

DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	J.D. OF LITCHFIELD
JON A. GOODWIN	:	AT TORRINGTON
<i>Plaintiff</i>	:	
v.	:	
	:	
RAYMOND J. MILOT, JUNIOR	:	JUNE 16, 2026
<i>Defendant</i>	:	

**PLAINTIFF’S MOTION FOR RECONSIDERATION AND/OR REARGUMENT OF
MEMORANDUM OF DECISION RE: DEFENDANT RAYMOND J. MILOT, JR.’S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Practice Book §§ 11-11 and 17-4, Plaintiff Jon A. Goodwin respectfully moves this Court to reargue and/or reconsider its Memorandum of Decision granting Defendant Raymond J. Milot, Jr.’s Motion for Summary Judgment.

Reargument is warranted because the Court overlooked or misapprehended material facts contained in the summary judgment record, resolved disputed factual issues in Defendant’s favor, relied on facts not established by admissible evidence, failed to address Plaintiff’s Practice Book § 17-47 argument regarding outstanding discovery, and made legal conclusions inconsistent with the governing summary judgment standard.

This motion is accompanied by a Memorandum of Law in Support and a Certificate of Service.

THE PLAINTIFF,

By: /s/ Jon A. Goodwin

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<i>Plaintiff</i>	:	
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	:	
RAYMOND J. MILOT, JUNIOR	:	JUNE 16, 2026
<i>Defendant</i>	:	

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S MOTION FOR
RECONSIDERATION AND/OR REARGUMENT OF MEMORANDUM OF DECISION
RE: DEFENDANT RAYMOND J. MILOT, JR.’S
MOTION FOR SUMMARY JUDGMENT**

I. INTRODUCTION

Plaintiff Jon A. Goodwin respectfully submits this memorandum in support of his Motion for Reargument and/or Reconsideration pursuant to Practice Book §§ 11-11 and 11-12. The Court’s memorandum of decision granting Defendant Raymond J. Milot, Jr.’s motion for summary judgment overlooked or misapprehended material record evidence, resolved disputed factual issues in Defendant’s favor, and failed to address Plaintiff’s Practice Book § 17-47 argument that summary judgment was premature because essential discovery remained outstanding. (Ex. A, Ex. B, Ex. C, Ex. D, Ex. E, Ex. F, Ex. G.)

Reargument is warranted because the Court’s ruling rests on assumptions not established by the summary judgment record, including when any DCF investigation began or ended, whether Defendant knew the status of any DCF proceeding when he made the challenged statements, whether the challenged statements were factual assertions rather than opinion, and whether deleted or withheld communications would bear directly on Defendant’s knowledge, intent, and publication. See *Jaser v. Jaser*, 37 Conn. App. 194, 202, 655 A.2d 790 (1995); *Disturco v. Gates in N. Canaan, LLC*, 204 Conn. App. 526, 536, 253 A.3d 1033 (2021).

This motion does not reargue matters already fully and fairly considered. It seeks correction of specific factual and legal premises that were overlooked or misapprehended and that materially affected the ruling. *See Comm’n on Hum. Rts. & Opportunities ex rel. Cortes v. Valentin*, 213 Conn. App. 635, 661, 278 A.3d 607 (2022).

II. GOVERNING STANDARD

A motion to reargue is appropriate where the movant demonstrates that the court overlooked controlling law or misapprehended material facts. *Jaser v. Jaser*, 37 Conn. App. 194, 202, 655 A.2d 790 (1995). Reargument is not a vehicle for a second bite at the apple, but it is proper to address overlooked facts, overlooked authorities, inconsistencies in the decision, or claims of law not previously addressed. *K.A. Thompson Elec. Co. v. Wesco, Inc.*, 24 Conn. App. 758, 760, 591 A.2d 822 (1991); *Comm’n on Hum. Rts. & Opportunities ex rel. Cortes v. Valentin*, 213 Conn. App. 635, 661, 278 A.3d 607 (2022).

Summary judgment may be granted only if there is no genuine issue of material fact and the movant is entitled to judgment as a matter of law. Conn. Practice Book § 17-49; *Stuart v. Freiberg*, 316 Conn. 809, 825–26, 116 A.3d 1195 (2015). The evidence must be viewed in the light most favorable to the nonmoving party, and the court may not weigh credibility, choose between competing inferences, or resolve disputed facts. *Mac’s Car City, Inc. v. Am. Nissan, LLC*, 205 Conn. App. 736, 746–47, 258 A.3d 245 (2021); *Maltas v. Maltas*, 298 Conn. 354, 365, 2 A.3d 902 (2010).

III. ARGUMENT

A. **The Court Overlooked That the Record Does Not Establish When Any DCF Investigation Began or Ended, or That Plaintiff Was “Under Investigation” When Defendant Made the Challenged Statements.**

A central premise of the Court’s decision is that Defendant’s statement that Plaintiff was “under investigation by DCF” was true because DCF investigated allegations involving Plaintiff. The record, however, does not establish the temporal facts necessary to support that conclusion. (Ex. A.)

DCF’s December 13, 2019, notice states only that DCF had “recently investigated reported allegation(s)” and concluded that the allegation of physical abuse regarding Noah Milot was “Unsubstantiated.” (Ex. A.) The same notice further states that “DCF finds that you do not pose a risk to the health, safety or well-being of children.” (Ex. A.) But the notice does not establish when the investigation commenced, when it concluded, or whether any investigation was pending when Defendant made the challenged accusations. (Ex. A.)

The distinction is material. A statement that a person was “under investigation” at a particular time is not proven merely because an agency later investigated some complaint at some point. The Court’s reasoning effectively assumed the missing temporal facts and resolved that disputed issue against Plaintiff. That was improper at summary judgment. *See Stuart v. Freiberg*, 316 Conn. 809, 825–26, 116 A.3d 1195 (2015).

The error is not merely that the temporal facts were unproven; it is that the Court supplied a fact the record affirmatively contradicts. The Complaint pleads that Defendant stated Plaintiff “is subject to an investigation by DCF” and was “under investigation by DCF”—assertions, in the present tense, of a then-existing investigation when Defendant spoke on November 3, 2019. (Compl., Count Six ¶ 15; Count Eighteen ¶ 42(d).) The only evidence of any

DCF investigation is the December 13, 2019 notice, which post-dates the challenged statement by nearly six weeks and recites only that DCF “recently investigated” allegations—past tense. (Ex. A.) The record connects that investigation to the report a school staff member made to DCF after Defendant’s own daughter brought her recording to school on November 4, 2019 (a Monday)—the day after, Defendant’s statement. (Compl., Count Eleven ¶ 24.) On this record a reasonable jury could find that no DCF investigation existed when Defendant declared one did, and that Defendant helped manufacture the very investigation he then publicized. The Court resolved that dispute the other way by inferring a “pending” investigation that the record does not establish and that the timeline calls into question. A party may not invoke the truth of an investigation that did not yet exist when he spoke, still less one he set in motion.

Even under the substantial-truth doctrine the Court applied, whether the “gist” of Defendant’s statement was substantially true *when published* is itself a disputed question of fact where the only evidence of an investigation post-dates the statement. *See Mercer v. Cosley*, 110 Conn. App. 283, 303–04, 955 A.2d 550 (2008) (substantial truth ordinarily a jury question, suitable for summary judgment only where the record excludes any real doubt). The Court’s contrary conclusion required it to choose Defendant’s inference over Plaintiff’s, which Practice Book § 17-49 forbids.

B. The Court Equated the Existence of a DCF Investigation With the Truth of Defendant’s Abuse Accusations, But Those Are Separate Questions.

Even if DCF investigated allegations at some point, that does not establish the truth of Defendant’s accusations that Plaintiff was “abusing his children,” was “dangerous,” or was a “psycho.” (Ex. C, Ex. D, Ex. E.) Truth is an affirmative defense, but it is not established by a

generalized showing that some governmental inquiry occurred. *See Gleason v. Smolinski*, 319 Conn. 394, 430–31, 125 A.3d 920 (2015).

The summary judgment record contains contrary evidence. Plaintiff averred that New Milford police investigated the November 1, 2019, incident and determined there was no evidence of a crime by an adult. (Goodwin Aff. ¶¶ 22–23; Ex. C.) DCF then issued the written determination stating that the abuse allegation was “Unsubstantiated” and that Plaintiff did not pose a risk to children. (Ex. A.) Plaintiff’s November 4, 2019, letter also expressly described Defendant’s accusations as false and demanded preservation of evidence. (Ex. C.) Christine Jowdy’s November 24 and November 26, 2019 messages likewise describe Defendant’s alleged statements to the children and to DCF-related contacts as “unstable,” “abusive,” “psycho,” and “fraudulent.” (Ex. D, Ex. E.)

Those materials created classic factual disputes concerning falsity, malice, publication, and damages. The Court should not have collapsed them into a single proposition that DCF had investigated allegations at some point.

C. The Court Failed to Address Plaintiff’s Practice Book § 17-47 Argument That Summary Judgment Was Premature Because Essential Discovery Remained Outstanding.

Plaintiff expressly argued that summary judgment was premature because Defendant’s communications had not been produced and because evidence had been deleted at Defendant’s direction. (Goodwin Aff. ¶¶ 46–48; Ex. G.) The record contains text messages in which Defendant instructs his daughter, “And you should delete these texts,” and “You should not save texts to me sweets,” followed by responses reflecting deletion. (Ex. G.) Plaintiff also averred that Defendant refused to produce his own text messages relating to these events. (Goodwin Aff. ¶ 48.)

Conn. Practice Book § 17-47 permits the court to deny or defer summary judgment where the nonmoving party cannot present facts essential to justify opposition. Plaintiff's argument was not peripheral. The missing communications were directly relevant to Defendant's knowledge, intent, motive, participation in creating or disseminating the accusations, and credibility. (Goodwin Aff. ¶¶ 46–48; Ex. G.)

The Court's memorandum of decision does not address that argument at all. It contains no reference to Practice Book § 17-47, to the outstanding depositions and the contemplated amended motion to compel, to Defendant's refusal to produce his own communications, or to the deletion instructions as a bar to summary judgment. The only place the deletions appear is in the Court's intentional-infliction analysis, where the Court treated them solely as a question of outrageousness and concluded that telling one's children to delete texts is not extreme and outrageous. The Court never considered those same deletions, and Defendant's withholding of his own messages, as what they independently are: grounds to deny or defer summary judgment because Plaintiff cannot yet marshal facts essential to his opposition. A court's failure to address a properly raised argument that could alter the outcome is itself a recognized basis for reargument. *K.A. Thompson Elec. Co. v. Wesco, Inc.*, 24 Conn. App. 758, 760, 591 A.2d 822 (1991). And where, as here, the movant's own conduct in directing the destruction of evidence and refusing production is what leaves the record incomplete, summary judgment on that record is especially inappropriate. *See Barasso v. Rear Still Hill Rd., LLC*, 64 Conn. App. 9, 16, 778 A.2d 980 (2001).

D. The Court Erred in Treating Defendant's Statements as Nonactionable Opinion.

The Court concluded that Defendant's references to Plaintiff as an "abuser," a "child abuser," or similar terms were nonactionable opinion. That conclusion overlooks both the context

of the challenged statements and the allegations contained in the Complaint. (Ex. C, Ex. D, Ex. E.)

Under Connecticut law, whether a statement is actionable depends on whether it can reasonably be understood as stating or implying verifiable facts. *See Goodrich v. Waterbury Republican-Am., Inc.*, 188 Conn. 107, 111–13, 448 A.2d 1317 (1982); *Daley v. Aetna Life & Cas. Co.*, 249 Conn. 766, 778–79, 734 A.2d 112 (1999). Here, Defendant allegedly stated that Plaintiff was “abusing his children,” was under investigation by DCF because of child abuse, and was dangerous. (Ex. C, Ex. D.) Those are not merely loose insults; they are factual assertions capable of being proven true or false.

The Court appears to have relied in part on Plaintiff’s own litigation characterization of Defendant as a “child abuser.” But the context of Plaintiff’s statements in litigation is not the same as Defendant’s alleged public accusations in the neighborhood, in the presence of children, and in connection with DCF and police involvement. (Ex. C, Ex. D.) The issue is not whether the noun “abuser” can never be opinion. It is whether, in context, Defendant’s statements conveyed objective factual allegations of child abuse. At minimum, that question is for the jury. *See Daley v. Aetna Life & Cas. Co.*, 249 Conn. 766, 778–79, 734 A.2d 112 (1999).

E. The Court Relied on Facts Not Established by the Summary Judgment Record Concerning Defendant’s Role in Creating and Disseminating the Allegations.

The Court’s analysis treated Defendant as though he merely repeated information from others. The summary judgment record does not compel that characterization. Plaintiff presented evidence from which a factfinder could conclude that Defendant participated in creating, encouraging, promoting, or disseminating the accusations. (Goodwin Aff. ¶¶ 3–6, 24–33, 46–48; Ex. B, Ex. G.)

The text messages in Exhibit B show the timeline of Defendant's communications immediately surrounding the incident, and the materials in Exhibit G show later communications instructing deletion of texts and other messages. Those documents support an inference that Defendant was not a passive recipient of information but an active participant in the creation, shaping, and concealment of evidence. (Ex. B, Ex. G.)

Because multiple competing inferences could be drawn from the same record, the Court should not have resolved Defendant's role as a matter of law. *See Maltas v. Maltas*, 298 Conn. 354, 365, 2 A.3d 902 (2010).

F. The Court Improperly Weighed Evidence Concerning Malice, Knowledge, Intent, and Credibility.

Plaintiff's claims turn on state-of-mind issues, including whether Defendant acted knowingly, recklessly, maliciously, or with disregard for the truth. Those are ordinarily jury questions. *See Gallo v. Barile*, 284 Conn. 459, 473–74, 935 A. 2d 103 (2007).

The summary judgment record contains evidence from which a reasonable factfinder could infer malice or reckless disregard, including Defendant's alleged continued accusations after police found no crime, his continuing reliance on accusations that DCF later found unsubstantiated, his instructions to delete communications, and his refusal to produce his own messages. (Goodwin Aff. ¶¶ 22–23, 29–33, 46–48; Ex. A, Ex. C, Ex. G.) The Court instead adopted Defendant's innocent explanation and rejected contrary inferences favorable to Plaintiff. That was improper. *See Mac's Car City, Inc. v. Am. Nissan, LLC*, 205 Conn. App. 736, 746–47, 258 A.3d 245 (2021).

The record also contains evidence that the underlying abuse narrative was coached rather than truthfully reported. In a March 21, 2020 text message, a friend of Defendant's daughter

instructed her: “If you call the police bring up the abuse stories and [N.M.]” (Ex. H.) A reasonable factfinder could read that message as evidence that the “abuse stories” were a coordinated fabrication—to be raised with law enforcement on cue—rather than genuine reports of abuse. That inference bears directly on the falsity of the accusations Defendant published and on whether he acted with malice or reckless disregard for the truth. At a minimum, Exhibit H presents a genuine issue of material fact on falsity and malice that precludes summary judgment.

G. The Court Improperly Resolved Publication, Republication, and Publicity Issues Against Plaintiff.

Plaintiff presented evidence that Defendant’s accusations were made outdoors in a residential neighborhood, in the presence of others, and in a manner audible to neighbors and police. (Goodwin Aff. ¶¶ 24–28; Ex. C, Ex. D.) Plaintiff also presented evidence of republication: a stranger later called Plaintiff a “child abuser,” and Heather Walsh later posted on Facebook that Plaintiff and Christine Jowdy were “in trouble for abusing her children.” (Goodwin Aff. ¶¶ 35–38; Ex. F.)

Those facts are sufficient to raise genuine issues concerning publication, republication, foreseeability, publicity, causation, and damages. The Court’s memorandum did not resolve those issues in Plaintiff’s favor, as required on summary judgment. Instead, it effectively treated publication and community spread as insufficiently established, despite the record evidence. That was error. *See Gallo v. Barile*, 284 Conn. 459, 468–74, 935 A.2d 103 (2007).

H. The Court Narrowed Count Eleven Beyond the Allegations and Failed to Address Plaintiff’s Concerted-Action Theory.

Count Eleven does not allege merely independent conduct by Hannah Milot. Plaintiff alleged that Defendant met with Hannah immediately before the November 1, 2019 incident,

encouraged conduct designed to generate allegations, aided dissemination, and acted in concert with Hannah. (Goodwin Aff. ¶¶ 3–6, 16–21; Ex. B.)

The Court’s decision does not address those allegations. Instead, it appears to have analyzed Count Eleven as though it involved only separate statements made by Hannah. That omission matters because the count was pleaded on a concerted-action theory, and the record contained evidence supporting that theory. *See Golek v. St. Mary’s Hosp.*, 133 Conn. App. 182, 194–95, 34 A.3d 546 (2012).

I. Reconsideration Is Necessary to Prevent Manifest Injustice.

The Court’s ruling rests on disputed facts and unresolved discovery issues concerning:

- when any DCF investigation began and ended;
- whether Plaintiff was under investigation when the challenged statements were made;
- whether the statements were factual accusations or opinion;
- whether Defendant participated in creating or disseminating the accusations;
- whether Defendant instructed deletion of evidence;
- whether essential communications remain undisclosed;
- whether publication and republication occurred; and
- whether malice or reckless disregard can be inferred from the record.

(Ex. A, Ex. B, Ex. C, Ex. D, Ex. E, Ex. F, Ex. G.)

If those issues are reconsidered under the proper summary judgment standard, the Court should deny summary judgment or, at minimum, defer judgment under Practice Book § 17-47 until essential discovery is complete.

IV. TIMELINE OF THE NOVEMBER 1, 2019 INCIDENT AND SUBSEQUENT EVENTS (WHAT THE EVIDENCE WILL SHOW)

- ❖ On Friday, November 1, 2019, Hannah Milot and Noah Milot were in the custody of their Mother, Christine Jowdy at 95 Indian Trail in New Milford, Connecticut, a residence that was shared by Mr. Goodwin and Ms. Jowdy.
- ❖ Hannah Milot and Noah Milot were interacting in a cooperative manner.
- ❖ Uninvited by Ms. Jowdy or Mr. Goodwin, at approximately 5:27 p.m. on Friday, November 1, 2019, Defendant Raymond Milot met with Hannah Milot outside of Ms. Jowdy's and Mr. Goodwin's residence. The timing is fixed by Defendant's own contemporaneous text messages: "Can you come outside" (5:26 p.m.), "Top" (5:27 p.m.), and "Be there in 1" (5:27 p.m.). (Ex. B; Goodwin Aff. ¶¶ 3–6.)
- ❖ Immediately after returning to the residence from meeting with her father, Hannah Milot began accusing her younger brother of stealing one piece of her Halloween candy which was implausible given the mountain of candy she had collected. Hannah Milot carried on for over two hours, demanding that Ms. Jowdy and Mr. Goodwin "punish" Noah Milot.
- ❖ During the same evening of Friday, November 1, 2019, N's dysregulation escalated until, at approximately 7:28 p.m., the children texted Defendant that the police had been called and that "mom got hit multiple times by Noah." At Ms. Jowdy's request, Mr. Goodwin removed bolts N had taped between his fingers as an improvised weapon and assisted in restraining N to prevent harm; N kicked and struck Mr. Goodwin. Hannah Milot recorded Mr. Goodwin without his consent. (Goodwin Aff. ¶¶ 11–16; Ex. B.)

- ❖ The New Milford Police responded that evening, spoke with the parties, and determined there was no evidence of any crime by an adult. (Goodwin Aff. ¶¶ 22–23; Ex. B.)
- ❖ On Saturday, November 2, 2019, Defendant instructed his daughter by text message, “You should not save texts to me sweets,” and the daughter replied, “I’ll just delete the whole conversation.” (Ex. G.) That instruction followed an earlier one on October 19, 2019—“And you should delete these texts”—and was followed by a further instruction on November 25, 2019—“Delete that.” (Ex. G.)
- ❖ On Sunday, November 3, 2019, outdoors in the residential neighborhood, in the presence of a uniformed New Milford police officer and his minor children, Defendant accused Mr. Goodwin of “abusing his children,” being “dangerous,” “abusive,” a “psycho,” and “under investigation by DCF.” (Goodwin Aff. ¶¶ 24–29; Ex. D.)
- ❖ Also on Monday, November 4, 2019, Defendant’s daughter brought her recording to her school and reported to a staff member that Mr. Goodwin had abused N; the staff member then contacted DCF. The record connects DCF’s ensuing investigation—which produced the December 13, 2019 notice—to this November 4 report, not to any proceeding shown to be open when Defendant spoke. (Compl., Count Eleven ¶ 24.)
- ❖ On Monday, November 4, 2019, Mr. Goodwin sent Defendant a written letter via Federal Express identifying the false and defamatory statements, demanding that

Defendant cease the conduct and preserve all evidence, and providing notice of impending litigation. (Goodwin Aff. ¶ 31; Ex. C.)

- ❖ On November 24, 2019, Ms. Jowdy sent Defendant a written message confirming that she personally heard Defendant's Sunday, November 3rd accusations, including that she and Mr. Goodwin were "unstable" and "abusive" and that Mr. Goodwin was a "psycho." (Ex. D.)
- ❖ On November 26, 2019, Ms. Jowdy sent Defendant a further written message addressing an additional fraudulent DCF report Defendant was alleged to have instigated. (Ex. E.)
- ❖ On December 13, 2019—nearly six weeks after Defendant's November 3 statement—DCF issued its written Notification of Investigation Results finding the allegation of physical abuse of Noah Milot "Unsubstantiated" and stating, "DCF finds that you do not pose a risk to the health, safety or well-being of children." (Ex. A; Goodwin Aff. ¶ 32.)
- ❖ On March 21, 2020, a friend of Defendant's daughter texted the daughter, "If you call the police bring up the abuse stories and [N.M.]," coaching the deployment of the abuse narrative to law enforcement. (Ex. H.)
- ❖ Notwithstanding the police finding of no crime, the DCF "Unsubstantiated" determination, and Mr. Goodwin's preservation letter, Defendant's accusations foreseeably spread within the community. A stranger later called Mr. Goodwin a "child abuser," and in March 2023 Heather Walsh publicly posted on Facebook that Mr. Goodwin and Ms. Jowdy were "in trouble for abusing her children." Walsh is

represented by the same firm that represents Defendant. (Goodwin Aff. ¶¶ 33–38, 43; Ex. F.)

- ❖ In September 2021, as a result of the ongoing hostility, Mr. Goodwin was forced to leave 95 Indian Trail and relocate to Canaan, Connecticut, where additional harm occurred. (Goodwin Aff. ¶¶ 39–42.)
- ❖ Throughout this litigation, Defendant has refused to produce his own text messages relating to these events, leaving only the partial record recovered from a child’s device. (Goodwin Aff. ¶ 48.)

The evidence will further show that no investigation was ever opened by DCF regarding the Friday, November 1, 2019, incident, and that at the time Defendant Milot made the defamatory statements about the Plaintiff, no DCF investigation was open regarding the Plaintiff. The evidence will also show that the investigation for which the Plaintiff received the December 13, 2019 notification of investigation results from DCF occurred on November 16, 2019.

V. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court:

1. Grant this Motion for Reargument and/or Reconsideration;
2. Vacate the Memorandum of Decision granting Defendant Raymond J. Milot, Jr.’s Motion for Summary Judgment;
3. Deny Defendant’s Motion for Summary Judgment; or
4. In the alternative, defer adjudication pursuant to Practice Book § 17-47 pending completion of discovery.

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 June 16, 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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Affidavit of Jon Goodwin

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

DOCKET NO: LLI-CV21-5014019-S	:	SUPERIOR COURT
	:	
JON GOODWIN	:	J.D. OF LITCHFIELD
	:	
V.	:	AT TORRINGTON
	:	
RAYMOND J. MILOT, ET AL	:	FEBRUARY 3, 2026

AFFIDAVIT

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

Background

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

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

November 1, 2019, Incident and Pre-Incident Instigation

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

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

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

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

Documented Psychiatric Conditions of the Minor Child (Redacted)

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

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

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

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

Plaintiff's Safety-Driven Intervention

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

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

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

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

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

Non-Consensual Video Recording and School Dissemination

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

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

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

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

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

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

Police Response and Lack of Criminal Findings

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

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

Defendant's Public Accusations on November 3, 2019

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

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

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

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

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

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

30. Defendant's accusations were false.

Notice, DCF Findings, and Continued Dissemination

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

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

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

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

Republication and Foreseeable Harm

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

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

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

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

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

Relocation, Continued Harm, and Community Impact

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

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

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

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

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

Recovered Text Messages, Motive, and Evidence Destruction

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

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

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

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

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

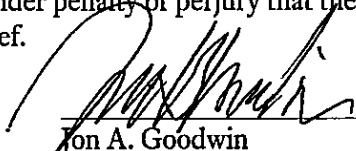
48. Defendant has continually refused to produce his own text messages relating to these events.

Damages and Malice

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

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

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

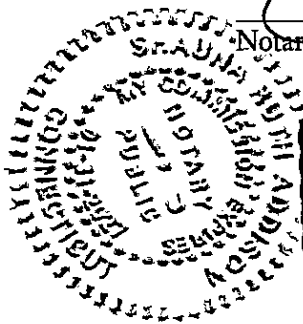


Jon A. Goodwin

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



Notary Public / Commissioner of the Superior Court



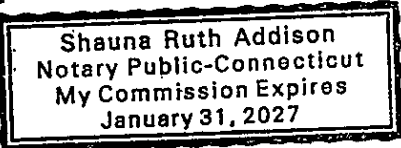


Exhibit A

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**Connecticut Department of Children and Families Notification of Investigation Results,
Dated December 13, 2019.**

Connecticut Department of Children and Families
NOTIFICATION OF INVESTIGATION RESULTS

DCF-2210
07/16 (Rev.)



Page 1 of 1

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

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

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

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



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



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

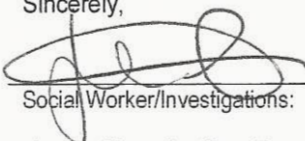
Persons whom DCF finds pose a risk to the health, safety or well-being of children are recommended for placement on the Central Registry. Names remain on this list indefinitely. The Central Registry may be checked by current or prospective employers whose work involves contact with children and by federal,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

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

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

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

Sincerely,


Social Worker/Investigations:

Telephone:

Email:

Jennifer Avila-Ganzhi

(203) 207-5164

jennifer.avila-ganzhi@ct.gov

Exhibit B

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

November 1, 2019 Text Messages Between M.M. and Raymond J. Milot, Jr.

2019-11-01 16:04:04 EDT

I did now

2019-11-01 17:24:00 EDT

Hi sweetie

2019-11-01 17:24:15 EDT

Hi

2019-11-01 17:25:24 EDT

Why'd u leave

2019-11-01 17:25:24 EDT

Please talk to me

2019-11-01 17:25:29 EDT

Where are you

2019-11-01 17:25:36 EDT

Noah said to say hi

2019-11-01 17:25:43 EDT

In lake club

2019-11-01 17:25:52 EDT

Can you come say hi

2019-11-01 17:26:11 EDT

Sure

2019-11-01 17:26:35 EDT

Can you come outside

2019-11-01 17:26:45 EDT

Yeah bottom or top

2019-11-01 17:27:00 EDT

Top

2019-11-01 17:27:08 EDT

Ok

2019-11-01 17:27:10 EDT

Be there in 1

2019-11-01 19:28:35 EDT

2019-11-01 19:28:35 EDT

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

2019-11-01 19:32:22 EDT

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

2019-11-01 20:09:31 EDT

Are you ok Hannah?

2019-11-01 20:09:39 EDT

Is Noah ok

2019-11-01 20:09:56 EDT

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

2019-11-01 20:10:05 EDT

We?

2019-11-01 20:10:12 EDT

Me and Noah

2019-11-01 20:10:24 EDT

Police?

2019-11-01 20:10:32 EDT

Yep they are here

2019-11-01 20:10:38 EDT

Did they call

2019-11-01 20:10:45 EDT

Not yet

2019-11-01 20:10:51 EDT

I asked them to

2019-11-01 20:11:41 EDT

Where is Cam?

2019-11-01 20:13:32 EDT

Not sure

2019-11-01 20:13:53 EDT

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

2019-11-01 20:14:10 EDT

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

2019-11-01 20:14:15 EDT

That's ok sweetie

2019-11-01 20:14:24 EDT

Did the police talk to Noah?

2019-11-01 20:14:33 EDT

Yes

2019-11-01 20:14:40 EDT

Do they know you have a video?

2019-11-01 20:15:13 EDT

They saw a picture

Exhibit C

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**Plaintiff's November 4, 2019 letter to Raymond J. Milot, Jr.
Regarding False Abuse Allegations and Preservation of Evidence.**

JON GOODWIN

November 4, 2019

Via Federal Express

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

Mr. Milot:

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

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

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

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

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

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

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

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

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

November 4, 2019

Milot, Raymond Joseph, Jr.

Page 3 of 5

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

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

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

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

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

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November 4, 2019

Milot, Raymond Joseph, Jr.

Page 4 of 5

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

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

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

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

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

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

November 4, 2019

Milot, Raymond Joseph, Jr.

Page 5 of 5

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

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

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

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

Sincerely,

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

Jon Goodwin

cc: Norm Pattis, Esq.

William J. Quinn, Esq.

Michael G. Martin, Esq.

Christine M. Jowdy

Jon Goodwin

95 Indian Trail • New Milford, Connecticut 06776

Exhibit D

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**Christine Jowdy's November 24, 2019 OFW Message to Raymond J. Milot, Jr.
Regarding Disparagement and False Allegations.**

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

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

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

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

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

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

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

This course of conduct must stop immediately.

Christine

Exhibit E

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**Christine Jowdy's November 26, 2019 OFW Message to
Raymond J. Milot, Jr. Regarding a False DCF Report.**

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

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

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

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

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

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

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

Christine

Exhibit F

To

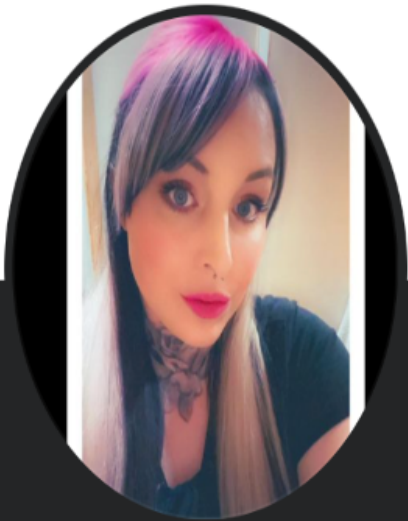
**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

March 2023 Facebook post by Heather Walsh Repeating Abuse Allegations

i am not like other girls, i'm worse



Heather Walsh (Slater)

 Add Friend

 Message

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[Photos](#)

[Videos](#)

[Check-ins](#)

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Heather's Post



Like 3d Edited



Heather Walsh

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

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

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

I'm really worried about my youngest son.

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

...

Exhibit G

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**Compendium of Text Messages Between Raymond J. Milot, Jr. and His Minor Daughter
Showing Deletion Instructions and Preservation Issues**

2019-09-05 19:09:57 EDT

So I have nothing to eat

2019-09-05 19:12:04 EDT

And it is called "lean meat"

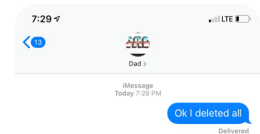
2019-09-05 19:12:45 EDT

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

2019-09-06 19:29:26 EDT

Ok I deleted all

2019-09-06 19:29:52 EDT



2019-09-06 19:29:52 EDT

That was it

2019-09-06 19:29:58 EDT

And I'll delete all of these messages

2019-09-06 19:44:15 EDT

Can you unpause the rest of my apps?

2019-09-06 19:49:30 EDT

Please

2019-10-19 13:41:19 EDT

Whatchadoin

2019-10-19 14:00:31 EDT

Nothing much but mom has left for apple picking

2019-10-19 14:16:24 EDT

What are you and Cameron doing

2019-10-19 14:16:36 EDT

Just playing on our devices

2019-10-19 14:16:58 EDT

Did John go with your mom

2019-10-19 14:17:15 EDT

Nope

2019-10-19 14:17:43 EDT

But I can still bring the kites somewhere for u

2019-10-19 14:17:55 EDT

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

2019-10-19 14:18:03 EDT

And you should delete these texts

2019-10-19 14:18:18 EDT

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

2019-10-19 14:18:57 EDT

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

2019-10-19 14:19:11 EDT

When do you pick Cameron up??

2019-10-19 14:20:39 EDT

Maybe in an hour

2019-11-02 14:25:46 EDT

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

2019-11-02 14:25:49 EDT

It's a 0

2019-11-02 14:26:08 EDT

For the practice log

2019-11-02 14:26:29 EDT

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

2019-11-02 14:26:39 EDT

Make sense?

2019-11-02 14:26:59 EDT

What is everyone doing?

2019-11-02 14:27:03 EDT

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

2019-11-02 14:27:07 EDT

I'm not sure

2019-11-02 14:27:17 EDT

Where is Cameron

2019-11-02 14:27:30 EDT

Upstairs maybe

2019-11-02 14:27:50 EDT

Ok

2019-11-02 14:28:10 EDT

You should not save texts to me sweets

2019-11-02 14:28:47 EDT

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

2019-11-02 14:28:59 EDT

Ok

2019-11-02 14:29:14 EDT

I'll just delet the whole conversation

2019-11-02 14:29:24 EDT



2019-11-02 18:07:11 EDT

Hi sweets

2019-11-02 18:08:19 EDT

Make sure you get soccer gear together tonight

2019-11-02 20:31:44 EDT

Goodnight sweets

2019-11-02 20:44:28 EDT

Ok

2019-11-02 20:44:29 EDT

Literally get me out of moms house

2019-11-02 20:45:09 EDT

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

2019-11-02 20:45:28 EDT

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

2019-11-02 20:50:31 EDT

Sorry sweetie, you ok?

2019-11-25 06:55:56 EST

Hi sweets

2019-11-25 06:56:06 EST

Hey dad

2019-11-25 06:56:19 EST

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

2019-11-25 06:56:24 EST

I'm on the bus now

2019-11-25 06:56:43 EST

They were on the counter next to sink

2019-11-25 06:56:51 EST

Why did you come here?

2019-11-25 06:56:58 EST

Bus at your moms

2019-11-25 06:57:09 EST

To get them and I forgot to tel my bus driver

2019-11-25 06:57:22 EST

Your mom explode?

2019-11-25 06:57:28 EST

Delete that

2019-11-25 06:57:31 EST

No

2019-11-25 06:57:42 EST

Cool

2019-11-25 06:57:48 EST

All calm?

Exhibit H

To

**Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Reconsideration
and/or Reargument of Memorandum Decision Re: Defendant Raymond J. Milot Jr's
Motion for Summary Judgment**

in

Goodwin v. Milot, No. LLI-CV21-5014019-S
(Conn. Super. Ct., J.D. of Litchfield Oct. 21, 2021)

**H.M. Text Message with "Haley" Regarding "abuse stories
and [N.M.]" on March 21, 2020**

2020-03-21 19:36:34 EDT

If you call the police bring up the abuse stories and N[REDACTED]

2020-03-21 19:38:09 EDT

i can't

2020-03-21 19:39:51 EDT

Why not what could happen

2020-03-21 19:40:05 EDT

my mom would find me

2020-03-21 19:40:14 EDT

How

2020-03-21 19:40:23 EDT

they would bring me back

2020-03-21 19:40:41 EDT

Not if you tell them

2020-03-21 19:40:47 EDT

What's happening

2020-03-21 19:41:28 EDT

my mom says i can't go and so does my dad because we're in the middle of a pandemic but i was with u guys last saturday

2020-03-21 19:41:34 EDT

not even a week ago

2020-03-21 19:41:47 EDT

it's getting so fricking cold

2020-03-21 19:42:07 EDT

imagine a cold monkey and that's what i look like

2020-03-21 19:42:20 EDT

Do you know any of your neighbors