I can stay with. My packing and leaving our home will be a major undertaking for which I have neither the time or resources.

I will call the victim advocate per your suggestion.



Thank you,  
Jon Goodwin

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[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

----- Original Message -----

On Monday, November 14th, 2022 at 12:42 PM, Jon Goodwin <[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)> wrote:

Hi Lisa,

██████ has been ranting at me this morning via text message, accusing me of: "gaslighting" her, making the situation more difficult for her and her children, creating police reports against her, harassing her, etc.

As I explained to you, her ex-husband, through the divorce and in its wake, ██████ manipulated and encouraged their children to engage in all sorts of anti-social and criminal conduct to harm ██████ and undermine her relationship with them. And since she and I reunited, during the fall of 2019, he has targeted me. I've never gone against ██████ in any way. There were two other incidents. One last summer and another in 2021. During both incidents, ██████ expressed she wanted to commit suicide. In the first incident, she attempted to obtain a means to carry through on her suicidal threat. I called the police. They responded and she was transported by ambulance to New Milford Hospital and held overnight for observation. The second incident occurred at our home in North Canaan last summer. ██████ was very upset during the late evening. I attempted to leave our home to find a place to sleep. She stood in front of my vehicle so I couldn't leave the garage. I called the police. She made a statement to a responding officer that he interpreted to be a suicide threat. The officers called paramedics who transported her to the hospital in Torrington where she was held overnight.

I spoke to ██████ on the phone last night and she seemed okay. When she contacted me this morning, she informed me I'm wrong for calling authorities and my doing so was harassing to her, that I have no empathy for her and if I was supportive of her would not call the police. I'm not sure of the genesis of her distress this morning. Her not being able to spend time with or speak to her two younger children, the stress of the litigation against her ex-husband and the situation of her being out of our home I'm sure are all contributing factors. I think she's experiencing very severe emotional distress. She told me she was seeing a psychiatrist and taking medication. If that's true, whatever therapy she's receiving is not effective. Witnessing her in such distress is upsetting to me. I don't like seeing her in such agony. And, I don't want a repeat of prior incidents. I'm really uncomfortable. I don't have another place to go nor resources to move out of this residence on short notice and find another place to live.

Please advise.

Thank you,

Jon Goodwin

j

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT J

**Title:** Letter to Jon Goodwin Regarding Affiant Compliance  
with Court Order

**Author(s):** Defendant Lisa Killiany

**Date(s):** December 14, 2022

**Complaint  
Reference(s):** ¶¶ 40, 41, 65(c), 73(f)

STATE OF CONNECTICUT  
COURT SUPPORT SERVICES DIVISION  
FAMILY SERVICES UNIT  
SUPERIOR COURT  
www.jud.ct.gov

Torrington Family Services  
50 Field Street  
Torrington CT 06790  
Telephone: (860) 626-2180  
Fax: (860) 626-2181



12/14/2022

JON GOODWIN  
12 Church Ter  
Canaan CT 06018

Re: State of Connecticut v. [REDACTED]  
Docket Number: L18W-CR22-[REDACTED]-S

Dear JON GOODWIN,

On 12/13/2022, the Superior Court ordered Court Support Services Division, Family Services Unit to monitor the above referenced case for compliance with the following court-imposed conditions:

- ☒ Follow all court orders, including all conditions of any Protective Order issued against you
- ☒ No acts of family violence and no new family violence arrests while this case is pending
- ☐ Successfully complete the ☐ Family Violence Education Program ☐ Explore Program, or ☐ Evolve Program
- ☐ Complete a Substance Abuse Evaluation and take part in any recommended treatment
- ☒ Complete a Mental Health Evaluation and take part in any recommended treatment
- ☐ Take part in counseling ☐ Individual, ☐ Family, ☐ Other \_\_\_\_\_
- ☐ Successfully complete Anger Management intervention
- ☐ Follow or take part in all recommended services at AIC
- ☐ Cooperate with the Department of Children and Families
- ☐ Contact your Family Relations Counselor \_\_\_\_\_
- ☒ Other: verification of tx by 2 1 23 \_\_\_\_\_

The defendant's next court date is scheduled for 02/02/2023 at 9:00 AM.

**If there are any new incidents of violence, threats, or harassment with the defendant, contact your local police department.** You may contact Family Services at any time while this case is pending to talk about any concerns that you may have and share information about the case. **However, it is important for you to know that any information you give to Family Services may be shared with the court.** If you have concerns or questions about your situation or the options and services that may be available to you, you should contact the Family Violence Victim Advocate at

(860) 626-2621

**Any information that you share with the Family Violence Victim Advocate will not be given to the court or anyone else without you agreeing that the information can be shared.**

If you have any questions, please contact me at (860) 626-2180.

Sincerely,

Lisa Killiany  
Family Relations Counselor

#### ADA NOTICE

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at [www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA).

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT K

**Title:** Email to Lisa Killiany from Jon Goodwin Re: Affiant  
accessing their residence

**Author(s):** Jon Goodwin

**Date(s):** December 20, 2022

**Complaint  
Reference(s):** ¶¶ 63, 65(d), 95

## Re: Response needed please.

---

From Jon Goodwin <jgoodwin@protonmail.com>  
To Ms. [REDACTED]  
CC lisa.killiany@jud.ct.gov<Lisa.killiany@jud.ct.gov>  
Date Tuesday, December 20th, 2022 at 5:50 PM

---

Hi Lisa,  
I have no objection to [REDACTED] coming into our residence.  
Thank you,  
Jon Goodwin

---

[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)  
+1 (212) 372-4803 office  
+1 (307) 760-0315 mobile

----- Original Message -----

On Tuesday, December 20th, 2022 at 9:15 AM, Ms. [REDACTED] wrote:

Lisa,

Troupe B in North Canaan, has indicated that I need to contact you about getting my items from my home. You need to contact Jon to find out when I can do that and inform Troupe B. They notified me this morning of that policy. I want items for Christmas, clothes, and need my financial documents to start my taxes.

Please see the message below sent on December 13th, asking if you wanted me to do anything else to fulfill your requirements. I would appreciate it if you got back to me on that so I can make it happen.

Kind Regards,

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

North Canaan, CT 06018

cell [REDACTED]

email [REDACTED]

Sent with [Proton Mail](#) secure email.

----- Original Message -----

On Tuesday, December 13th, 2022 at 7:51 PM, Ms. [REDACTED] wrote:

Lisa,

Please let me know if there are further activities that you want me to perform to fulfill any requirements you may have for me. I am continuing to attend therapy with Fred [REDACTED] as requested.

Kind Regards,

[REDACTED]

[REDACTED]

North Canaan, CT 06018

cell [REDACTED]

email [REDACTED]

Sent with [Proton Mail](#) secure email.



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT L

**Title:** Notice from Connecticut Judicial Branch Office of  
Victim Services Confirming Protective Order  
Issued for Plaintiff Against Affiant (Dkt. No.  
[REDACTED])

**Author(s):** Connecticut Judicial Branch Office of Victim  
Services

**Date(s):** February 2, 2023

**Complaint  
Reference(s):** ¶¶ 32, 73(b), 95



CONNECTICUT JUDICIAL BRANCH  
**OFFICE OF VICTIM SERVICES**  
225 Spring Street, Waterbury, Connecticut 06109

Victim Services Unit  
Toll Free 1-800-822-8428  
Fax 860-263-2777  
TDD: 711

***Restraining and Protective Order Notification Program***

February 2, 2023

Jon Goodwin  
12 Church Ter  
Canaan CT 06018

Re: Docket Number: [REDACTED]  
Defendant: [REDACTED]

Dear Jon Goodwin:

This letter is to inform you that the **Protective Order** issued on October 13, 2022, to protect you or your family member from the person who was arrested under the above docket number ended on February 2, 2023.

Please note that this letter is about the above docket number, so it is possible that other orders of protection issued under other docket numbers may still be in effect.

If you feel that your physical safety is at risk, you may be eligible for a Restraining Order or a Civil Protection Order to protect you from being harassed, threatened, or injured.

A **Restraining Order** may be ordered by the civil or family court to protect victims of domestic violence. A **Civil Protection Order** may be ordered by the civil court to protect victims of sexual assault, sexual abuse, or stalking, who are not related to, in a relationship with, or a household member of the offender.

The most up-to-date information on how to file a Restraining Order or a Civil Protection Order may be found at the Judicial Branch website at [jud.ct.gov/HomePDFs/TRO\\_Instructions.pdf](http://jud.ct.gov/HomePDFs/TRO_Instructions.pdf).

If you need help applying for a Restraining Order, a Civil Protection Order, or have questions about the criminal case, please call your attorney, if you have an attorney, the victim advocate that helped you, the local Domestic Violence Program at 1-888-774-2900, or the Office of Victim Services (OVS) Helpline at 1-800-822-8428.

*The OVS Victim Notification Program provides notification when an order of protection ends. For more information on the OVS Victim Notification Program, please call OVS at 1-800-822-8428.*

Sincerely,

Victim Services Unit

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT M

**Title:** Email from Affiant, to Goodwin, Jon Advising of  
Planned Visit to Residence Without Expression of  
Fear (Nov. 23, 2023 7:28 AM)

**Author(s):** Affiant

**Date(s):** November 23, 2023

**Complaint** ¶43  
**Reference(s):**

## stop at house

---

From Ms. [REDACTED]

To Jon Goodwin<jgoodwin@protonmail.com>

Date Thursday, November 23rd, 2023 at 7:28 AM

---

Jon,

I need to stop at the house to get documents, personal items and a pair of boots. I will be there today between 12 and 1pm. I will only be there for a few minutes to grab those belongings.

Kind Regards,

[REDACTED]

[REDACTED]

[REDACTED], CT [REDACTED]

cell [REDACTED]

email [REDACTED]

Sent with [Proton Mail](#) secure email.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT N

**Title:** Email from Affiant to Goodwin, Jon Confirming Plaintiff Could Remain in Residence and Describing Him as “Like Family” (Nov. 23, 2023 4:31 PM)

**Author(s):** Affiant and Jon Goodwin

**Date(s):** November 23, 2023 4:31 PM

**Complaint Reference(s):** ¶¶ 45, 118, 119

**Re: Fw: Re: [REDACTED] Transcript**

---

From Ms. [REDACTED]

To Jon Goodwin<jgoodwin@protonmail.com>

Date Thursday, November 23rd, 2023 at 4:31 PM

---

Jon,

Loving someone is not easy. I love you. I do not expect saying that will change anything, but my love for you won't stop because we are not together, nor do I believe we can be together now. I also know that you don't believe me because you have expressed enormous anger toward me, and you said so. I am understanding of that. Our relationship is complex due to the interference of other parties, the court, and the trauma and abuse that I have been enduring for over 20 years. I believe you came into my life without fully understanding the breadth of harm and damage that was done, and you nor I expected it to continue. Given the circumstances, I know you did your best. I know you were drawn into a terrible situation, and I don't blame you for any of it. The sadness I carry in not being able to have a relationship with my children or influence their lives in any way is unbearable. I am sorry you got to know me through that part of my life. You have given me a direction and hope that things will change; as hard as it may be to move forward each day, I still have a path because of you. I wanted so badly to grow old with you, but I could not put aside the emotions and trauma I am dealing with because of the loss of my relationship with my children. Given what I have been through, I found it very hard to trust you or anyone. I wish that were not true. I know how hard you worked to help me, and I am grateful for everything. I am most thankful for your kindness, friendship, and willingness to guide me forward during an incredibly difficult period in my life. I have enjoyed all of the good moments with you, including our travels to Wyoming and Maine, you reading to me, friends for dinners, dinners out, buying the Canaan home and moving there with the dream of working on it with you, buying the camper, you playing the guitar, playing with the dogs, discovering I like country music, learning how to shoot a gun, bow and arrow target shooting, and even dreams of going to Alaska and many others.

I hope you understand that I could/can not be in a relationship with you because I am overwhelmed by the loss of my relationship with my children, and over time, it has become worse for me, not better. I struggle to discuss court issues because I am overwhelmed and hurting, yet I was looking to you for those answers, and that was not fair or helpful. I can't focus on a relationship, and I know that I need time away from any expectations and focus on you and me. I needed time to destress and manage my thinking to move forward. Therapy was not doing it, and yes, I have a PhD now, but I still need space to manage all my life obligations. I care deeply about you, and I know you must make your best choices and have your plans. I am sad about the circumstances, but I don't know how to improve things for you immediately. I know that I need time to complete the Civil Cases, and I won't be able to emotionally add any additional responsibilities into my life until that is complete. You are welcome to stay at the home in Canaan. I will always keep the door open for you; I consider you family.

[REDACTED] went to the hospital for a psychiatric emergency on Tuesday morning. I was made aware when the hospital called me asking for a release. It took 3 hours for the hospital to contact me, but I could not provide it because Judge Winslow gave the father full custody. I don't know where [REDACTED] was, and I don't know what happened. I do know that it took place at [REDACTED] home. I also know that [REDACTED] has not gotten a psychiatrist for [REDACTED]. It devastated me because I could not be there for my son. I cannot get the hospital report because [REDACTED] is over 12, and I need [REDACTED] to sign a release. I got the Discharge papers, which identified the timing and the referral to a psychiatrist.

I know you are still angry about the situation with Rob. I had nothing to do with his choice. I am sorry that I did not communicate to you clearly that there was time to deal with the [REDACTED] case. I emailed Rob earlier this week, telling him I wanted a discussion after the holiday to review the [REDACTED] case for risk and steps to move forward. I have a Dec 1 family court date to deal with the finances, and I have a lead on a possible account(s) [REDACTED] had before the June 19th dissolution date. I have [REDACTED] mother's will; let me know if you want a copy. We still both have Civil Cases against [REDACTED], and I hope we can work toward completing those.

Please give hugs to Elvis for me. I miss him too!

Enjoy your holiday. [REDACTED]

Kind Regards,

[REDACTED]

[REDACTED]

[REDACTED]

cell [REDACTED]

email [REDACTED]

Sent with [Proton Mail](#) secure email.

On Saturday, November 18th, 2023 at 10:00 PM, Jon Goodwin <jgoodwin@protonmail.com> wrote:

Okay. I'll get the bar complaint filed against Rob on Wednesday and we can go from there.

---

[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

On Saturday, November 18th, 2023 at 9:57 PM, [REDACTED]  
wrote:

I am working through documents for my Dec 1 family hearing right now and I cannot address the details of the [REDACTED] case at the moment. I do not plan to drop it. Unless you want me to do that.

Kind Regards,

[REDACTED]

[REDACTED]

[REDACTED]

cell [REDACTED]

email [REDACTED]

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

JON GOODWIN,  
*Plaintiff,*

v.

MICHAEL EGAN, ET AL  
*Defendants.*

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Civil Action No. 3:25-cv-01711 (VAB)

## EXHIBIT O

**Title:** Notice of Deposition of Fact Witness Affiant and  
Document Requests in *Goodwin, Jon v. [Affiant's  
Ex-husband]*, No. [REDACTED]  
[REDACTED])

**Author(s):** Jon Goodwin

**Date(s):** January 25, 2024 (document contains clerical year  
error)

**Complaint  
Reference(s):** ¶¶ 46(e), 73(g)



DOCKET NO: [REDACTED] : SUPERIOR COURT  
JON GOODWIN, ET AL : J.D. OF LITCHFIELD  
V. : AT TORRINGTON  
[REDACTED] : JANUARY 25, 2023

**NOTICE OF DEPOSITION**

**PLEASE TAKE NOTICE** that Plaintiff, **Jon Goodwin**, in the above-entitled matter will take the deposition of witness [REDACTED] [REDACTED], on **February 5, 2024, at 10:00 a.m.** at The Law Office of [REDACTED], [REDACTED], [REDACTED] **CT 06770** before a court reporter, or other competent authority pursuant to the attached subpoena served on Ms. [REDACTED], January 25, 2024. The deposition will continue from day-to-day until completed.

**PLAINTIFF,  
JON GOODWIN, ET AL**

By: /s/ *Jon Goodwin*  
Jon Goodwin  
12 Church Terrace  
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 January 25, 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 [REDACTED] h

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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

TO: [REDACTED]  
[REDACTED]  
[REDACTED], CT 06776-4553  
[REDACTED]

**By Authority of the State of Connecticut,** You are hereby commanded to appear at the Law Offices of [REDACTED] on the Fifth Day of February, 2024, at 10:00 a.m.

Then and there to testify what you know in a certain cause pending in the Superior Court for the Litchfield Judicial District, wherein JON A. GOODWIN Is Plaintiff and [REDACTED] Is Defendant

AND YOU ARE FURTHER COMMANDED TO PRODUCE AT THAT TIME THE FOLLOWING:

1. All court transcripts in your possession or control concerning your divorce litigation with [REDACTED] and concerning the case of Goodwin v. [REDACTED]
2. All documents evidencing [REDACTED] providing juvenile or family court records to third parties, including school officials, from January 1, 2018, to the present.
3. All emails and/or text messages and/or other communications from January 1, 2018, to the present concerning Jon Goodwin, Raymond Milot [REDACTED] or [REDACTED].
4. All OFW messages from January 1, 2018, to the present, including attachments.
5. All arrest records concerning [REDACTED]
6. All photographs and videos depicting bruising on your body inflicted by [REDACTED]
7. All photographs and videos depicting Jon Goodwin.
8. All photographs and videos depicting [REDACTED] t.
9. All financial records of [REDACTED].
10. All arrest records concerning you.
11. The bolts used as weapons by [REDACTED] on November 1, 2019, to attack

██████████

12. All documents and communications from January 1, 2018, to the present regarding violent and otherwise anti-social conduct by your minor children including statements by ██████████ regarding her manipulation of people.

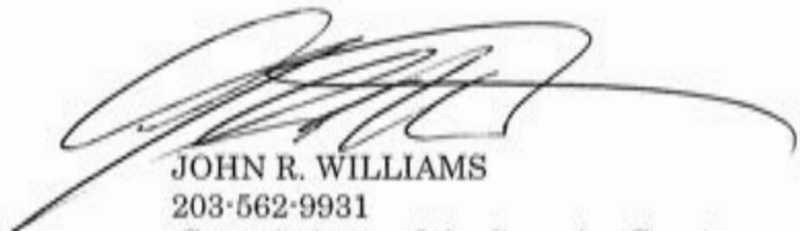
13. All emails and/or text messages and other communications from January 1, 2018, to the present with ██████████ regarding Jon Goodwin, ██████████, your minor children or litigation in which you are involved.

14. Lawyer representation letters between you and ██████████ and you and ██████████

Hereof fail not, under penalty of the law in that case provided.

Dated at New Haven this 24<sup>th</sup> day of January, 2024.

To any proper officer or indifferent person to serve and return.

  
JOHN R. WILLIAMS  
203-562-9931  
*Commissioner of the Superior Court*

A TRUE COPY:

ATTEST:

County, SS.

Conn.

Then and by virtue hereof, I read the within Subpoena in the presence and hearing of each of the within named witnesses:

and paid, tendered each the fees allowed by law.

Attest:

Witness Fees

Service

Travel

Endorsement

.....  
Connecticut State Marshal  
Constable  
Indifferent Person

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VS.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

|                     |   |                                      |
|---------------------|---|--------------------------------------|
| JON GOODWIN,        | : |                                      |
| <i>Plaintiff,</i>   | : |                                      |
|                     | : |                                      |
| v.                  | : | Civil Action No. 3:25-cv-01711 (VAB) |
|                     | : |                                      |
| MICHAEL EGAN, ET AL | : |                                      |
| <i>Defendants.</i>  | : |                                      |

EXHIBIT P

|                                    |                                                                 |
|------------------------------------|-----------------------------------------------------------------|
| <b>Title:</b>                      | Restraining Order Hearing Family Services Report<br>(JD-FM-258) |
| <b>Author(s):</b>                  | Defendant Michael Egan                                          |
| <b>Date(s):</b>                    | March 11, 2024                                                  |
| <b>Complaint<br/>Reference(s):</b> | ¶¶ 23, 24, 69–71, 80, 91, 93, 94, 118, 119                      |

**RESTRAINING ORDER HEARING  
FAMILY SERVICES REPORT**  
JD-FM-258 Rev. 5-17  
P.A. 16-105 § 4

**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

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|-------------------------------------------------------------------------------------|
| Court Use Only                                                                      |
| ROHFSR                                                                              |
|  |

|                                                                                            |                                      |                                                       |
|--------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------|
| Name of Applicant<br>[REDACTED]                                                            | Name of Respondent<br>Jon A. Goodwin | Docket number<br>LLJ FA245016249S                     |
| Address of Court (number, street, town, zip code)<br>50 Field Street, Torrington, CT 06790 |                                      | Temporary Restraining Order hearing date<br>3/11/2024 |

**Records Review and Risk Level**

**I. Family Services has conducted a criminal record check and found the following information on the respondent:**

List dates and charges in the spaces below. Specifically identify family violence cases. Do not include victim names however identify if the family violence is with the applicant of this hearing or not.

A. All Pending criminal cases:

0 Number of cases

B. Convictions for a violent crime:

0 Number of convictions

C. Outstanding warrants:

0 Number of warrants

**II. Family Services has reviewed the Family Civil Court records and found:**

A. Pending and disposed Family Civil Court Matters:

0 Number of matters

Identify matters between the applicant and respondent and specify what is pending and what is disposed.

**III. Protective/Restraining Order Registry Check (Applicant and Respondent) revealed:**

A. Current Protective/Restraining/Standing Criminal Protective Orders: 0 Number of current orders

List dates and specify below. Indicate if they are with the applicant or another individual. Do not include today's Restraining Order in this count or list.

B. Expired Protective/Restraining Orders:

0 Number of expired orders

List dates and specify below. Indicate if they are with the applicant or another individual.

**RESTRAINING ORDER HEARING  
FAMILY SERVICES REPORT**JD-FM-258 Rev. 5-17  
P.A. 16-105 § 4**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

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ROHFSR



|                                                                                            |                                      |                                                       |
|--------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------|
| Name of Applicant<br>[REDACTED]                                                            | Name of Respondent<br>Jon A. Goodwin | Docket number<br>LLI [REDACTED]                       |
| Address of Court (number, street, town, zip code)<br>50 Field Street, Torrington, CT 06790 |                                      | Temporary Restraining Order hearing date<br>3/11/2024 |

**IV. Family Services Risk Assessment administered with the following outcome:**DVSI-R (Scale 0 - 28) Actual Score 10 Low Risk: 0 - 4 Moderate Risk: 5 - 10 High Risk: 11 - 28SRI (Scale 0 - 5) Actual Score 1 High Risk: 2 or moreAssessment: ☐ Low Risk ☒ Moderate Risk ☐ High Risk

**Note:** All levels of risk are for the statistical probability for recidivism or potential danger for the applicant. A score of low risk does not mean that future violence will not occur, and a score of high risk does not necessarily mean that future violence will occur. All cases of intimate partner violence have a potential for increased frequency and/or escalation. **This report may be considered by the court, in its discretion, consistent with General Statutes Section 46b-15(b), but does not negate the requirement for proof of the statutory criteria necessary for granting an application for a restraining order.**

|                                                                                  |                   |
|----------------------------------------------------------------------------------|-------------------|
| Report prepared by: (Name and title)<br>Michael Egan, Family Relations Counselor | Date<br>3/11/2024 |
|----------------------------------------------------------------------------------|-------------------|

**ADA NOTICE**

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at



## EXHIBIT Q

**Title:** March 11, 2024, Hearing Transcript Excerpts (judicial reliance; lack of fear; co-presence permitted; no fear of plaintiff asserted; contradiction of affidavit and threat narrative not reconciled)

**Author(s):** Kelly Ward (Recorder)

**Date:** March 11, 2024

**Complaint Reference:** ¶¶ 46(e), 75–77, 79, 82, 85, 91, 101, 123–124, 126–127, 133

LLI-[REDACTED]-S : SUPERIOR COURT  
[REDACTED] ■. [REDACTED] : JUDICIAL DISTRICT OF LITCHFIELD  
v. : AT TORRINGTON, CONNECTICUT  
JON A. GOODWIN : MARCH 11, 2024

TRANSCRIPT OF PROCEEDINGS

11:07 TO 11:30

BEFORE THE HONORABLE WALTER MENJIVAR, JUDGE

A P P E A R A N C E S:

Representing the Plaintiff:

[REDACTED]  
[REDACTED]  
[REDACTED]

Representing the Defendant:

JON A. GOODWIN  
Self-Represented Party

Recorded By:  
Kelly Ward

Transcribed By:  
Vanessa Fiorito  
Court Recording Monitor  
50 Field Street  
Torrington, Connecticut 06790

1 THE COURT: So, we are here on the matter of  
2 [REDACTED] v. Goodwin. Could I have the parties put  
3 their appearances on the record, please.

4 ATTY. [REDACTED]: [REDACTED] for Ms.  
5 [REDACTED], who is to my left.

6 THE COURT: Good morning. Good morning and  
7 welcome.

8 MS. [REDACTED]: Good morning.

9 MR. GOODWIN: Jon Goodwin. I'm appearing pro  
10 se.

11 THE COURT: Okay. Good morning and welcome.

12 MR. GOODWIN: Good morning.

13 THE COURT: So, we are here on a temporary  
14 restraining order application filed by Ms. [REDACTED] v.  
15 Mr. Goodwin. I've heard that you met with Family  
16 this morning. Is that in fact correct?

17 MR. GOODWIN: Yes, that's correct.

18 THE COURT: Okay.

19 ATTY. [REDACTED]: Yes, Your Honor.

20 THE COURT: And, sir, I've heard reports that  
21 you are going to be requesting a continuance to  
22 obtain counsel. Is that in fact the case or not?

23 MR. GOODWIN: Yes, Your Honor. I have a  
24 disabling autoimmune disease and I need rest periods  
25 and I've got -- and I think it would be best if I  
26 could find counsel to help me, assist me.

27 If you're going to enter an order against me

1 affidavit. We're not going to get into the hearing  
2 today. I will grant your request for a continuance  
3 to seek an attorney.

4 The next time that you appear here in court,  
5 you'll either be here represented by your counsel.  
6 If your counsel is not here, we will have to move  
7 forward.

8 At the present time, I'm correct that they're  
9 not residing together. They haven't -- there's no  
10 criminal proceeding pending, is that correct?

11 ATTY. [REDACTED]: Actually, Your Honor, there is  
12 -- Mr. Goodwin went into Ms. [REDACTED]'s computer  
13 records going back to family photographs from about  
14 17 years ago.

15 THE COURT: Oh, okay. I think I read about  
16 that in the affidavit. Okay.

17 ATTY. [REDACTED]: And Mr. Goodwin filed a  
18 complaint with the FBI and the National Center for  
19 Missing and Exploited Children. That became an  
20 investigation by the New Milford Police Department,  
21 which has been -- which is now pending. Mr.  
22 Goodwin, upon information and belief, Mr. Goodwin is  
23 -- there will be criminal charges.

24 THE COURT: I was going to ask is there a  
25 criminal protective order in place?

26 ATTY. [REDACTED]: There is not --

27 THE COURT: No.

1 MR. GOODWIN: Right, Your Honor. But you are  
2 being misled here by Mr. Shiffrin, who again, I'm  
3 going to call him as a witness. You're being  
4 grossly misled by him. Grossly. And I need a  
5 couple of weeks, Your Honor. I would appreciate a  
6 couple of weeks to try -- I have an autoimmune  
7 disease. I have doctor's appointments. I have all  
8 kinds of things going on.

9 THE COURT: Well, my concern is that someone  
10 says that they are out of their house. I don't know  
11 that in fact is the case --

12 MR. GOODWIN: Yes, Ms. [REDACTED]'s been out of the  
13 house since mid-October. And she's actually --  
14 she's even sent me emails and she's come back into  
15 the house to get possessions.

16 THE COURT: Okay. Let's stop. Let me just --  
17 I'm trying to fair it out just the continuance. Has  
18 she in fact been out of the house since mid-October?

19 ATTY. SHIFFRIN: She left the house during --  
20 in October/November.

21 THE COURT: Okay.

22 ATTY. [REDACTED]: And Mr. Goodwin -- when she  
23 had the proceeding in Danbury that did not involve  
24 Mr. Goodwin -- Mr. Goodwin sent communication.

25 THE COURT: Okay. So, we'll leave that for the  
26 hearing.

27 ATTY. SHIFFRIN: And, Your Honor, if I -- just

1 ATTY. [REDACTED] -- between the respondent --

2 THE COURT: Sir, can you agree to that?

3 ATTY. [REDACTED]: -- and the applicant.

4 MR. GOODWIN: Yeah, absolutely.

5 THE COURT: Okay.

6 MR. GOODWIN: And I don't know why I would be  
7 prevented from going to a public hearing when the  
8 parties that I'm involved in litigation with, in a  
9 courthouse, in a secure courthouse, why that would  
10 be a problem.

11 THE COURT: Sir, right now what, you know,  
12 Counsel has represented is he's asking me to take a  
13 stipulation. The Court -- here in open court, I can  
14 take a stipulation.

15 MR. GOODWIN: Yeah, I will stipulate that I  
16 will not communicate directly with Ms. [REDACTED]. I  
17 have -- we're in ongoing litigation. I have asked  
18 for a deposition of Ms. [REDACTED] and that is being  
19 heard by another judge in this court. Her attorney  
20 filed for a motion for a protective order.

21 THE COURT: Okay. So, I don't want to get into  
22 the details. If there's a stipulation -- is that  
23 what you were seeking, sir? I mean, you'd have to  
24 phrase it because if we're going to make a clear  
25 court order --

26 ATTY. [REDACTED]: Yes.

27 THE COURT: -- and hold him in contempt of it

1 THE COURT: Stop.

2 MR. GOODWIN: That's the agreement.

3 THE COURT: You don't want to agree that --

4 ATTY. [REDACTED]: Your Honor, we're not agreeing  
5 that she can't come to the house. We'll file  
6 another -- we'll file an ex parte application --

7 MR. GOODWIN: Well --

8 ATTY. [REDACTED]: -- and we'd like Mr. -- and in  
9 that we'd like Mr. Goodwin's guns to be surrendered  
10 to the state police so that there isn't the  
11 potential of that threat.

12 MR. GOODWIN: There isn't a threat, Your Honor.

13 THE COURT: So, I'm hearing that you're not  
14 coming to a -- how about the stipulation of you just  
15 are not going to contact her.

16 MR. GOODWIN: Well, Your Honor, I have a  
17 disabling autoimmune disease. If I have to leave my  
18 home, I have to leave the state. I don't have  
19 another place to go like Ms. [REDACTED] does. And then I  
20 have to leave and so, what we're saying, if I agree  
21 to this stipulation, she comes to the home, then I  
22 could be in contempt of that order. And I don't  
23 want to be in contempt. I will agree to something  
24 that is balanced for two weeks. If she stays away  
25 from the home and doesn't contact me, I won't  
26 contact her. I won't come to the hearing. We'll  
27 keep it and that seems like a fair balance.

1 THE COURT: Counsel.

2 ATTY. [REDACTED]: Your Honor, we will agree that  
3 if Ms. [REDACTED] -- that if Ms. [REDACTED] comes to her home  
4 and Mr. Goodwin is there, he will not be held in  
5 contempt for her presence in her home. But she's  
6 not going to give up the ability to go to her house  
7 and -- where her things are.

8 MS. [REDACTED]: My dog is there and if something  
9 happens --

10 ATTY. [REDACTED]: Her dog is there. This is --

11 MR. GOODWIN: Your Honor --

12 THE COURT: Okay. I --

13 MR. GOODWIN: -- they're arguing against their  
14 affidavit right now.

15 THE COURT: I --

16 MR. GOODWIN: Right now.

17 THE COURT: So right now the parties can't come  
18 to a stipulation. It seems that the safety concerns  
19 -- you're not concerned about her going to the home  
20 and meeting with him. /

21 MS. [REDACTED]: I'm not going to that home.

22 ATTY. SHIFFRIN: My client isn't looking to go  
23 to the home. If there's some exigent circumstance  
24 at the home -- at her home that she needs to attend  
25 to -- that hasn't been the case. That isn't  
26 anticipated.

27 THE COURT: Okay.



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

|                     |   |                                      |
|---------------------|---|--------------------------------------|
| JON GOODWIN,        | : |                                      |
| <i>Plaintiff,</i>   | : |                                      |
|                     | : |                                      |
| v.                  | : | Civil Action No. 3:25-cv-01711 (VAB) |
|                     | : |                                      |
| MICHAEL EGAN, ET AL | : |                                      |
| <i>Defendants.</i>  | : |                                      |

EXHIBIT R

|                                 |                                                                                                                                                                      |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Title:</b>                   | Email from Jon Goodwin to Attorney Participant, with<br>Copies to Defendants Egan and Killiany, Regarding<br>Restraining Order Application and Related<br>Litigation |
| <b>Author(s):</b>               | Jon Goodwin                                                                                                                                                          |
| <b>Date:</b>                    | March 19, 2024                                                                                                                                                       |
| <b>Complaint<br/>Reference:</b> | ¶¶ 83–90, 99–101, 127, 133                                                                                                                                           |

## Your Abuse of Legal Process

From Mr. Goodwin Jon <jgoodwin@protonmail.ch>

To S [REDACTED], lisa.killiany@jud.ct.gov, michael.egan@jud.ct.gov,  
John R Williams<jrw@johnrwilliams.com>

Date Tuesday, March 19th, 2024 at 12:25 PM

Lawyer [REDACTED],

I am copying Lisa Killiany and Michael Egan on this email.

Ms. Killiany is the family relations counselor who assisted with the case # [REDACTED] when your client, [REDACTED], attacked me and was arrested. As you are aware there was a protective order issued in that case in my favor.

Mr. Egan is the family relations counselor on [REDACTED], the case your client filed against me March 4, 2024.

For everyone's edification, there is a great deal of litigation pending between Ms. [REDACTED], Ms. [REDACTED]'s ex-husband, my neighbors, [REDACTED] and [REDACTED], and me. Case docket numbers are as follows:

1. [REDACTED], filed 04/20/2018
2. Jon Goodwin v [REDACTED] filed 10/21/2021
3. [REDACTED], 10/21/2021
4. Jon Goodwin v. [REDACTED]
5. Jon Goodwin v. [REDACTED], 02/28/2024 (Ms. [REDACTED] was served 02/26/2024 (En. 100.30)

I went to the Litchfield JD Courthouse this morning to file the motion for continuance I emailed you earlier (see attached). After filing that document with the clerk, I left a copy of it for Mr. Egan with family services, then I went into the court services center to check the docket in [REDACTED]. After checking the docket, I got up to leave and noticed your client, [REDACTED], speaking to a court services person, telling her I am continuing to harass her and complaining about my filing the request for continuance. Is your client following me?

I've only had one email exchange with [REDACTED] since she came by here to pick up mail, documents and clothing in December 2023. She initiated that email to request I fix a fence at our residence. Because [REDACTED] quit coming by to collect her mail, I sent it to her mother's house via express mail on February 6, 2024. Last week, I had a mutual friend of [REDACTED] and mine attempt to deliver clothes, mail and other items. Her mother angrily refused to allow him to drop them off citing that we are in litigation. I understand [REDACTED] picked up her belongings at our friend's home over the weekend.

At the hearing last Monday, it was clear to the judge from statements you and your client made in court that your bringing the specious abuse protective order request was a pretext to fraudulently remove me from our residence. You both are aware I have a stress induced autoimmune disease, need to be near my doctors and must rest several

times per day. Acting cruelly toward me is not going to resolve any of the issues your client, it's only going to exacerbate her legal problems.

Attempting to cause me to leave my residence is not the only fraudulent pretext for your specious abuse protective order. Reviewing the court filings in [REDACTED] it's clear that you, [REDACTED]'s lawyers are attempting to obtain a restraining order against me so I do not attend any of the hearings in that case. See Id., En. 209. Judge Winslow has not closed the courtroom in that case. Connecticut law is very clear that the public have a right to attend civil hearings. Moreover, I have pending litigation against both Mr. [REDACTED] and Ms. [REDACTED] which makes my attendance even more appropriate-- if I choose to attend of course.

As you are aware both your client and [REDACTED] filed for protective orders in Jon Goodwin v [REDACTED] and [REDACTED] v [REDACTED] (10/21/2021) prevent me from taking their depositions. Those motion are scheduled to be heard by Judge Lynch on April 9, 2024. It is clear your attempts to obtain a restraining order against me are also an attempt to prevent me from prevailing in those actions or if I do to misuse legal process to attempt to interfere with my due process rights.

The deposition noticed for tomorrow is cancelled. Because of today's episode with your client and your refusal to communicate with me to make arrangements for that deposition to be taken at the Litchfield Courthouse, I will seek relief directly from the court.

Your continuing abuse of legal process will not be tolerated. You and your client need to cease and desist immediately.

Jon Goodwin

From: Jon Goodwin <[jag@jongoodwin.com](mailto:jag@jongoodwin.com)>  
Date: On Sunday, March 17th, 2024 at 1:50 PM  
Subject: Fw: Motion to Intervene, Motion for Continuance, etc.  
To: [REDACTED]  
CC: John R Williams <[jrw@johnrwilliams.com](mailto:jrw@johnrwilliams.com)>

[REDACTED],

Read carefully.

I will be filing a motion to intervene in [REDACTED]. There are multiple bases for my request, including, [REDACTED] threat, communicated through [REDACTED] falsely testify that I abused [REDACTED] and [REDACTED] to undermine my civil case against him is outrageous. As you are aware, [REDACTED] instigated an investigation against me with DCF. DCF cleared me of the allegations and sent a letter stating "DCF finds that you do not pose a risk to the health, safety or well-being of children." That needs to be brought to the attention of the family court along with: 1) [REDACTED] and a male accomplice's assaults on me at the New Milford Home Depot; 2) [REDACTED] and [REDACTED]'s attempt to settle [REDACTED] civil case by "allowing" her visits with [REDACTED]; 3) [REDACTED] intentional destruction of evidence; 4) [REDACTED] using his child's disability to cause violent altercations in [REDACTED] and my home; 5) [REDACTED] impairing the morals

of [REDACTED] and his children, etc. I will illustrate for the Court that [REDACTED] suicidal ideation stems from [REDACTED] abuse of her and her children and will try to clean up some of the mess you made by not being prepared. Needed is for the court to order an evaluation which I am sure would conclude that [REDACTED] offers a better environment for the [REDACTED] Minor children. My intervention will also offer me the opportunity to clear my good reputation that you and [REDACTED] have soiled with the Court.

[REDACTED] is a much better lawyer. It's a shame [REDACTED] fired him and is allowing you to finish the destruction of her life started by [REDACTED].

I dropped clothes, sun glasses, reading glasses, packages and mail for [REDACTED] at the home of [REDACTED] in the Candlewood Lake Club last Thursday. when [REDACTED] attempted to deliver them to [REDACTED] other's home ([REDACTED]) at [REDACTED], [REDACTED] informed him that she would not accept them because of "litigation." I suppose that is another game you are playing. I'm informed that [REDACTED] is aware her belongings are at the [REDACTED] and she intended to pick them up there.

I have not heard back from you regarding the location of [REDACTED] deposition. I really don't want to take it in your home which I understand from [REDACTED] is a "packrat's nest." Given you and your client's false statements regarding me, I prefer that the deposition take place in a courthouse or other secure facility. If need be, I will file a motion requesting such leave from the court. Let me know how you'd like to proceed.

Attached is a motion for continuance the basis of which is stated therein. I will be filing the motion tomorrow afternoon. Please inform me forthwith of your position thereon.

Jon Goodwin

From: Jon Goodwin <[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)>  
Date: On Tuesday, March 12th, 2024 at 12:42 PM  
Subject: [REDACTED] v [REDACTED] Renotice of Deposition  
To: [REDACTED]

[REDACTED]

Attached is my renotice to take your client's deposition on March 20, 2024 at your "office." The renotice includes document requests.

To reiterate, I realize that you work out of your home and car. I'm happy to accommodate you by taking your client's deposition at the Torrington Town Hall. Or, if you can arrange for the deposition to be taken at the Litchfield Judicial District Courthouse I am happy with that choice as well. Please let me know your preference as soon as possible so I can make arrangements with the court reporter.

Jon Goodwin

[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)  
+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

From: Jon Goodwin <[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)>

Date: On Monday, March 11th, 2024 at 8:00 PM

Subject: [REDACTED] Mail, etc.

To: [REDACTED]

[REDACTED],

[REDACTED] quit collecting her mail from the house in December. I sent her an express mail on February 6th with all of the mail that piled up in January. There are some items her now and several packages. What would she like me to do with it? Keep it here? Send it to her mother's house? I could drop it along with the packages at [REDACTED] [REDACTED] house or another place of her choosing the next time I'm in the New Milford area.

Dog Elvis is doing well. I have him on a much better diet than what [REDACTED] was feeding him and I think his overall health is improving. I know her mother doesn't allow Elvis in the house. That said, if she want him I'm delighted to drop him somewhere for her.

Your client made several major provably false misrepresentations in her affidavit. I understand abuse of process pales in comparison to all of the other claims I'm asserting against her. That said, if she continues with the affidavit as it stands, I will seek all available legal remedies to deal with her false statements. Accordingly, I strongly suggest your client drop her specious request and focus on answering the complaint I served on her and the litany of other litigation in which she is involved.

Jon Goodwin

[jgoodwin@protonmail.ch](mailto:jgoodwin@protonmail.ch)

+1 (212) 372-4803 office

+1 (307) 760-0315 mobile

---

**337.87 KB** 1 file attached

2024-03-19 082200 Goodwin, Jon, Motion for Continuance in [REDACTED].pdf 337.87 KB

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

|                     |   |                                      |
|---------------------|---|--------------------------------------|
| JON GOODWIN,        | : |                                      |
| <i>Plaintiff,</i>   | : |                                      |
|                     | : |                                      |
| v.                  | : | Civil Action No. 3:25-cv-01711 (VAB) |
|                     | : |                                      |
| MICHAEL EGAN, ET AL | : |                                      |
| <i>Defendants.</i>  | : |                                      |

EXHIBIT S

|                                    |                                             |
|------------------------------------|---------------------------------------------|
| <b>Title:</b>                      | March 25, 2024, Hearing Transcript Excerpts |
| <b>Author(s):</b>                  | Alyssa Sinopoli (Recorder and Transcriber)  |
| <b>Date(s):</b>                    | March 25, 2024                              |
| <b>Complaint<br/>Reference(s):</b> | ¶¶ 92–94, 103–104                           |

LLI- [REDACTED] : SUPERIOR COURT  
[REDACTED] [REDACTED] : JUDICIAL DISTRICT OF LITCHFIELD  
v. : AT TORRINGTON, CONNECTICUT  
JON A. GOODWIN : MARCH 25, 2024

TRANSCRIPT OF PROCEEDINGS

BEFORE THE HONORABLE WALTER A. MENJIVAR, JUDGE

A P P E A R A N C E S :

Representing the Petitioner:

[REDACTED]  
[REDACTED]  
[REDACTED]

Representing the Respondent:

JON A. GOODWIN  
Self-Represented Party

Recorded and Transcribed By:  
Alyssa Sinopoli  
Court Recording Monitor Trainee  
50 Field Street  
Torrington, Connecticut 06790

1 THE COURT: Good morning.

2 ATTY. [REDACTED]: Good morning, Your Honor.

3 THE COURT: Okay. So, we're going to call the  
4 matter of [REDACTED] *versus Goodwin*. Please come up, sir.

5 THE RESPONDENT: Good morning, Your Honor.

6 THE COURT: Good morning.

7 ATTY. [REDACTED]: Your Honor, for the record, I'm  
8 Attorney Mark [REDACTED]. I am the attorney for the  
9 applicant.

10 THE COURT: Okay. Good morning and welcome. Mr.  
11 Gowdy, could you just state your name for the record,  
12 please.

13 THE RESPONDENT: I'm Mr. Goodwin and --

14 THE COURT: Goodwin.

15 THE RESPONDENT: -- it's Jon Goodwin. I'm  
16 appearing pro-se, Your Honor.

17 THE COURT: Okay. Good morning and welcome. And  
18 I'll just note for the record, if I remember  
19 correctly, I continued this matter to give you an  
20 opportunity to obtain an attorney. It sounds like you  
21 are now representing yourself pro-se in this matter.

22 THE RESPONDENT: Well, it's -- Ms. [REDACTED] has  
23 been involved in an enormous amount of litigation  
24 with DCF, with family matters. I have not been able  
25 to find an attorney until this morning. Literally,  
26 this morning. And he said, well, you know, you're in  
27 court so, let me know when you're out of court and



1 we'll go from there.

2 THE COURT: Okay.

3 THE RESPONDENT: But that's -- it's been  
4 extraordinarily difficult. I mean, I even had a  
5 friend who was going to help me, and he died on the  
6 operating table on Wednesday. I mean, this is --

7 THE COURT: Okay. I'm sorry to hear that. But I  
8 will make the finding that you are proceeding pro-se  
9 in this matter. That the Court has already continued  
10 this matter and will be moving forward. Okay. So,  
11 what we're here for is the hearing -- now, there was  
12 two motions for a temporary restraining order.  
13 They're essentially -- I'm going to consolidate them  
14 unless there's any objection --

15 THE RESPONDENT: Yes. I object, Your Honor.

16 THE COURT: -- to doing that.

17 THE RESPONDENT: I was never served the second  
18 one.

19 THE COURT: Okay. Let's see. Counselor, do you  
20 want to withdraw the second one? We're here for the  
21 relief that would be granted.

22 ATTY. [REDACTED]: Yeah. We're --

23 THE COURT: If it's granted on one, it's --  
24 yeah.

25 ATTY. [REDACTED]: All the Court needs is the  
26 first one and --

27 THE COURT: Okay.

1           ATTY. [REDACTED]: -- it wasn't served on the  
2       advice of family --

3           THE COURT: Okay.

4           ATTY. [REDACTED]: -- of family services because  
5       Your Honor was already going to be holding a hearing  
6       this morning --

7           THE COURT: Okay.

8           ATTY. [REDACTED]: -- and the parties are  
9       summoned.

10          THE COURT: Okay. So, Mr. Goodwin, I'll grant,  
11       you know, your motion to dismiss the second one for  
12       improper service, but we're still proceeding on the  
13       first one.

14          THE RESPONDENT: Okay.

15          THE COURT: Okay. So, we're here for a hearing  
16       on the temporary restraining order. And I -- just to  
17       make clear for the parties so that we can confine the  
18       evidence and testimony to matters that are relevant,  
19       the Court is here to apply the statute in deciding  
20       this matter, namely that the applicant is a family or  
21       household member and that they, the applicant, are  
22       subjected by that family or household member, the  
23       respondent, to a continuous threat of present  
24       physical pain or physical injury, to stalking, or to  
25       a pattern of threatening or coercive control, which  
26       is a pattern of behavior that, in purpose or in  
27       effect, unreasonably interferes with the applicant's

1           freewill and personal liberty.

2           The way that the hearing will work is I'll hear  
3           from the applicant first. They can put on any  
4           evidence that they would like to meet that standard.  
5           The respondent will have an opportunity to cross-  
6           examine. I may limit that cross-examination based on  
7           what I hear. It needs to be relevant to this, and I  
8           may -- deciding -- depending on how it goes, require  
9           that those questions come through me, and if I find  
10          them to be relevant, then I'll ask those questions on  
11          cross-examination.

12          For both the parties -- I know that you have  
13          counsel, so but, I see that you don't have counsel,  
14          Mr. Goodwin. I just remind you that if there are any  
15          criminal proceedings, anything that you say in this  
16          court proceeding is being recorded by a court  
17          monitor. You have certain Fifth Amendment rights. You  
18          have the right, you know, to remain silent if you so  
19          choose. You have the right to stop answering  
20          questions. You have the right against self-  
21          incrimination. So, I just make you aware of that. At  
22          this point, I'm ready to conduct the hearing.  
23          Counsel, you may call your first witness.

24                 ATTY. [REDACTED]: Thank you, Your Honor. Would  
25                 Your Honor like my client to be in the witness box or  
26                 to testify from counsel table?

27                 THE COURT: Yes. I'll say from the witness box.

1           restraining order does not apply to a civil action,  
2           so you conducting discovery, as long as it goes  
3           through the proper legal avenues. The respondent in  
4           this case may return to the applicant's home. He has  
5           noted that he has moved out, but he can -- if he  
6           needs to go back with a police escort to retrieve his  
7           belongings, he may do so.

8           Sir, I want to make a couple of things clear for  
9           the record. The first is that I have issued the  
10          restraining order. It'll apply for a period of six  
11          months. You have noted that you no longer -- you  
12          understand that the relationship between you and the  
13          applicant is over. If you don't breach this  
14          agreement, in six months you can move on with your  
15          life. If you do breach this agreement, there are  
16          criminal penalties that may be applied. And I want  
17          you to be very aware of those, so that you understand  
18          these conditions because it is a separate criminal  
19          offense. It's a felony. It's punishable with up to  
20          five years imprisonment and a \$5,000 fine.

21               THE RESPONDENT: I -- Your Honor.

22               THE COURT: Do you understand that sir?

23               THE RESPONDENT: Yes, I do. Can I ask you a  
24          question, Your Honor?

25               THE COURT: I've issued my order. This is not  
26          the time for questions.

27               THE RESPONDENT: I just --

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

|                     |   |                                      |
|---------------------|---|--------------------------------------|
| JON GOODWIN,        | : |                                      |
| <i>Plaintiff,</i>   | : |                                      |
|                     | : |                                      |
| v.                  | : | Civil Action No. 3:25-cv-01711 (VAB) |
|                     | : |                                      |
| MICHAEL EGAN, ET AL | : |                                      |
| <i>Defendants.</i>  | : |                                      |

EXHIBIT T

|                                |                                                                                                                                                                                   |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Title:</b>                  | Affiant Deposition Excerpts (third-party shaping; public-hearing attendance; lack of personal knowledge; Attorney inclusion; going back and forth; June 2024 filings); pp. 45-75. |
| <b>Author(s):</b>              | Jacqueline V. McCauley (Reporter)                                                                                                                                                 |
| <b>Date(s):</b>                | November 16, 2025                                                                                                                                                                 |
| <b>Complaint Reference(s):</b> | ¶¶ 23, 30, 48, 60, 62, 96, 97                                                                                                                                                     |

DOCKET NUMBER: LLI-CV24[REDACTED]-S : SUPERIOR COURT

JON A. GOODWIN

VS.

:  
: JUDICIAL DISTRICT  
: OF LITCHFIELD  
: AT TORRINGTON

DEPOSITION OF: [REDACTED]

DATE: NOVEMBER 16, 2025

HELD AT: \*\*HELD THROUGH VIDEOCONFERENCE  
AND SPEAKERPHONE/CELLPHONE  
WITH EACH PARTICIPANT AT  
THEIR RESPECTIVE LOCATIONS

Reporter: BRANDON LEGAL TECH  
JACQUELINE V. McCAULEY, RPR, CSR  
LICENSE #40

37 Pinnacle Mountain Road  
Simsbury, CT 06070  
(860) 528-2244

1 or asking you to move. I am just not going to pursue  
2 damages against the [REDACTED]. I need to do that for  
3 myself. You have your own choices to make."

4 Q. Who informed you that the [REDACTED] would  
5 not press a counterclaim against you if you agreed to  
6 do the same?

7 A. My attorney.

8 Q. Which attorney?

9 A. Actually, both [REDACTED] and [REDACTED]  
10 had said that to me.

11 Q. Court reporter, please [REDACTED] that Exhibit  
12 C.

13 (Plaintiff's Exhibit C, [REDACTED]ed for  
14 identification.)

15 Q. Have you ever told anyone that Mr. Goodwin  
16 gaslighted you?

17 A. I don't know.

18 Q. What does gaslighting mean?

19 A. I don't know how to answer that.

20 Q. But you used that term loosely. Have you  
21 ever used that term loosely if you don't know what it  
22 means?

23 A. I don't know what to say to that.

24 Q. Did you state in your interrogatories  
25 provided to Mr. [REDACTED] in [REDACTED] vs. [REDACTED] that you were

1 [REDACTED] regarding the theft of  
2 your logos?

3 A. They stole them from you and, yes, because  
4 I designed them.

5 Q. Did you purchase a computer monitor for  
6 Mr. Goodwin in October 2022?

7 A. Yes.

8 Q. Why did you purchase the monitor for him?

9 A. Because I accidentally cracked it.

10 Q. How did it get cracked?

11 A. I threw a dog collar into a room, and it  
12 hit the corner of the monitor.

13 Q. After Mr. Goodwin -- after that incident  
14 Mr. Goodwin contacted emergency personnel to help; is  
15 that correct?

16 A. No.

17 Q. What happened after that happened?

18 A. Mr. Goodwin called the police and told  
19 them that I assaulted him and that I went for his gun,  
20 and then the police turned around and arrested me.

21 Q. You have a copy of the 911 call that Mr.  
22 Goodwin allegedly made those statements on?

23 A. No.

24 Q. No?

25 A. No.



1 Q. Then how do you know what Mr. Goodwin told  
2 the police?

3 A. Because that's what the social worker told  
4 me.

5 Q. Which social worker?

6 A. The one in Litchfield that I had to go and  
7 see with Attorney [REDACTED]. I don't know -- Lisa  
8 Killarney? I can't recall her full name.

9 Q. And you cut off Mr. Goodwin from the  
10 health insurance policy after that incident, correct?

11 A. I didn't just cut it off. I removed you  
12 from my policy. It was my policy.

13 Q. But subsequent to that, your removal, Mr.  
14 Goodwin had no health insurance, is that correct, from  
15 your understanding?

16 A. My understanding was that Mr. Goodwin  
17 never had any health insurance. It made me nervous  
18 when we were dating.

19 Q. You were aware of threats that the [REDACTED]  
20 made to Mr. Goodwin using Facebook?

21 A. I'm aware that Mr. Goodwin believed that  
22 they are threats. I had looked at them as stupid,  
23 childish, bullying garbage and was trying to ignore  
24 them.

25 Q. Did the [REDACTED] accuse you of abusing your

1 came to the house, because it was my house.

2 Q. Right, but you asked for a restraining  
3 order against Mr. Goodwin on the basis that you're  
4 afraid of him.

5 A. Correct. That's why I wasn't sleeping  
6 there.

7 Q. It wasn't -- were you taking  
8 antidepressants during this point in time, Ms. [REDACTED]?

9 A. Nope.

10 Q. Were you drinking?

11 A. Nope. I don't drink. I haven't had a  
12 glass of wine since I had seen you, and I never had a  
13 drinking problem ever before or drug addiction,  
14 nothing. If you would like, we can ...

15 Q. You state in here that "Goodwin is  
16 verbally and emotionally abusive toward you, bullies  
17 you, is not rational, and gaslights you by telling  
18 others that you are suicidal and needs to be  
19 hospitalized, hire a psychologist, and need to take  
20 medication."

21 A. Those are things that you did to me.

22 Q. Explain to me what gaslighting means.

23 A. Exactly what you just read.

24 Q. I'm sorry, but that's not a definition.

25 A. I don't have Wikipedia in front of me.

1 That's my definition.

2 Q. You state in here that I called the police  
3 in 2022 and told them I was trying to get ahold of --  
4 that you were trying to get ahold of my gun during an  
5 argument, which was not true, and led to misdemeanor  
6 family violence charges against you.

7 While the case was pending on the  
8 docket in Torrington, you had to leave your home for  
9 months, because I wouldn't relinquish my firearms; is  
10 that true?

11 A. Yes.

12 Q. How do you know that's true?

13 A. I believe I already answered that.  
14 Because it was told to me by Lisa Killarney.

15 Q. Did you ever ask Mr. Goodwin?

16 A. Yes, verbally we spoke, and you wouldn't  
17 get rid of them.

18 Q. And Lisa Killarney never showed you any  
19 e-mails from you discussing that issue.

20 A. She communicated to me.

21 Q. How?

22 A. Verbally. We had a meeting.

23 Q. She never showed you any e-mails from me  
24 regarding my taking my firearms to storage so you  
25 could return to the house.

1 paid him, that he would go to the police regarding the  
2 evidence that he found; is that correct? Is that what  
3 you're saying here?

4 A. No.

5 Q. When Mr. Goodwin showed up in court, were  
6 the hearings that Mr. Goodwin was attending regarding  
7 your divorce case public?

8 A. When you showed up in court in my divorce  
9 case, I don't -- they're both different things.

10 Q. Excuse me?

11 A. You showing up in court and my divorce --  
12 can you restate the question, please?

13 Q. Mr. Goodwin attended hearings in your  
14 divorce case in Danbury; is that correct?

15 A. Correct.

16 Q. Mr. Goodwin has an action pending against  
17 your ex-husband; is that correct?

18 A. Correct.

19 Q. Would information regarding the conduct of  
20 your ex-husband's attorneys and him be relevant to Mr.  
21 Goodwin's -- what you understand Mr. Goodwin's pending  
22 action against your ex-husband?

23 A. I don't know.

24 Q. You state here that "Mr. Goodwin has also  
25 sent threatening e-mails to the attorneys I am working

1 with."

2 A. Correct, you did, in the middle of the  
3 case.

4 Q. What were the threats?

5 A. I was informed that you sent threats.

6 Q. Who informed you?

7 A. The attorneys.

8 Q. Which attorneys?

9 A. [REDACTED] was my family attorney at  
10 the time, and when I say attorneys, my ex's attorney  
11 also said things on the record in court that day.

12 Q. So you didn't have direct knowledge of  
13 these purported threatening e-mails, did you.

14 A. My knowledge was what happened in court  
15 that day.

16 Q. What happened in court that day?

17 A. The only thing that was talked about in  
18 court that day was the fact that you sent threatening  
19 letters to the attorneys and to my ex-husband and to  
20 my son, and the judge at that time got very upset  
21 about it, threw her arms up in the air, and gave my ex  
22 control over my visitation. That's what happened.

23 Q. What were the threats?

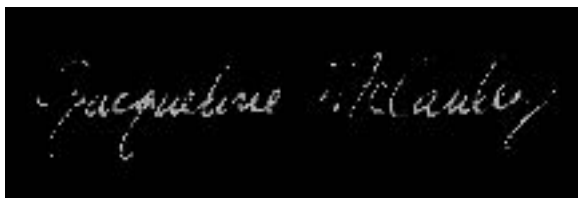
24 A. I don't know what the threats were. I  
25 just know that it was expressed as threats from the

## 1 CERTIFICATE OF REPORTER

2 I, Jacqueline V. McCauley, a Notary Public  
3 duly commissioned and qualified in and for the State  
4 of Connecticut, do hereby certify that pursuant to  
5 Notice, there came before me, on the 16th day of  
6 November, 2025 at 11:04 a.m., the following named  
7 person, to wit: [REDACTED], who was by me duly  
8 sworn to testify to the truth and nothing but the  
9 truth; that she was thereupon carefully examined upon  
10 her oath and her examination reduced to writing under  
11 my supervision; that this deposition is a true record  
12 of the testimony given by the witness.

13 I further certify that I am neither attorney  
14 nor counsel for, nor related to, nor employed by any  
15 of the parties to the action in which this deposition  
16 is taken, and further, that I am not a relative or  
17 employee of any attorney or counsel employed by the  
18 parties hereto, or financially interested in the  
19 action.

20 IN WITNESS WHEREOF, I have hereunto set my hand  
21 and affixed my seal this 5th day of December, 2025.

22 

Jacqueline V. McCauley  
Notary Public

24  
25 My Commission expires: 5/31/2030

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2026, a copy of the foregoing was electronically filed. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. Additionally, a copy of the foregoing will be e-mailed to Thadius Bochain at [Thadius.Bochain@ct.gov](mailto:Thadius.Bochain@ct.gov).

By: /s/ Jon Goodwin  
Jon Goodwin  
Plaintiff in Pro Se