

1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM

4 PER SE

5  
6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
7 **IN AND FOR THE COUNTY OF SANTA CLARA**

8 KOSTIANTYN MARS

9 Petitioner,

10 vs.

11 HANNA MARS,

12 Respondent.

) [Hon. Beth McGowen,  
Presiding Judge of Superior Court of California]

) [Dept. 72 - Hon. Brooke A. Blecher,  
Supervising Judge of Superior Court of California]

) [Dept. 79 - Hon. Stephen P. Lowney,  
Judge to be served the Disqualification Statement]

) Case No.: 22FL003144

) **STATEMENT OF DISQUALIFICATION -  
EVIDENCE LIST**

) (Code Civ. Proc. 170.1(a)(6)A(iii);  
170.1(a)(3)A; 170.3)

18  
19  
20 **STATEMENT OF DISQUALIFICATION - EVIDENCE LIST**

21 Dear Honorable Court,

22 Please find evidence list below:

23  
24 P1. Intentionally harmful orders 02/07/2024 of judge Lowney suspected of being bribed by  
25 unethical attorney Nancy L Roberts in January 2024. Lowney denied disqualification of  
26 Nancy Roberts, ordered me to give up passport of my son to facilitate international child  
27 abduction, removed trial, refused hear DVROs and unreasonably moved them 6 months later  
28

- 1 P2. Audio recording of hearing 02/07/2024 – made because Lowney removed court reporter and  
2 denied all requests for lawful recording / transcribing that hearing
- 3 P3. Transcript of hearing 02/07/2024 with highlights, markings and personal notes on critical  
4 decisions and discussions during hearing, which confirm that Lowney not only has  
5 extremely suspicious level of prejudice, but is making intentionally harmful orders solely in  
6 favor of Nancy Roberts
- 7
- 8 P4. Intentionally harmful orders 02/01/2024 made by judge Lowney, suspected in being bribed  
9 by Nancy L Roberts in January 2024. Lowney ordered unreasonable amount of equalizing  
10 payment that goes against bank and loan statements, and additionally sanctioned me by CCP  
11 271 sanctions for requesting reconsideration of intentionally harmful orders of bribed judge  
12 Flint
- 13
- 14 P5. Video recording of hearing 02/01/2024 when Lowney faked hearing, refused to review  
15 evidence, ignored bank and loan statements, threatened me to never say that Flint was  
16 suspected in bribery, and sanctioned me for requesting reconsideration of harmful orders.
- 17 P6. Stamped first page of Request for Statement of Decision – unlawfully and unreasonably  
18 denied by judge Lowney suspected in receiving bribe from Nancy Roberts in January 2024
- 19 P7. Request for Court Reporter – completely ignored by judge Lowney. No court reporter was  
20 present on hearing 02/07/2024 (same on 02/01/2024)
- 21
- 22 P8. Request for ADA Accommodations – denied by judge Lowney with some mocking remark
- 23 P9. Media request – denied by judge Lowney with some irrelevant remark
- 24 P10. Response to media request, written by Nancy L Roberts for judge Lowney – which  
25 contains some irrelevant comments, and obvious threat that any recordings and reporting of  
26 judges, who are bribed by Nancy, will lead to contempt of court, and other harmful  
27 sanctions. Also Nancy confirms that bribed judges are afraid of publicity of their crimes.  
28



1 P11. Stamped front page of Evidence of impermissible pressure on emergency screener  
2 and professional supervisors, made by unethical attorney Nancy L Roberts, together with  
3 compromised supervised reports – filed with the Court, and served through email to judge  
4 Lowney and Department 79. Bribed judge Lowney ignored evidence, and threatened to  
5 punish me for filing evidence with the court (documented in audio recording and transcript  
6 02/07/2024)  
7

8 P12. Stamped first page of evidence for DVROs trial that was rescheduled by judge  
9 Lowney from 1/25/2024 to 2/7/2024 (while he was waiting for bribe in January), and then –  
10 to 6/17/2024 (six months later, after he received bribe from Nancy). Evidence was filed with  
11 the Court and ready to be presented on 02/07/2024 – but Lowney refused to hear matter and  
12 rescheduled it 6 months later.  
13

14 P13. Stamped first page of evidence for Disqualification of Opposing attorney Nancy L  
15 Roberts  
16

17 P14. Stamped first page of motion to hold Respondent in Contempt of Court  
18

19 P15. Stamped first page of evidence for motion to hold Respondent in Contempt of Court  
20

21 P16. Stamped first page of request for Bifurcation of marriage status  
22

23 P17. Stamped first page of request for Final Trial – judge Lowney, suspected in being  
24 bribed by Nancy L Roberts, unlawfully and unreasonably removed Final Trial from Court  
25 calendar already twice – therefore blocking resolution of this divorce case  
26

27 P18. Notice of Status Conference 03/05/2024 – which judge Lowney, suspected in being  
28 bribed by Nancy L Roberts, unlawfully and unreasonably removed from Court calendar,  
therefore blocking resolution of this divorce case

1 P19. Complete Motion to Disqualify Opposing Attorney Nancy L Roberts that was denied  
2 without consideration by judge Lowney, suspected in being bribed by Nancy L Roberts in  
3 January 2024. List of Evidence is not attached for brevity – please feel free to check filed  
4 with the Court List of Evidence for Motion to Disqualify Opposing Attorney, case No.:  
5 22FL003144  
6

7 P20. Declaration for DVRO 2023, which suspected of bribery judge Lowney refused to  
8 hear on 2/7/2024 (after he personally rescheduled it from 1/25/2024 to 2/7/2024), and  
9 intentionally moved Trial on opposing DVROs 6 months later, to June 2024 – to conceal  
10 matter from being heard. List of Evidence to DVRO 2023 is not attached for brevity – but  
11 please feel free to check case No.: 22FL003144 for this and many other evidences filed with  
12 the Court, but never heard because of corrupted judges Lowney, Flint and Towery.  
13  
14  
15

16 Respectfully submitted,

17  
18 DATED: February 12, 2024

  
\_\_\_\_\_  
KOSTIANTYN MARS

Evidence P1



SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

22FL003144

Hearing Start Time: 1:30 PM

Hearing Type: Request for Order: Mod  
Custody/Visitation

Date of Hearing: 02/07/2024

Comments: Line 3-11

Heard By: Lowney, Stephen  
Courtroom Reporter: No Court Reporter

Location: Department 79  
Courtroom Clerk: True Parker

Court Interpreter:

Court Investigator:

Parties Present:

Mars, Hanna  
Mars, Kostiantyn  
Roberts, Nancy Lee

Respondent  
Petitioner  
Attorney  
Limited Scope  
Attorney

Future Hearings:

Exhibits:

Neither custody,  
nor opposing DVROs  
were not heard this day.  
All hearing was fake  
made by Lowney to  
save Nancy from  
disqualification

All above listed parties are personally present.

Respondent is assisted by Ukrainian interpreter, Mariya Rekretuk.

Petitioner and respondent are sworn.

Who is that?  
She didn't interpret anything  
(check audio recording)

Service issues are addressed.

The Court finds, in lieu of personal service, electronic service deemed appropriate and valid going forward.

Hearing on petitioner's motion to disqualify attorney Nancy Roberts.

The Court hears from the parties.

The Court is not going to reconsider the prior ruling.

It was new, 2nd motion to disqualify,  
not "reconsideration"  
Lowney is lying in minute order

Hearing on petitioner's Request for Order: modification child custody and visitation.

The Court reserves on this issue of modification of child custody and visitation, and any request made in this motion.

Not heard, evidence not reviewed  
- check audio recording

Hearing on petitioner's motion to set aside the 06-29-2023 order.

The Court denies petitioner's motion to set aside the 06-29-2023 order.

A printed copy of the 06-29-2023 order is printed by the Court and handed to petitioner in Court by the deputy.

Not heard. Ruled solely in favor of Nancy Roberts  
without hearing matter, ignoring evidence,  
ignoring request to hear DVROs before custody



SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

MINUTE ORDER

Hearing on petitioner's motion to set aside the 07-31-2023 order.

The Court denies petitioner's motion to set aside the 07-31-2023 order.

Not heard. Fake talk  
of Lowney ended with  
"decision"  
without viewing evidence

Second hearing set on petitioner's motion to set aside the 07-31-2023 order is a duplicate setting.

Hearing on respondent's request for order, to declare petitioner a Vexatious Litigant.

Parties to file with the Court further briefings on this issue by 02-23-2024.

The Court will provide an answer by 03-08-2024.

Retaliation of  
Nancy Roberts  
for filing 2nd motion  
to Disqualify her

Hearing on respondent's request for petitioner to comply with the Court order and have petitioner provide minor child's legal documents to attorney Nancy Robert.

Petitioner's request for a rehearing of this issue is DENIED.

The Court orders petitioner to comply with this order and deliver all of the minor's legal documents to attorney Nancy Robert's office by 02-16-2024 by close of business.

Lowney ordered to give up passport of my son despite direct threats of international child abduction

Hearing on respondent's request for petitioner to comply with the Court order re: the VW Tiguan vehicle. Petitioner is ordered to provide the statement of the current loan balance to respondent; respondent will pay off the balance of the loan. Within 24 hours of petitioner receiving the title for this vehicle, petitioner must transfer the title to respondent, forthwith.

Hearing on respondent's request for petitioner to comply with the Court order re: the division of petitioner's 401K through his place of employment.

Parties are ordered to comply with the 08-29-2023 order re: QDRO.

A printed copy of the 08-29-2023 order is printed by the Court and handed to petitioner in Court by the deputy.

QDRO was provided, Nancy refused  
to sign it. This order is nonsense

Mutual requests for DVRO is set for trial on 06-17-2024 at 9:00 am in department 79.

Time estimate: 1/2 day.

Parties are instructed to be personally present for the trial; parties to electronically file exhibits and not email the exhibits to the department email.

The Court authorizes electronic service for both sides.

The parties are to file and exchange/serve any declarations/exhibits/witness lists 5-days prior to the trial.

Mutual DVTROs are extended to 06-17-2024.

The Clinic to prepare the order for the petitioner.

Attorney Nancy Robert to prepare the order for respondent.

6 months from now???  
Lowney is extending parental alienation for  
next 6 months, while was presented evidence  
and video recordings for hearing today  
Typical bribed judge



SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

MINUTE ORDER

The Court VACATES the 03-05-2024 status conference hearing date.

Attorney Nancy Robert to prepare the order after hearing.

Why Lowney removed Trial from calendar already twice?  
Why Lowney removed status conference?  
Ruling solely in favor of Nancy

Evidence P2



Audio recording of fake hearing 02/07/2024 when suspected of bribery judge Lowney was faking hearing while ruling solely in favor of unethical attorney Nancy Roberts, who Lowney saved from disqualification from this case by intentionally wrongfully denying Motion To Disqualify Unethical Attorney Nancy L Roberts, without consideration of matter and multiple evidence filed with the Court.

<https://drive.google.com/file/d/1qNu3QoqWg379VFoeUISB2NWFQOJu44zQ/view?usp=sharing>

Lowney intentionally prohibited all and every recording for this hearing, attempting to avoid any evidence of his falsifications and shameless abuse of judicial power that he demonstrated on this day,, including:

- Court Reporter - there was no court reporter, despite it was requested;
- Statement of Decision - was denied by suspected of bribery Lowney;
- Media Coverage - was denied by Lowney, denial note created and signed by Nancy Roberts
- ADA Accommodations for audio recording and transcript - denied by Lowney without consideration
- Lowney denied audio and video recording, and threatened to hold me in contempt of court if I will do any recordings;
- Lowney denied all matters on this day, and threatened to order Vexatious Litigant prefiling order against me if I will file any motion to reconsider

On this 4 hours hearing, suspected of bribery judge Lowney made massive amount of intentionally harmful wrongful orders:

- Ordered me to give up passport and documents of my son to unethical attorney Nancy Roberts and her client, therefore facilitating international abduction of my son outside of the United States (my son currently is held hostage in undisclosed location by Respondent on advice of her unethical attorney Nancy Roberts, all contact with my son is blocked, sim card is pulled out from his phone, and Respondent filed DVRO against me prohibiting all our contact, motivating it by orders of bribed judge Flint, terminated from Court in 2023;
- Moved DVRO trial 6 months later, to June 2024 - unreasonably extending temporary no-contact orders against facts and basis of this case (I requested protection of my son from domestic violence and international child abduction in DVRO, Lowney refused to hear DVRO and refused to view evidence - but moved hearing 6 months later)
- Denied 2nd Motion of Disqualification of unethical attorney Nancy Roberts without consideration - despite massive amount of evidence of Nancy's falsifications of court records and evidence, influencing judges with bribes, impermissible pressure on experts, emergency screener and professional supervisors. Nancy Roberts is under investigation by multiple authorities, including Bar Association, and is expected to lose license this year - but Lowney protected Nancy, because is suspected of being bribed by her;
- Denied reconsideration of 4 matters (fraudulent stipulation by Nancy Roberts, harmful custody orders of bribed judge Flint 06/29, harmful financial orders of bribed judge Flint 07/31, reconsideration of fraudulent DVRO 2022)

Evidence P3

# 2024-02-07 Transcript of Hearing

[00:00:00]

[Participants:] Good afternoon. Good afternoon.

[Judge Lowney:] Appearances please.

[Kostiantyn Mars:] Kostiantyn Mars, petitioner.

[Nancy Roberts:] Nancy Roberts for respondent, Hanna Mars, who's present.

She's going to be assisted by the Ukrainian interpreter.

[Maria Rekretuk:] Interpreter, Maria Rekretuk, R E K R E T Y U K, registered Ukrainian language interpreter, bench number 7 0 0 7 3 9, open file.

[00:00:39]

**Who is that person? Did she interpret anything?  
check audio recording - there is no voice of interpreter**

[Judge Lowney:] Alright, So we are here on several matters.

We did pass a matter that was on this morning's calendar, line number three,

and we pass it to this afternoon,

[00:01:00]

[Judge Lowney:] And that's the one I want to take up first, that is Mr. Mars' request for a **motion to disqualify opposing counsel.**

Before we get started, are there any issues that need to be discussed?

[00:01:07]

**[Kostiantyn Mars:] Your Honor, from my side, my printer was out of paper. I was not able to make copies for this matter. I did courtesy copies of evidence for restraining order, and unfortunately we didn't have a chance to prepare copies for disqualification of opposing counsel, so it was something I would like to bring to attention of the Court.**

[Judge Lowney:] So were you served with this motion?

[00:01:36]


[Nancy Roberts:] I received his response, your honor.

[00:01:42]


[Judge Lowney:] This is on the motion to disqualify.

[Nancy Roberts:] Oh, the motion to disqualify?


[Judge Lowney:] Yeah, that's what we're, that's all we're doing right now.

 **[Nancy Roberts:] Yes, I received, but I am objecting.** Mr. Mars has served amended, uh, pleadings for most of these motions, and I was served like five days before this hearing, so I have responded to [00:02:00] the original motion, um, and his, uh, **amended motions are not timely.**

[00:02:07]

 [Judge Lowney:] So I understand that you're objecting. Yes. And I understand, uh, the merits of the objection. **Would you never the less like to proceed today and get an answer on this?**

<< PERSONAL NOTE: JUDGE LOWNEY PROCEEDS WITH DISQUALIFICATION OF ATTORNEY DESPITE BOTH PARTIES CONFIRMED THAT PROCEDURALLY MATTER MUST BE CONTINUED (NOT TIMELY SERVICE, ABSENCE OF COURTESY COPIES FOR ALL PARTIES)

 **[Nancy Roberts:] Yes, Your Honor,** but if there's any new claims that were brought up. Absolutely. Thank you.

<< PERSONAL NOTE: NANCY ROBERTS WANTS TO PROCEED, BECAUSE SHE KNOWS OUTCOME WHICH WAS AGREED WITH BRIBED JUDGE LOWNEY

[Judge Lowney:] Absolutely.

[Nancy Roberts:] I also have one issue that needs to be addressed.

[00:02:28]

Um, it is impossible to personally serve Mr. Mars. Um, he has given a PO box to the court and to my office. Um, as you know, you can obtain the residential address for a PO box. When that was done, the P. O. box, address given was another P. O. box, and then when I followed up on that P. O. box, um, he had, uh, closed that box and moved.

<< PERSONAL NOTE: WHY NANCY ROBERTS IS SPYING ON ME?  
WHY SHE IS SEEKING MY RESIDENCE?

[00:02:56] Okay. Um, I had a process server go out, he has not been at that address for [00:03:00] the last nine months. I understand the post office is looking into it, but I have no way, at this point in time, other than in court, to serve Mr. Mars. Okay.

[Judge Lowney:] And is this about the Which thing are you trying to pursue?

<< PERSONAL NOTE: EVEN JUDGE LOWNEY SURPRISED THAT  
NANCY IS TRYING TO FIND MY HOME IN RETALIATION FOR  
REPORTING HER FOR UNETHICAL CONDUCT AND FRAUD

[Nancy Roberts:] Um, I, I had to continue the contempt hearing.

[00:03:16] Okay. I get a, a new date because serving him today would mean it outside the 16 court dates.

[Judge Lowney:] Okay, and I believe that continuance is granted.

[Nancy Roberts:] Yes, it was.

[Judge Lowney:] Okay. And it, it's rescheduled.

[Nancy Roberts:] The problem is that the, this issue comes up in the future. There's still no address at which he can be served, personally.

[00:03:37]

[Judge Lowney:] Alright, and Mr. Mars, um, service is important in this case. Um, we need to have an address for you to be personally served if we're going to move forward on certain things.

[Kostiantyn Mars:] Your Honor, so, um, taking into account the massive fraud scheme that opposing counsel...

[Judge Lowney:] I didn't get that

[00:04:00]

[Kostiantyn Mars:] Taking into account the massive fraud scheme that opposing counsel created against me, unfortunately, I feel, unsafe to share my address.

[00:04:07] And, uh, I'm available for personal service on the phone call. I can come to, um, Mr. Roberts office and just be served.

So I'm open for service, and we have contact with Ms. Roberts all the time.

[Judge Lowney:] Okay, so just so you know, um, if you are not going to make yourself available for personal service, and the court, under the code, finds that you are evading, and essentially, if you are not going to make yourself available for personal service, um, the court can find you're evading, and can order alternative means of service, which would require you to accept, for example, Electronic service.

<< PERSONAL NOTE: I NOTIFIED JUDGE LOWNY THAT NANCY ROBERTS IS REPEATEDLY EVADING SERVICE, AND THIS IS INCLUDED IN MOTION TO DISQUALIFY OPPOSING ATTORNEY. LOWNY IS MAKING SAME, BUT FALSE, ALLEGATIONS AGAINST ME (TYPICAL TACTICS OF ALL CORRUPT PEOPLE IN COURT).

[00:04:48]

[Kostiantyn Mars:] Thank you, your Honor. I would kind of ask you to allow electronic service

[Judge Lowney:] Allow?

[Kostiantyn Mars:] Yes.

[Judge Lowney:] In personal service, in lieu of personal service. Um, when it is required, [00:05:00] uh, electronic service, um, is going to be deemed appropriate. Uh, and same for any service going forward.

[Kostiantyn Mars:] Thank you, your Honor.

[Judge Lowney:] Okay.

[Nancy Roberts:] Okay. Thank you Sir.

[00:05:12]

[Judge Lowney:] Again, let's move to the first, the motion to disqualify, opposing counsel, and that,

Yes, I'm sorry, we're going to, that's where I'm going to start.

Can you repeat your comment?

[Clerk True Parker swearing parties:]

Do you both promise to stay under penalty of perjury that my testimony should you be the truth, and only the truth?

[00:06:00]

**[Judge Lowney:] Mr. Mars, It looks like this same motion,**

**[00:05:59] and this was on June 22nd, 2023, and the same motion was denied on August 1st, 2023.** Just so you know, the legal standard for bringing this motion again is that you need to provide newer different facts or circumstances or law that warrants the court to reconsider this motion.

**So between the time of the denial, uh, 8 1, 23, and the time that you filed this, um, what new law, facts, or circumstances?**

<< PERSONAL NOTE: JUDGE LOWNEY IS LYING IN THE COURTROOM AND IS ATTEMPTING TO CREATE CONFUSION: MOTION TO DISQUALIFY OPPOSING ATTORNEY FILED IN NOVEMBER IS BASED ON LOTS OF NEW FACTS, INCLUDING CONFIRMATION THAT NANCY'S CLIENT BLOCKING ALL CONTACT WITH THE CHILD ON HER ADVICE FALSIFIED NUMBERS OF EQUALIZING PAYMENT PROVIDED BY NANCY TO COURT, PRESSURE AND HARASSMENT ON PROFESSIONAL SUPERVISORS AND PROCESS SERVERS. BESIDES, BRIBED JUDGE FLINT WAS



TERMINATED FROM COURT – AND NEW MOTION TO DISQUALIFY NANCY ROBERTS WAS BROUGHT BECAUSE BRIBED JUDGE WHO DENIED IT WITHOUT CONSIDERATION WAS TERMINATED FROM COURT, AND THERE IS HOPE THAT LOWNEY WILL HEAR MATTER AND REVIEW EVIDENCE. UNFORTUNATELY, IT APPEARS THAT LOWNEY IS SUSPECTED TO BE BRIBED BY NANCY IN HIS FIRST MONTH IN DEPT 79, AND HE COMPLETELY REFUSES TO HEAR MATTER. SEE FULL TRANSCRIPT.

 [00:06:35] And keep in mind **that I looked at your prior motion in preparation for today.**

<< PERSONAL NOTE: LOWNEY IS LYING IN COURTROOM AGAIN. IF IMPARTIAL JUDGE WILL LOOK INTO MOTION AND EVIDENCE – THERE WILL BE NO DENIAL OF MOTION, AND EVIDENCE WILL BE REVIEWED, BECAUSE INTERNATIONAL CHILD ABDUCTION FACILITATED BY UNETHICAL ATTORNEY, SAME AS BRIBERY OF JUDGES, IS SERIOUS MATTER

So what new law, facts, or circumstances?

[Kostiantyn Mars:] May I use my laptop to look up documents? You may.[00:07:00]

<< PERSONAL NOTE: LOWNEY RUSHES WITH THIS MATTER, EVEN DESPITE THERE ARE NO PAPER COPIES FOR ALL PARTIES TO LOOK THROUGH EVIDENCE

[00:07:33] So, the first fact, uh, that changed since August is **disqualification of Judge Flint.**

So it would be changes since June, um, you're right, August, since August 1st, 2021.

[Judge Lowney:] Go ahead.

[Kostiantyn Mars:] So first is, uh, disqualification of Judge Flint.

[00:08:00]

And I do know that court brought, um, this in different light.

[Judge Lowney:] Um, um, thanks.

[Kostiantyn Mars:] So, I would say, um, a **verified written statement of disqualification of Judge Flint that was addressed to, um, Presiding Judge Beth McGowen.**

[00:08:14]

[Judge Lowney:] Um, and thank you. So, we're going to go one at a time. So, the fact that a judge has changed, since the actual ruling on this, uh, is not a legal, legally sufficient change of circumstance. Because that's not a changed circumstance that would not justify reconsideration.

[Kostiantyn Mars:] Your Honor, I'm bringing it because there **was a suspect that, opposing counsel, um, had an unlawful relationship with the judge.**

<< PERSONAL NOTE: THIS SINGLE FACT, THAT JUDGE FLINT WAS SUSPECTED IN BRIBERY AND HAD UNDENIABLE RELATIONSHIP WITH OPPOSING COUNSEL, SHOULD ALREADY GRANT DISQUALIFICATION OF OPPOSING COUNSEL. BUT, OF COURSE, IF LOWNEY IS BRIBED BY NANCY ROBERTS, HE WILL IGNORE THIS FACT

[00:08:51] And that's why I'm bringing it to attention to the court.

[Judge Lowney:] So, I understand, I understand you want to bring lots of different things to the attention of the court.

But I'm going to focus here. Okay?

<< PERSONAL NOTE: LOWNEY SO SHAMELESSLY LYING AND IGNORING THE FACT THAT BRIBED JUDGE FLINT WAS RULING SOLELY IN FAVOR OF NANCY ROBERTS IN VIOLATION OF THE LAW AND COMPLETELY IGNORING LAW AND FACTS

So, Another? That is not, also not a changed circumstance. So, you need to give me a changed circumstance before I'm going to reconsider.

<< PERSONAL NOTE: LOWNEY SHAMELESSLY LYING IN THE COURT – BECAUSE REMOVAL OF BRIBED JUDGE WHO WAS RULING

WITH EXTREME PREJUDICE, IS OBVIOUS CHANGE OF CIRCUMSTANCES

[00:09:17]

[Kostiantyn Mars:] Another change of circumstances is, um, professionally supervised reports which, contain the fact that respondent did actually, um, abduct or at least, uh, parentally keep child in undisclosed location and pulled out SIM card from my son's phone.

[Judge Lowney:] Okay. So, what is What is the date of that?

[Kostiantyn Mars:] Let me check evidence

[00:09:53]

[Nancy Roberts:] Your Honor, I didn't get what was that?

[Judge Lowney:] It was an allegation that a SIM card was pulled out. Okay,  
[00:10:00] That kidnapping or abduction occurred.

<< PERSONAL NOTE: LOWNEY SAW SUPERVISED REPORTS, AND LOTS OF EVIDENCE THAT NANCY ROBERTS ADVISED HER CLIENT TO DO PARENTAL ABDUCTION AND BLOCK ALL CONTACT WITH THE CHILD. THOSE WERE FILED WITH THE COURT AND EMAILED TO DEPARTMENT 79 BEFORE HEARING. BUT LOWNEY IGNORES THESE EVIDENCE

[00:10:08]

[Kostiantyn Mars:] So, I just need to pulled up, visitation report.

[00:10:25]

**So, this was November 10, 2023.**

[Judge Lowney:] What is the allegation?

[Kostiantyn Mars:] So, Respondent, um, relocated my child, which I do see as abduction.

[Judge Lowney:] When?

[Kostiantyn Mars:] So respondent moved my child in April.

[Judge Lowney:] Of what year?

[Kostiantyn Mars:] 2023.

[Judge Lowney:] Okay.

[00:11:00]

[Kostiantyn Mars:] To an unknown location and refused to share address.

[Judge Lowney:] Okay, so let me just stop you there, to me because I looked at your prior motion and you made just saying the same to me.

<< PERSONAL NOTE: LOWNEY IS SHAMELESSLY MAKING APPEARANCE THAT PREVIOUS HEARING OF DISQUALIFICATION OF NANCY ROBERTS WAS LAWFUL – BUT IT IS WELL KNOWN THAT JUDGE FLINT WAS SUSPECTED IN BEING BRIBED BY NANCY ROBERTS, AND DENIED DISQUALIFICATION OF NANCY ROBERTS WITHOUT CONSIDERATION. THEREFORE NO “APPEARANCE OF NORMAL HEARING” IS EVER POSSIBLE IN THIS CASE – AND ALL THAT LOWNEY IS DOING IS JUST FAKING HEARING, WHILE COMPLETELY IGNORING FACTS OF THE MATTER

[00:11:07]

[Kostiantyn Mars:] But I'm talking about report, which confirms that respondent pulled out SIM card, and this report was made on November 10th. So it's a new fact which confirms,

[Judge Lowney:] But this is a disqualification motion, so it would have to be a new fact. That justifies disqualification. This is not disqualification of the respondent.

<< PERSONAL NOTE: WHAT THIS JIBBERISH IS ABOUT? IT IS OBVIOUS THAT RESPONDENT ACTED UNLAWFULLY ON ADVICE OF HER ATTORNEY – THAT’S WHY MOTION TO DISQUALIFY

ATTORNEY IS BROUGHT. BUT LOWNEY IS JUST FAKING HEARING AND AVOIDING TOPIC

[00:11:32] It's not a disqualification of the respondent.

[Kostiantyn Mars:] Yes, your honor. But among evidence that I provided for disqualification of opposing counsel, there are messages where respondent confirms that her attorney suggests to block all contact with the child and force me to sign-off custody, which they call “sign a new agreement”.

[00:12:01]

[Judge Lowney:] So beyond the, the allegations of kidnapping and abduction Do you have any other basis for disqualification?

<< PERSONAL NOTE: JUST IMAGINE THAT YOUR CHILD IS ABDUCTED WITH THE THREAT TO “BURY OUR SON IN UKRAINIAN SOIL, SO YOU WILL NEVER SEE HIM AGAIN”, AND YOU NEED TO DISQUALIFY OPPOSING ATTORNEY WHO ADVISED YOUR EX ON PARENTAL KIDNAPPING, WHILE THIS ATTORNEY THROUGH BRIBERY AND FRAUD IS ATTEMPTING TO RE-ISSUE PASSPORT FOR INTERNATIONAL ABDUCTION OF YOUR CHILD – WHAT A HECK IS THIS DISCUSSION WITH LOWNEY IS ABOUT? THE VERY FACT OF **PARENTAL KIDNAPPING IN CUSTODY CASE IS ALREADY A RED FLAG!** IF JUDGE IS IGNORING IT – THERE IS OBVIOUSLY SOMETHING WRONG WITH THE JUDGE

[00:12:13]

[Kostiantyn Mars:] Your Honor, so another basis, um, that might be old, but I would like to bring it to attention to the court, that Judge Flint, unlawfully removed signed and emergency screener recommendations that were filed with the court.

[Judge Lowney:] So, this is an allegation against Judge Flint?

<<PERSONAL NOTE: SUCH A NONSENSE COMMENT FROM LOWNEY. OBVIOUS WASTE OF TIME

[Kostiantyn Mars:] No.

[Judge Lowney:] This motion is for disqualification of opposing counsel.

[00:12:36]

[Kostiantyn Mars:] Um, Your Honor, this is an allegation against an opposing counsel - because opposing counsel lied to Judge Flint during the hearing on June 29th. And Judge Flynn, trusted opposing counsel that signed emergency screener recommendations were, falsified, allegedly, but that message was [00:13:00] sent to the court.

[00:13:02] And that message was forwarded to...

<< INTERRUPTED BY LONEY, BECAUSE HE SAW THIS MESSAGE PERSONALLY

[Judge Lowney:] Sir, all of these allegations were produced in May. In your June disqualification.

[Kostiantyn Mars:] I do think that I did bring, a screenshot of the thread, of the email thread of conversation of opposing attorney with the court.

[Judge Lowney:] It has to be something new. It can't be cumulative evidence of your allegations that you've already made.

<< PERSONAL NOTE: JUDGE IS AWARE OF THE FACT THAT BRIBED JUDGE FLINT DENIED MOTION OF DISQUALIFICATION PREVIOUS TIME, AND WAS SUSPECTED IN RECEIVING BRIBE FROM OPPOSING COUNSEL. IMPARTIAL JUDGE CANNOT RELY ON JUDGMENT OF BRIBED JUDGE, ESPECIALLY TAKING INTO ACCOUNT THAT CUMULATIVE AMOUNT OF FALSIFICATIONS AND ABUSE OF JUDICIAL POWER BY FLINT LED TO HER EARLY TERMINATION IN 2023

[00:13:26]

[Kostiantyn Mars:] Let me check it again.

[Judge Lowney:] Ok, just one more time and I'm about to get the response

[00:14:14]

[Kostiantyn Mars:] Your Honor, it is also was brought to court... I mean, it's not as important as child abduction made on advise of attorney, and it is not as important as lying to judge in the courtroom, which led to dismissal of signed emergency screener recommendations, but it was brought to the court that on December 12th, Ms. Roberts was attempting evasion of service.

[00:14:40] And, unfortunately, the same day she harassed process servers, which was documented in email and evidence.

[Judge Lowney:] Okay. Alright, Ms. Roberts, do you have any comments?

[Nancy Roberts:] Just on this one. Yes, um, this is actually the same as [00:15:00] the first motion, which was denied. There are no legal grounds for disqualification, or disqualification of counsel.

[00:15:07] There is no conflict of interest. Um, and my client is requesting that the court deny Mr. Mars' motion and that he be sanctioned for bringing this motion.

[Kostianyn Mars:] Objection.

[Judge Lowney:] Go on.

[Kostiantyn Mars:] So, regarding permissible conflict of interest, I do believe that, the definition of impermissible conflict of interest is included in Motion to Disqualify Opposing Attorney, and contains legal grounds, which you most probably saw, and I will not repeat them as self represented.

[00:15:38] But, um, permissible conflict of interest obviously exists, because, um, pressure on professional supervisors, repetitive pressure on professional supervisors, and pressure on emergency screener, both are documented. Unfortunately, it confirms that Nancy Roberts when much further than just, court hearings.

[00:16:00]

[Nancy Roberts:] I would object to assuming facts are not an evidence.

[00:16:02]



[Judge Lowney:] So, it does assume facts are not an evidence. However, even if those facts were true, and the court is not saying at all that they are true,

[00:16:17] That is not a conflict of interest. That is a disagreement about how to defend a client. So, the court is not going to reconsider your motion because I don't find any legally sufficient facts, any clear circumstances or law warranting reconsideration for your motion to qualify. And let me say, if I did believe that this was new information, I have examined the information and heard from both parties, and even if I was going to consider it, I would deny it as insufficient. [00:17:00]

**Motion to disqualify Nancy included in this list of evidence.  
Evidence for this motion is filed with the Court**

<< PERSONAL NOTE: LOWNEY IS FAKING "DECISION", WHILE COMPLETELY IGNORING EVIDENCE AND FACTS, AND RULING SOLELY IN FAVOR OF NANCY ROBERTS

[00:17:00] So let's move on to number two. And number two is a, Mr. Mars, your request to modify child custody and child visitation and appoint minor's counsel to Max, is that correct?

[Kostiantyn Mars:] So initially it was to grant child abduction prevention orders and to review emergency screener recommendations that were removed without consideration.

[00:17:29] So, um, to ground child abduction prevention orders and to review and ground emergency screener recommendations that were signed by emergency screener and by me.

[00:17:49]

[Judge Lowney:] When was the time you filed it?

[00:19:14]

[Kostiantyn Mars:] The version was filed on January 17th, but I think the initial version was about, um, August.

[00:19:27]

Yes, it's an amended version, but I think, like, the format of 300 wasn't modified.

[00:20:00]

[Judge Lowney:] So, I got the amended request for order, and it says that you're asking for child abduction prevention orders, and they're asking for totally new custody, joint legal, physical custody, and a brief end to the child abduction order, and amended scheduled exchanges on Wednesdays after school.

Um, again, it's going to be the same question. What are the changes and advances from the prior orders of 10/31/22?

Does everyone agree that the prior orders are from 10/31/22? Ms. Roberts?

[00:21:00]

[Nancy Roberts:] There are two sets of orders, Your Honor. One set of orders is 10/22. There are also, uh, orders that are not in conflict that were filed on January 26, 22. That's not the timeshare, but they are additional continuity orders.

[00:21:00]

[Judge Lowney:] Okay. This includes orders on what changed in circumstances. Do you have to justify a modification?

<< PERSONAL NOTE: SOUNDS LIKE "HEARING" – BUT IN FACT OBVIOUS IGNORANCE OF FACTS, BECAUSE AGREEMENTS ARE ALREADY MADE BETWEEN LOWNEY AND NANCY ROBERTS, AND HE IS FAKING HEARING

[Kostiantyn Mars:] I do believe that, um, **this matter could be heard only after OPPOSING DVROs.**

Because, um, on November 20th, I filed a DVRO against the Respondent to protect my son from domestic violence and international child abduction.

[00:21:26]

**So I'm kindly of asking you to hear this matter after opposing DVROs, because there's extensive evidence.**

[Judge Lowney:] So right now you're withdrawing your request for modification?

[Kostiantyn Mars:] I do not withdraw the request, but I do believe that it depends on what the court

[Judge Lowney:] You want the court to reserve on the issue?

[00:21:44]

[Kostiantyn Mars:] I do, until after the devalue. Thank you Your Honor.

[Judge Lowney:] Mr. Roberts?

[00:21:52]

[Nancy Roberts:] Um, I would agree with him on the issue of the restraining order. Also, that **Mr. Mars has been in contempt for some of these orders.**

<< NANCY ROBERTS IS LYING TO JUDGE LOWNEY AGAIN. JUDGE ALLOWS LIES

[00:22:07]

[Kostiantyn Mars:] Objection? May I?

[Judge Lowney:] No, sir.

<< PERSONAL NOTE: WHY NO?

[Kostiantyn Mars:] Um, I'm not in contempt.

[Judge Lowney:] Okay, that's not illegal. Alright, overruled.

<< PERSONAL NOTE: WHY?

[00:22:27]

Um, so, I just want to make sure I am keeping track of your requests.

[00:22:34]

So, line 2, we are going to reserve on,

I'm sorry, line 1 on this calendar, we are going to reserve on any modification of child custody and child visitations.

[00:22:56]

And any request contained in that order. [00:23:00] So

[00:23:05]

The next one on our calendar

[00:23:17]

Also looks like a set aside order from June 29, 2023. We need to file this request for order so we make sure we're not going to have to correct it. When did you file this request for order? Set aside.

[00:23:46]

[Kostiantyn Mars:] Let me check.

Meanwhile, I do remember there was media request for coverage on this hearing.

[Judge Lowney:] It was denied.

<< PERSONAL NOTE: WHY IT WAS DENIED? LOWNEY IS AFRAID OF PUBLICITY BECAUSE HE IS BRIBED?

[Kostiantyn Mars:] Thank you.

[Judge Lowney:] It was denied formally. Uh, you should have received notice.

[Kostiantyn Mars:] And I didn't receive it.

[00:24:00]

[Judge Lowney:] It says it comes **from our media coordinator** and it doesn't come from me.

<< PERSONAL NOTE: LOWNEY IS LYING. DENY MEDIA REQUEST WAS PREPARED BY NANCY ROBERTS – AND IS INCLUDED IN EVIDENCE. WHICH AGAIN CONFIRMS UNLAWFUL RELATIONSHIP BETWEEN LOWNEY AND NANCY ROBERTS

[Kostiantyn Mars:] Thank you.

[Judge Lowney:] The service list. I believe that's tomorrow's motion.

[00:24:09]

[Nancy Roberts:] It's followed by March 30th.

[Judge Lowney:] Thank you.[00:25:00]

[00:26:27]

[Kostiantyn Mars:] June 29th. It was filed on, um, August 30.

[00:27:02]

[Kostiantyn Mars:] Did anyone expect any witnesses? I am not sure who.

[Judge Lowney:] You have to know the names of your witnesses. So, my question is, there's somebody called Ren Bird.

[00:27:24]

Time to get in on the scene. Is that a friend or a witness of yours?

[Kostiantyn Mars:] I think so.

[Judge Lowney:] You think so?

[Kostiantyn Mars:] Yes.

[Judge Lowney:] Okay, so you have to tell the names of your witnesses. You have to know who they are and what they're going to say. Do you know who this person is?

[Kostiantyn Mars:] No, I'm not sure.

[Judge Lowney:] Okay, so they won't be able to join.

[00:27:52]

[Kostiantyn Mars:] Okay.[00:28:00]

[00:28:03]

[Judge Lowney:] Okay.

[00:28:22]

[Judge Lowney:] Ok, Mr. Mars, what exactly are you looking for in this, in this request?

[Kostiantyn Mars:] I didn't prepare for this matter today. I didn't took evidence, uh, but briefly I do remember that orders, uh, on June 29 were made, um, um, extremely favorable for respondent by Judge Flint who was suspected in receiving bribe from Respondent, and made without consideration of any evidence and...

[00:29:04]

[Judge Lowney:] So, so your allegations of **bribery and fraud** are not proven. They assume facts, not evidence. And the court is not going to consider them. **And I do not want to hear that.**

<< PERSONAL NOTE: WHY LOWNEY DOESN'T WANT TO HEAR ABOUT BRIBERY IN SUPERIOR COURT? BECAUSE HE IS DOING THE SAME FAKE AS FLINT, HAVING THE SAME MOTIVATION?

[00:29:27]

Alright.

[Kostiantyn Mars:] May I?

[Judge Lowney:] Alright. So let's, let's talk about this 6/29 order. Tell me the reasons, the legal reasons you believe the court should reconsider and set it up.

[Kostiantyn Mars:] Your Honor, I have kindly, asked the court to reconsider this order and review evidence related to parental child abduction because initial request for hearing on, uh, June 29th was related to the fact The respondent, without notice, without prior notice, moved my child to an unknown location, refused to share address.

**[Lowney and Nancy Roberts both interrupted me]**

[00:30:09]

[Judge Lowney:] Okay, so, Mr. Mars, it must not be lost on you that you're using the same allegations to ask the court to set aside all of these orders, the same exact allegations.

<< PERSONAL NOTE: ALL THESE ORDERS WERE REQUESTED TO BE NULLIFIED TOGETHER WITH DISQUALIFICATION OF BRIBED JUDGE FLINT. FLINT WAS TERMINATED FROM SUPERIOR COURT. LOWNEY KNOWS WHY CUSTODY ORDERS MUST BE RECONSIDERED – AND HAS MORE THAN 50 PIECES OF EVIDENCE. BUT PLAYS SHOW OF “WHAT’S NEW?”

[Kostiantyn Mars:] Um, I apologize, but, um, I think that for this specific order It was very relevant, because that hearing was brought to the attention of the court.

**[Interrupted by Lowney again]**

[00:30:35]

[Judge Lowney:] Right, so my problem is, at that hearing, you brought up all of these things. And your request **was denied**.

[Kostiantyn Mars:] Your Honor. My request **was denied by Judge Flint...**

[Interrupted by Lowney again – so I will not say BRIBED judge Flint]



[Judge Lowney:] Right.

[00:31:00]

[Kostiantyn Mars:] I will not repeat my words because you said I shouldn't, right? But evidence was never reviewed, and an emergency screener was not subpoenaed on best interest of the child, on safety of the child.

[00:31:07]

[Judge Lowney:] But those are not, those are **complaints** about how the hearing went, and how you wanted it to go, and what you wanted to be considered at the time of the hearing. Those aren't new facts and circumstances that would justify reconsideration and a set aside of that order.

<< PERSONAL NOTE: WHAT A HELL IS THAT “NEW FACTS” WHEN BRIBED JUDGE WAS TERMINATED FROM COURT, BRIBED JUDGE WHO MADE INTENTIONALLY HARMFUL ORDERS, FACILITATING INTERNATIONAL CHILD ABDUCTION BY PARENT-ABUSER WITH DOCUMENTED HISTORY OF CHILD AND ELDERLY ABUSE, AND DOCUMENTED HISTORY OF INTERNATIONAL CHILD ABDUCTION ? LOWNY IS MAKING SHOW OF FAKE HEARING, INSTEAD OF HEARING MATTER

[Kostiantyn Mars:] Your Honor, I understand your position.

[00:31:29] And I trust you as a judge, but I just bring to your attention the fact that that order was intentionally wrongful and my son deserves to have father.

[Judge Lowney:] Okay, so I understand, I understand you disagree, but **in those circumstances**, where there are not changes filed or changes in law, the law provides a remedy. And that remedy is an appeal, a timely filed appeal.

<< PERSONAL NOTE: WHICH CIRCUMSTANCES? 3<sup>RD</sup> BRIBED JUDGE ON ONE SINGLE CASE IN ONE SINGLE YEAR?

[00:31:57] And an appeal is saying exactly what [00:32:00] you are saying to the court. You believe it was wrongly decided. You would like it to be heard again. But, that is not the basis of a motion for reconsider. Okay?

So, that request to set aside the 6th Amendment is denied. And it is denied because there are no new circumstances, facts, or law that would justify a reconsideration.

[00:32:32] And having heard the, the proper reasons for reconsideration, even if there were new circumstances, law, or facts, the court would deem them legally insufficient to set aside the order.

[Nancy Roberts:] I'm sorry, Your Honor. There's been so many motions filed in this case. Was, was that still regarding the, [00:33:00] uh, custody and child custody?

[00:33:01]

[Judge Lowney:] That was regarding the motion to set aside the 629.

[00:33:09] So it would be number three on today's calendar.[00:34:00]

[00:34:05] Now we'll go to number four on this afternoon's calendar.

[00:34:16] This is a request to set aside an order filed on July 31st, 2023.

[00:34:28] And that is your request, Mr. Mars.

[Kostiantyn Mars:] Yes.

[Judge Lowney:] And what is the change of circumstances? The law or facts that were judged by the consideration.

[Kostiantyn Mars:] Your Honor, as you mentioned, I cannot say why Judge Flint made that wrongful order, so I would just say that Judge Flint made an order with all consideration of, um, balance statements and, and sale agreement for Volkswagen Tiguan that is in possession of Respondent.

I do believe there were some other wrongful orders, but this one, uh, is outstanding because we still cannot transfer title to Respondent. And my request was to resolve the matter of transferring title because, as you're aware, I'm on the brink of bankruptcy.

[00:35:27] I do not have 6, 000 dollars to buy out a car. And I kindly offered Respondent's attorney a settle an agreement.

[Judge Lowney:] And so, I imagine, all of those facts were brought to the court's attention at that time?

[Kostiantyn Mars:] Um, unfortunately, Judge Flint refused to review evidence and refused to see a car sale agreement.

[Judge Lowney:] Did you make those, did you make those arguments at that time?

<< PERSONAL NOTE: LOWNEY AGAIN EVADING MAKING ANY DECISION AND MAKING IT LOOK LIKE “THERE WAS AN ORDER” – DESPITE THIS HEARING IS ON REQUEST OT RECONSIDER HARMFUL ORDERS OF BRIBED JUDGE WHO WAS TERMINATED FROM SUPERIOR COURT YEAR BEFORE END OF HER TERM

[00:35:54]

[Kostiantyn Mars:] I think so.

[Judge Lowney:] Right. Okay.

[Kostiantyn Mars:] But...

[Interrupted by Lowney]

[Judge Lowney:] Hold on, hold on.

[Nancy Roberts:] Objection

[00:36:00]

[Judge Lowney:] Okay, which one?

[Nancy Roberts:] ...that the judge did not consider his evident.

[Judge Lowney:] So again, you disagree with the order. I understand that. We just talked about the, an appeal, and when an appeal is appropriate, um, it sounds like you made these arguments in front of Judge Flint. I don't know why you would not have.

[00:36:26] It was listened to. You don't think it was considered, but it was at least listened to. It was presented and afterwards **denied**.

Or there was an order made that you disagreed with. Correct?

[Kostiantyn Mars:] Your Honor, as far as I remember, on July 31st, I did request for continuance due to medical emergency, and because Judge Flint, , had prejudice against me, she denied, and at all the hearing, I, I've been seated with a very severe head and tooth pain, [00:37:00] and it was very hard to concentrate at the moment.

[00:37:02]

[Judge Lowney:] Okay. So, again, the court was made aware of all of those things? And that is not new to the court, and so there is no basis for reconsideration. So that request is also going to be denied.

<< PERSONAL NOTE: HOW IT COULD BE DENIED IF THERE WERE OBVIOUS CIRCUMSTANCES OF WRONGFUL ORDER, MADE BY PREJUDICED JUDGE (BRIBED JUDGE), AND ORDERS WERE MADE INTENTIONALLY HARMFUL? HOW Lowney CAN IGNORE FACTS IF HE IS NOT PREJUDICED BY HIMSELF? OBVIOUSLY HE IS

[Kostiantyn Mars:] Your Honor, may I ask you at least to reserve this matter until a final trial? Because we, we need to transfer car title to respondent.

[00:37:27] And unfortunately we are blocked because the car is registered to me.

[Judge Lowney:] So I'm not going to reserve an issue that has already been decided in an order already made.

<< PERSONAL NOTE: IT IS REQUESTED FROM Lowney TO RECONSIDER ORDER. WHAT A NONSENSE HE IS SAYING HERE?

[Kostiantyn Mars:] Your Honor, how we can resolve it? I cannot say how the court in this moment is refusing to come to an agreement about payment.

[Judge Lowney:] Um, in normal circumstances, there would be a meet, confer, and mediation on these things, and a settlement officer conference.

[00:37:54] But, um, it's not to ask the court to set aside a [00:38:00] lawful order.

[Kostiantyn Mars:] Thank you, Your Honor. Do you understand correctly that we should, we can bring this matter to a family status conference?

[Judge Lowney:] So, we're not ready to do that. I'm just saying that there are ways to resolve these issues. But, um, you would have to agree on a way to resolve these issues.

[00:38:20] And you're not quite there yet. But the way, it certainly isn't a way to ask the person to set aside.

<< PERSONAL NOTE: LOWNEY REMOVED FROM CALENDAR FINAL TRIAL AND STATUS CONFERENCE ALREADY TWICE – AND REPEATS “WE ARE NOT THERE YET” – WHILE CREATING SITUATION WHERE HE REMOVED ANY OPPORTUNITY TO MEET AND CONFER, THEREFORE CREATING FAKE SITUATION OF ME BEING IN CONTEMPT OF COURT (BECAUSE JUDGE PREVENTS ME FROM RESOLVING MATTER)

[00:38:31] Yes, it sounded familiar.

[00:38:40] And let's go on. So Lines 5 and 6 are the mutual requests for domestic violence restraining orders.

[00:38:53] The normal course would be to, is everybody ready for trial?

[Nancy Roberts:] Um, before we get, get to that issue on it, [00:39:00] can we get the [ILLEGIBLE] resolution?

[Judge Lowney:] I was going to do that. Oh, okay, fine, Um, we still have, so,

[00:39:17] normal course of business on these types of cases. We will accept them. Other issues are waiting to be resolved. **Are both sides ready for trial?**

[Nancy Roberts:] Yes, sir.

[Kostiantyn Mars:] Yes, Your Honor.

[Judge Lowney:] And time of trial? Is that your case?

[00:39:38]

[Kostiantyn Mars:] I would try to do it in two hours. If you would allow me to present all evidence.

[Judge Lowney:] You're going to do it in two hours for news, your witnesses, and any evidence that you want to do?

[Kostiantyn Mars:] Yes, Your Honor.

[00:39:56]

[Judge Lowney:] So let's set it for half a day. Just so you're aware, it's going to be some time. We have a heavily impacted trial calendar

<< PERSONAL NOTE: LOWNEY IS LYING – BECAUSE MOST OF TRIALS ARE SET ON MARCH-APRIL. HE IS INTENTIONALLY SCHEDULING IN 6 MONTHS, ON JUNE

[00:41:46] When is the party anticipated being ready for a final trial on all the outstanding things?

[Nancy Roberts:] I'm not sure we can address that anytime soon. [00:42:00] A final trial and termination of status, but there is no QDRO in place because Mr. Mars is not cooperating with the court order and he's not [ILLEGIBLY] the QDRO.

[00:42:10]

[Judge Lowney:] We'll get to that, we'll get to that next. So we're not, we're not anywhere near?

[Nancy Roberts:] No, not until we have a quadro.

[Kostiantyn Mars:] Objection. So we do have a QDRO.

[Judge Lowney:] I got it. And I have to apologize. I'm getting more information than I can.

<< PERSONAL NOTE: LOWNEY REFUSED TO GIVE ADVISE HOW TO RESOLVE ISSUE WITH QDRO – WHICH IS ALREADY SIGNED BY ME,

BUT NANCY ROBERTS IS TRYING TO MAKE SOME FRAUD BY GETTING MY SIGNATURE ON PAPERS THAT ARE IRRELEVANT TO QDRO

[00:42:31]

The first full half day **I have is June 17<sup>th</sup> at 9:00 AM.**

<< PERSONAL NOTE: LOWNEY IS INTENTIONALLY MOVING DVROS TRIAL 6 MONTHS LATER (AFTER 3 MONTHS OF WAITING SINCE NOVEMBER), AND REMOVING FINAL TRIAL FROM CALENDAR – DESPITE ALL PARTIES ARE READY TO PRESENT EVIDENCE

[00:42:47] The trial under the DVRO.

[00:42:54] Um, all parties will have to be personally present, exchange witnesses and exhibits [00:43:00] five days before. I'm authorizing, as I said before, electronic service for both sides.

[00:43:10] I'm going to be reading through these trial exhibits. Not by email, but by filing.

[Kostiantyn Mars:] Your Honor, how much is this different from filing in person?

[Judge Lowney:] You file, so you know how to electronically file things, correct?

[Kostiantyn Mars:] Possibly.

[Judge Lowney:] These are going to be electronically filed. And I should say, please read our email policy. You're emailing too many things to the court.

<< PERSONAL NOTE: JUDGE SAW EVIDENCE OF NANCY ROBERTS NOT COOPERATING, NANCY ROBERTS LIES AND FRAUD, NANCY ROBERTS AVOIDANCE OF SERVICE AND HARASSMENT OF SERVERS IN EMAIL. AND HE IS SAYING “DON'T SEND THOSE EMAILS TO THE COURT. DEFINITELY LOWNEY IS NOT CREDIBLE

[00:43:43]

[Kostiantyn Mars:] Ok, I'm sorry. These will not be emailed to the court.

[00:43:58]

[Judge Lowney:] And as added incentive [00:44:00] regarding our email policy, if it's violated, I don't receive them. Okay.

[00:44:09]

[Kostiantyn Mars:] All right. Your Honor, um, may you consider date for a final trial? Because we most probably will not need the settlement conference.

[Judge Lowney:] You don't need it or don't want it?

[Kostiantyn Mars:] I sent, a marital settlement agreement this morning. It is a sixth amendment version. And unfortunately, Ms Roberts answered this morning that she doesn't want to cooperate.

[00:44:35] So I would kindly of ask for a trial date. To finalize financial matters. And I would kindly ask court to grant me permission to file QDRO for signature of court. Because it's ready.

[Judge Lowney:] To file what?

[Kostiantyn Mars:] QDRO. My 401(k).

[Judge Lowney:] That's not on today.

[00:45:00]

 **[Kostiantyn Mars:] Is it possible to get a date for final trial?**

 **[Judge Lowney:] It doesn't sound like the parties are ready.**

<< PERSONAL NOTE: LOWNY IS BLOCKING FINALIZATION OF THE CASE – OBVIOUSLY AND BLUNTLY

[00:45:00] So, you have to vote when you are ready. And you're not going to get away with not having a settlement conference, or a mandatory settlement, or a settlement officer conference, or a mandatory settlement conference. Those are going to happen no matter what.



<< PERSONAL NOTE: LOWNEY TALKING SOME NONSENSE TO MAKE BLOCKING FINALIZATION LOOK “LEGITIMATE” – WHILE IN FACT HE REMOVED FINAL TRIAL FROM CALENDAR ALREADY TWICE

Um, and the DVRO also has to be set, has to be done before the final trial, because we can't do permanent orders on, uh, file and other things.

[00:45:33]

**[Kostiantyn Mars:] Is it possible to hear DVROs today?**

**[Judge Lowney:] No**

<< PERSONAL NOTE: WHAT IS THE REASON TO BLOCK HEARING ON DVROS THAT WAS SCHEDULED FOR TODAY? PROBABLY ONLY BRIBE THAT LOWNEY RECEIVED IN JANUARY

**[00:45:43] So the request for a new trial date is denied.**

<< LOWNEY REMOVED FINAL TRIAL FROM CALENDAR AND DENIED SCHEDULING NEW TRIAL ON HEARING

And I should also add, um, we can't just bring up new things when we're in court. So everybody have a notice, that's why we have notice and opportunity to be heard. Um, you can imagine if you [00:46:00] saw the product of a brand new subject, um, you would want time, notice, and opportunity.

[00:46:16]

[Nancy Roberts:] [Indistinguishable words]

[Kostiantyn Mars:] Objection. Your Honor, I think we need a status conference. This potentially may settle things.

[Judge Lowney:] You can settle things on your own. It's got to. The settlement is not going to occur at the status conference.

[Kostiantyn Mars:] So you're saying the status conference is not going to happen before trial?

[Judge Lowney:] No, mandatory settlement conference.

[00:46:39]

[Kostiantyn Mars:] Can we get settlement conference please?

[Judge Lowney:] No, we need a trial date first. We're not, we're just not there yet. We're not there yet. We just set a domestic violence restraining order trial, uh, in June. Um, so that needs to be settled. Um, you are free to settle any matters that you want without court [00:47:00] intervention, but those do not happen.

[00:47:02] on a five minute status conference.

[Kostiantyn Mars:] Your Honor, I just kindly ask you to consider the possibility to hear the DVRO before June, because it will be already two years of artificially extended parental alienation.

[Judge Lowney:] These were, these were both just recently filed, so I'm, the court is not sympathetic. And these are subsequent, second DVROs, so the court is really not sympathetic about these, about filing part of them.

 [00:47:31] **We are going to vacate the March 5th status. We are not going to set a trial.**

<< PERSONAL NOTE: WHAT A HELL IS LOWNEY DOING RIGHT NOW? HE IS VACATING BOTH TRIAL AND STATUS CONFERENCE AND MANIPULATING COURT CALENDAR WITH OBVIOUS GOAL TO MAKE CASE ENDLESS – WITHOUT ANY REASONS FOR THAT

We have our next stage. on the DVRO. And I'm sure we have more data to come out.

[00:47:48] We are going to move on.[00:48:00]

[00:48:17] So, this may be the same request, but this is a another modification that set aside the orders from July 31st 2023. That, this looks like a repeat request. Um, yes, I think you already heard this metric today. Right, but I'm just

saying if I'm correct. Um, maybe very promising. I'm not sure. I want to make sure that we address this.

**<< PERSONAL NOTE: LOWNEY IGNORED VACATE FRAUDULENT STIPULATION 02/08 – WHICH WAS NOT HEARD AT ALL**

[00:48:47] And now we're going to go to respondents request for orders.[00:49:00]

[00:49:00] I have a newspaper on this. Can you remind me? Your filing date?

[Nancy Roberts:] Filing date was September 26th, 2023. September 26th, 2023.[00:50:00]

[00:50:00]

[Judge Lowney:] January 11th, 2023. And that would continue

[00:50:08] Okay,

[00:50:26] so at your request for order, I will let you present it in the order that you would like.

[Nancy Roberts:] Yes, Your Honor. The first request was to have Mr. Mars declare vexatious litigant.

Um, in the six months after his former counsel withdrew, there were 14 motions filed and appealed. Um, the divorce case filed in Ukraine, um, These consisted of pre judicial refusals,

One request for a trial, was then continued out several crimes, [00:51:00] A contempt motion, A motion to disqualify me as respondent's counsel, two motions to terminate wage withholding orders, A motion to prescribe a court order, and a motion to modify his court.

[00:51:13] Since the filing of the motion, since September 22nd, in the last four months, there's been six amended trial dates, six amended exhibits for trial, additional motions, uh, five to six additional motions to improve the form of, uh, charges in the matter to [UNDISTINGUISHABLE].

An additional motion to disqualify me, an additional contempt motion, additional motions to incriminate the ways that the building ordinance is in order, three motions to modify support and custody.

[00:51:42] Two motions for reconsideration and a motion to bifurcate and terminate marital status. Um, I have no more room in my office for all these motions. If each motion are the same 250 pages of exhibits attached, it is difficult to even keep straight which pleading is Mr. Mars [00:52:00] of an illusion than it seems.

[00:52:01] There are amendments to everything. Um, most of these motions have been denied. They Um, I'm asking this court to list Mr. Mars as a vexatious litigant to prohibit his filing without the leave of the presiding judge in order to put an end to this. I'm very concerned that even once this case is resolved, with the filing of support and custody motions, two and three every month.

[00:52:28] But this is never ending.

<< PERSONAL NOTE: NANCY ROBERTS FACILITATED MASSIVE FRAUD SCHEME OF INTERNATIONAL CHILD ABDUCTION THROUGH BRIBERY, FRAUD, MASSIVE FALSIFICATIONS AND PRESSURE ON EXPERTS, SUPERVISORS AND SERVERS. NANCY ROBERTS DID FRAUD WITH DCSS, WITH SUPERIOR COURT, AND CAUSED MASSIVE FINANCIAL DAMAGES TO ME. NANCY ROBERTS ENFORCED HARM TO MY SON AND TO MY GRANDMOM THROUGH FRAUDULENT ORDERS, SIGNED BY BRIBED JUDGES TOWERY AND FLINT, WHO WERE TERMINATED FROM COURT. THOSE MULTIPLE MOTIONS THAT SHE MENTIONS, ARE NECESSARY TO CLEAR DAMAGES CAUSED BY NANCY'S FRAUD, TO GET BRIBED JUDGE FLINT REMOVED FROM THIS CASE, AND TO GET CUSTODY MATTER BE HEARD (BECAUSE OTHERWISE NANCY WITH BRIBED JUDGES WILL JUST CLOSE THIS CASE AND MAKE IT LOOK LIKE I AGREED TO FRAUD THAT SHE DID). AND YES, WE HAVE MORE THAN 50 PIECES OF EVIDENCE RELATED TO CUSTODY MATTERS, AND EVEN MORE – FOR DISQUALIFICATION OF UNETHICAL ATTORNEY NANCY L ROBERTS AND DISQUALIFICATION OF BRIBED JUDGE FLINT. AND FLINT WAS TERMINATED FROM COURT, WHILE NANCY WILL BE DISQUALIFIED IF NOT BRIBING LONEY, WHO SAVED HER FROM DISQUALIFICATION TODAY.

[Kostiantyn Mars:] Objection.

[Judge Lowney:] So now it's your turn to respond.

[00:53:00]

[Kostiantyn Mars:] Okay. So, uh, first and foremost, I kindly bring to your attention that there were probably eight or nine motions to this court to recuse Judge Flint. And as you mentioned, I will not raise again the reasons why, but there was strong belief that there was a relationship between Ms. Roberts and Judge Flint.

Therefore, those motions were very reasonable. And the reason was to move on the case. Because unfortunately, Ms. Roberts, together with Judge Flint, were sabotaging finalization of this case. So Ms. Roberts did know that.

[Judge Lowney:] So Mr. Mars, you brought a motion to disqualify Judge Flint - and what was the result?

[Kostiantyn Mars:] The first time it was denied by Judge Flint without consideration.

And then you brought it again. I brought verified written statement to attention of Presenting Judge Beth McGowen.

[Judge Lowney:] And what was the result?

[Kostiantyn Mars:] I'm waiting for response. As far as I know, uh, it was considered, but I'm waiting to respond.

[00:53:54]

[Judge Lowney:]

And the reason for all of these other motions?

[Kostiantyn Mars:] So your Honor, as you might be aware Judge Flint was trying together with Nancy Roberts, to force me to sign-off custody...

[Interrupted by Nancy Roberts]

[Nancy Roberts:] Objection. [Undistinguishable jibberish]

[Judge Lowney:] I just need to hear what, what he has to say first. Go ahead.

[Kostiantyn Mars:] There were attempts to force me to send off custody and abandon my son.

[00:54:17] Orders from June 29th ordered no contact with my son without any merit. Because, initial opposing DVROs, from September 2022, were never heard, because Ms. Roberts, together with my attorney at the time, dismissed trial on DVROs.

[Judge Lowney:] Okay. So, let me just stop you here. So you've heard the court today, evaluate some of your motions.

[00:54:47] None of them have legal basis. Um, you have given the same reasons for every single one of your motions. You seem to be very focused on those reasons. [00:55:00] Um, if I don't grant this order, what will stop you from continuing to file requests for orders?

[Kostiantyn Mars:] My word.

[Judge Lowney:] Requests for orders. On the same exact basis that you did today.

[00:55:19]

**[Kostiantyn Mars:] Your Honor, I trust you – because you are the New Hope for this Court. And for me personally, you are the hope that this court may be impartial, honest, and serve justice. << PERSONAL NOTE: I WAS NAÏVE AND STUPID TRUSTING LOWNEY. HE DOESN'T DESERVE IT**

[Judge Lowney:] Okay. So, let's say that is true. This court, and me personally, follow the same laws that have been in this court since the beginning of this litigation.


[00:55:45] We follow the same standards. Those standards are not going to change. The law is the law. And I am not confident at this time that [00:56:00] you will only file meritorious requests for orders. In other words, you looked at the law, you understand what the law is, there are new facts that apply to the


law, and you're requesting the order or filing the motion because you believe you have a better than 50 chance, 50 percent chance of winning the motion.

[00:56:28] That's why you file motions. If you're just filing motions because you want to be heard again on your allegation, that is not a good basis to file a motion.

[Kostiantyn Mars:] Your Honor, I do believe this is a mistake of many self represented litigants, and I kindly ask you for a chance to fix my mistake.

[Judge Lowney:] So, just so you know, um, this court has heard motions from hundreds [00:57:00] and hundreds and hundreds of self represented litigants.

 [00:57:04] And I can tell you that it's not that common, okay? The number of sheer motions that are then filed in this case is not common.

 [Kostiantyn Mars:] Thank you, Your Honor. I do think it's because I really worry about the life of my son. And I would love to share this story with you if you would allow...

[INTERRUPTED BY LOWNEY]

[Judge Lowney:] So, again, we're going to focus on the law, the requirements of the law.

[00:57:34] And what you are supposed to consider before you are filing.

[00:57:41] Alright, um, are your other requests for orders related to your vexatious litigant?

[Nancy Roberts:] No, they are not.

[Judge Lowney:] Just one moment.[00:58:00]

[00:58:01] On the vexatious litigant request. Ms. Roberts, you filed this back in September. You were good enough to then recount what had happened since September. What I would like, um, is further briefing, not much, just what has happened since September, um, that would, in your mind, justify the Vexatious Litigant designation.

[00:58:34] And I'm just asking for subsequent briefing.

[00:58:41] Mr. Mars, again, this was filed in September. And so I want the same thing from you. Since September, I want your reasons for why the court should not declare you a vexatious litigant. And I want that in writing. [00:59:00]

Um, I don't want to put too much pressure on the parties. Can the court have that by February 16th?

<< PERSONAL NOTE: ONE WEEK TO PROVIDE BRIEFING AND GET BANNED FOR REPRESENTING MYSELF – BECAUSE ULTIMATELY EACH MOTION IS THE WAY TO MOVE CASE FORWARD, WHILE WITHOUT THIS OPPORTUNITY NANCY ROBERTS WILL DO WHATEVER SHE WANTS ON THIS CASE, ABSOLUTELY UNCONTROLLABLE

[00:59:12]

[Nancy Roberts:] You would like that filed?

[Judge Lowney:] I would like it filed.

[Kostiantyn Mars:] May I ask for March 1st? To get more time.

[00:59:24]

[Judge Lowney:] Uh, so. Give me the reason.

[Kostiantyn Mars:] Um, just to better prepare this, Because I will be busy next two weeks with the job related matters and I would prefer to get time to prepare brief better.

[Judge Lowney:] We were speaking of February 23rd.

[Kostiantyn Mars:] Thank you Your Honor

[00:59:48]

[Judge Lowney:] So I'm looking for briefings by February 23rd, And then I am going to make, the decision which I will put in writing [01:00:00]

[01:00:23] by March 8th.



[01:00:29]

[Kostiantyn Mars:] Your Honor, should this briefing be filed with a declaration like MC 025 or just the rule?

[Judge Lowney:] Yeah, you can do it that way. Just as long as I can identify it in the queue amongst all the others.

And I will be able to. You can file it any way in which you can clearly identify the rule. You can put that in “further for the briefing on vexatious litigant”. [01:01:00]

[01:01:03] Give me just one moment.

[01:01:54] Alright, so now I'm looking at your request for a court order. And it looks like we would [01:02:00] be on your label number two. Is that the duty of unregistered legal documents?

[01:02:13]

[Nancy Roberts:] Yes. That was a court order made back in July of last year. I have sent Mr. Mars several emails that he was court ordered to bring those documents to my office to be held. Um, Ms. Mars could come and look at the documents in my office that they were giving out in front of me. Um, Mr. Mars refuses to do anything.

→ [01:02:35] So, um, Mr. Mars, as I said before, he has absolutely everything. His vaccination record, his green card, his passport. Um, and, and he's in a violation of the order.

**My son was physically abducted with fraud DVRO. His mother never had any documents and threatened to abduct my son to Ukraine**

>> PERSONAL NOTE: MY SON WAS ABDUCTED AND HELD IN UNDISCLOSED LOCATION. ALL CONTACT WITH MY SON IS BLOCKED. SIM CARD PULLED OUT FROM HIS PHONE. MOTHER-ABUSER THREATENED TO ABDUCT MAX TO UKRAINE AS SOON AS OBTAIN MAX'S PASSPORT. ORDER THAT NANCY MENTIONED IS THE ORDER OF BRIBED JUDGE FLINT, WHO FACILITATED INTERNATIONAL ABDUCTION OF MY SON OUTSIDE OF THE UNITED STATES AND ORDERED ME TO ABANDON MY SON (WHO IS ABDUCTED AND HELD IN UNDISCLOSED LOCATION WITHOUT ANY CONTACT), AND ORDERED ME TO GIVE UP ALL DOCUMENTS OF MY SON TO FACILITATE INTERNATIONAL CHILD ABDUCTION (BECAUSE BIOLOGICAL MOTHER WHO ABDUCTED MY SON HAS

TRAVEL AUTHORIZATION CONSENT AND WILL ABDUCT MY SON OUTSIDE OF THE UNITED STATES IMMEDIATELY AFTER OBTAINING MY SON'S PASSPORT) – AS SHE THREATENED BEFORE ABDUCTION. CHILD ABDUCTION PREVENTION ORDERS WERE ALWAYS DENIED BY BRIBED JUDGE FLINT – AND BY BRIBED JUDGE LONEY, SAME WAY, DESPITE MASSIVE EVIDENCE OF HISTORY OF PREVIOUS CHILD ABDUCTION, WITNESS STATEMENTS AND CONFIRMED THREATS OF INTERNATIONAL CHILD ABDUCTION.

So, I'm asking if you will not move, to court sign to re-issue those. Um, that's all I can think of, because Mr. Mars just [01:03:00] doesn't obey court orders.

[Judge Loney:] Mr. Mars, can you respond?

→ [Kostiantyn Mars:] Yes. So, this matter cannot be heard until we will hear opposing DVROs in June.

[01:03:11] **Suspected of bribery Loney today moved DVROs trial 6 months later, to June. Video evidence to DVROs clears all lies of Nancy Roberts about why they want to obtain passport of my son. Because they abducted my son, [Judge Loney:] Why is that? hold him hostage and trying to abduct Max outside US**

→ [Kostiantyn Mars:] The reason is that my son was abducted by a respondent. I was primary parent. I've been taking care of my son. I provided green card to my son. In August, on August 25, my son received a green card and responded promised to me to bury my son in Ukrainian soil, so I will never see him again.

[01:03:35]

→ [Judge Loney:] So, what is that? We're talking about documents.

<< PERSONAL NOTE: DID LONEY JUST PLAYED IDIOT? HE KNOWS THE CASE, HE HEARD EXPLANATION ABOUT INTERNATIONAL CHILD ABDUCTION, AND HE STILL SAYS “WE ARE TALKING ABOUT DOCUMENTS”

[Kostiantyn Mars:] Yes, Your Honor.

→ [Judge Loney:] And you've been ordered to turn them over. **by bribed judge Flint**

[Kostiantyn Mars:] Yes, Your Honor.

→ [Judge Lowney:] So you must turn them over.

That's why Nancy bribed Lowney

<< PERSONAL NOTE: WHAT A HELL LOWNEY DID JUST SAY? HE KNOWS THAT MY SON IS ABDUCTED, THAT I'M PRIMARY PARENT, THAT THERE IS HIGHEST RISK OF INTERNATIONAL CHILD ABDUCTION BY RESPONDENT, THAT RESPONDENT DIRECTLY THREATENED TO "BURY OUR SON IN UKRAINIAN SOIL SO YOU WILL NEVER SEE HIM AGAIN" – AND AFTER THAT LOWNEY IS SAYING SOME STUPID NONSENSE ABOUT "YOU MUST TURN THEM OVER"? THIS CONFIRMS THAT LOWNEY IS BRIBED – THERE COULD BE NO OTHER EXPLANATION OF SUCH ORDER OF LOWNEY

→ [Kostiantyn Mars:] Those orders were done by Judge Flint.

Bribed and terminated from court judge Flint

<< PERSONAL NOTE: BRIBED JUDGE FLINT, TERMINATED FROM SUPERIOR COURT 1 YEAR BEFORE END OF HER TERM. ORDERS THAT WERE REQUESTED TO BE RETROACTIVELY NULLIFIED IN VERIFIED WRITTEN STATEMENT OF DISQUALIFICATION OF BRIBED JUDGE FLINT

→ [Judge Lowney:] Yes, and they're valid.

Typical fraud and abuse of judicial power by bribed judge

<< PERSONAL NOTE: THIS IS FINAL CONFIRMATION THAT LOWNEY IS BRIBED. HE REFUSED TO HEAR MATTER OF DVROS, HE MOVED DVROS SIX MONTHS AWAY SO EVIDENCE WILL NOT BE PRESENTED NEXT SIX MONTHS. HE REFUSED TO HEAR ANY OF MATTERS TODAY. HE DENIED DISQUALIFICATION OF NANCY ROBERTS DESPITE CLEAR UNDENIABLE EVIDENCE. AND NOW HE SAYS THAT ORDERS OF BRIBED JUDGE FLINT "ARE VALID" – NO DOUBTS ABOUT HIS EXTREME PREJUDICE MOTIVATED BY BRIBE RECEIVED FROM NANCY ROBERTS IN JANUARY

Yes. We've just gone over all of it.

→ [Kostiantyn Mars:] Those orders were made against factual and legal basis of the case.

[01:03:54]

[Judge Lowney:] The orders stand.

[01:04:00]

[Kostiantyn Mars:] I understand, Your Honour, but I kindly request to stand at this order until opposing DVROs will be heard.

[Judge Lowney:] Denied

<< **PERSONAL NOTE: LOWNEY CONFIRMS THAT HE IS BRIBED AND IGNORES MY REQUEST TO HEAR MATTER OF DVROS TO RESOLVE MATTER OF DOCUMENTS THAT CANNOT BE HEARD BEFORE DVROS**

[Judge Lowney:] You must comply with the orders.

**Orders of bribed judge(s)**

[Kostiantyn Mars:] Your Honor, my son will be abducted to Ukraine and will never return. There is a war. May I explain?

[01:04:20]

[Judge Lowney:] I want you to be, I want you to listen to the court.

We have just gone over a vexatious litigant analysis. I've asked for further briefing. And I've asked to see all of the conduct in this case regarding filed motions. What is also really relevant to that designation and to the court in general, is when you are ordered to do something by the court, that you comply, and that goes with both parties, and you not complying. It's not good.

**Lowney is threatening me with "vexatious litigant" and "contempt"**

<< **PERSONAL NOTE: WHAT A HELL LOWNEY IS SAYING? HOW IS VEXATIOUS LITIGANT RELEVANT TO INTERNATIONAL CHILD ABDUCTION? WHY LOWNEY IS INSISTING ON ME GIVING UP DOCUMENTS OF MY SON TO ALLOW INTERNATIONAL ABDUCTION OF MY SON – WHILE LOWNEY REFUSED TO HEAR THIS MATTER, AND REFUSED TO CONSIDER EVIDENCE. ONE EXPLANATION: BRIBED JUDGE**

[01:04:52]

[Kostiantyn Mars:] Your Honor, I would love to comply, but first, I need this matter to be heard.

[01:05:00]

[Judge Lowney:] You don't understand. So you do not set conditions on when the court orders are to be complied with. You just comply.

<< PERSONAL NOTE: WHAT A HELL LOWNEY DID JUST SAY? HE SAID THAT COURT “MAKES ORDER” – “ AND YOU MUST COMPLY”? WHERE LOWNEY DID LOST THE PART ABOUT “BEST INTEREST OF THE CHILD”, “LAW” AND “SAFETY OF THE CHILD”?

[Kostiantyn Mars:] Your Honor, if this order endangers life of my son, and court refuses to hear this matter, what should I do?

[01:05:23]

[Judge Lowney:] You should have appealed the order. We've gone over this. You disagree with it, the order was heard, you disagree with it, it was valid, and the law provides a remedy, and that remedy is appeal. You did not appeal, the order is valid, you must comply.

[01:06:00]

[Kostiantyn Mars:] Your Honor, signature of Judge Towery, who also was also resigned early, like Flint, costed my mom her health, terminal condition, because respondent with Signature of bribed Judge Towery kicked 95 years old senior woman with disabilities from home...

[INTERRUPTED BY LOWNEY AGAIN]

[01:06:04]

[Judge Lowney:] So, Mr. Mars, you have to comply.

[Kostiantyn Mars:] Your Honor, could we hear this matter?

[Judge Lowney:] I'm hearing it. I'm hearing it right now.

[Kostiantyn Mars:] Evidence. With evidence, Your Honor. With evidence that confirms that the respondent doesn't have a bond with the United States.

[INTERRUPTED BY LOWNEY AGAIN]

[Judge Lowney:] No, no, no. You're asking for the hearing of the previous matter. No, they're not.

[01:06:28]

[Kostiantyn Mars:] So the only way is appeal, right?

[Judge Lowney:] The only way for you to have That order reversed is for you to appeal, which you did not appeal, you did not appeal. You apparently decided you weren't going to comply. I know that you have reasons, but your reasons are irrelevant. The only thing that we are here today is to talk about the fact that you are now going to comply.

[01:07:00]

[Kostiantyn Mars:] Do I have any choice?

[Judge Lowney:] You do not have any choice, that's what I've been trying to say. You don't have a choice. The court have a lot of choices. I should tell you that. The court has a lot of choices on how it's going to enforce its orders. I'm trying to reason with you, and I'm trying to get you to understand that it's in your best interest, in a lot of different ways, to comply with these orders.

**Bribed judge makes orders that endanger life of minor child - and “you must comply”**

<< PERSONAL NOTE: HERE ARE THREATS OF LOWNEY ABOUT ENFORCING INTENTIONALLY HARMFUL ORDERS, AND THREATS THAT “IT IS IN YOUR BEST INTEREST IN A LOT OF DIFFERENT WAYS”

[01:07:27]

[Kostiantyn Mars:] I understand, Your Honor.

[Judge Lowney:] So, here's what I want to hear.

[Kostiantyn Mars:] What should I do if my son will die, as a victim of the war in Ukraine?

**Respondent threatened to “bury our son in Ukraine - so you will never see him again”. She abducted my son. And with the help of 2nd bribed judge is attempting to force me to give up my son’s passport to facilitate international child abduction. And yes, there is war in Ukraine, and thousands of children die victims of war**

[01:07:39]

[Judge Lowney:] I know you want the order changed. I know you want me to change it, I'm not going to, but you are going to comply.

[01:07:55] And just to be clear, because I want the record to be clear, the request was [01:08:00] for court order, Mr. Mars, to deliver to the court all legal documents regarding the minor child.

<< PERSONAL NOTE: JUDGE COMPLETELY IGNORED HIGH RISK OF INTERNATIONAL CHILD ABDUCTION, RISK FOR CHILD'S LIFE, REFUSED TO REVIEW EVIDENCE AND REFUSED TO HEAR MATTER

[Nancy Roberts:] Yes, to follow the court order from July trial date, there is a

[Judge Lowney:] And you are ordered to comply. To the letter, every part of that order.

<< PERSONAL NOTE: NANCY ROBERTS CONFIRMED THAT LOWNEY IS DOING WHATEVER NONSENSE SHE ORDERED WHEN THEY MADE A DEAL – AND SHE IS DICTATING TO JUDGE WHAT EXACTLY SHOULD GO INTO THE ORDER

[01:08:24]

[Kostiantyn Mars:] Your Honor, what exactly is requested? And who should receive documents of my son?

→ [Nancy Roberts:] The court order, Your Honor, is to deliver them to my office. They are to be held in trust by my office.

[Judge Lowney:] Do you have the order?

→ [Kostiantyn Mars:] Your Honor, I don't have it, and I would raise to attention to the court that Nancy Roberts is not a trustworthy person, and I don't trust her life or my son.

**Nancy Roberts, who is suspected in bribing Lowney on his first month in Dept 79, Who bribed and led to premature termination of judge Flint, Who was requested to be disqualified already twice - 2nd time today. And who Lowney saved from being disqualified today by falsifications and abuse of judicial power**

<< PERSONAL NOTE: LOWNEY IS DEMONSTRATING EXTREME SHITTINNESS: HE IS ORDERING ME TO GIVE UP DOCUMENTS OF MY SON TO HANDS OF NANCY ROBERTS, WHO WAS REQUESTED TO BE DISQUALIFIED FROM THIS CASE FOR MASSIVE FRAUD AND FACILITATION OF INTERNATIONAL ABDUCTION OF MY SON

[01:08:51]

[Judge Lowney:] I understand. But you're saying you do not have the court order?

[01:09:00]

[Kostiantyn Mars:] I do not have, but I can obtain it, probably.

[SOME JIBBERISH. NANCY AND LOWNEY ARE TALKING AT THE SAME TIME]

[Nancy Roberts:] I believe it is July 29th.

[Kostiantyn Mars:] If it is June 29th then I have it, and it's in evidence.

<< PERSONAL NOTE: EVIDENCE FOR DISQUALIFICATION OF NANCY ROBERTS – WHICH BRIBED JUDGE LOWNEY REFUSED TO REVIEW

[Judge Lowney:] I'm gonna print it out for you.

[01:09:20]

[Kostiantyn Mars:] Thank you. Honor.

[01:09:25]

[Judge Lowney:] Did you say July 29th?

[Kostiantyn Mars:] June 29<sup>th</sup>. This order was made by Judge who was suspected in bribery and refused to review evidence.

[Judge Lowney:] So you're gonna keep saying that even though the court said you don't?



[01:10:00]

[Kostiantyn Mars:] Of course, I won't

[01:10:12]

[Nancy Roberts:] it was June 29th, your Honor, I apologize.

[01:10:17] The trial was on June 29th. The written orders were filed on July 31st.

[01:11:00]

[Judge Lowney:] The order at the hearing was on, filed on July 31st?

[Nancy Roberts:] It should say partial, partial, orders at partial trial, uh, was July 31st.

[01:11:41] Okay, yeah.

[01:11:55]

[Judge Lowney:] Deputy, can you hand a copy of this order to Mr. Mars, please?

[01:12:09]

[Nancy Roberts:] Your Honor, can we have a date by which Mr. Mars will be responsible?

[Judge Lowney:] Yes, so today is the 7th. Mr. Mars, I'm going to ask you to comply with this order by February 15th.

[01:12:47]

[Kostiantyn Mars:] May I ask for a stay of this order until final trial?

[Judge Lowney:] Denied

[01:13:04]

[Nancy Roberts:] Your Honor, the next request has to do with the same orders that were, um, filed on July 31st. The court ordered that Ms. Mars was to be awarded the WV Tiguan without offset. Um, and that Mr. Mars was to pass the title to her. After the court made that order, Mr. Mars then volunteered that there was a loan on the vehicle that he had in his name.

[01:13:34] I spoke to the lenders. They told me that because the loan was in his name, he could not pass the title to Ms. Mars. So I spoke to Mr. Mars and suggested that he provide me the latest loan statement. That Ms. Mars paid off the loan, he would receive the title, and then he'd transfer title. And he's demanding the full value price of the car that you paid for.

[01:14:00] Um, not the quarter. Um, and so what I'm asking for the quarter is that he provide an office with the latest lender statement. That Ms. Mars be allowed to pay off the loan, and that he then transfer title to Ms. Mars. And if he does not do so, that the court clerk sign the title as elizor.

[Kostiantyn Mars:] Objection, Your Honor.

[01:14:25] So your honor, I offered opposing counsel two options to pay either balance on date of separation as was ordered by judge Flint, or full price.

It was in evidence for final trial that was dismissed by you.

[01:14:39] this quote, this quote, or yeah, it was in evidence, uh, for final trial that was dismissed by your, and, price of bought signing agreement.

And I think I provided both statements. And all the documents to make sure that, yes, unfortunately, this car was, loaned [01:15:00] advance from the revenue end to transfer title item.

[01:15:03]

[Judge Lowney:] Alright, so Mr. Mars, the order was for you to transfer title. That has not occurred. A solution has been proposed that will, that does not hurt you at all. Um, and in fact requires, uh, respondent to pay down the rest of the car. And so I do not see why you're standing in the way of that. Your Honor, I'm not standing.

[01:15:26]

[Kostiantyn Mars:] Your Honor, I don't stand. I don't understand why, Ms. Roberts is, blocking payment.

[01:15:36]

[Nancy Roberts:] Your Honor, the only statement you provided me was for the purchase price of the car, which is not the point of order.

[Kostiantyn Mars:] Objection.

[INTERRUPTED BY NANCY ROBERTS]

[Nancy Roberts:] Ms. Mars demanded the current loan balance, and he will not provide me with that statement.

[Kostiantyn Mars:] Objection. So, um, excuse me, but I provided the current, statement on loan, on the date of separation.

[01:15:59] And it was [01:16:00] provided, I think, very early. I just admit, that Ms. Roberts is refusing to...

[INTERRUPTED BY LOWNEY]

[Judge Lowney:] So, so what you need to do is you need to provide the current loan balance as of today.

[Kostiantyn Mars:] Okay, I'll do it.

[Judge Lowney:] And then, you, she is going to pay off that balance. And once it's paid off, and you then have the title in your hand You must provide the title to her.

[01:16:27] You must sign off the notice of release of liability and transfer of ownership.

[Kostiantyn Mars:] Absolutely. Your Honor, um, could you please include an order that respondent transfers me amount in statement so I pay off my balance?

[Judge Lowney:] No.

<< PERSONAL NOTE: SIMPLE, TRIVIAL TASK – BUT LOWNEY SERVES NANCY EVEN IN THIS MATTER. BECAUSE NANCY ORDERED LOWNEY TO MAKE IT THIS WAY – AS ADDITIONAL REASON TO CREATE CONTEMPT CONDITIONS WHEN NANCY WILL DO FRAUD WITH PAYMENT.

[Kostiantyn Mars:] Your Honor, I'm not sure if she can do this technically. That's why I'm asking for her to transfer money to me.

[01:16:52] So I will pay off. It will be much faster than she do.[01:17:00]

[Judge Lowney:] Ms. Roberts?

[Nancy Roberts:] I don't believe that Ms. Mars will do that... [SOME INDISTINCTIVE JIBBERISH]

[01:17:07]

[Judge Lowney:] If it becomes a problem, we can revisit it. So those are the orders.

[Kostiantyn Mars:] Thank you, your honor.

[Nancy Roberts:] If Mr. Mars does not sign off the title get a contempt... [INDISTINCTIVE JIBBERISH]

[01:17:28]

[Kostiantyn Mars:] Objection, Your Honor. That's why I'm asking for a respondent to transfer money to me. Because Ms. Roberts will file another vexatious litigant or contempt without reasons and without merits. I have a task to transfer money to me. I will make pay my balance and transfer title.

[01:17:46]

[Judge Lowney:] So, Mr. Mars, once title is given to you by whatever bank is holding the loan, you must transfer title forthwith, which means immediately. Immediately. Yes. There's not going to be [01:18:00] any

[Kostiantyn Mars:] No, there are no reasons for delaying. What I'm asking for is just the word.

[Judge Lowney:] It will be a violation of the court order if you do not transfer those, the title, once you receive it, immediately.

[01:18:21] And I'm going to say within 24 hours of you having it in your hand. You must, you must transfer the title.

[Kostiantyn Mars:] Did you saw evidence with the statements?

[Judge Lowney:] That's it, that's it, That's the end of the discussion on that.

[01:18:52]

[Kostiantyn Mars:] Just to conclude, so respondent transfers money to me, and I transfer title?

[Judge Lowney:] Yeah, right, right on. Is that correct? Yeah. Respondent, pay up the [01:19:00] money. To the company. The company. We're not going to keep going around and around on these small things, okay?

[Kostiantyn Mars:] No, I just wanted to confirm that Ms. Roberts will send me a notification and call me when they will buy out, because they will file another contempt on me without any merits.

[01:19:19]

[Nancy Roberts:] You won't be notified, Mr. Mars. As soon as you give me the statement, it will be paid.

[Kostiantyn Mars:] Ms. Roberts, you give your word?

[Nancy Roberts:] That is my word, yes.

,[01:20:00]

[Judge Lowney:] Okay and what is the next request?

[Nancy Roberts:] The last request, because the last three issues have been resolved, The last issue is One of the court's prior orders was that the parties, um, divide Mr. Mars 401(k) for the price of employment, and that they be concerned regarding the choice of an expert to draft the QDRO.

[01:20:29] That didn't happen, so the court appointed Barbara Strasen to draft the QDRO. Um, she sent out her, um, contact for the parties to sign. Mr. Mars refused to pay the tuition that each party could have. So Ms. Mars paid it in order to get the sewing. And now Ms. Strasen thinks that to this date, and it's been a number of months, Mr. Mars is not signing off on their contract.

[Kostiantyn Mars:] Objection.

[01:21:00]

[Nancy Roberts:] Um, therefore, uh, what he's done is he's He's drafted his own QDRO and said, sign it, we don't need that, and we're not willing to do that, and there's already a court order to sign this, so it's, and we don't have the information for this, because he's not providing it to Barbra Strasen.

[Kostiantyn Mars:] Objection

[01:21:22] I had asked for an authorization to be signed by Mr. Mars, so that with less cost, I could obtain the records from his employer and the retirement plan. In order to get, get them to, you know,

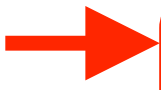
[Kostiantyn Mars:] Objection

[Judge Lowney:] stop. Okay. Alright. So, let's have a little chat about objections. So, objections in court are legal objections. So, there has to be a legal basis.

[01:21:49] They are not, and shouldn't be, tools to interrupt the other side. I am not going to allow Ms. Roberts to interrupt you when you are speaking.

[01:22:00] And so, don't use objection, which is a legal term, to interrupt her, I'm going to give you a fair chance to say your respect. Also Um, I can't listen to her when we're doing that, and I can't listen to you if she would going to do that.

[01:22:15] That's going to stop. Now it's your time to respond.



[Kostiantyn Mars:] Your Honor, I provided QDRO, uh, prepared by my 401(k) key provider to Ms. Roberts, and filed it to the court for final trial, but for some reasons, it was ignored. I do understand that Ms. Roberts is mentioning that, uh, Ms. Roberts with her client prepared some other QDRO, which I'm not aware of.

**QDRO is nothing. But it was shared with Nancy and filed with the court. She is just wasting everybody's time on this matter.**

[01:22:46] I do ask the judge, your honor, to decide which QDRO to use. I do believe that QDRO provided by the provider is much faster and straightforward. Again, it's done by professionals [01:23:00] who own that account. But, in any matter, if your honor will decide that we need to use a QDRO prepared by opposing counsel, that is totally fine.

[01:23:13] I would just kindly ask to forward that QDRO to me. I'm not aware of final decision on that.

[01:23:31]

[Judge Lowney:] May I pull out this uh, what is the

[01:23:36]

[Judge Lowney:] The, the partial trial order

[Nancy Roberts:] Yes. And then there's the subsequent, um, The order states that the parties are unable to reach an agreement, they submit names or talk to representatives. And so it was only the case in the first option.

[Judge Lowney:] Okay. Hold on, may I, hold on. I gotta find the partial order.[01:24:00]

[01:24:04] Click on this.

[01:24:23] Hold on, hold on, hold on.

[01:24:34] Here was the order. And it's going to be the order. The second set of orders will be the same as the first,

[01:24:42] based on the timing. Parties to be inferred regarding the name of an expert can select a name within five days. If no agreement, the party may submit directly to the Department of 79. You're saying there was no agreement?  
[01:25:00] Yes. So then it was just a quick order?

[01:25:17] The chosen name they said would be in the email from the party.

[01:25:27] The Bud Party? Yes.

[01:25:35] What's

[01:25:40] the name of the expert?

[Nancy Roberts:] Barbara Strasen C-R-A-V-S-S-E-S-T-R-A-S-E-N,[01:26:00]

[01:26:26] August 29th, 2023 for. I think that we're calling it recorded, but I think we are just using it.

[01:26:43] Okay, I found it. This is an order dated August 29th, 2023.

[01:26:54] Based on the pertinence part, the parties were ordered to retain an expert to complete the QDRO based on the [01:27:00] timeline. The parties were ordered to meet and concur. To select an expert and select many of the quadros, July 31st, 2023. If there was no agreement, the parties were to submit three names directly to the Department of 79's e mail and the court would select the names.

[01:27:16] The cost of the QDRO could be shared equally by the parties. Respondent's attorney notified the court and petitioner by e mail on August 9th, 2023, that the parties had not reached agreement on the names of the witnesses. Respondent counsel provided the court with three names from which to choose the joint experts.

[01:27:34] The petitioner objected, having already ruled that the court would select the mutual expert if there was no agreement between the parties, the court selects Elizabeth Strasen to prepare the process. Both parties are [01:28:00] ordered to cooperate with Ms. Strasen. That was the order, and that is the order. Everybody is expected to comply with that order.

[01:28:10]

[Kostiantyn Mars:] Um, Your Honor, could you please clarify what exactly is requested from me at this moment?

[Judge Lowney:] It complies with the August 29th, 2023 order regarding the quietness. It's super clear.

[Kostiantyn Mars:] Which actions are required from me at the moment?

[Judge Lowney:] You have to, Ms. Strasen is the project expert. The fee will be split between the two of you.



[01:28:35] You will pay half, and you will cooperate with me. We will provide the information required. to complete the QDRO, and then she will complete her analysis.

[Kostiantyn Mars:] Do I need to submit any documents? Do you need a copy of this order? Um, yes, please.

[Judge Lowney:] I just have the minutes reflect that I have printed out both the, both copies [01:29:00] of the orders that were

[Kostiantyn Mars:] I would kindly ask you for a statement of decision for this hearing.

[01:29:06]

[Judge Lowney:] Denied.

<<PERSONAL NOTE: STATEMENT OF DECISION IS LEGALLY STANDARD APPROACH, ESPECIALLY WHEN JUDGE RULING WEIRDLY AND RECOMMENDS TO APPEAL. LOWNEY DENIED STATEMENT OF DECISION – WHICH IS EXTREMELY SUSPICIOUS. AGAIN, LOGICAL CONFIRMATION THAT LOWNEY IS BRIBED

[Kostiantyn Mars:] I think it was filed.

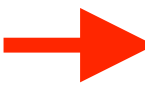
[Judge Lowney:] I saw it, I'm considering it, and I'm denying it. Within the court's ultimate discretion, I will not oppose or motion whether or not a statement of decision is appropriate. And I don't find it is, either.

[Nancy Roberts:] If I may clarify, Your Honor, several emails sent from Ms. Strasen's office with her contract and it notes documents that may be required to ensure a stringent response.

[01:29:37]

[Judge Lowney:] So, to the extent that clarification would be needed, Mr. Mars will have that clarification and the orders will be complied with.

[01:29:51]



[Kostiantyn Mars:] Your Honor, Also, may I note that, , if I remember, on July 31st, when this order was made, I had a medical emergency, that judge Flint completely ignored, and therefore, I apologize for missing your orders, because I was not able to focus on this. Well, you seem like you're doing much better now, and so the court will expect you to comply.

**Flint was abusing judicial power same as Lowney. Suspected of bribery**  
Thank you parties. I look forward to your briefing, and I'll have that decision

[Parties:] Thank you. your honor. your honor.

Evidence P4



SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

22FL003144

Date of Hearing: 02/01/2024

Hearing Start Time: 1:30 PM

Hearing Type: Request for Order: Other  
w/fee

Comments: Line 8

Heard By: Lowney, Stephen  
Courtroom Reporter: No Court Reporter

Location: Department 79

Courtroom Clerk: True Parker

Court Interpreter:

Court Investigator:

Future Hearings:

Parties Present:

Mars, Hanna  
Mars, Kostiantyn  
Roberts, Nancy Lee

Respondent  
Petitioner  
Attorney  
Limited Scope  
Attorney

Exhibits:

Respondent is assisted by Russian interpreter, Maria Entchevitch.  
All above listed parties appear via MS Teams.  
Petitioner and respondent are sworn.

**Lowney is afraid of having evidence**

Petitioner makes an oral request to record, audio/video, this hearing; this request is DENIED.

Case is called on petitioner's motion to reconsider payment order and respondent's request for 271 sanctions.

The Court hears from the parties.

Petitioner's motion for reconsideration is DENIED.

**Some nonsense ruling against evidence and facts. Lowney is ruling solely in favor of Nancy**

Respondent's request for FC section 271 sanctions. The Court orders petitioner pay \$500.00 in FC section 271 sanctions directly to attorney Nancy Roberts. Petitioner is ordered to pay the full amount by 02-15-2024.

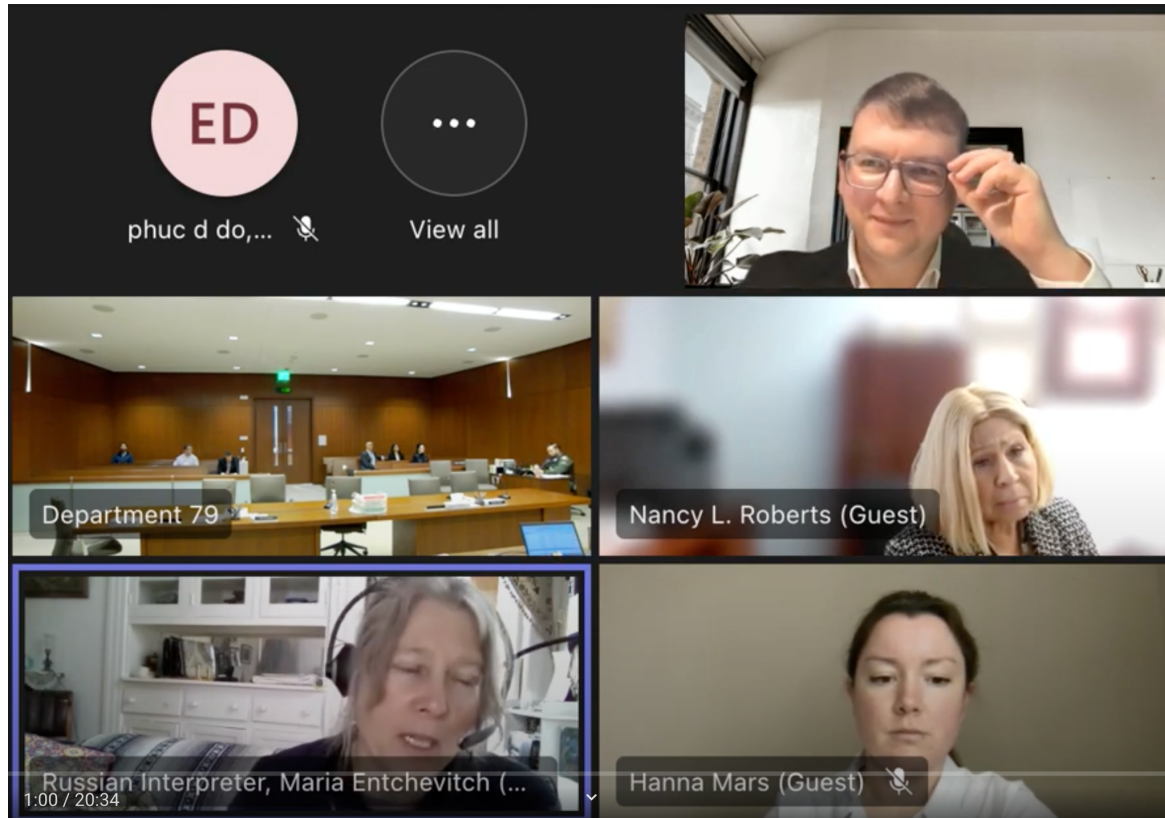
Respondent's request to delay the \$500.00 payment for 2 years is DENIED.

Attorney Nancy Roberts to prepare the order.

Evidence P5

Video recording of fake hearing 02/01/2024 where suspect of bribery judge Lowney fakes hearing matter, while ruling solely in favor of unethical attorney Nancy L Roberts, who is suspected in bribing Lowney in January 2024, on the first month of Lowney's assignment in Department 79:

<https://youtu.be/3qabDRGU3Eg>



Bribed judge Lowney on this hearing refused to hear matter, refused to review extensive evidence (including bank and loan statements), prohibited me from saying that judge Flint was suspected of bribery (while she was investigated for bribery), and lied that "judge Flint was moved to another department on regular rotation" (while massive investigation of Flint's suspect of bribery and massive judicial misconduct is still pending, and Flint's name is completely removed from all public Court records)

Lowney intentionally wrongfully sanctioned me \$500 CCP 271 sanctions, threatening me that my motion to reconsider was "meritless" (while he refused to review numbers and accept obvious fact that Nancy Roberts falsified numbers of equalizing payment and obtained fraudulent numbers granted by bribed judge Flint - numbers that go against both balances on date of separation, and current balances).

Lowney denied reconsideration without consideration of facts. He ordered me to pay wrongful amount of equalizing payment provided by unethical attorney Nancy Roberts, which cannot be paid, because I do not have that amount of money on my balances (same as didn't have on date of separation).

Lowney is protecting Nancy because he is suspected of receiving bribe from her.

Evidence P6

1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM

4 PRO PER

(ENDORSED)  
**FILED**  
JAN 31 2024  
Clerk of the Court  
Superior Court of CA County of Santa Clara  
BY J. RARAS DEPUTY

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **IN AND FOR THE COUNTY OF SANTA CLARA**

10 KOSTIANTYN MARS

11 Petitioner,

12 vs.

13 HANNA MARS,

14 Respondent.

) Case No.: 22FL003144

) **PETITIONER'S REQUEST FOR**  
) **STATEMENT OF DECISION PURSUANT**  
) **CCP § 632, CRC 3.1590(d) and CFC § 3044**

) **DATE: 02/07/2024**

) **TIME: 1:30 PM**

) **AND ALL SUBSEQUENT HEARINGS**

) Judge: Honorable Stephen P. Lowney

) Dept: 79

) Department of Record

19 Dear Honorable Stephen P. Lowney and Department of Record,

20 Pursuant Code of Civil Procedure § 632, California Rules of Court 3.1590(d), and California  
21 Family Code § 3044, Petitioner Kostiantyn Mars hereby respectfully requests a Statement of  
22 Decision following each and every hearing or trial arising from any of the following filings by any  
23 party in the case 22FL003144 starting February 7, 2024:

24 1. The DV-100 Request for Domestic Violence Restraining Order,

25 2. The Motions (including request to re-issue Child passport, any decisions regarding  
26 sole vs joint child custody, Court decisions about assignment of professionally supervised  
27  
28



Evidence P7

ATTORNEY OR PARTY WITHOUT ATTORNEY: <span style="float: right;">STATE BAR NO:</span> NAME: KOSTIANTYN MARS FIRM NAME: STREET ADDRESS: PO BOX 8081 CITY: SAN JOSE <span style="float: right;">STATE: CA ZIP CODE: 95155</span> TELEPHONE NO.: (408) 518-0088 <span style="float: right;">FAX NO.:</span> EMAIL ADDRESS: CONSTANTINE.MARS@GMAIL.COM ATTORNEY FOR (name):		FOR COURT USE ONLY  <b>(ENDORSED)</b> <b>FILED</b> <b>JAN 31 2024</b> <b>Clerk of the Court</b> Superior Court of CA County of Santa Clara BY _____ DEPUTY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA</b> STREET ADDRESS: 201 N FIRST STREET MAILING ADDRESS: 191 N FIRST STREET CITY AND ZIP CODE: SAN JOSE, CA 95113 BRANCH NAME: FAMILY JUSTICE COURT		
Plaintiff/Petitioner: KOSTIANTYN MARS Defendant/Respondent: HANNA MARS Other Party:		
<b>REQUEST FOR COURT REPORTER BY PARTY WITH FEE WAIVER</b>		CASE NUMBER: 22FL003144

### INSTRUCTIONS

If you have been granted, or are applying for, a waiver of court fees and costs, you may use this form to request the services of an official court reporter for a hearing or trial for which a court reporter is not otherwise provided and for which electronic recording is not provided.

- You should make a request 10 calendar days before any court date for which you want a reporter. If the court date is scheduled with less than 10-days' notice, you should file the request as soon as you can.
- If you do not file the request on time, the court may be unable to provide a court reporter on the date requested and may have to reschedule the hearing or trial.
- There will be no fee to you for the court reporter being at the hearing if you have a fee waiver.
- **Note:** Having a court reporter does not guarantee the right to get a free transcript. To learn more about transcripts and records for an appeal, read the Self Help webpages for civil appeals, particularly [courts.ca.gov/designating-record](http://courts.ca.gov/designating-record).

If you are eligible, the court will try to schedule a court reporter for the court proceeding but cannot guarantee that one will be available at that time.

### REQUEST FOR COURT REPORTER

1. (Name of party making request): KOSTIANTYN MARS

- ☐ a. has received a waiver of court fees and costs in this action.
- ☒ b. is filing a *Request to Waive Court Fees* (form FW-001 or FW-001-GC) with this form.

2. An official court reporter is requested for ☐ trial ☒ hearing on (date): 02/07/2024

Date: 01/21/2024

KOSTIANTYN MARS

(TYPE OR PRINT NAME OF ATTORNEY OR PARTY WITHOUT ATTORNEY)



  
(SIGNATURE)

Evidence P8

If you have a disability and need an accommodation while you are at court, you can use this form to make your request. For more information, see form MC-410-INFO.



Make this request at least **5 days** (when the court is open) before you need the accommodation.

Clerk receives and date stamps here.

**1 Your information**

Name: KOSTIANTYN MARS

Address: PO BOX 8081

SAN JOSE, CA 95155

Phone: (408) 518-0088

Email: CONSTANTINE.MARS@GMAIL.COM

**Court Name and Address:**

Superior Court of California,  
County of Santa Clara,  
201 N First Street,  
191 N First Street,  
San Jose, CA 95113

**Case Number (if you know it):**

22FL003144

**Case Name/Type (if you know it):**

Dissolution of Family Mars

**2 How are you involved in the case?**

☐ Juror ☒ Party ☐ Witness ☐ Lawyer

☐ Other (explain):

**3 When and where do you need the accommodation? [date(s), time(s), and court location]**

Department 79, Family Justice Center, Superior Court of California, 201 N First Street

Dates: Feb 7, 2024, 1:30 PM; Feb 27, 2024, 1:30 PM; Feb 29, 2024, 1:30 PM

San Jose, CA 95113

**4 What accommodation do you need at the court?**

Audio recordings and real time transcription of all hearings to which I am a party.

Request that all hearings in my case be scheduled after 10:30 am Pacific Time

**5 Why do you need this accommodation to assist you in court?**

Adjustment disorder and consequences of hard insomnia, extremely hard to concentrate under pressure in the courtroom.

Due to threats and coercion, extreme psychological pressure on me from opposing attorney Nancy L Roberts and bribed judge Andrea E. Flint, who forced me to sign-off custody of my son who is abducted, held hostage in undisclosed location, with phone blocked, sim card pulled out, and threats of international abduction and physical harm to my son, my disorder worsened and I need accommodation to review audio recordings

☐ More information on this request is attached. and transcripts after the hearing in calm environment.

Date: 01/21/2024

KOSTIANTYN MARS

Type or print name

  
Signature

**(Optional)** If a court employee, caregiver or other person helped fill out this form and is **willing to provide more information if needed**, provide contact information below:

Name: \_\_\_\_\_

Email: \_\_\_\_\_

Phone: \_\_\_\_\_



Name: \_\_\_\_\_

Case Number (if you know it): \_\_\_\_\_

----- Court fills out below -----



(Optional)

**Important!** If your case is delayed or dismissed after you make this request and you do not need the accommodation for the date you specified under 3, please contact the court at:

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

☐ Your request is **GRANTED**. The court will provide the accommodation(s) requested.

☒ Your request is **DENIED IN WHOLE OR IN PART**. The denied portion of your request:

☐ Does not meet the requirements of Cal. Rules of Court, rule 1.100.

☒ Creates an undue financial or administrative burden for the court.

☒ Changes the basic nature of the court's service, program, or activity.

Explain the reasons supporting the box(es) checked above:

Family Court does not generally provide court reporters, recordings or real-time transcription.

☒ **Instead**, the court will provide the following accommodation(s):

The Court will grant your request to schedule your hearings after 10:30 am. Also, the Court encourages you to attend Court proceedings in-person where the Court will be able to provide you with any needed clarification and will also be willing to take more frequent breaks to accommodate any concentration issues.

**The court will provide the accommodation(s):**

☐ For the date(s) and time(s) requested ☐ Indefinitely


☐ On date(s): \_\_\_\_\_

☐ More information on this decision is attached.

Date: 2/6/24

**JUDGE STEPHEN P. LOWNEY**

Type or print name

Signature 

The court responded in person, by phone, or mail/email on: 2/06/2024

**Note:** You may be able to ask for a review of this decision.  
Cal. Rules of Court, rule 1.100(g) explains how to do this.

Evidence P9



MEDIA AGENCY (name): Save Max From Abduction CHANNEL/FREQUENCY NO.: www.youtube.com/@SaveMaxFromAbduction PERSON SUBMITTING REQUEST (name): KOSTIANTYN MARS ADDRESS: PO BOX 8081, SAN JOSE, CA 95155 TELEPHONE NO.: (408) 518-0088		FOR COURT USE ONLY  Filed February 2, 2024 Clerk of the Court Superior Court of CA County of Santa Clara 22FL003144 By: ageorgieva
Insert name of court and name of judicial district and branch court, if any: Superior Court of California, County of Santa Clara, 201 N First St, SJ CA		
TITLE OF CASE: Dissolution of Family Mars		
NAME OF JUDGE: Honorable Stephen P. Lowney		
ORDER ON MEDIA REQUEST TO PERMIT COVERAGE		CASE NUMBER: 22FL003144

AGENCY MAKING REQUEST (name): Save Max From Abduction

1. a. ☐ No hearing was held:

b. ☒ Date of hearing: 02/07/2024 Time: 1:30 PM Dept./Div.: 79 Room:

2. The court considered all the relevant factors listed in subdivision (e)(3) of California Rules of Court, rule 1.150 (see reverse).

3. ☒ THE COURT FINDS (findings or a statement of decision are optional): ☐ Attached ☒ As follows:

*The requested media access would be detrimental to and invade the privacy rights of the parties including the minor child.*

#### THE COURT ORDERS

4. The request to photograph, record, or broadcast is

a. ☒ denied.

b. ☐ granted subject to the conditions in rule 1.150, California Rules of Court, AND the following:

- (1) ☐ The local rules of this court regulating media activity outside the courtroom (copy attached).
- (2) ☐ The order of the presiding or supervising judge regulating media activity outside the courtroom (copy attached).
- (3) ☐ Payment to the clerk of increased court-incurred costs of (specify): \$ ☐ to be determined.
- (4) ☐ The media agency shall demonstrate to the court that the proposed personnel and equipment comply with California Rules of Court, rule 1.150, and any local rule or order.
- (5) ☐ Personnel and equipment shall be placed: ☐ as directed ☐ as indicated in the attachment ☐ as follows (specify):

(6) (i) ☐ The attached statement of agreed pooling arrangements is approved.

(ii) ☐ A statement of agreed pooling arrangements satisfactory to the court shall be filed before coverage begins.

(7) ☐ This order

(i) ☐ shall not apply to allow coverage of proceedings that are continued.

(ii) ☐ shall apply to allow coverage of proceedings that are continued.

(8) ☐ Other (specify):

5. Coverage granted in item 4b is permitted in the following proceedings:

a. ☐ All proceedings, except those prohibited by California Rules of Court, rule 1.150, and those proceedings prohibited by further court order.

b. ☐ Only the following proceedings (specify type or date or both):

6. ☐ The order made on (date): Is ☐ terminated ☐ modified as follows (specify):

7. ☐ Number of pages attached:

Date: 2/1/24

JUDGE STEPHEN P. LOWNEY

JUDGE

(See reverse for additional information).

Page 1 of 2

Evidence P10



Nancy L. Roberts, Esq.  
155 E. Campbell Ave., #255  
Campbell, CA 95008  
(408) 871-0775

Attorney for Respondent  
HANNA MARS

Electronically filed  
by Superior Court of CA,  
County of Santa Clara,  
on 2/1/2024 4:01 PM  
Reviewed By: S. Prasad  
Case #22FL003144  
Env. #14293099

SUPERIOR COURT OF CALIFORNIA  
IN AND FOR THE COUNTY OF SANTA CLARA

KOSTIANTYN MARS,

Petitioner,

and

HANNA MARS,

Respondent.

Case No.: 22FL003144

RESPONSE TO PETITIONER'S  
REQUEST TO RECORD COURT  
PROCEEDINGS AND PUBLISH THEM  
TO HIS PERSONAL YOUTUBE  
CHANNEL

Dept. #79  
APJ: Stephen P. Lowney

California Rules of Court, Rule 1.150 forbids the photographing, recording, and broadcasting of court proceedings is circumscribed and must be executed in a manner that ensures that fairness and dignity of the proceedings is not adversely affected. There is no presumption for granting permission to photograph, record, or broadcast court proceedings.

California Rules of Court, Rule 1.150(d) provides that "the judge may permit inconspicuous personal recording devices to be used by persons in a courtroom but the recording person must obtain advance permission from the judge and the recordings must not be used for any purpose other than as personal notes. Subdivision (e), which Mr. Mars erroneously relies upon, addresses media coverage and provides that, "media coverage may be permitted only on written order of the judge as provided in this subdivision. The judge in his or her discretion may permit, refuse, limit, or terminate media coverage. This rule does not otherwise limit or restrict the right of the media to cover and report court proceedings. Subdivision (e)(1) provides that, "the media may request an order on request to photograph, record, or broadcast and the form

1 must be filed at least five court days before the portion of the proceeding . . . and the judge  
2 assigned to the proceeding must rule on the request. The judge must consider the following  
3 factors in relevant part:

- 4 (A) The importance of maintaining public trust and confidence in the judicial system;  
5 (B) The importance of promoting public access to the judicial system;  
6 (C) The parties' support of or opposition to the request;  
7 (D) The nature of the case;  
8 (E) The privacy rights of all participants in the proceeding, including witnesses, jurors, and  
9 victims;  
10 (F) The effect on any minor who is a party, prospective witness, victim, or other participant in  
11 the proceeding;  
12 (O) The security and dignity of the court;  
13 (R) The maintenance of the orderly conduct of the proceeding; and  
14 (S) Any other factor the judge deems relevant.

15 Petitioner request to record, take pictures, videotape and publish all court proceedings in  
16 this matter to his personal Youtube channel which he lists as a "media agency." Mr. Mars in an  
17 individual requesting to record court proceedings, not a member of the media as he claims  
18 because he posts to a channel on Youtube. In the past, in violation of state and local rules Mr.  
19 Mars, without court permission, recorded proceedings in this matter and posted them to his  
20 Youtube channel along with libelous commentary disparaging the Hon. Andrea Flint, the judicial  
21 system, and Ms. Mars attorney of record as well as harassing Respondent, Hanna Mars. Exhibit  
22 "A." Once a contempt action was filed against Mr. Mars regarding this illicit recording and  
23 posting of the trial held in this matter on November 13, 2023, Mr. Mars removed the thirty-six  
24 video recordings of the trial he had posted on his Youtube channel including the entirety of the  
25 trial.

26 The Parties have a young son, Maksym Mars, who just turned eight years old this past  
27 Thanksgiving. Mr. Mars publicly posts his Youtube videos where his young son and/or his  
28 friends can see these videos and his commentary. Moreover, there is currently a temporary  
restraining order issued against Mr. Mars protecting both Ms. Mars and their young son Maksym  
from Mr. Mars' verbal abuse of Ms. Mars and Maksym. Mr. Mars already has an ongoing  
problem discussing the court proceedings and denigrating Ms. Mars to his young son. This has  
caused Maksym emotional distress as witnessed in the videos Mr. Mars has already posted to his



1 Youtube channel.

2 Even if Mr. Mars was a member of the media, which he is not, the factors to be  
3 considered by the court would rule against Mr. Mars being allowed to record and publish the  
4 court proceedings in this case. Mr. Mars' posts undermine the public trust and confidence in the  
5 judicial system, particularly because Mr. Mars in the past had posted short clips of the court  
6 proceedings, taking them out of context and arguing his negative opinion of the judicial system.

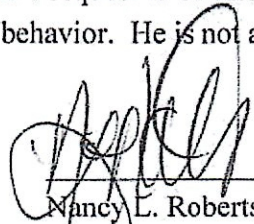
7 Moreover, there is no need to Mr. Mars to promote the public access to the judicial  
8 system and his dissolution of marriage proceeding. The hearings and trials are available online to  
9 the public, without being taken out of context.

10 Ms. Mars opposes this request for the reasons set forth above. Mr. Mars' public posting  
11 of the proceedings with his disparaging commentary invades Mr. Mars' privacy and exposes her  
12 to unbalanced members of the public when she is identified risking her safety. The privacy of  
13 and risk to Mr. Mars' attorney and the officiating judicial officer is similarly affected. Moreover,  
14 Mr. Mars' libelous comments affect the security and dignity of the Court.

15 As a dissolution of marriage action, there is no need for public access, other than that  
16 provided by the public nature of the hearings themselves. There is no benefit for the public to  
17 gain by Mr. Mars' postings of the court hearings.

18 Mr. Mars cannot control his obsessive, delusional and harassing behavior. Allowing Mr.  
19 Mars to record the court proceedings in this matter will simply give him another venue to  
20 continue his harassment of Ms. Mars, allow him to continue to denigrate the judicial system and  
21 the judges in this matter as well as further expose his young son to the court proceedings and his  
22 father's erratic behavior. This Court must deny Petitioner's request to be allowed to use this  
23 court's proceedings to further his abusive and harassing behavior. He is not a member of the  
24 media because he posts to Youtube.

25 Dated: February \_\_, 2024



Nancy L. Roberts

Attorney for Respondent

**36 public Youtube postings by Kostiantyn/Constantine Mars**

**2023-11-13 Bribed Judge Flint Refused to Recuse and Kicked Petitioner from Teams**

<https://www.youtube.com/watch?v=UfzHqrWf05Y&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w>

**2023-11-13 Trial with Bribed Judge Flint - Full Recording - Part 1**

<https://www.youtube.com/watch?v=oprPRl1mtEM&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=7>

**2023-11-13 Trial with Bribed Judge Flint - Full Recording - Part 2**

<https://www.youtube.com/watch?v=JfSyEpu5Exs&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=4>

**2023-11-13 Trial with Bribed Judge Flint - Full Recording - Part 3**

[https://www.youtube.com/watch?v=-\\_ITqOOeYzc&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=2](https://www.youtube.com/watch?v=-_ITqOOeYzc&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=2)

**2023-11-13 Trial with Bribed Judge Flint - Full Recording - Part 4**

[https://www.youtube.com/watch?v=R2\\_UBo-lW2g&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=8](https://www.youtube.com/watch?v=R2_UBo-lW2g&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=8)

**2023-11-13 Bribed Judge Flint Repetitively Refuses to Recuse Completely Ignores Conflict of Interest**

<https://www.youtube.com/watch?v=apGq2b7BpI8&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=6>

**2023-11-13 Judge Flint proceeds with trial ignoring obvious conflict of interest with Petitioner**

<https://www.youtube.com/watch?v=2yRup1Iq4zs&list=PLs-P-IYUAfTKdEwIx7gdba9PT8poi7u8w&index=9>





Search



Sign in



Home



Shorts



Subscriptions



You



History



# Save Max From Abduction

@SaveMaxFromAbduction · 1 video

More about this channel >

Subscribe

Community



## 2023-11-23 Max 8th Birthday - Hanna prohibited us to talk and kicked me out from home

Save Max From Abduction · 169 views · 1 month ago

On Max's 8th Birthday, Hanna was forcibly pulling Max away, prohibiting us to talk, and creating scandal in front of our son on his Birthday. She completely prohibited Max taking postcard with...

CC



## Removal of Bribed Judge Flint

View full playlist





Home



Shorts



Subscriptions



You



History



# Save Max From Abduction

@SaveMaxFromAbduction · 1 video

More about this channel >

Community 🔍





Sign in

59 views Nov 14, 2023

On this video bribed Judge Andrea E. Flint from Department 79, Superior Court of California, County of Santa Clara, during partial trial on November 13, 9:00 AM, interrupted, muted and kicked from Teams Petitioner, with whom she has undeniable personal conflict of interest, because Petitioner stated on record during hearing that Judge Flint is suspected and investigated for bribery and severe intentional repetitive misconduct, and requested Judge Flint obey the law and recuse according to CCP 170.1, 170.3

and intentionally is violating CCP 170.1, 170.3 by repetitive refusal to recuse 7 (SEVEN) times in a row. Judge was caught on falsification of Court records, manipulations of court proceedings, intentional harmful and wrongful orders, removal of signed emergency screener recommendations from Court records, completely ignoring multiple (up to 50 pieces) evidences and witness statements.

Multiple motions to recuse were filed and served to Judge. Requests for recusal were stated on record during hearings, but were maliciously removed by Clerk.

But Judge denied all 7 (SEVEN) motions to recuse and completely ignored obvious and undeniable PERSONAL CONFLICT OF INTEREST WITH PETITIONER. Which, in conjunction with suspect of BRIBERY, is clear and undeniable basis for immediate recusal of Judge from presiding over this case.

Hearings with Judge Flint always are held without Court Reporter, and Judge always puts case 22FL003144 to the very end - ensuring that there are no witnesses. In this specific case, Judge intentionally heard all matters (initially there were 12 people in the teams), and all people who left on the call - are Petitioner's witnesses and reporters. But Judge didn't stop even knowing that she is recorded.

Judge knowingly and intentionally facilitated abduction of minor child of Petitioner outside of the United States to get rid of witnesses of bribery.

Judge multiple times falsified Court records, 3 (THREE) times in a row denied Child Abduction Prevention orders, unreasonably removed signed Emergency Screener recommendations without any consideration, manipulated Court proceedings and instructed Clerk to remove statements made on record from docket, ruled series of hearings solely in favor of Respondent and granted orders that violate law, ethics and human reason - including granting full custody to violent abuser with documented history of child and elderly abuse, and ordering Petitioner no contact with his child without any legal reasons for that.

Judge ordered Petitioner to abandon his son and give up all documents of his son to Respondent, violent abuser with documented history of child abduction outside of the United States, who currently holds child as hostage in undisclosed location, blocks all contact of the child with father, pulls out sim card from Child's phone to ensure that Child cannot call and ask for help when she is beating and torturing child.

Respondent attempted to cancel Child's Green Card, steal passport and abduct Child outside of the United States to Ukraine in times of war.

Respondent promised to kill Petitioner's mom, abduct and "bury our son in Ukrainian soil, so you will never see him again" - and Judge Flint, who is suspected in receiving bribe from Respondent in April 2023, granted full custody and right of abduction to Respondent, mentally unstable woman and socially dangerous woman, and ordered no visitations to primary parent, father, who was protecting child from physical violence and abduction, and who asked Respondent to stop beating our son and give him peace and safety.

Judge Flint completely ignored emergency screener recommendations, unreasonably removed them, and ignored all evidence and witness statements.

Being caught on severe falsifications, and being served 7 (SEVEN) motions to recuse, Judge completely ignores obvious and undeniable personal conflict of interest with Petitioner, interrupts, mutes Petitioner, and continues to preside over the matter, despite she is legally obliged to recuse themselves pursuant CCP 170.1 sec (6)(a)(3), and (3)(a)

## Transcript

Follow along using the transcript.





Search

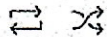


Sign in



## Removal of Bribed Judge Flint

Save Max From Abduction - 1 / 36



2023-11-13 Bribed Judge Flint Refused to Recuse and Kicked Petitioner from Teams

Save Max From Abduction



2023-11-13 Trial with Bribed Judge Flint - Full Recording - Part 3

Save Max From Abduction



2023-11-13 Trial with Bribed Judge Flint - Full Recording - Part 3

Save Max From Abduction



2023-11-13 Trial with Bribed Judge Flint - Full Recording - Part 2

Save Max From Abduction



2023-11-13 Bribed Judge Flint Refused to Recuse and Kicked Petitioner from Teams

## 2023-11-13 Bribed Judge Flint Refused to Recuse and Kicked Petitioner from Teams

Unlisted





Sign in

46 views Nov 14, 2023

You may see how bribed judge completely ignores law, intentionally repetitively violates CCP 170.1, 170.3, interrupts, mutes, kicks out from hearing Petitioner for request to recuse due to obvious and undeniable personal conflict of interest.

Judge facilitated child abduction outside of the United States by 3 (THREE) times denying child abduction prevention orders, unreasonably removed signed emergency screener recommendations, granted full custody to violent abuser with documented history of child abduction outside of the United States, who abducted Petitioner's son to undisclosed location, blocked all contact with the child, pulled out sim card from child's phone to ensure that child cannot call and ask for help, and promised to "bury our son in Ukrainian soil so you will never see him again".

Multiple examples of ruling in favor of Respondent despite clear falsification of facts and records on Respondent's side. Judge sanctions Petitioner to pay equalization payment to Respondent to punish Petitioner, despite equalization calculation payment sheet, facts and bank statements confirm that Respondent owes Petitioner equalization payment.

This judge was caught on multiple falsifications and intentional harmful wrongful orders - and was requested to recuse from case. Though, due to personal financial interest in the case, judge refused to recuse 7 (SEVEN) times in a row, and attempted to facilitate child abduction outside of the United States to get rid of witnesses of bribery.

## Transcript

Follow along using the transcript.

Show transcript



Save Max From Abduction

Videos

About

Show less



Poverty in the USA: Being Poor in the World's Richest Country | ENDEVR Documentary

ENDEVR  
14M views • 2 years ago



Don't Look Frumpy Over 40 || Beware These 5 Frump Factors!

Dressed for My Day with Kay Harms  
2M views • 1 year ago



Cocaine Shoes (Full Episode) | To Catch a Smuggler

National Geographic  
12M views • 1 year ago

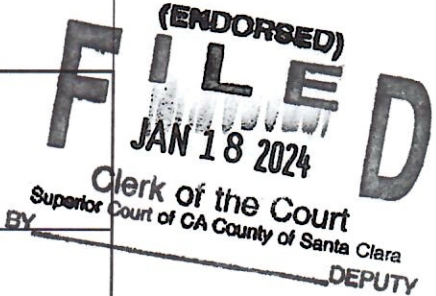
Alone with God : Instrumental Worship & Prayer Music With Scriptures & Autumn Scene  
CHRISTIAN piano

CHRISTIAN Piano  
1.9M views • Streamed 1 month ago

3:54:17

Evidence P11



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>KOSTIANTYN MARS</b> <b>PO BOX 8081</b> <b>SAN JOSE CA 95155</b>  TELEPHONE NO.: (408) 518-0088 FAX NO. (Optional): E-MAIL ADDRESS (Optional): <b>CONSTANTINE.MARS@GMAIL.COM</b> ATTORNEY FOR (Name):		FOR COURT USE ONLY   <div style="text-align: center;">  </div>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA</b> STREET ADDRESS: <b>201 N FIRST STREET</b> MAILING ADDRESS: <b>191 N FIRST STREET</b> CITY AND ZIP CODE: <b>SAN JOSE, CA 95113</b> BRANCH NAME: <b>FAMILY JUSTICE COURT</b>		
PLAINTIFF/PETITIONER: <b>KOSTIANTYN MARS</b> DEFENDANT/RESPONDENT: <b>HANNA MARS</b>		
<b>DECLARATION 2ND AMENDED</b>		CASE NUMBER: <b>22FL003144</b>

Dear Honorable Stephen P. Lowney,

Please find attached list of professionally supervised visit reports with my son Max Mars, compromised by impermissible pressure and defamatory falsehood allegations of unethical attorney Nancy L Roberts on emergency screener Dr Mary Rolison and professional supervisors (including Lorraine Ruiz).

Please also find attached list of evidence of impermissible pressure which unethical attorney Nancy L Roberts made on emergency screener Dr Mary Rolison and professional supervisors (including Lorraine Ruiz), with the goal to get redacted reports, made in favor of Nancy and her client.

Please also review attached fraudulent defamatory falsehood DVRO 09/13/2022, which Respondent and her unethical attorney Nancy L Roberts used to manipulate Court and abduct my son Max Mars, who after abduction with fraudulent DVRO Respondent held in undisclosed location, blocking all contact with my son, even phone calls, while Respondent attempted through fraud, falsifications and bribing judge Flint, to facilitate international child abduction of my son outside of the United States with threats to abduct and "bury our son in Ukrainian soil, so you will never see him again".

I appreciate if you could possibly review attached Respondent's DVRO from 09/13/2022 together with my opposing DVRO 09/19/2022 before proceeding with evidences of impermissible pressure on emergency screener and professional supervisors, to understand basis of the case - because matter of these DVROs was never heard by the Court, because unethical attorney Nancy L Roberts fraudulently dismissed trial on opposing DVROs, and later, bribed judge Andrea Flint refused to hear this matter, and refused to review any of more than 50 pieces of evidence and witness statements, forcing me to abandon my son and sign-off custody.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 01/17/2024

**KOSTIANTYN MARS**

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

☐ Attorney for ☒ Plaintiff ☐ Petitioner ☐ Defendant  
☐ Respondent ☐ Other (Specify):

Evidence P12

1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM

4 PRO PER

ENDORSED  
**FILED**  
JAN 31 2024  
Clerk of the Court  
Superior Court of CA County of Santa Clara  
3Y \_\_\_\_\_ DEPUTY

**L. Martinez**

5  
6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
7 **IN AND FOR THE COUNTY OF SANTA CLARA**

8 KOSTIANTYN MARS

9 Petitioner,

10 vs.

11 HANNA MARS,

12 Respondent.

) Case No.: 22FL003144

) **LIST OF EVIDENCE FOR DV**  
) **RESTRAINING ORDER**  
) **TO PROTECT MY SON**  
) **MAX MARS**  
) **FROM DOMESTIC VIOLENCE BY**  
) **BIOLOGICAL MOTHER-ABUSER,**  
) **PHYSICAL AND EMOTIONAL ABUSE,**  
) **AND FROM INTERNATIONAL CHILD**  
) **ABDUCTION**  
) **(AMENDED)**

15 ) **DATE: 02/07/2024**

16 ) **TIME: 1:30 PM**

17 ) **DEPT: 79**

**JUDGE: Honorable Stephen P. Lowney**

18  
19  
20 Dear Honorable Stephen P. Lowney,

21  
22 Please see below the list of evidence for DV Restraining Order to protect my son Max Mars from  
23 domestic violence, physical and emotional abuse by biological mother-abuser, and from  
24 international child abduction outside of the United States, facilitated by bribed Judge Andrea E.  
25 Flint, resigned due to severe abuse of judicial power, bribery, severe falsifications of court records  
26 and severe repetitive judicial misconduct, Respondent Hanna Mars, and her extremely unethical

27 - 1 -

28 LIST OF EVIDENCE FOR DV RESTRAINING ORDER TO PROTECT MY SON MAX MARS  
FROM DOMESTIC VIOLENCE, PHYSICAL AND EMOTIONAL ABUSE,  
AND FROM INTERNATIONAL CHILD ABDUCTION (AMENDED)

DISSOLUTION OF FAMILY MARS

CASE NO.: 22FL003144

Evidence P13



1 KOSTIANTYN MARS  
2 PO BOX 8081  
3 SAN JOSE, CA 95155  
4 (408) 518-0088  
5 CONSTANTINE.MARS@GMAIL.COM  
6 PER SE

(ENDORSED)  
**FILED**  
FEB 01 2024  
Clerk of the Court  
Superior Court of CA County of Santa Clara  
BY J. RARAS DEPUTY

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **IN AND FOR THE COUNTY OF SANTA CLARA**

9 KOSTIANTYN MARS  
10  
11 Petitioner,  
12  
13 vs.  
14 HANNA MARS,  
15  
16 Respondent.

) Case No.: 22FL003144  
) **LIST OF EVIDENCE FOR**  
) **MOTION TO DISQUALIFY**  
) **OPPOSING ATTORNEY**  
) **NANCY L ROBERTS**  
) **ON THE GROUNDS OF**  
) **INTENTIONAL HARM TO JUDGE OF**  
) **SUPERIOR COURT,**  
) **FACILITATION OF INTERNATIONAL**  
) **CHILD ABDUCTION**  
) **THROUGH BRIBERY, FRAUD,**  
) **FALSIFICATIONS,**  
) **MANIPULATIONS OF THE COURT,**  
) **AND FALSIFICATION OF**  
) **COURT RECORDS,**  
  
) **WHICH CAUSED PREMATURE RESIGNATION**  
) **OF**  
) **BRIBED JUDGE ANDREA E. FLINT,**  
  
) **DOMESTIC PARENTAL ABDUCTION**  
) **OF MY SON MAX MARS,**  
) **AND MALICIOUS CHILD DETENTION**  
) **IN UNKNOWN LOCATION,**  
  
) **ALSO, ON LEGAL GROUNDS OF**  
) **IMPERMISSIBLE CONFLICT OF INTEREST,**  
) **UNETHICAL CONDUCT,**  
) **AND SEVERE REPETITIVE VIOLATIONS OF**  
) **PROFESSIONAL AND ETHICAL STANDARDS**

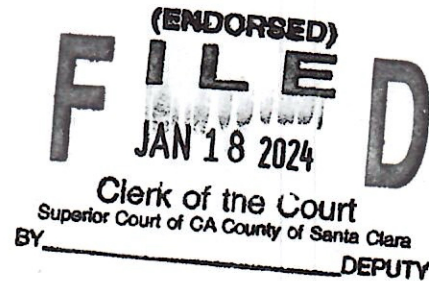
23 (AMENDED)  
24  
25 **HEARING: 02/07/2024, 1:30 PM**  
26 **JUDGE: HONORABLE STEPHEN P. LOWNEY**  
27 **DEPT.: 79**

Evidence P14



1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM

4 PRO PER



5  
6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
7 **IN AND FOR THE COUNTY OF SANTA CLARA**  
8

9 KOSTIANTYN MARS

10 Petitioner,

11 vs.

12 HANNA MARS,

13 Respondent.  
14  
15  
16  
17

) Case No.: 22FL003144

) **MOTION TO HOLD RESPONDENT**  
) **IN CONTEMPT OF COURT AND**  
) **REQUEST FOR SANCTIONS UNDER**  
) **CCP 278.5**  
) **(2<sup>ND</sup> AMENDED)**

) Judge: Hon. Stephen P. Lowney  
) Dept: 79  
)  
)  
)

18 **MOTION TO HOLD RESPONDENT IN CONTEMPT OF COURT**  
19 **AND REQUEST FOR SANCTIONS UNDER CCP 278.5 (2<sup>ND</sup> AMENDED)**  
20

21 Dear Honorable Stephen P. Lowney,

22 I, Kostiantyn Mars, the Petitioner in this matter, respectfully submit this Motion to request that  
23 the Court to hold Respondent, Hanna Mars, in contempt of Court for her actions that have violated  
24 the law, Court Orders from October 31, 2022, and the Code of Civil Procedure (CCP) 278.5.

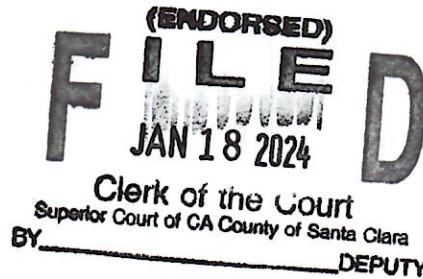
25 I am also seeking sanctions against Respondent, as permitted under CCP 278.5.

26 This is 2<sup>nd</sup> Amended Motion, filed because the Clerk of the Court lost whole filing on  
27 01/12/2024 after she stamped and returned stamped copies to me for service.  
28

Evidence P15

1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM

4 PRO PER



7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **IN AND FOR THE COUNTY OF SANTA CLARA**

10 KOSTIANTYN MARS

11 Petitioner,

12 vs.

13 HANNA MARS,

14 Respondent.

) Re: Dissolution of Family Mars  
) Case No.: 22FL003144

) **LIST OF EVIDENCE FOR ORDER**  
) **TO SHOW CAUSE AND AFFIDAVIT FOR**  
) **CONTEMPT**  
) **(2<sup>ND</sup> AMENDED)**

) Judge: Honorable Stephen P. Lowney  
) Dept: 79

19 **LIST OF EVIDENCE FOR ORDER**  
20 **TO SHOW CAUSE AND AFFIDAVIT FOR CONTEMPT (2<sup>ND</sup> AMENDED)**

21 Dear Honorable Stephen P. Lowney,

22 Please find list of evidence for Order to Show Cause and Affidavit for Contempt below.

23  
24 This is 2<sup>nd</sup> Amended Motion, filed because the Clerk of the Court lost whole filing on  
25 01/12/2024 after she stamped and returned stamped copies to me for service.

Evidence P16



PARTY WITHOUT ATTORNEY OR ATTORNEY NAME: KOSTIANTYN MARS FIRM NAME: STREET ADDRESS: PO BOX 8081 CITY: SAN JOSE TELEPHONE NO.: (408) 518-0088 E-MAIL ADDRESS: CONSTANTINE.MARS@GMAIL.COM ATTORNEY FOR (name): STATE BAR NUMBER: STATE: CA ZIP CODE: 95155 FAX NO.: SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA STREET ADDRESS: 201 N FIRST STREET MAILING ADDRESS: 191 N FIRST STREET CITY AND ZIP CODE: SAN JOSE CA 95113 BRANCH NAME: FAMILY JUSTICE CENTER PETITIONER: KOSTIANTYN MARS RESPONDENT: HANNA MARS OTHER PARENT/PARTY: REQUEST FOR ORDER <input type="checkbox"/> CHANGE <input type="checkbox"/> TEMPORARY EMERGENCY ORDERS <input type="checkbox"/> Child Custody <input type="checkbox"/> Visitation (Parenting Time) <input type="checkbox"/> Spousal or Partner Support <input type="checkbox"/> Child Support <input type="checkbox"/> Domestic Violence Order <input type="checkbox"/> Attorney's Fees and Costs <input type="checkbox"/> Property Control <input checked="" type="checkbox"/> Other (specify): BIFURCATION OF STATUS OF MARRIAGE	FOR COURT USE ONLY  (ENDORSED) <b>FILED</b> JAN 31 2024 Clerk of the Court Superior Court of CA County of Santa Clara BY <b>J. RARAS</b> DEPUTY  CASE NUMBER: <b>22FL003144</b>
---	---

## NOTICE OF HEARING

1. TO (name(s)): HANNA MARS  
☐ Petitioner ☒ Respondent ☐ Other Parent/Party ☐ Other (specify):

## 2. A COURT HEARING WILL BE HELD AS FOLLOWS:

a. Date: <u>07/24/2024</u>	Time: <u>1:30 p.m.</u>	<input checked="" type="checkbox"/> Dept.: <u>79</u>	<input type="checkbox"/> Room.:
b. Address of court <input checked="" type="checkbox"/> same as noted above <input type="checkbox"/> other (specify):			

3. **WARNING to the person served with the Request for Order:** The court may make the requested orders without you if you do not file a *Responsive Declaration to Request for Order* (form FL-320), serve a copy on the other parties at least nine court days before the hearing (unless the court has ordered a shorter period of time), and appear at the hearing. (See form FL-320-INFO for more information.)

(Forms FL-300-INFO and DV-400-INFO provide information about completing this form.)

## COURT ORDER

(FOR COURT USE ONLY)

## It is ordered that:

4. ☐ Time ☐ for service ☐ until the hearing is shortened. Service must be on or before (date):
5. ☐ A *Responsive Declaration to Request for Order* (form FL-320) must be served on or before (date):
6. ☐ The parties must attend an appointment for child custody mediation or child custody recommending counseling as follows (specify date, time, and location):
7. ☐ The orders in *Temporary Emergency (Ex Parte) Orders* (form FL-305) apply to this proceeding and must be personally served with all documents filed with this *Request for Order*.
8. ☐ Other (specify):

Date:

JUDICIAL OFFICER

Page 1 of 4

Evidence P17



FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (NAME AND ADDRESS):

**KOSTIANTYN MARS**  
**PO BOX 8081**  
**SAN JOSE, CA 95155**

TELEPHONE NUMBER:

(408) 518-0088

ATTORNEY FOR (Name):

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA**

STREET ADDRESS: 201 North First Street, San José, CA 95113

MAILING ADDRESS: 191 North First Street

CITY AND ZIP CODE: San José, California 95113

BRANCH NAME: Family Justice Center

PLAINTIFF/PETITIONER: **KOSTIANTYN MARS**DEFENDANT/RESPONDENT: **HANNA MARS**

OTHER PARENT/CLAIMANT:

**REQUEST FOR TRIAL**  
(Family Law)☒ Dissolution☐ Nullity☐ Legal Separation☐ Other Family Law: \_\_\_\_\_☐ Parentage

CASE NUMBER:

**22FL003144**

DEPARTMENT NUMBER:

**79**

(ENDORSED)  
**FILED**  
 JAN 31 2024  
 Clerk of the Court  
 Superior Court of CA County of Santa Clara  
 BY **J. BARAS** DEPUTY

- How long will your trial take (estimate)? 4 ☒ Hours ☐ Days (check one)
- Check the issues on which you and the other party disagree or need orders:
 

<input checked="" type="checkbox"/> Child Support	<input checked="" type="checkbox"/> Spousal Support	<input type="checkbox"/> Arrearages
<input type="checkbox"/> Property Characterization	<input type="checkbox"/> Property Valuation	<input type="checkbox"/> Property Valuation Date
<input checked="" type="checkbox"/> Property Division	<input checked="" type="checkbox"/> Reimbursement	<input checked="" type="checkbox"/> Date Of Separation
<input checked="" type="checkbox"/> Attorney's Fees & Costs	<input checked="" type="checkbox"/> Other: <b>Finalize divorce, terminate spousal support</b>	
- Discovery** (getting information about/from the other party) that still needs to be done:  
 Has discovery been finished? ☒ Yes ☐ No ☐ Not required/requested in this case  
 If no, what discovery still needs to be done? ☐ Interrogatories ☐ Depositions ☐ Document Production  
 How long do you think it will take both parties to finish discovery: \_\_\_\_\_
- Mandatory Declarations of Disclosure** (Dissolution, Legal Separation and Nullity cases only):  
 Petitioner has served Respondent with ☒ Preliminary ☒ Final Declarations of Disclosure  
 Respondent has served Petitioner with ☒ Preliminary ☒ Final Declarations of Disclosure  
 If financial disclosures have not been exchanged/served, do you need a deadline? ☐ Yes ☐ No
- Do you want a **Trial on separate issues**? ☒ Yes ☐ No If yes, what issues: **Finalize divorce, terminate spousal support, reimburse attorney fees and financial damages. Custody is bifurcated**
- Have you and the other party and/or your attorneys met to discuss settlement? ☒ Yes ☐ No  
 Do you want a **Settlement Officer Conference**? ☐ Yes ☒ No
- Is the **Department of Child Support Services** involved on the issue of child support? ☒ Yes ☐ No  
 If yes, which county? Santa Clara FSB Number: \_\_\_\_\_ Court case number (if different from this case): \_\_\_\_\_

Date: 1/21/24

  
☐ Attorney for ☒ Petitioner ☐ Respondent ☐ Other

**NOTE: THIS FORM SHALL NOT BE USED FOR CUSTODY OR VISITATION ISSUES OR IN DOMESTIC VIOLENCE PREVENTION ACT CASES.**

Evidence P18





**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA**

DOWNTOWN COURTHOUSE  
191 NORTH FIRST STREET  
SAN JOSÉ, CALIFORNIA 95113  
FAMILY JUSTICE CENTER

January 31, 2024

**Kostiantyn Mars**  
**PO Box 8081**  
**San Jose CA 95155**

RE: **Kostiantyn Mars vs Hanna Mars**  
CASE NUMBER: **22FL003144**

**STATUS CONFERENCE NOTICE**

**You must go the Status Conference scheduled for:**

Date: **03/05/2024** Time: **9:00 AM** Dept.: **Department 79**

Location: **201 North First Street, San José, CA 95113**

See the next page for information about why a Status Conference has been scheduled, what you need to do before your Status Conference, how to appear by telephone, how to reschedule this date, if needed, and where to get more information.

Bring your calendar to the Status Conference. Additional court dates may be set.

---

If you, a party represented by you, or a witness to be called on behalf of that party need an accommodation under the American with Disabilities Act, please contact the Court Administrator's office at (408) 882-2700, or use the Court's TDD line, (408) 882-2690 or the Voice/TDD California Relay Service, (800) 735-2922.

**DECLARATION OF SERVICE BY MAIL:** I declare that I served this notice by enclosing a true copy in a sealed envelope, addressed to each person whose name is shown above, and by depositing the envelope with postage fully prepaid, in the United States Mail at San Jose, CA on. CLERK OF THE COURT, by Juleiana Raras, Deputy.

cc: Nancy Lee Roberts 155 E Campbell Ave #255 Campbell CA 95008

Evidence P19

<p>PARTY WITHOUT ATTORNEY OR ATTORNEY  NAME: KOSTIANTYN MARS  FIRM NAME:  STREET ADDRESS: PO BOX 8081  CITY: SAN JOSE STATE: CA ZIP CODE: 95155  TELEPHONE NO.: (408) 518-0088 FAX NO.:  E-MAIL ADDRESS: CONSTANTINE.MARS@GMAIL.COM  ATTORNEY FOR (name):</p> <p><b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA</b>  STREET ADDRESS: 201 N FIRST STREET  MAILING ADDRESS: 191 N FIRST STREET  CITY AND ZIP CODE: SAN JOSE, CA 95113  BRANCH NAME: FAMILY JUSTICE CENTER</p> <p>PETITIONER: KOSTIANTYN MARS  RESPONDENT: HANNA MARS  OTHER PARENT/PARTY:</p> <p><b>REQUEST FOR ORDER</b> <input type="checkbox"/> <b>CHANGE</b> <input type="checkbox"/> <b>TEMPORARY EMERGENCY ORDERS</b>  <input type="checkbox"/> Child Custody <input type="checkbox"/> Visitation (Parenting Time) <input type="checkbox"/> Spousal or Partner Support  <input type="checkbox"/> Child Support <input type="checkbox"/> Domestic Violence Order <input type="checkbox"/> Attorney's Fees and Costs  <input type="checkbox"/> Property Control <input checked="" type="checkbox"/> Other (specify):  MOTION TO DISQUALIFY OPPOSING ATTORNEY <span style="float: right;">AMENDED</span></p>	<p style="text-align: center;">FOR COURT USE ONLY</p> <p style="text-align: center; font-size: 2em; font-weight: bold;">FILED</p> <p style="text-align: center;">(ENDORSED)  FEB 01 2024  Clerk of the Court  Superior Court of CA County of Santa Clara  BY <u>I. Rowland</u> DEPUTY</p> <p>CASE NUMBER:  22FL003144</p>
---	---

**NOTICE OF HEARING**

1. TO (name(s)): HANNA MARS  
☐ Petitioner ☒ Respondent ☐ Other Parent/Party ☐ Other (specify):

2. A COURT HEARING WILL BE HELD AS FOLLOWS:

a. Date: 02/07/2024	Time: 1:30 PM	<input checked="" type="checkbox"/> Dept.: 79 <input type="checkbox"/> Room.:
b. Address of court <input type="checkbox"/> same as noted above <input type="checkbox"/> other (specify):		

3. **WARNING to the person served with the Request for Order:** The court may make the requested orders without you if you do not file a *Responsive Declaration to Request for Order* (form FL-320), serve a copy on the other parties at least nine court days before the hearing (unless the court has ordered a shorter period of time), and appear at the hearing. (See form FL-320-INFO for more information.)

(Forms FL-300-INFO and DV-400-INFO provide information about completing this form.)

**COURT ORDER**

(FOR COURT USE ONLY)

**It is ordered that:**

4. ☐ Time ☐ for service ☐ until the hearing is shortened. Service must be on or before (date):
5. ☐ A *Responsive Declaration to Request for Order* (form FL-320) must be served on or before (date):
6. ☐ The parties must attend an appointment for child custody mediation or child custody recommending counseling as follows (specify date, time, and location):
7. ☐ The orders in *Temporary Emergency (Ex Parte) Orders* (form FL-305) apply to this proceeding and must be personally served with all documents filed with this *Request for Order*.
8. ☐ Other (specify):

Date:

JUDICIAL OFFICER

Page 1 of 4

1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM  
PER SE

4 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
5 **IN AND FOR THE COUNTY OF SANTA CLARA**

7 KOSTIANTYN MARS

8 Petitioner,

9 vs.

10 HANNA MARS,

11 Respondent.

) Case No.: 22FL003144

) **MOTION TO DISQUALIFY**  
) **OPPOSING ATTORNEY**  
) **NANCY L ROBERTS**  
) **ON THE GROUNDS OF**

) **INTENTIONAL HARM TO JUDGE OF**  
) **SUPERIOR COURT,**

) **FACILITATION OF INTERNATIONAL**  
) **CHILD ABDUCTION**

) **THROUGH BRIBERY, FRAUD,**  
) **FALSIFICATIONS,**  
) **MANIPULATIONS OF THE COURT,**  
) **AND FALSIFICATION OF**  
) **COURT RECORDS,**

16 **WHICH CAUSED**  
17 **PREMATURE RESIGNATION OF**  
18 **BRIBED JUDGE ANDREA E. FLINT,**

19 **DOMESTIC PARENTAL ABDUCTION**  
20 **OF MY SON MAX MARS,**  
21 **AND MALICIOUS CHILD DETENTION**  
22 **IN UNKNOWN LOCATION,**

23 **ALSO, ON LEGAL GROUNDS OF**  
24 **IMPERMISSIBLE CONFLICT OF INTEREST,**  
25 **UNETHICAL CONDUCT,**  
26 **AND SEVERE REPETITIVE VIOLATIONS OF**  
27 **PROFESSIONAL AND ETHICAL STANDARDS**

28 **(AMENDED)**

**HEARING: 02/07/2024, 1:30 PM**  
**JUDGE: HONORABLE STEPHEN P. LOWNEY**  
**DEPT.: 79**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CONTENTS**

I.	INTRODUCTION	3
II.	INTENTIONALLY DESTROYING REPUTATION OF SUPERIOR COURT BY INVOLVING TWO BRIBED JUDGES IN THE SAME SINGLE CASE DURING ONE SINGLE YEAR	5
III.	INTENTIONAL HARM TO THE JUDGE OF THE SUPERIOR COURT	7
IV.	FACILITATION OF MASSIVE FRAUD SCHEME OF INTERNATIONAL CHILD ABDUCTION THROUGH BRIBERY, FRAUD, FALSIFICATION OF COURT RECORDS	11
V.	SEVERE MASSIVE FALSIFICATION OF COURT RECORDS	14
VI.	ENDORCING AND ENFORCING VIOLENCE AGAINST MINOR CHILD AND DEFENSELESS 95 YEARS OLD SENIOR WOMAN WITH DISABILITIES	16
VII.	IMPERMISSIBLE PRESSURE ON EXPERTS, EMERGENCY SCREENER AND PROFESSIONAL SUPERVISORS	19
VIII.	BLOCKING EMERGENCY SCREENING IN VIOLATION OF COURT ORDERS	21
IX.	FACILITATION OF DOMESTIC CHILD ABDUCTION	22
X.	AVOIDANCE OF SERVICE AND HARASSMENT OF SERVERS	25
XI.	DEFAMATORY FALSE ALLEGATIONS AND LIES IN THE COURT	27
XII.	IMPERMISSIBLE CONFLICT OF INTEREST	31
XIII.	UNETHICAL CONDUCT	33
XIV.	CONCLUSION	39

1 **I. INTRODUCTION**

2  
3 Dear Honorable Stephen P. Lowney,

4  
5 I, Kostiantyn Mars, the Petitioner in the above-mentioned divorce case, respectfully submit this  
6 motion to disqualify opposing attorney, Nancy L Roberts, on the grounds of intentional substantial  
7 harm that Nancy L Roberts did to the bribed judge Andrea E. Flint of Superior Court leading Flint  
8 to premature termination before official end of her term, intentional substantial harm to reputation  
9 of Superior Court, massive severe fraud and falsifications made with the goal to manipulate the  
10 Court and facilitate international child abduction outside of the United States by mother-abuser with  
11 documented history of child and elderly abuse and international child abduction history, massive  
12 falsification of court records, massive severe fraud with DCSS, avoidance of service, impermissible  
13 conflict of interest, impermissible pressure on witnesses and experts, harassment of me, supervisors  
14 and process servers, impermissible unethical conflict of interest, unethical conduct and multiple  
15 severe repetitive violations of professional and ethical standards.

16  
17 Intentional unethical conduct of Nancy L Roberts lead to premature termination of bribed judge  
18 Andrea E. Flint, one year before official end of her term, completely destroyed credibility of  
19 Superior Court (because Nancy bribed 2<sup>nd</sup> judge in a row on the same case, during the same year –  
20 who was prematurely terminated like the previous bribed judge Towery – which completely  
21 destroyed credibility of the Court), intentionally harmed health and safety of my son, lead to  
22 domestic abduction of my son and unlawful malicious detention of my son in unknown location  
23 without any contact with father for more than year, obtained through bribed judge Flint intentionally  
24 harmful orders that did irreparable terminal harm to health of my grandmom, defenseless 95 years  
25 old senior woman with disabilities, did irreparable damage to my reputation, put me into complete  
26 financial collapse, on a brink of bankruptcy and homelessness, jeopardized my rights as a parent,  
27 endangered life of my son, Max Mars, who is physically and emotionally abused by Nancy's client  
28

1 while being held hostage in undisclosed location without any means of contact neither with me, nor  
2 with 9-1-1, and is under constant threat of international child abduction outside of the United States  
3 to Ukraine, where his biological mother threatened to “bury our son in Ukrainian soil, so you will  
4 never see him again”.

1  
2 **II. INTENTIONALLY DESTROYING REPUTATION OF SUPERIOR COURT BY**  
3 **INVOLVING TWO BRIBED JUDGES IN THE SAME SINGLE CASE DURING**  
4 **ONE SINGLE YEAR**  
5

6 Nancy L Roberts, knowingly and intentionally involved 2 bribed judges (Flint and Towery) in  
7 the same single divorce case, 22FL003144 – both bribed judges were multiple times reported to  
8 Judicial Commission, Presiding Judge(s) of Superior Court and multiple government authorities, up  
9 to the Office of the President of the United States.

10 Both bribed judges were prematurely terminated from Superior Court of California before  
11 official end of their term:

- 12 1. Bribed judge Andrea E. Flint – prematurely terminated January 2024, 1 year before official  
13 end of term in 2025 (Evidence 11, 12)  
14 2. Bribed judge James E. Towery – prematurely terminated in 2023, 4 years before official end  
15 of his term in 2027 (Evidence 13, 14)

16 Both bribed judges signed unlawful and intentionally harmful orders, including the very  
17 fraudulent falsehood DVRO 2022, used by Nancy’s client to attempt to kill and cause irreparable  
18 terminal condition to my grandmother, 95 years old senior woman with disabilities, and used to  
19 facilitate international abduction of my son, Max Mars outside of the United States by mother-  
20 abuser, who currently, using intentionally harmful orders of bribed judge Flint, abducted my son to  
21 undisclosed location, where she holds my son, completely blocking all our contact with my child.

22 Signatures of both bribed judges were present in such unlawful and intentionally harmful orders:

- 23 1. Fraudulent defamatory falsehood DVRO 2022 – Evidence 15  
24 2. Intentionally harmful orders 10/31/2022 – Evidence 17  
25 3. Intentionally harmful orders and falsification of court records with removal of signed  
26 emergency screener recommendations 06/29/2023 – Evidence 20  
27  
28



1 4. Intentionally harmful orders 07/31/2023, 11/13/2023 and whole bunch of other intentionally  
2 harmful orders of bribed judge Flint which were requested to be nullified by Presiding Judge

3  
4 Nancy L Roberts works solely through bribing judges, and involves them into massive fraud,  
5 intentionally harmful wrongful orders, falsification of court records and abuse of judicial power.

6 The very fact that Nancy L Roberts didn't stop on bribing Towery (who was kicked out from  
7 court by another law-obedient litigant in the very beginning of our case in 2023), but bribed second  
8 judge in a row – Andrea E. Flint, and dragged Flint into scandal and premature termination, this fact  
9 is absolutely ridiculous.

10 Nancy L Roberts led Flint into huge trouble by bribing her, knowingly and intentionally making  
11 2<sup>nd</sup> bribed judge in a row to become target of media attention (Evidence 11).

12  
13 The very fact that TWO BRIBED JUDGES WERE PRESIDING ON THIS VERY SINGLE  
14 CASE, DURING ONE SINGLE YEAR – AND BOTH WERE PREMATURELY TERMINATED  
15 FROM SUPERIOR COURT – COMPLETELY DESTROYS CREDIBILITY OF THE SUPERIOR  
16 COURT FOR YEARS.

17  
18 It is very unfortunate that such unethical attorneys as Nancy L Roberts continue their unlawful  
19 and unethical practice, harming judges, and continues deteriorating and harming reputation of the  
20 Superior Court furthermore.

21  
22 It is of my belief, that to restore credibility of the Superior Court (which inevitably will take  
23 years), it is mandatory to disqualify Nancy L Roberts from representing her client in this case,  
24 suspend her attorney license and ban Nancy L Roberts from attorney practice indefinitely.

1

2 **III. INTENTIONAL HARM TO THE JUDGE OF THE SUPERIOR COURT**

3

4 Nancy L Roberts, knowingly and intentionally bribed judge Andrea E. Flint and dragged Flint  
5 into massive illegal fraud scheme with the goal to facilitate international child abduction of my son  
6 outside of the United States to Ukraine by mother-abuser with documented history of international  
7 child abduction, and documented history of child and elderly abuse – which led to premature  
8 termination of bribed judge Flint (Evidence 11, 12).

9 Nancy L Roberts, knowingly and intentionally dragged judge Andrea E. Flint into massive  
10 fraud scheme, which led bribed judge Flint to being reported to Judicial Commission, Presiding  
11 Judge of Superior Court, and to multiple government authorities up to the Office of The President of  
12 The United States, which led to premature termination of bribed judge Flint from Superior Court of  
13 California one year before official end of her term in 2025 (Evidence 11, 12) – and depending on  
14 the results of investigation, Flint potentially can get sentence in jail or severe financial sanctions.

15 Nancy L Roberts did harm to bribed judge Flint knowingly and intentionally – because Nancy  
16 knew factual basis of the case from the very beginning, was aware of documented history of  
17 international child abduction by her client (Evidence 5), knew that her client shared threats and  
18 plans of repeating international child abduction in 2022 with witnesses (Evidence 6), knew that her  
19 client is attempting to obtain my son’s passport with harmful and illegal intentions, knew that her  
20 client has documented history of child and elderly abuse, was on mental health (“therapist”)  
21 treatment for many years because of severe mental health disorder which we kept private, and the  
22 very DVRO 2022 (Evidence 15) was used to abduct my son and attempt to kill my grandmom was  
23 based solely on fraud and false allegations.

24 Nancy L Roberts knew that bribery is federal crime (Evidence 1), international parental  
25 kidnapping is federal crime (Evidence 2), that facilitation of international child abduction could in  
26 certain circumstance constitute for human trafficking (Evidence 3) – which could lead to sentences  
27 of 15-up-to-life and fines up to \$1,500,000.

28

1 Nancy L Roberts bribed Flint after previous bribed judge, Towery, was terminated from Court.

2 Nancy L Roberts knew that intentionally harmful orders, threats and coercion made by bribed  
3 judge Flint will lead to abduction of my son to Ukraine in times of war, where according to  
4 UNICEF about 1,000 children were already killed in war in 2022 (Evidence 4)

5 Nancy L Roberts knew that intentionally harmful orders of bribed judge Flint are separating 6  
6 years old child with his primary parent, who was building life for his son in the United States, was  
7 protecting his son from abuse and abduction by mentally unstable mother-abuser, and that Max had  
8 with father healthy, supportive and nurturing environment for all his life before abduction by  
9 mother-abuser (Evidence 9).

10 Nancy L Roberts knew that I devoted my life to my son (Evidence 10), and multiple witnesses  
11 shared that I'm primary parent, great father, loving father and husband (Evidence 6, 7, 8).

12 Despite knowledge of facts of this case, Nancy L Roberts shamelessly forced bribed judge Flint  
13 to make massive obvious falsifications, that completely ignore the Law and the factual basis of this  
14 case – therefore intentionally harming Flint's reputation, and putting her career at risk.

15

16 Massive fraud scheme, in which Nancy L Roberts dragged bribed judge Flint with bribery,  
17 involved:

18 1. Bribery,

19 2. Falsification of court records (including falsification of court orders and unlawful removal  
20 of signed emergency screener recommendations 06/29/2023)

21 3. Violation of court orders (child abduction and blocking emergency screening in violation of  
22 orders 10/31/2022)

23 4. Repetitive severe violation of the Law (by both Nancy, her client – CCP 278.5, orders  
24 10/31/2022; by bribed judge Flint – CCP 170.1, 170.3),

25 5. Fraud with DCSS – Flint ordered wages garnishment and transferred case to DCSS, based  
26 on fraud and falsehood statements of Nancy L Roberts. In the last month before  
27  
28

1 termination, Flint and Roberts filed fraudulent motion with DCSS, unlawfully increasing  
2 garnishment amount.

- 3 6. Unlawful financial sanctions through abuse of judicial power (including intentionally  
4 harmful orders 11/13/2023, 07/31/2023 prepared by Nancy and signed by Flint)
- 5 7. Unlawful intentionally harmful custody orders obtained through abuse of judicial power by  
6 bribed judge Flint (including orders 06/29/2023, 10/31/2022)
- 7 8. Facilitating massive fraud scheme with the goal to grant re-issuance of passport of my son  
8 on the unlawful “legal precedent” of “child abandonment” – which was fraudulently  
9 facilitated by Nancy and Flint through:

- 10 a. Ordering no-contact to me with my son (against factual basis of the case);
- 11 b. Ordering only paid supervised visitations (against legal and factual basis of the case);
- 12 c. Unlawfully artificially extending unreasonable paid visitations for more than year –  
13 by:
- 14 i. Blocking emergency screening (in violation of Court orders 10/31/2022,  
15 Evidence 21, 22, 19, 18)
- 16 ii. Refusing to sing emergency screener recommendations (Evidence 19, 18)
- 17 iii. Unlawfully removing signed emergency screener recommendations from  
18 Court records (Evidence 17, 18)
- 19 iv. Continuing unreasonable paid supervised visits for more than year without  
20 any legal or factual basis for it (Evidence 17, 24)
- 21 v. Making impermissible pressure on emergency screener and professional  
22 supervisors (Evidence 22, 25, 29) – which was endorsed by bribed judge  
23 Flint, who refused to disqualify Nancy and put her client in Contempt of  
24 Court in August 2023
- 25 d. Ordering unbearable and unreasonable financial sanctions that pushed on a brink of  
26 bankruptcy and homelessness – therefore forcing me to stop paid visitations,  
27 because I became unable to pay for PAID visitations (same as retain attorney, pay  
28

1 expert fees, pay for medical bills for my partially paralyzed grandmom injured by  
2 Nancy's client, and even to cover self basic needs)

3  
4 Because of Nancy L Roberts and bribed judge Flint this case is in media attention, and in  
5 attention of multiple government authorities, up to the Office of The President of the United States.

6  
7 The very fact that NANCY L ROBERTS DRAGGED BRIBED JUDGE FLINT INTO  
8 SCANDAL ABOUT BRIBERY LESS THAN YEAR AFTER HER PREDCESSOR TOWERY  
9 WAS PREMATURELY TERMINATED DUE TO SCANDAL ABOUT BRIBERY,  
10 DEMONSTRATES THAT NANCY L ROBERTS SHAMELESSLY USED JUDGE FLINT, AND  
11 KNOWINGLY AND INTENTIONALLY CAUSED HARM TO JUDGE OF SUPERIOR COURT.

12  
13 It is the shame that such unethical attorneys as Nancy L Roberts are continuing deterioration of  
14 the Superior Court and harming judges.

15 It is on my opinion mandatory to disqualify Nancy L Roberts from representing her client,  
16 suspend her attorney license, and ban Nancy L Roberts from attorney practice indefinitely – to  
17 protect other judges from becoming victims of Nancy's fraudulent schemes of bribing and exposing  
18 judges for falsifications that Nancy shamelessly forced judges to do in her favor in exchange for  
19 money.

1  
2 **IV. FACILITATION OF MASSIVE FRAUD SCHEME OF**  
3 **INTERNATIONAL CHILD ABDUCTION**  
4 **THROUGH BRIBERY, FRAUD, FALSIFICATION OF COURT RECORDS**  
5

6 Nancy L Roberts, knowingly and intentionally facilitated massive fraud scheme of international  
7 child abduction outside of the United States to Ukraine in times of war – therefore endangering life  
8 of my son by the very fact of such abduction plan – not mentioning threats of biological mother to  
9 abduct and “bury our son in Ukrainian soil, so you will never see him again”.

10  
11 Nancy L Roberts not only was aware that her client abducted and unlawfully detains my son in  
12 unknown location, blocking all our contact – but advised her client to do so to force me to sign-off  
13 custody and give up passport and all documents of my abducted son to her client (Evidence 30, 31,  
14 32)

15  
16 Nancy L Roberts was aware of documented history of child and elderly abuse, about bruises on  
17 body of my son (Evidence 33), verbal and non-verbal (Evidence 34) asks of my son to return to me  
18 – and made impermissible pressure on supervisors to remove any mentions of my son asking for  
19 help. Impermissible pressure was documented (Evidence 25, 29, 22), but reports were compromised  
20

21 Nancy L Roberts was aware of documented history of international child abduction by her client  
22 in 2019 – 2020 (7 months instead of 1 as planned originally, Evidence 5).  
23

24 Nancy L Roberts was aware that her client forced me to sign TRAVEL AUTHORIZATION  
25 CONSENT, which allows her client to travel outside of the United States with my son without my  
26 permission for the next 10 years – and her client has intentions to abduct my son outside of the  
27 United States to Ukraine (or Europe) using this Travel Authorization Consent and passport of my  
28

son – which Nancy attempted to obtain through massive fraud scheme which involves bribing judge Flint and:

1. Ordering me to give up passport of my son to her client – through temporary emergency orders included in fraudulent falsehood DVRO 2022 (Evidence 15) signed by bribed judge Towery right before his termination from Superior Court
2. Ordering me to give up passport of my son to Nancy L Roberts and her client – through orders of bribed judge Flint 06/29/2023 (Evidence 20)
3. Attempt to re-issue passport of my son through orders of bribed judge Flint included in Nancy’s request for “vexatious litigant pre-filing order” which Flint was unable to grant, because Flint was premature terminated from Superior Court in January 2024 – therefore those orders to re-issue passport of my son are now scheduled to be heard by Honorable Stephen P. Lowney on 02/07/2023, 1:30 PM – which makes Honorable Stephen P. Lowney  
TARGET OF NANCY L ROBERTS FOR BRIBERY AND POTENTIAL  
FALSIFICAION OF COURT ORDERS TO RE-ISSUE PASSPORT

Taking into account that bribed judge Flint severely falsified court records, including unlawful removal of signed emergency screener recommendations (Evidence 18, 21) through intentionally unlawful and harmful court orders 06/29/2023 (Evidence 20), also refused to hear matter of custody review, denied child abduction prevention orders, completely ignored more than 50 pieces of evidence and witness statements, filed with the Court, made massive falsifications, threats and coercion in attempt to force me to give up passport of my son to facilitate international child abduction of my son outside of the United States by mother-abuser with documented history of international child abduction, it is of high probability that NANCY L ROBERTS WILL ATTEMPT TO BRIBE 3<sup>RD</sup> JUDGE ON THE CASE – HONORABLE STEPHEN P. LOWNEY, and therefore Honorable Stephen P. Lowney needs protection from harmful influence and pressure of unethical attorney Nancy L Roberts.



1 Taking into account aforementioned facts, and extremely harmful influence of Nancy L Roberts  
2 on previous two judges, who were prematurely terminated from Superior Court with the scandal  
3 about bribery after making fraud and falsifications in favor of Nancy,  
4

5 TO PROTECT IMPARTIALITY OF THE COURT PROCESS AND PROFESSIONAL  
6 CAREER OF HONORABLE STEPHEN P. LOWNEY,

7 IT IS MANDATORY TO DISQUALIFY NANCY L ROBERTS from representing her client  
8 on this case, suspend her attorney license and ban her from any attorney practice indefinitely.  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2 **V. SEVERE MASSIVE FALSIFICATION OF COURT RECORDS**  
3

4 Nancy L Roberts was assigned as “lead attorney” on this case by bribed judge Flint, which  
5 helped her to make massive falsifications of court records and alter court orders in her favor.

6 Orders that were extremely severely falsified are:

- 7 1. Intentionally harmful wrongful orders 06/29/2023 (Evidence 20) – complete falsification of  
8 facts, unlawful removal of signed emergency screener recommendations, intentionally  
9 harmful wrongful custody orders of bribed judge Flint and attempt through falsifications of  
10 court orders, threats and coercion to force me to abandon my son, sign-off custody, give up  
11 passport and documents of my son and allow international child abduction of my son outside  
12 of the United States (plus bribed judge Flint denied child abduction prevention orders) –  
13 signed by bribed judge Flint, prematurely terminated from Superior Court in 2024
- 14 2. Fraudulent defamatory falsehood DVRO 2022 (Evidence 15) that facilitated attempt to kill  
15 my grandmom, causing terminal condition to defenseless 95 years old senior woman with  
16 disabilities, and abduction of my son to unknown location by mother-abuser with documented  
17 history of child and elderly abuse, and documented history of international child abduction –  
18 signed by bribed judge Towery before his premature termination from Superior Court in  
19 2023
- 20 3. Fraudulent stipulation on maximum spousal support 02/08/2023 – signed by Nancy and  
21 another unethical attorney Steven Dinneen in attempt to force me to bankruptcy,  
22 homelessness and to force me to abandon my son and sign-off custody through stipulation.  
23 To obtain my signature Nancy and Steven lied that there is verbal agreement that Nancy’s  
24 client will release my son from being hostage if I will sign for maximum spousal support.  
25 This verbal agreement was immediately broken after I signed stipulation – and Nancy’s  
26 client abducted my son to unknown location and blocked all our contact (Ev. 30, 31, 32)  
27  
28

- 1 4. Intentionally harmful orders 10/31/2023 (Evidence 17) - signed by bribed judge Flint,  
2 prematurely terminated from Superior Court in 2024
- 3 5. Intentionally harmful wrongful orders 11/13/2023, 07/31/2023, and bunch of others – signed  
4 by bribed judge Flint before her premature termination, and were requested to be nullified  
5 retroactively back to 10/31/2022 by Presiding Judge Beth McGowen  
6

7 Nancy L Robers massively and severely falsified Court records together with bribed judge Flint,  
8 in attempt to force me to sign-off custody and give up passport of my son to Nancy’s client –  
9 therefore facilitating international child abduction of my son outside of the United States to  
10 Ukraine, with the threat of her client to abduct and “bury our son in Ukrainian soil, so you will  
11 never see him again”.

12 I would emphasize that actions of Nancy and her client already led to “never see him again” –  
13 because Nancy’s client abducted my son to unknown location, blocked all our contact and, like  
14 terrorist, is blackmailing me and attempting to force me to abandon my son, sign-off custody and  
15 give up documents of my son (Evidence 30, 31, 32), while my son is coming on supervised visits  
16 with bruises (Evidence 33), asking for help (Evidence 34) – and cannot ask me verbally because all  
17 our contact is prohibited, sim card is pulled out from my son’s phone, all chats and messengers are  
18 blocked, and we are prohibited from communication on paid supervised visits, ordered by bribed  
19 judge Flint in favor of unethical attorney Nancy L Roberts on the basis of fraudulent falsehood  
20 DVRO 2022 signed by another bribed judge Towery – unlawfully and unreasonably, without any  
21 legal or factual bases for harmful and wrongful custody orders, no reasons for no-contact orders  
22 with primary parent, me, no reasons for orders to give up passport of my son and allow international  
23 child abduction of my son outside of the United States by mentally unstable mother-abuser with  
24 documented history of child and elderly abuse, and documented history of international child  
25 abduction outside of the United States.  
26  
27  
28

1  
2 **VI. ENDORCING AND ENFORCING VIOLENCE AGAINST MINOR CHILD AND**  
3 **DEFENSELESS 95 YEARS OLD SENIOR WOMAN WITH DISABILITIES**  
4

5 Nancy L Roberts knowingly and intentionally, through bribing two judges of Superior Court  
6 (Towery and Flint), through fraud, falsification of court records and orders obtained through bribed  
7 judges (Evidence 15, 17, 18, 20) , through lying to judges in courtroom (Evidence 20, 21, 26, 27,  
8 28) and defamatory falsehood allegations that go against legal and factual basis of the case, through  
9 lies, defamatory falsehood allegations did impermissible pressure on experts, emergency screener  
10 and professional supervisors (Evidence 22, 29, 25, 26, 27, 28) facilitated massive fraud scheme of  
11 international child abduction outside of the United States by mother-abuser with documented  
12 history of international child abduction (Evidence 5, 6), child and elderly abuse.

13 Nancy L Roberts, knowingly and intentionally, enforced domestic child abduction by her client  
14 (Evidence 30, 31, 32) in violation of ATROs, court orders and CCP 278.5 (Malicious child  
15 abduction, child detention, custody deprivation) – and even worse, advised her client (Evidence 31,  
16 32) to use child abduction as the tool of threats and coercion against me to force me to abandon my  
17 son, sign off custody and give up passport and all documents of my son to mother-abuser, therefore  
18 facilitating international child abduction of my son outside of the United States.

19 Nancy L Roberts, through impermissible pressure on professional supervisors, bribery, threats,  
20 coercion and other unethical means ensured that bruises on body of my son (Evidence 33),  
21 screaming asks for help (Evidence 34), any conversations between me and my son where my son  
22 was asking to stay with me and not return to mother-abuser – were never included in any of paid  
23 supervised reports for more than year.

24 Nancy L Roberts advised her client on abduction of my son and blocking all contact with my  
25 son – therefore using my son as hostage in hands of terrorists (Evidence 31, 32).

26 Nancy L Roberts advised her client to file new DVRO against me for greeting my son with 8<sup>th</sup>  
27 Birthday, for cheering up my son, making him smile and talking to my son. In that DVRO Nancy  
28

1 and her client requested total no-contact orders, complete prohibition of any contact between me  
2 and my son – and the only basis for such order is:

- 3 1. Desire of Nancy’s client to abduct my son outside of the United States to Ukraine in times of  
4 war
- 5 2. Desire of Nancy’s client to enforce parental alienation and prohibit all and any healthy  
6 contact with father
- 7 3. Urgent need to block all contact with my son – to ensure that Max cannot expose new  
8 bruises on his body, cannot freely talk to me and explain his current situation, and cannot  
9 ask for help
- 10 4. Urgent need to block any contact with father – to ensure that my son cannot call me and ask  
11 for help when abused by mother-abuser, who unreasonably holds Max hostage for more than  
12 year
- 13 5. Attempt through separation with my son, threats and coercion to force me to abandon my  
14 son, sign-off custody and give up passport and all documents of my son

15  
16 It is worth mentioning, that on advice of Nancy L Roberts, her client pulled out sim card from  
17 phone of my son, and blocked all our messengers and chats – therefore enforcing parental alienation  
18 and ensuring that my son has no contact neither with me, nor with 9-1-1 in case of emergency.  
19

20 It is also worth mentioning that style of defamatory false allegations in DVRO 2022, signed by  
21 bribed judge Towery, that was used in attempt to kill my grandmom, and used to abduct my son,  
22 obviously shows defamatory falsehood style of lies by Nancy L Roberts.  
23

24 It is also worth mentioning, that during interrogatories, Nancy L Roberts shamelessly harassed  
25 me, saying that her client did right attempting to kill my grandmom, defenseless 95 years old senior  
26 woman with disabilities – because according to Nancy “she was very old, weak and will die  
27 anyways”.  
28

1 Nancy L Roberts and her client intentionally did irreparable harm to my grandmom, causing her  
2 terminal condition by kicking defenseless 95 years old senior woman with disabilities from home  
3 with fraudulent defamatory falsehood DVRO 2022 (Evidence 15, 16, 10), and did irreparable  
4 damage to health, safety and wellbeing of my son, abducted by her client to unknown location and  
5 blocking all contact with my son (Evidences 30, 31, 32), with bruises and asks for help (Evidence  
6 33, 34).

7  
8 Such unethical person like Nancy L Roberts, who so obviously hates and makes harm to  
9 defenseless little children and senior women with disabilities, cannot be an attorney in custody  
10 cases.

11 Criminal approach that “child must suffer and cry”, and senior woman with disabilities “was  
12 very old, weak, and will die anyways” is absolutely unethical and impermissible.

13  
14 After all irritable harm to my family, to my son and grandmom, I request immediate  
15 disqualification of Nancy L Roberts, suspension of her attorney license and to ban her from attorney  
16 practice indefinitely.

**VII. IMPERMISSIBLE PRESSURE ON EXPERTS, EMERGENCY SCREENER AND PROFESSIONAL SUPERVISORS**

Nancy L Roberts shamelessly made impermissible pressure on emergency screener Dr Mary Rolison (Evidence 22 – retaliating to Dr Rolison for sharing signed emergency screener recommendations with the Court – Evidence 21), did impermissible pressure on professional supervisor Lorraine Ruiz (Evidence 25, 29), other professional supervisors (extensive list of evidence of impermissible pressure together with list of all compromised supervised reports was filed with the Court 01/12/2024 and emailed electronically to Department 79 01/18/2024 after clerk of the court lost all filings made on 01/12/2024).

Nancy L Roberts made impermissible pressure on emergency screener Dr Mary Rolison, sending shameless defamatory falsehood allegations in email (Evidence 22) to Department 79 and Dr Mary Rolison, in retaliation to Dr Mary Rolison for sharing signed Emergency Screener Recommendations with the Department 79 and the Court ( Evidence 21, 18).

Later on 06/29/2023, bribed by Nancy judge Flint, unlawfully and unreasonably removed from court records these signed emergency screener recommendations without consideration (Evidence 20) and ordered Nancy to prepare court orders after hearing – which were falsified in favor of Nancy’s client.

Bribed judge Flint made orders completely opposite to emergency screener recommendations, and completely opposite to legal and factual basis of this case, completely ignoring emergency screener recommendations and more than 50 pieces of evidence and witness statements.

Nancy L Roberts through shameless defamatory falsehood allegations and impermissible pressure (Evidence 25) forced Lorraine Ruiz to stop supervising visits of my son Max – because of ethical reasons, because Lorraine Ruiz was that unique, honest supervisor, who refused to make falsifications requested by Nancy L Roberts, and honestly included in her report all facts and all defamatory allegations that were heard (Evidence 29)



1  
2 Nancy L Roberts ensured that no evidence of good healthy bond of me and my son will be  
3 present in reports that she compromised. Even worse – Nancy ensured that neither bruises on body  
4 of my son (Evidence 33), nor screaming messages asking for help (Evidence 34) will ever be  
5 included in supervised reports.

6  
7 On instruction of Nancy L Roberts paid supervisors Jesus Santos and Dylan Smith sent a  
8 derogatory falsehood allegations in email to Nancy and me, accusing in violation of rules of  
9 visitation by “being late” (which is nonsense, because I always notified them for each occasion, and  
10 this nonsense has nothing to do with safety and wellbeing of my son, forcibly held hostage by  
11 mother-abuser). Nancy L Roberts ensured that new supervisors Esther and Bianca Taylor repeated  
12 the same allegations, in practically the same wording – shamelessly blaming me in “being late for  
13 15 minutes” (after I notified Bianca about change of location to save her from becoming wet under  
14 rain that according to forecast could start in a few minutes). Again, late start of paid visitation, after  
15 I notified supervisor about being late, has nothing to do with safety of my son – who was coming on  
16 supervised visits with bruises from mother-abuser.

17  
18 List of all compromised supervised reports together with extensive evidence of impermissible  
19 pressure that Nancy L Roberts did on professional supervisors, was filed with the Court on  
20 01/12/2024, and was emailed to Department 79 on 01/18/2024 after clerk of the court lost all filings  
21 made on 01/12/2024.

22  
23 Nancy L Roberts demonstrated the worst of unethical conduct of attorney by violating  
24 professional and ethical standards and making impermissible pressure on experts, emergency  
25 screener and professional supervisors, completely compromising all supervised reports,  
26 compromising screener recommendations – and in the end, removing those recommendations  
27 completely with the help of bribed judge Flint, who later was prematurely terminated from Court.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**VIII. BLOCKING EMERGENCY SCREENING IN VIOLATION OF COURT  
ORDERS**

Nancy L Roberts, knowingly and intentionally blocked Emergency Screening (Evidence 19, 20, 21) in violation of Court orders from 10/31/2022 (Evidence 17), made impermissible pressure on Emergency Screener Dr Mary Rolison (Evidence 21, 22) – and later on 06/29/2023 with the help of bribed judge Flint (Evidence 11), removed signed Emergency Screener Recommendations (Evidence 18) from Court records completely – obtaining favorable to her client court orders made by bribed judge Flint on 06/29/2023 (Evidence 20) made completely against emergency screener recommendations, legal and factual basis of this case, and more than 50 pieces of evidence and witness statements (Evidence 6, 7, 8).

Such ridiculous manipulations with the Court made by Nancy L Roberts completely undermine credibility of the Court, and demonstrate absolutely impermissible level of corruption in Superior Court of California – especially taking into account that all this massive fraud and falsifications were done with support and direct involvement of two bribed judges, prematurely terminated from Superior Court with loud scandals about bribery, falsifications and abuse of judicial power – Flint (Evidence 11, 12) and Towery (Evidence 13, 14).

Presence of unethical attorney Nancy L Roberts on this case completely destroys credibility of the Superior Court of California – and therefore, her immediate disqualification is mandatory, together with suspension of her attorney license and ban from attorney practice indefinitely.

1  
2 **IX. FACILITATION OF DOMESTIC CHILD ABDUCTION**  
3

4 Nancy L Roberts knowingly and intentionally facilitated unlawful and unethical “legal” basis  
5 for abduction of my son by his biological mother to unknown location in April 2023 (Evidence 30,  
6 31, 32) – and even worse – Nancy shamelessly advised her client use our son as hostage and  
7 blackmail me in attempt to force me to sign-off custody and give up passport and all documents of  
8 my son to her client (Evidence 31, 32).

9 Actions of her client go in direct violation of CCP 278.5 Malicious child detention, Parental  
10 Child abduction and Malicious custody deprivation – and were knowingly and intentionally  
11 recommended by Nancy L Roberts (Evidence 31, 32).

12 Even worse – her client not only abducted my son to unknown location, blocked all contact with  
13 my son, but also pulled out sim card from my son’s phone and blocked all our messengers and chats  
14 (documented in supervised reports, added in extensive list of evidence of impermissible pressure  
15 together with list of all compromised supervised reports was filed with the Court 01/12/2024 and  
16 emailed electronically to Department 79 01/18/2024 after clerk of the court lost all filings made on  
17 01/12/2024).

18 My son is held hostage in undisclosed location (which I managed to discover through private  
19 investigation only recently), without any contact with me – and even greeting my son with birthday  
20 is strictly prohibited. Nancy’s client with help of Nancy, called police on me and filed new  
21 falsehood DVRO 2023 against me for greeting my son with his 8<sup>th</sup> Birthday – and punished my son  
22 so much, that next day Max was scared, was running away from me, was hiding his body (which  
23 raises huge concerns of physical violence of mother-abuser against my son in punishment for being  
24 happy, smiling and hugging father – who Max was obviously missing after year of only paid  
25 supervised visits, Evidence 37).

26 Nancy L Roberts shamelessly abused legal system and manipulated Court through bribery, fraud  
27 and falsifications to facilitate abduction of my son and attempt through multiple illegal means to  
28

1 force me to abandon my son, sign-off custody and give up passport and all documents of my son to  
2 Nancy's client, mother-abuser, who attempted to steal Max's passport, abducted my son and  
3 threatened to abduct my son outside of the United States to Ukraine and "bury our son in Ukrainian  
4 soil, so you will never see him again".

5  
6 Nancy L Roberts is a shame for California State Bar Association. Such shameless and extremely  
7 unethical terror against minor child, that Nancy L Roberts did together with her client, is absolutely  
8 impermissible.

9  
10 CHILD IS NOT A MILITARY PRISONER!

11 CHILD IS NOT A HOSTAGE FOR TERRORISTS WHO USE CHILD FOR  
12 BLACKMAILING, THREATS AND COERCION OF CARING PRIMARY PARENT!

13 CHILD IS NOT PROPERTY TO STEAL, HIDE, USE!

14 CHILD IS NOT AN OBJECT FOR TERROR, ABDUCTION AND ABUSE!

15  
16 CHILD IS PERSONALITY – AND MUST BE TREATED AS PERSONALITY, WITH CARE,  
17 LOVE, SUPPORT AND WITH THE FOCUS ON CHILD'S SAFETY, WELLBEING AND  
18 FUTURE!

19  
20 Attorney must not advise and help with child abduction – attorney must help parent to take care  
21 of child, and find peaceful resolutions in the best interest of the child.

22  
23 With Nancy L Roberts everything is opposite to normal – my son was abducted, is held hostage,  
24 all contact is blocked, sim card is pulled out, seeing father is strictly prohibited, my son is in  
25 constant fear of punishment and "more trouble" if he sees father, resolution of absolutely artificial  
26 custody "issues" was unreasonably delayed – and Nancy dragged bribed judge Flint into this fraud  
27 scheme to force me to abandon my son, sign-off custody and give up my son's passport.

1 Nancy L Roberts intentionally guided her client into parental child abduction in violation of  
2 CCP 278.5, which is punishable by 3 years in jail and \$10,000 fine.

3 Intentionally harmful actions of Nancy L Roberts led to severe phsycological trauma of my son,  
4 obvious and undeniable signs of PTSD and severe parental alienation – in the worst form of it,  
5 when child is now afraid of punishment for seeing father, and is repeating threats of mother-abuser  
6 that “there will be no trouble if we see each other only on paid supervised visits”.

7 Intentionally harmful influence of Nancy L Roberts enforced parental alienation for more than  
8 year – with the stupid goal to claim my son “abandoned child” (Evidence 37) and re-issue passport  
9 with the help of bribed judge Flint, using “legal precedent” of fabricated “missed visitations” and  
10 “zero time spent with father”.

11 Lies and fraud of Nancy L Roberts assured her client that she can obtain full legal custody and  
12 re-issue passport of my son in case if she will follow orders of unethical attorney Nancy L Roberts,  
13 will make parental abduction, enforce parental alienation, did irreparable harm to personality of our  
14 son, being misguided by her absolutely unethical attorney Nancy L Roberts.

15 Client of Nancy L Roberts fell victim of attorney’s fraud – same as me fell victim of Nancy’s  
16 fraud with fraudulent stipulation 02/08/2023 on maximum spousal support, believing her lies about  
17 exchange of my son’s freedom to maximum spousal support (that Nancy broke immediately), fraud  
18 with DCSS (despite all regular payments of spousal support, and later – Nancy with Flint filed  
19 fraudulent increase of payments with DCSS, which was uncovered and dismissed, but is  
20 documented), and finally – massive fraud scheme of international child abduction through re-  
21 issuance of passport after claiming my son “abandoned child” (Evidence 37) after intentionally  
22 harmful orders of bribed judge Flint and parental abduction by Nancy’s client.

23 Nancy L Roberts shamelessly harmed both my son and her client, dragging her client into  
24 trouble with violation of CCP 278.5 Parental child abduction, Malicious child detention and  
25 malicious custody deprivation, and dragging my son into severe PTSD, fear of punishment by  
26 mother and severe parental alienation.

27 Those actions of Nancy L Roberts make her immediate disqualification mandatory.

28

1

2                   **X. AVOIDANCE OF SERVICE AND HARASSMENT OF SERVERS**

3

4           Nancy L Roberts, knowingly and intentionally attempted to avoid personal service of DVRO to

5 her in her office by hiding from process server for couple of days, lying in emails with the

6 Department 79 in copy (Evidence 35), and later – harassing process servers for serving papers to her

7 in time (Evidence 35).

8           First server, young lady, returned in tears, saying that she is scared and wouldn't talk to her

9 anymore.

10          Second server, busy gentleman, mentioned, that he sacrificed his busy schedule to help serve

11 papers to Nancy in the end of his busy day, after multiple unsuccessful attempts. But in turn Nancy

12 harassed server, and was so rude that server stated that he barely held himself from responding to

13 Nancy in the same manner.

14          After hearing those complaints from my servers, I raised concern with Nancy regarding her

15 unethical conduct and asked her to stop harassing innocent people – but Nancy not only did not

16 apologize for harassing process servers, but instead she aggressively and derogatory respondent to

17 me accusing me in some nonsense (Evidence 35). I was shocked by unethical behavior of Nancy L

18 Roberts, which is absolutely inappropriate for a licensed attorney (which was noticed by experts and

19 servers too).

20          This unethical behavior and violation of ethical and professional standards is not a one-off

21 occasion – unfortunately it is constantly repeated and systematic unethical approach of Nancy ot

22 interact with the people in her professional activities – which violates ethical and professional

23 standards for attorney. Among those occasion were:

- 24           1. Harassment of process servers (Evidence 35)
- 25           2. Impermissible pressure on Emergency Screener Dr Mary Rolison and defamatory false
- 26           allegations sent in email to Dr Mary Rolison and Department 79 in retaliation to Emergency
- 27
- 28

- 1 Screener for sharing signed recommendations with the Department 79 in email (Evidence  
2 22, 21)
- 3 3. Impermissible pressure on professional supervisor Lorraine Ruiz with defamatory falsehood  
4 allegations (Evidence 25)
- 5 4. Impermissible pressure on my attorney with defamatory falsehood allegations (Evidence 24)
- 6 5. Statements during interrogatory that killing my grandmom is absolutely ok, because “she  
7 was very old, weak and will die anyways”
- 8 6. Multiple other absolutely impermissible harassing statements that Nancy said and sent to me  
9 in emails, making impermissible pressure and harassment against me (which together with  
10 threats and coercion of bribed judge Flint led me to issues with severe insomnia and  
11 problems with keeping focus and concentration in hard conversations under pressure and  
12 harassment of unethical attorney Nancy L Roberts and bribed judge Flint)

13

14 These multiple occasions of harassment of people, defamatory false allegations, threats,  
15 coercion and impermissible pressure on servers, experts, emergency screener, professional  
16 supervisors confirm that Nancy is simply rude and unethical person who systematically violates  
17 ethical and professional standards of attorney ethics, on each and every occasion, even against  
18 innocent people, who are not parties in the case (like experts and process servers).

19

20 With all aforementioned facts, and taking into account that Nancy is driving position of her  
21 client solely through bribery of judges (Evidence 11 – 14), massive fraud, falsifications and  
22 falsehood statements (Evidence 17, 18, 19, 20), massive defamatory falsehood allegations used as  
23 basis for fraudulent orders and for impermissible pressure on experts, supervisors and servers  
24 (Evidence 15, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29), and through violation of the court orders and  
25 Law (Evidence 17, 18, 19, 20, 30, 31, 32), with avoidance of service (Evidence 35), it is obvious  
26 that DISQUALIFICATION OF NANCY L ROBERTS IS MANDATORY TO RESTORE  
27 INTEGRITY OF THE COURT PROCESS AND PRESERVE SAFETY OF ALL PARTIES

28



1  
2 **XI. DEFAMATORY FALSE ALLEGATIONS AND LIES IN THE COURT**  
3

4 Nancy L Roberts is systematically lying in the Court and all communications and filings  
5 (Evidence 15, 16, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 35). Those lies, defamatory  
6 falsehood statements and falsifications of facts were massively supported by two bribed judges –  
7 Towery and Flint, both prematurely terminated from Superior Court years before official end of  
8 their term with the scandals about bribery (Evidence 11, 12, 13, 14).

9 It is worth to mention that both bribed judges, Towery and Flint, were present on this one single  
10 case during one single year, and both were kicked from Superior Court with scandals about bribery,  
11 fraud, falsifications and abuse abuse of judicial power.  
12

13 It looks like Nancy L Roberts attracts bribed judges – and those bribed judges fall victims of  
14 extremely bad influence of unethical attorney Nancy L Roberts, who lures them into hard and risky  
15 cases through bribery – and then shamelessly uses those judges until they got caught on severe  
16 falsifications, entangled in lies and fraud, and got terminated with the scandal.  
17

18 I would emphasize that all bribed judges, same as parties in this case were very well aware that  
19 Nancy's defamatory false allegations are completely falsehood by their nature, but just in case you  
20 could you review few pieces of evidence to clear just some of those false allegations:

- 21 1. DVRO 2022 (Evidence 15) – was solely fraud and defamatory falsehood allegations by it's  
22 nature. All allegations were cleared in Opposing DVRO and Response to DVRO (Evidence  
23 16) – but Opposing DVRO and Response to DVRO was never heard because Trial on  
24 DVRO was dismissed by Nancy L Roberts and Steven Dinneen (attorney who I hired and  
25 who intentionally completely screwed up case on agreement with Nancy and bribed judge  
26 Flint). Allegations of abuse and domestic violence were complete fake, but matter was never  
27 heard because Trial was dismissed and bribed judge Flint attempted to conceal this matter.  
28

2. Defamatory false allegations used for impermissible pressure on emergency screener Dr Mary Rolison in emails with Department 79 (Evidence 22) were intentionally completely lies by their nature, but in addition Nancy already saw Mental Health Evaluation (Evidence 26) and therefore was lying intentionally to the Court and Emergency Screener
3. Defamatory false allegations used for impermissible pressure on professional supervisor Lorraine Ruiz (Evidence 25) were sent much later that pressure on Emergency Screener – and therefore Nancy L Roberts again was aware of results of Evaluation (Evidence 26) and was again shamelessly intentionally lying
4. Multiple communications with me and my attorney were involving the same intentional lies of Nancy L Roberts, plus lies about allegedly “her client’s fear of me” and requesting DVRO in place allegedly because of “fear” (for example Evidence 24) – which is obvious lie, because real reasons to request DVRO, abduct my son, completely block all our contact, and through threats and coercion force me to sign-off custody and give up documents of my son - are solely desire of her client to obtain full legal custody, re-issue passport of my son and abduct my son internationally outside of the United States to Ukraine in times of war (Evidence 4) as she previously did in 2019-2020 (Evidence 5), which she threatened to do in 2022 (Evidence 6).

In addition, to clarify false allegations that her client was “primary parent” of Max – please see my Instagram Constantine\_Mars to verify that my life was devoted to Max and our family, and I’ve been taking care of Max, granny and Max’s biological mother (Evidence 9, 10).

You may see our selfie with Max on the very day when Max received Green Card (Evidence 9) – the fact, for which Nancy’s client severely retaliated to our son, by scandals, emotional abuse and abduction of my son in a months after the day you see on picture.

You also may see our pictures with Max on his First Day of the First Grade in School (Evidence 9), from our trips to eKids events in my office in San Francisco (Evidence 9), pictures of whole

1 family and happy Max (Evidence 10) which confirm that Max always had close bond with me and  
2 great granny.

3 Looking through my Instagram Constantine\_Mars and Youtube channel Business and  
4 Architecture you may see moments of Max's life from the very childbirth until the very day of  
5 abduction by mother-abuser in September 2022. All Nancy's allegations that removal of me from  
6 Max's life is anyhow "reasonable" or "allowed" are total lies and fraud.

7  
8 Please see witness statements of people who saw Max and our family for years (Evidence 6, 7,  
9 8) – all of them mention that I'm a great father, I created supportive and nurturing environment for  
10 my son, and Max would significantly benefit from growing with me.

11  
12 All the terror of parental child abduction suggested by Nancy is absolutely evil and wrong.

13  
14 I've been with Hanna during delivery, helping her to give birth tho our son.

15 I've held my son on my hands when Max was just born, and was the first person who Max  
16 smiled to.

17 I've cut umbilical cord by my hands.

18 I've been growing my son in love, support, in the whole family, with both parents.

19 We moved from LA, and my son was helping to unload U-Haul, moving into new home –  
20 where two years later Nancy's client killed my mom and abducted my son.

21 I've assembled all furniture in our home by my hands, with the help of my son, teaching Max  
22 that hardwork and curiosity are the main drivers of progress, even in everyday life.

23 I organized home with books and learning materials – so my son can read and learn things  
24 playing.

25 I was talking my son English, and discussing best human values – while Nancy's client was  
26 prohibiting us to talk, creatings scandals and abusing my son physically and emotionally for  
27 spending time with father, and for speaking English.

1 I was teaching my son to be respectful and responsible.

2 I was teaching my son that when mother-abuser is beating him – he never raises his hand on  
3 mom, he has to say “sorry mom” – and step away. And then explain what happened to father – it’s  
4 father’s mistake to choose such violent and abusive mother to Max, he didn’t deserve being beaten  
5 and abused. It’s father’s mistake, and father has to deal with it.

6 I created supportive and nurturing environment for my son, was with Max every day in many  
7 activities and daily routines, supporting my son in each step and each discovery.

8 I was invited to School Council and PIQE – program of improved parental education, and on  
9 PIQE educational experts stated that I’m implementing best practices of child education on my own.

10 I brought my son to multiple educational events.

11 I organized family evenings, family trips, kids events, established friendship with Max’s friends  
12 in school – and organized first Max’s school party.

13 I provided Green Cards to my son and his biological mother – regardless of her attempts to  
14 cancel Max’s Green Card and abduct my son to Ukraine.

15 I saved my grandmom, Child of World War II, from Ukraine when war began – and my mom  
16 survived TWO WARS – but was killed by shameless and brainless violent woman, who I devoted  
17 best years of my life, Nancy’s client.

18  
19 After all shameless lies and defamatory falsehood allegations of Nancy L Roberts, used to  
20 facilitate international abduction of my son outside of the United States to Ukraine in times of war,  
21 with the sole goal to separate my son from father and endanger life of my son – because of war, and  
22 because of insane threats of Nancy’s client to “bury our son in Ukrainian soil, so you will never see  
23 him again” – I do believe that Nancy L Roberts must be immediately disqualified from representing  
24 her client on this case, her attorney license must be suspended, and Nancy must be banned from  
25 attorney practice indefinitely.

1  
2 **XII. IMPERMISSIBLE CONFLICT OF INTEREST**

3 Nancy L Roberts has an obvious impermissible conflict of interest that arises from her unethical  
4 conduct, multiple defamatory false allegations against me, Petitioner in this case, impermissible  
5 pressure on Emergency Screener Dr Mary Rolison and Professional Supervisor Lorraine Ruiz,  
6 falsification of facts and numbers in numerous motions and filings made with the Court, lying about  
7 facts to Judge Flint in the Courtroom, and adding so much falsification, fraud and lies, that all  
8 position of her client in this case seems to be solely based on falsifications and fraud, which  
9 extremely complicates case without any reasonable grounds for that.

10 Nancy L Roberts, during representation of her client, who has a documented history of child and  
11 elderly abuse, and child abduction outside of the United States, substantially lying to Court about  
12 multiple facts, starting from falsified DVRO, based on defamatory false allegations, that her client  
13 used to abduct my son from primary parent, including multiple defamatory false allegations about  
14 me, Petitioner, and until smallest details like requesting absolutely ungrounded sums of money from  
15 stock balances that clearly go against bank and stock statements, filed with the Court according to  
16 Law.

17 Nancy L Roberts lied to Judge Andrea E. Flint in the Court during a Child Abduction  
18 Prevention hearing on May 10, 2023, threatening to put Petitioner to jail with some fictitious  
19 ungrounded false allegations, and intentionally mislead the Court from the matter of hearing which  
20 was Child Abduction by Respondent in April 2023.

21 Those actions of Nancy L Roberts endangered life of my Child, Max Mars, who is currently  
22 held hostage by Respondent in undisclosed location for multiple months, and harmed Petitioner's  
23 reputation in front of the Judge Andrea E. Flint, who is suspected in receiving bribe from  
24 Respondent in April 2023.

25  
26 Multiple lies and falsifications in each and every moment of the case shadow significant  
27 misconduct such as suspected bribing Judge Flint, impermissible pressure on Emergency Screener  
28

1 and Professional Supervisors, and attempt to obtain or re-issue passport of my son with purpose of  
2 abduction of my son outside of the United States with the threat of Respondent to “bury my son in  
3 Ukrainian soil, so I will never see my son again”.

4 This presents a conflict of interest that directly jeopardizes the best interests of the child, Max  
5 Mars, and has unnecessary complicated and impeded the progress of these proceedings.

1 **XIII. UNETHICAL CONDUCT**

2  
3 Nancy L Roberts has engaged in vexatious litigation tactics designed to silence me and deprive  
4 me of my lawful right to defend my son, my 95-year-old grandmother, and myself in this case.  
5

6 In turn, Nancy L Roberts, while making multiple unethical motions and substantial lies in Court,  
7 is attempting to silence me by motion to claim me “vexatious litigant” – and is attempting to block  
8 my lawful right to protect my son’s safety and wellbeing.  
9

10 She has consistently lied in the courtroom to Judge Flint, making false allegations that have led  
11 to the falsification of court orders and findings after hearings.  
12

13 Nancy L Roberts with the help of Judge Flint, who is suspected in receiving bribe from  
14 Respondent in April 2023, achieved removing signed Emergency Screener Recommendations from  
15 the Court orders, therefore preventing the court from making informed decisions about the child's  
16 best interests – which were endorsed and signed by Judge Flint, therefore confirming illegal and  
17 unethical relationship between extremely unethical attorney and Judge, suspected in receiving bribe  
18 from her client.  
19

20 Nancy L Roberts has falsified numbers of community assets and debts balance numbers, as well  
21 as requested irrelevant numbers of "equalizing" payments, retirement and stock accounts – therefore  
22 requesting significant and absolutely ungrounded sums of equalization payments from Petitioner,  
23 while completely ignoring actual numbers of community assets and debts balances, that must be  
24 equalized by Respondent’s payment of equalization payment in amount of \$34,000 – though, Nancy  
25 L Roberts persistently refuses to review community bank statements and balances, and requests  
26 random numbers created by her greed and fantasy.  
27  
28



1 Nancy L Roberts has impermissibly pressured the Emergency Screener Dr Mary Rolison and  
2 Professional Supervisor Lorraine Ruiz, blocking emergency screening in violation of Court orders  
3 from 10/31/2022 (Evidence 1), blocking professionally supervised visits and undermining their  
4 professional assessments.

5 As results of impermissible pressure that Nancy L Roberts did on Emergency Screener and  
6 Professional Supervisor, Emergency Screener Recommendations were never signed by Nancy L  
7 Robert's client, and were illegally and unreasonably removed from Court orders by Judge Flint,  
8 suspected in receiving bribe from Respondent in April 2023. At the same time, Professional  
9 Supervisor Lorraine Ruiz withdrawn herself from supervising visits with Max, being scared by  
10 impermissible pressure and defamatory false allegations of Nancy L Roberts.

11  
12 To gain complete control over the Court proceedings and silence me, Petitioner in this case,  
13 Nancy L Roberts filed multiple meritless motions, focused on blocking my lawful rights to  
14 communicate with the Court and present evidence and witness statements to protect my Child from  
15 violence of Respondent and from abduction outside of the United States.

16 These motions include:

- 17 - Motion in Limine – Nancy L Roberts made attempt to request that all the evidence presented  
18 by me, Petitioner in this case, to be excluded from the proceedings,
- 19 - Motion to Vexatious Litigant – Nancy L Roberts attempted to request to claim me  
20 “Vexatious Litigant” to silence my rights to represent my Child in the Court proceedings  
21 and obstruct the proper administration of the Justice.

22  
23 Respondent's counsel Nancy L Roberts made impermissible pressure on professional supervisor  
24 Lorraine Ruiz and emergency screener Dr Mary Rolison by sending ungrounded defamatory false  
25 allegations against Petitioner, claiming that Petitioner has “delusions”, “mental disorder”, and “is  
26 dangerous to a child” therefore intervening fair and unbiased emergency screening and visitations,  
27  
28

1 and putting significant pressure on emergency screener and professional supervisors to force them  
2 to make biased decisions (Evidence 2, 4, 5, 14).

3  
4 As result of Nancy L Robert pressure, Emergency Screener Recommendations were signed only  
5 by Emergency Screener and Petitioner (Evidence 2), but were never signed by Respondent and her  
6 attorney, therefore they blocked Emergency Screening in violation of Court orders from 10/31/2023  
7 (Evidence 1).

8  
9 Nancy L Roberts, without any grounds for that, has requested no contact orders for me, primary  
10 parent and caring father, with my Child Max Mars, who has been abducted by her client, in direct  
11 contradiction to the emergency screener's recommendations, and is held in undisclosed location in  
12 complete isolation from his Father and family friends.

13  
14 Nancy L Roberts has actively sought to obtain Max Mars's passport from me, despite her client's  
15 documented history of child abduction, and lied to Court that she allegedly “will held Max’s  
16 passport in safety”, while, taking into account amount of substantial lies of Nancy L Roberts, she  
17 clearly will transfer passport of my son to her client, violent abuser with documented history of  
18 child abduction outside of the United States, who clearly threatened me to abduct my son to Ukraine  
19 and “bury my son in Ukrainian soil, so you will never see him again”.

20  
21 Nancy L Roberts was aware that the initial falsified restraining order, obtained by Respondent  
22 with the signature of Judge J. Towery, recused from Court immediately due to scandal regarding his  
23 bribery and misconduct, was based completely on defamatory false allegations and was absolutely  
24 clearly an act of fraud within an attempt to manipulate the Court with the lies to “legally” abduct  
25 Child. Nevertheless, Nancy L Roberts not only supported fraud and lies to the Court, but added new  
26 lies to the case to mislead the Court from the main case matter – Child abduction prevention, and  
27 protection of Child’s safety and wellbeing from Respondent’s violence and humiliation.

1  
2 These impermissible actions of Nancy L Roberts lead to biased decisions, overly restrictive  
3 recommendations of an emergency screener Dr Mary Rolison, and to ignoring of absolutely clear  
4 evidences that Petitioner is a healthy, caring primary parent, who was protecting child from  
5 Respondent's violence and humiliation, from physical abuse and abduction by Respondent outside  
6 of the United States, and there are no any reasons to block Child's contact with primary parent,  
7 Father. Even more, Child's safety in both short and long term depends on his contact with Father –  
8 because while Father is healthy and supportive parent, Respondent is dangerous psychopath, who  
9 was on mental health treatment for more than eight years due to bipolar disorder and unmotivated  
10 outbursts of violence against Child and 95 years old senior woman with disabilities. And while  
11 Petitioner was humbly obeying meaningless and violent Court orders that enforced parental  
12 alienation and harmed Child's mental health, Respondent meanwhile had freedom to humiliate,  
13 torture and physically abuse Child (Evidence 9, 10, 14), abducted Child to unknown location,  
14 blocked all contact with the Child (Evidence 6, 7, 8) and threatened to repeat abduction of the Child  
15 from the United States to Ukraine like in 2019-2020 (Evidence 11), but this time completely and  
16 without chances for Child to return home to United States – because Respondent attempted to  
17 cancel Child's Green Card, and documented history of Child Abduction by Respondent includes  
18 extremely prolonged periods more than six months, which will lead to cancellation of Green Card  
19 for Child, and losing of status of Permanent Resident.

20 Again, taking into account documented history of Child Abduction by Respondent, and mental  
21 health issues of Respondent, any attempts to obtain Child's passport or custody over Child to  
22 Respondent are absolutely unethical and harmful for Child. Respondent has mental disability that  
23 prevents her from neither healthy co-parenting, nor healthy parenting and care about Child, who she  
24 violently abducted with the help of absolutely unethical attorney Nancy L Roberts.

25 Therefore, Nancy L Roberts, knowingly and intentionally is helping her mentally disabled client  
26 to obtain permanent full custody over my Son, and obtain my Son's passport with the goal of child  
27  
28

1 abduction outside of the United States – that completely undermines attorney ethics, and confirms  
2 that Nancy L Roberts acts extremely unethically and jeopardizes integrity of Court process.

3  
4 The State Bar of California, Rule 8.1 “False Statement Regarding Application or Admission to  
5 the Practice Law” p. (a), (b), Comment (1): “A lawyer shall not, in connection with another  
6 person’s\* application for admission to practice law, make a statement of material fact that the  
7 lawyer knows\* to be false.”

8 “A person\* who makes a false statement in connection with that person’s\* own application for  
9 admission to practice law may be subject to discipline under this rule after that person\* has been  
10 admitted. (See, e.g., In re Gossage (2000) 23 Cal.4th 1080 [99 Cal.Rptr.2d 130].) “

11 The State Bar of California, Rule 8.4 “Misconduct”

12 “It is professional misconduct for a lawyer to: “

13 p (c) “engage in conduct involving dishonesty, fraud,\* deceit, or reckless or intentional  
14 misrepresentation;“

15 (e), (f) “state or imply an ability to influence improperly a government agency or official, or to  
16 achieve results by means that violate these rules, the State Bar Act, or other

17 law; or knowingly\* assist, solicit, or induce a judge or judicial officer in conduct that is a  
18 violation of an applicable code of judicial ethics or code of judicial conduct, or  
19 other law.“

20 Comment 3 “A lawyer may be disciplined for criminal acts as set forth in Business and  
21 Professions Code sections 6101 et seq., or if the criminal act constitutes “other misconduct  
22 warranting discipline” as defined by California Supreme Court case law. (See In re Kelley (1990)  
23 52 Cal.3d 487 [276 Cal.Rptr. 375].) “

24 The State Bar of California, Rule 1.2 “Scope of Representation and Allocation of Authority” p  
25 (d) “A lawyer shall not counsel a client to engage, or assist a client, in conduct that

26 the lawyer knows is criminal or fraudulent, but a lawyer may discuss the legal consequences of  
27 any proposed course of conduct with a client and may counsel

1 or assist a client to make a good faith effort to determine the validity, scope, meaning or  
2 application of the law.

3  
4 Therefore even if the lies of Nancy L Roberts are based on Respondent's lies, a lawyer must  
5 avoid assisting a client's crime or fraud by simply withdrawing from the representation.

6 Instead, Nancy L Roberts demonstrated multiple new cases of fraud, falsehood statements nad  
7 clear violation of attorney ethical proscriptions, and misled the Court with false allegations instead  
8 of carrying duties of loyalty and fairness, as result - breaking integrity of the process.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

7

0

1

3

5

7

8

Q

100

 $\angle$ 

23

24

25

6

7

1

1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM  
PER SE

4 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
5 **IN AND FOR THE COUNTY OF SANTA CLARA**

6  
7 KOSTIANTYN MARS

8 Petitioner,

9 vs.

10 HANNA MARS,

11 Respondent.

) Case No.: 22FL003144

) **PETITIONER'S DECLARATION**  
) **IN SUPPORT OF MOTION TO**  
) **DISQUALIFY OPPOSING ATTORNEY**  
) **NANCY L ROBERTS**  
) **ON THE GROUNDS OF**

) **INTENTIONAL HARM TO JUDGE OF**  
) **SUPERIOR COURT,**

) **FACILITATION OF INTERNATIONAL**  
) **CHILD ABDUCTION**

) **THROUGH BRIBERY, FRAUD,**  
) **FALSIFICATIONS,**  
) **MANIPULATIONS OF THE COURT,**  
) **AND FALSIFICATION OF**  
**COURT RECORDS,**

**WHICH CAUSED**  
**PREMATURE RESIGNATION OF**  
**BRIBED JUDGE ANDREA E. FLINT,**

**DOMESTIC PARENTAL ABDUCTION**  
**OF MY SON MAX MARS,**  
**AND MALICIOUS CHILD DETENTION**  
**IN UNKNOWN LOCATION,**

**ALSO, ON LEGAL GROUNDS OF**  
**IMPERMISSIBLE CONFLICT OF INTEREST,**  
**UNETHICAL CONDUCT,**  
**AND SEVERE REPETITIVE VIOLATIONS OF**  
**PROFESSIONAL AND ETHICAL STANDARDS**

**(AMENDED)**

**HEARING: 02/07/2024, 1:30 PM**  
**JUDGE: HONORABLE STEPHEN P. LOWNEY**  
**DEPT.: 79**

1  
2 Dear Honorable Stephen P. Lowney,

3 Please find declaration in support of motion to disqualify opposing counsel Nancy L Roberts:

- 4
- 5 1. I am the petitioner in this marriage dissolution action and I have personal knowledge of  
6 each fact stated in this Declaration
  - 7 2. On May 10, 2023 Respondent's counsel Nancy L Roberts lied to Honorable Judge  
8 Andrea E. Flint in the Court during a Child Abduction Prevention Hearing, threatening  
9 to put Petitioner to jail with the false allegations, and intentionally mislead the Court  
10 from the matter of hearing, which was child abduction, that happened in April 2023.
  - 11 3. This act of professional misconduct in front of the Judge endangered the life of my  
12 Child, Maksym Mars, who is currently held hostage in an undisclosed location by  
13 Respondent for multiple months without any contact with Father, and harmed  
14 Petitioner's reputation in front of the Honorable Judge Andrea E. Flint.
  - 15 4. On April 19, 2023 Nancy L Roberts sent defamatory false allegations in the email to Dr  
16 Mary Rolison and Department 79, stating such explicit defamatory lies as "Due to the  
17 increase in Mr. Mars' delusional behavior ", "Mr. Mars' delusional disorder", "Mr. Mars  
18 submitted a fraudulent copy", "Mr. Mars is not visiting the minor child because his  
19 chosen professional visitation supervisor refused to work any longer with Mr. Mars due  
20 to his failure to follow rules", "Mr. Mars has failed to obtain a new professional  
21 supervisor." - those defamatory lies were sent with the intent to put pressure on  
22 Emergency Screener Dr Mary Rolison and force her to make biased decisions  
(Evidence 4)

23 As result of impermissible pressure of Nancy L Roberts on Emergency Screener Dr  
24 Mary Rolison, signed recommendations of Screener (Evidence 2) were overly cautious  
25 and overprotective, they included such weird recommendations like "mental health  
26 evaluation for Petitioner" (which obviously was recommended because defamatory lies  
27 of Nancy L Roberts, because all evidences and witness statements confirm that I'm  
28 healthy, caring primary parent, who was protecting Child from humiliation, physical  
violence and abduction by Respondent – mentally sick pshychopath, who was on mental



1 health treatment for more than eight years, and abducted my Son simply because I  
2 prohibited beating my Child.

3 Also worth mentioning that I passed “mental health evaluation” from these  
4 recommendations even before those recommendations were signed by Screener –  
5 because when I saw this ridiculous recommendation, I completed it and additional  
6 parenting courses immediately, to speedup process and give relief of custody to my Son,  
7 who is currently in huge trouble because of his mentally sick and extremely violent  
8 mother. Results of evaluation were shared with all parties immediately.

9 Though, Nancy L Roberts continued lying and sending defamatory false allegations to  
10 everybody even after seeing results of evaluation – simply because Nancy L Roberts  
11 cannot control her lies and those lies are generated by Nancy L Roberts completely  
12 uncontrolled and against any evidence or facts.

13 As all parties know, mental health evaluation confirmed that there are no any  
14 “delusions” and Nancy L Roberts is continuing to lie to the Court and Emergency  
15 Screener, to mislead the Court from matters of Custody Evaluation and Abduction  
16 Prevention.

- 17 5. On May 8, 2023 Nancy L Roberts sent a defamatory false allegations in email to  
18 Professional Supervisor Lorraine Ruiz, threatening Professional Supervisor to stop  
19 visitations and prevent any communication with Father. Nancy L Roberts stated such lies  
20 as “Dr. Rolison do recommend a mental health evaluation of Mr. Mars by a qualified  
21 psychiatrist”, “Mr. Mars has delusions”, “which is why, in part, the former supervisor  
22 terminated visits with Mr. Mars”, which are completely ungrounded explicit lies, and are  
23 made to pressure Professional Supervisor (Evidence 5).

24 This pressure led to withdrawal of highly Professional Supervisor from supervision of  
25 our visits.

- 26 6. On December 11, 2023, Nancy L Roberts attempted to avoid personal service of DVRO  
27 against her client 5 times in a row, lying to server and me and hiding from service. After  
28 being served, Nancy L Roberts shamelessly harassed two process servers and instead of  
apologizing shamelessly accused innocent people who she recently harassed.

1 7. As all parties know - I completed a mental health evaluation immediately after it was  
2 found in recommendations, and stopped paid visitations because of my financial  
3 hardship I cannot afford paid visits anymore. Nancy L Roberts and Respondent were  
4 interfering with Professional Visitations and Emergency Screening, and refused to sign  
5 Emergency Screener Recommendations to prevent any visitations and keep my son as  
6 hostage in unknown location without any contact with Father.

7 8. Based on all the foregoing, I request the Court grant the within motion to  
8 recuse/disqualify attorney Nancy L Roberts from representing Respondent herein.

9  
10 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
11 true and correct

12  
13  
14 [Enclosures: Declaration, Supporting Memorandum, Legal Argument, List of evidence]

15 DATED: January 21, 2024

16  
17   
18 \_\_\_\_\_  
19 KOSTIANTYN MARS  
20 PER SE  
21  
22  
23  
24  
25  
26  
27  
28

1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM

4 PER SE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SANTA CLARA**

6 KOSTIANTYN MARS

7 Petitioner,

8 vs.

9 HANNA MARS,

11 Respondent.

) Case No.: 22FL003144

) **PETITIONER'S MEMORANDUM  
IN SUPPORT OF MOTION TO  
DISQUALIFY OPPOSING ATTORNEY  
NANCY L ROBERTS**

) **ON THE GROUNDS OF**

) **INTENTIONAL HARM TO JUDGE OF  
SUPERIOR COURT,**

) **FACILITATION OF INTERNATIONAL  
CHILD ABDUCTION**

) **THROUGH BRIBERY, FRAUD,  
FALSIFICATIONS,  
MANIPULATIONS OF THE COURT,  
AND FALSIFICATION OF  
COURT RECORDS,**

**WHICH CAUSED  
PREMATURE RESIGNATION OF  
BRIBED JUDGE ANDREA E. FLINT,**

**DOMESTIC PARENTAL ABDUCTION  
OF MY SON MAX MARS,  
AND MALICIOUS CHILD DETENTION  
IN UNKNOWN LOCATION,**

**ALSO, ON LEGAL GROUNDS OF  
IMPERMISSIBLE CONFLICT OF  
INTEREST,  
UNETHICAL CONDUCT,  
AND SEVERE REPETITIVE VIOLATIONS  
OF PROFESSIONAL AND ETHICAL  
STANDARDS**

**(AMENDED)**

**HEARING: 02/07/2024, 1:30 PM  
JUDGE: HONORABLE STEPHEN P.  
LOWNEY  
DEPT.: 79**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dear Honorable Stephen P. Lowney,

Please find memorandum in support of motion to disqualify Nancy L Roberts below:

## I STATEMENT OF FACTS

1. On May 10, 2023 Respondent's counsel Nancy L Roberts lied to Honorable Judge Andrea E. Flint in the Court during a Child Abduction Prevention Hearing, threatening to put Petitioner to jail with the false allegations, and intentionally mislead the Court from the matter of hearing, which was child abduction, that happened in April 2023.  
This act of professional misconduct in front of the Judge endangered the life of my Child, Maksym Mars, who is currently held hostage in an unknown location by Respondent for multiple months without any contact with Father, and harmed Petitioner's reputation in front of the Honorable Judge Andrea E. Flint.
2. On May 8, 2023 Nancy L Roberts sent a derogatory email with false allegations to Professional Supervisor Lorraine Ruiz, threatening Professional Supervisor to stop visitations and prevent any communication with Father. Nancy L Roberts stated such lies as "Dr. Rolison do recommend a mental health evaluation of Mr. Mars by a qualified psychiatrist", "Mr. Mars has delusions", "which is why, in part, the former supervisor terminated visits with Mr. Mars", which are explicit lies and pressure on Professional Supervisor (Evidence 5)  
As all parties know - Petitioner completed a mental health evaluation immediately after it was found in recommendations, and stopped paid visitations because of disastrous financial hardship, because of which Petitioner cannot afford paid visits anymore.  
Nancy L Roberts and Respondent are lying to the Court, Professional Supervisors, Emergency Screener and are interfering with Professional Visitations and Emergency Screening to prevent any visitations and force biased decisions of authorities.
3. On April 19, 2023 Nancy L Roberts sent derogatory email to the Department 79 and Dr Mary Rolison (Evidence 4) stating such lies as "Due to the increase in Mr. Mars' delusional behavior ", "Mr. Mars' delusional disorder", "Mr. Mars submitted a fraudulent copy", "Mr. Mars is not visiting the minor child because his chosen professional visitation supervisor refused to work any longer with Mr. Mars due to his failure to follow rules", "Mr. Mars has failed to obtain a new professional supervisor." - those lies were sent with the intent to put pressure on Emergency Screener Dr Mary Rolison and force her to make overly protective recommendations – (Evidence 2) As all parties know, mental health evaluation confirmed that there are no any "delusions" and Nancy L Roberts is continuing to lie to the Court and

Emergency Screener, to mislead the Court from matters of Custody Evaluation and Abduction Prevention.

## II LEGAL ARGUMENT

1. The State Bar of California, Rule 8.1 “False Statement Regarding Application or Admission to the Practice Law”

p. (a), (b): “A lawyer shall not, in connection with another person’s\* application for admission to practice law, make a statement of material fact that the lawyer knows\* to be false.

Comment (1): “A person\* who makes a false statement in connection with that person’s\* own application for admission to practice law may be subject to discipline under this rule after that person\* has been admitted. (See, e.g., In re Gossage (2000) 23 Cal.4th 1080 [99 Cal.Rptr.2d 130].)”

2. The State Bar of California, Rule 8.4 “Misconduct”: “It is professional misconduct for a lawyer to: “

p (c): “engage in conduct involving dishonesty, fraud,\* deceit, or reckless or intentional misrepresentation;“

p (e), (f): “state or imply an ability to influence improperly a government agency or official, or to achieve results by means that violate these rules, the State Bar Act, or other law; or knowingly\* assist, solicit, or induce a judge or judicial officer in conduct that is a violation of an applicable code of judicial ethics or code of judicial conduct, or other law.“

Comment 3: “A lawyer may be disciplined for criminal acts as set forth in Business and Professions Code sections 6101 et seq., or if the criminal act constitutes “other misconduct warranting discipline” as defined by California Supreme Court case law. (See In re Kelley (1990) 52 Cal.3d 487 [276 Cal.Rptr. 375].) “

3. The State Bar of California, Rule 1.2 “Scope of Representation and Allocation of Authority”

p (d): “A lawyer shall not counsel a client to engage, or assist a client, in conduct that the lawyer knows is criminal or fraudulent, but a lawyer may discuss the legal consequences of any proposed course of conduct with a client and may counsel or assist a client to make a good faith effort to determine the validity, scope, meaning or application of the law.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

### III CONCLUSION

Based on all the foregoing, I request the Court grant the within motion to recuse/disqualify attorney Nancy L Roberts from representing Respondent herein.

[Enclosures: Declaration, Supporting Memorandum, Legal Argument, List of evidence]

DATED: January 21, 2024

  
\_\_\_\_\_  
KOSTIANTYN MARS  
PER SE

Evidence P20



1 KOSTIANTYN MARS  
PO BOX 8081  
2 SAN JOSE, CA 95155  
(408) 518-0088  
3 CONSTANTINE.MARS@GMAIL.COM

4 PRO PER

5  
6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
7 **IN AND FOR THE COUNTY OF SANTA CLARA**

8 KOSTIANTYN MARS

9 Petitioner,

10 vs.

11 HANNA MARS,

12 Respondent.

) Case No.: 22FL003144

) **DECLARATION FOR**  
) **DV RESTRAINING ORDER**  
) **TO PROTECT MY SON**  
) **MAX MARS**  
) **FROM DOMESTIC VIOLENCE BY**  
) **BIOLOGICAL MOTHER-ABUSER,**  
) **PHYSICAL AND EMOTIONAL ABUSE,**  
) **AND FROM INTERNATIONAL CHILD**  
) **ABDUCTION**

) **DATE:**

) **TIME:**

) **DEPT: 79**

Judge: Hon. Andrea E. Flint

Dept: 79

Trial Date:

18  
19  
20 Respectfully,

21 Please see below the Petitioner's Declaration for DV Restraining Order to protect my son Max Mars  
22 from domestic violence, physical and emotional abuse by biological mother-abuser, and from  
23 international child abduction outside of the United States, facilitated by Judge Andrea E. Flint,  
24 investigated for bribery and severe repetitive misconduct and requested to be recused 8 (EIGHT)  
25 times, Respondent Hanna Mars, and her extremely unethical attorney Nancy L Roberts already  
26 twice requested to be disqualified for unethical conduct, violation of professional and ethical  
27 standards, falsifications and pressure on experts and supervisors:

1                                   **DECLARATION FOR DV RESTRAINING ORDER**

2                                   **TO PROTECT MY SON**

3                                   **MAX MARS**

4                                   **FROM DOMESTIC VIOLENCE BY BIOLOGICAL MOTHER-ABUSER,**

5                                   **PHYSICAL AND EMOTIONAL ABUSE,**

6                                   **AND FROM INTERNATIONAL CHILD ABDUCTION**

7  
8 I, Kostiantyn Mars, requesting party herein, testify truthfully to the facts stated herein.

- 9       1. I am seeking a domestic violence restraining order against my spouse Hanna Mars  
10       (hereinafter “Hanna”). I was married to Hanna on June 5, 2015. As a result of our marriage,  
11       we have the wonderful child together, Max Mars – age 8 (DOB: 11/23/2015), who Hanna  
12       violently abducted using falsehood defamatory DVRO in September 2022 to retaliate me for  
13       prohibition of domestic violence against our son, and threatened to abduct our son outside of  
14       the United States and “bury our child in Ukrainian soil so you will never see him again”  
15  
16       2. In April 2023 Hanna abducted my son to undisclosed location, completely blocked all our  
17       contact, prohibiting even calls, and threatening me to never give me chance to see or talk to  
18       my son until I will sign off custody to her and give up Max’s passport and documents,  
19       therefore allowing her international abduction of my son outside of the United States to  
20       Ukraine in times of war (which imposes threat to life and safety of my son) (Evid. 17-22)  
21  
22       3. On Max’s 8<sup>th</sup> Birthday, 11/23/2023 Hanna was physically and emotionally abusing my son,  
23       forcibly grabbing and dragging my son inside house away from me, forcing my son Max  
24       Mars to suffer physical and emotional pain. Max was fighting back, trying to escape forcible  
25       clinch of mother-abuser, but his birthday morning was completely destroyed by domestic  
26       violence of mother-abuser. (Evidence 1 – 6)  
27  
28

1 4. On Thanksgiving, 11/24/2023, Hanna on the eyes of my son Max Mars called police on me  
2 and attempted to request police to put me in jail for visiting my son and checking up on his  
3 safety after violent mother-abuser was abusing my son on my eyes, locked up my son in the  
4 house and refused to respond on text messages, asking to grab a coffee and donuts and make  
5 a birthday party for Max. Hanna prevented us from talking, scared Max by threats of more  
6 physical violence if he will expose bruises to me, and called police on me on the eyes of my  
7 son. (Evidence 7 – 10)

8  
9 5. I would emphasize that I had to checkup on Max's safety 11/24/2023 because of Hanna's:

- 10 a. Documented history of child and elderly abuse – see initial DVRO 09/19/2022,  
11 signed by Judge J. Towery, resigned due to scandal about bribery, which Hanna used  
12 to Max and kick out from home, causing irreparable terminal condition to Max's  
13 great granny, defenseless 95 years old senior woman with disabilities
- 14 b. Documented bruises on body of my son in December 2022 – Evidence 9,
- 15 c. History of Hanna beating my son on face and a head in July 2022 – when I asked  
16 Hanna to stop domestic violence against our son and start healthy co-parenting, but  
17 Hanna respondent that she will not stop, but will kill my grandmom, abduct Max and  
18 “bury our son in Ukrainian soil so you will never see him again”
- 19 d. Mental health issues of Hanna with uncontrollable violence and aggression against  
20 Max and his great granny, 95 years old senior woman with disabilities
- 21 e. Recommended by Emergency Screener Dr Mary Rolison mental health treatment for  
22 Hanna due to her uncontrollable aggression – Evidence 23, page 5, p.14
- 23 f. Hanna's threats to abduct and “bury our son in Ukrainian soil so you will never see  
24 him again”
- 25  
26  
27

6. You may observe how drastically changed Max's behavior after yesterday physical and emotional punishment by mother-abuser – full video recording in Evidence 7
7. Hanna holds my son Max hostage in location that she refused to share, blocked all our calls, pulled out sim card from Max's phone, blocked all chats, and prevents us from seeing each other and even talking – which constitutes malicious and intentional violation of CCP 278.5 "Child Detention. Deprivation of Custody" (Evidence 11 - 15, 6, 7, 1 - 5, 9, 10, 17 – 19)
8. Hanna has documented history of international child abduction and her threats to abduct Max outside of the United States were captured in witness statements (Evidence 20, 21)
9. Hanna is in violation of court orders 10/31/2022 that prescribed to participate and cooperate in emergency screening (Evidence 29), but Hanna with her attorney Nancy L Roberts intentionally blocked emergency screening and made impermissible pressure on Emergency Screener Dr Mary Rolison and professional supervisor Lorraine Ruiz (Evidence 23, 30, 31, 32, 33, 34), which led to Motion to Hold Respondent into Contempt of Court (Evidence 35) and Motion to Disqualify Opposing Attorney Nancy L Roberts (Evidence 27)
10. Hanna is suspected in bribing Judge Andrea E. Flint with the help of her extremely unethical attorney Nancy L Roberts, which led to massive repetitive falsifications of court records, unreasonable removal of signed Emergency Screener Recommendations without consideration, and multiple intentional harmful and wrongful orders of Judge Andrea E. Flint, who by series of consecutive harmful and wrongful orders facilitated abduction of my son outside of the United States and cleared Respondent from Contempt (Evidence 24, 23, 36).

1 Which led to 8 consecutive Motions to Recuse Judge Flint for Cause, and to Verified  
2 Written Statement of Disqualification of Judge Flint and Nullification of her Orders  
3 (Evidence 25)  
4

5 11. While Judge Flint together with Nancy L Roberts were doing massive falsifications and  
6 fraud in Superior Court of California (Evidence 24, 25, 27, 35, 36), my son Max Mars was  
7 forced to live in full custody of mother-abuser and suffer from everyday domestic violence,  
8 physical and emotional abuse (Evidence 1 – 15), being in complete control of mother-  
9 abuser, defenseless, separated from loving father (Evidence 16, 43, 44, 45), left without any  
10 support and protection from domestic violence that father provided while living together,  
11 and without any means for communication (Evidence 11, 12, 13). Max not only survived  
12 complete collapse of his life during domestic abduction by mother-abuser, but was  
13 completely psychologically maimed and forced into position of hostage and slave, who is  
14 afraid to see father or talk to father because mother is constantly threatening Max that “there  
15 will be more trouble” (Evidence 7). Domestic violence incident captured on camera on  
16 Max’s 8<sup>th</sup> Birthday and Thanksgiving is just a tip of the iceberg, which hides huge  
17 mutilation of my son’s personality by physical and emotional abuse, and complete  
18 destruction of all Max’s life (including removal from normal healthy, supportive and  
19 nurturing environment that Max had – Evidence 44, 45, and tearing off away all old friends),  
20 all of that – in preparation for international abduction of my son Max Mars outside of the  
21 United States to Ukraine, to endanger life of my son due to ongoing war there, and quite  
22 possibly, as Hanna threatened, to abduct and “bury our son in Ukrainian soil so you will  
23 never see him again”.  
24  
25  
26  
27  
28

1 12. I am requesting a restraining order against Hanna protecting my son Max Mars, me and my  
2 grandmom Nadiia. I am requesting full legal and physical custody of Max to protect Max  
3 from domestic violence and international child abduction. I also request Child Abduction  
4 Prevention Orders, Minor's Counsel, Parenting Counseling and Emergency Screener  
5 Recommendations with Mental Health Treatment (p.14) for Hanna to be granted.

6  
7 Please find attached "INTERNATIONAL CHILD ABDUCTION PREVENTION REQUEST" with  
8 detailed explanation of aforementioned facts, and facilitation of international child abduction by  
9 Respondent, Hanna Mars, Judge Andrea E. Flint, investigated for bribery, and unethical attorney  
10 Nancy L Roberts, requested to be Disqualified for unethical conduct, in the following sections  
11 below:

- 12 I. DOMESTIC CHILD ABDUCTION. SEPTEMBER 2022, APRIL 2023  
13 II. BRIBED JUDGE. ANDREA ELIZABETH FLINT, LIC. NO.: 186714  
14 III. INTERNATIONAL CHILD ABDUCTION. DECEMBER 2019 – JULY 2020,  
15 THREATS IN 2022  
16 IV. CHILD – HOSTAGE  
17 V. CONCLUSION

18  
19 I declare under penalty of perjury that the foregoing is true and correct.

20  
21  
22 [ENCLOSED: INTERNATIONAL CHILD ABDUCTION PREVENTION REQUEST, LIST OF  
23 EVIDENCE 1 - 45]

24  
25 DATED: November 28, 2023

26  
27   
KOSTIANTYN MARS  
Pro Per

1 Kostiantyn Mars  
2 PO Box 8081  
3 San Jose, CA 95155  
4 Constantine.Mars@gmail.com  
5 (408) 518-0088  
6

7 **INTERNATIONAL CHILD ABDUCTION PREVENTION REQUEST**  
8

9 Dear Superior Court of California,  
10

11 I kindly ask you for help to protect my son Max Mars from international child abduction outside  
12 of the United States by his biological mother Hanna Mars, who currently:

- 13 - Abducted my son to undisclosed location - Evidence 17,
- 14 - Refused to share address where she holds Max - Evidence 18,
- 15 - Blocked all contact with my son, even phone calls - Evidence 19, 14
- 16 - Pulled out sim card from Max's phone to ensure that child cannot call - Evidence 11, 13
- 17 - Prohibited chatting with Max - Evidence 15
- 18 - Blocked all chat messengers, even Roblox – Evidence 12
- 19 - Blocked emergency screening – Evidence 23, 30, 31
- 20 - Made impermissible pressure on Emergency Screener – Evidence 32
- 21 - Made impermissible pressure on Professional Supervisors (Evidence 33, 34), that led to  
22 withdrawal of supervisor Lorraine Ruiz from our visitations
- 23 - Has documented history of international child abduction outside of the United States -  
24 Evidence 20, supported by witness statements about new abduction plans – Evidence 21
- 25 - Has documented history of domestic violence, child and elderly abuse – Evidence 1, 2, 3, 4,  
26 5, 6, 7, 9, 10  
27

- Unreasonably prohibits Max any contact with father, and is obviously physically and emotionally punishing Max for any contact with father or expressions of love to father – Evidence 1, 2, 4, 5, 6, 7, 9, 13, 14, 15, 31
  - Completely refuses to communicate and cooperate in healthy co-parenting, instead insisting on sole custody and child abduction outside of the United States – Evidence 5, 6, 7, 8, 31
  - Is so determined to solely own child (in opposite to healthy co-parenting, that I offered her many times), that is ready to completely destroy Max’s Birthday with physical violence, physical and emotional abuse – just to enforce parental alienation and kick father out from the doorway – Evidence 6, 1, 2, 3, 4, 5
  - Behaves aggressively and absolutely unreasonably, creating scandal and emotionally abusing Max, with the sole goal to threaten Max, push Max inside house and completely prevent Max’s contact with father. Hanna is calling police on Max’s father on Max’s eyes – just to prove that she is dominating owner of the child, having court order obtained through bribery, that gave her temporary full custody, and which unreasonably limited visitations to only paid professionally supervised visits (against recommendations of Emergency Screener, multiple evidence, and against safety and best interest of the child) – Evidence 7. It is also suspected that Hanna forced Max to avoid hugs with father, to ensure that father will not occasionally see Max’s bruises after yesterday (11/23/2023) beating by mother – Evidence 7
  - Is suspected of bribing Judge Andrea E. Flint of Superior Court of California, who by series of consecutive harmful and wrongful orders, facilitated abduction of my son outside of the United States – Evidence 24, 23, 25, 28, 29 with the help of extremely unethical attorney Nancy L Roberts who was requested to be disqualified already twice – Evidence 26, 27, 30, 31, 32, 33, 34.
- Previous Motion to Disqualify Opposing Attorney and Motion to Hold Hanna into Contempt of Court, filed 06/22/2023 were both denied without consideration by Judge Flint, investigated for bribery, on 08/01/2023 – Evidence 36



1 - Was requested to be held in Contempt of Court for violation of Court orders 10/31/2022 and  
2 CCP 278.5 (Child abduction and malicious custody deprivation) – Evidence 35. Previous  
3 Motion to Disqualify Opposing Attorney and Motion to Hold Hanna into Contempt of  
4 Court, filed 06/22/2023 were both denied without consideration by Judge Flint, investigated  
5 for bribery, on 08/01/2023 – Evidence 36

6  
7 All aforementioned actions of Hanna, and related Court orders (Evidence 29), issued by Judge  
8 Flint, suspected of bribery, are absolutely unreasonable, and go against safety and best interest of  
9 the Child.

10 Please check multiple pieces of evidence of our great bond with Max, me being primary parent,  
11 and my credibility – Evidences 6, 16, 13, 15, 21, 37, 38, 39, 40, 41, 42, 43, 44, 45. Please feel free  
12 to review also “2023-09-14 Respondent’s defamatory fraudulent DVRO” (initial DVRO, using  
13 which Hanna abducted my son in September 2022 – signed by Judge James E. Towery, resigned  
14 soon due to scandal about bribery) and “2023-09-19 Petitioner’s response and opposing DVRO”  
15 (my initial responsive declaration and first list of original evidence attached).

16  
17 The only reason of current domestic child abduction, bribing Judge Andrea E. Flint of Superior  
18 Court of California, blocking all contact with my son, is that Hanna is determined to re-issue new  
19 passport and abduct Max outside of the United States to Ukraine, which imposes imminent threat to  
20 Max’s safety and could lead to death due to ongoing war in Ukraine.

1  
2 **I. DOMESTIC CHILD ABDUCTION**

3 **SEPTEMBER 2022, APRIL 2023**

4 *Disclaimer:*

5 *I do believe that parents can and should focus their attention on the best interest of the child.*  
6 *Any misunderstandings or conflicts of interest are nothing comparing to collapse of the world, that*  
7 *child observes when family crushes. Therefore, it is duty of caring parent to put misunderstandings*  
8 *aside and create supportive and nurturing environment for their child as the top priority.*

9 *I do not want to retaliate to Hanna for amount of damages she did to my family – but rather I’m*  
10 *asking for help to protect Max’s future – because violent actions and massive fraud that she did,*  
11 *especially with the judge, suspected of bribery, will lead to long-term destruction of Max’s life and*  
12 *irreparable damage to my son’s personality.*

13 *If international abduction of my son outside of the United States happen – Max can die due to*  
14 *war in Ukraine. If he will survive in Ukraine – Max can lose his Green Card and live life in*  
15 *extremely hostile environment of people, who endorse and promote violence, crime and terror.*

16 *I brought my son to the United State,gave him Green Card and build life for my son in*  
17 *supportive and nurturing environment to give Max future.*

18 *Today, Max is hostage of a woman, who promised me to destroy his life – and this is absolutely*  
19 *unacceptable.*

20 *All I ask – is just help to save my son.*  
21  
22

23 Hanna abducted Max in September 2022 with defamatory fraudulent DVRO, signed by Judge  
24 James E. Towery (who resigned from Court few months later due to scandal about bribery), because  
25 I prohibited Hanna beating Max, and prevented her from stealing Max’s passport when she  
26 attempted to find Max’s passport in our home and threatened to abduct Max outside of the United  
27 States to “bury our son in Ukrainian soil, so you will never see him again”.

1  
2 Please see “2023-09-14 Respondent’s defamatory fraudulent DVRO” (initial DVRO, using  
3 which Hanna abducted my son in September 2022 – signed by Judge James E. Towery, resigned  
4 soon due to scandal about bribery) and “2023-09-19 Petitioner’s response and opposing DVRO”  
5 (my initial responsive declaration and original evidence list attached).

6 Matter of those initial opposing DVROs was never heard, because Hanna’s attorney (with the  
7 help of my previous attorney) dismissed trial on DVROs, to ensure that nobody ever sees  
8 evidences.

9 My previous attorney Steven Dinneen (Lic. No.: 254494) suggested me “not to file any  
10 evidence”, explaining it by “they don’t need to know it, we’ll use it someday” – and agreed with  
11 Nancy L Roberts (Lic. No.: 187211) to dismiss trial, signing a stipulation.

12 It was already very suspicious – because if evidence will not be filed, how then Judge could  
13 decide what is in the best interest of the child?

14 Later, Steven Dinneen and Nancy L Roberts made me sign stipulation on maximum child and  
15 spousal support, with Smith-Osler formula (which as I later discovered is the worst option ever  
16 possible), which added concerns about who Steven is serving in this case.

17 After Steven offered me to sign 3<sup>rd</sup> stipulation, which included clear wording that I agree to sign  
18 off custody and give up my son’s passport and all documents to Hanna, I canceled Steven’s  
19 services, and went self-represented. Though, as final “good-bye” Steven sent me such an  
20 unreasonably huge bill, that had put me on a brink of bankruptcy, and after paying out his bill, I  
21 became unable to pay for paid supervised visitations anymore.

22  
23 In April 2023 Hanna abducted Max to undisclosed location (Evidence 17), and blocked all  
24 contact with my son (Evidence 18, 19, 11, 12, 13, 14, 15, 31), interfering with emergency screening  
25 (Evidence 23, 30, 32) and supervised visitations (Evidence 33, 34), which led to withdrawal of  
26 supervisor Lorraine Ruiz and interruption of visits (besides the fact that I already was in complete  
27 financial collapse, so I cannot afford regular paid visitations anymore).

1  
2 Recent video Evidence 6 <https://youtu.be/m33POsKnXYk> from Max's 8th Birthday 11/23/2023  
3 and video Evidence 7 <https://youtu.be/Lsr1Jp8U8K8> from Thanksgiving Max's checkup  
4 11/24/2023 clearly demonstrates Hanna's absolutely unreasonable aggression, systematic actions to  
5 completely block all contact with my child, who by the way could be also threatened and instructed  
6 to avoid hugs with father to avoid exposure of bruises that mother-abuser left on his body after  
7 11/23/2023 beating.

8  
9 Which I suspect because I already observed bruises during previous supervised visits on  
10 12/10/2022 – Evidence 9, which appeared after my son was asking to stay with me and not return to  
11 mother-abuser, but was prohibited because of inhumane rules of paid professionally supervised  
12 visits.

13  
14 Later Max was drawing screaming messages asking for help (Evidence 10), and shared alarming  
15 information about abduction threats before grandparents arrived with visit in April 2023 – exactly  
16 when Hanna abducted Max to undisclosed location and blocked all our contact.

17 Professional supervisors Jesus Santos and Dylan Storme refused to include pictures of bruises  
18 (Evidence 9) and screaming messages for help (Evidence 10) into visitation reports, explaining it by  
19 “those pictures of your son's butt could be misinterpreted”. I had to report bruises to CPS, but never  
20 heard back.

21  
22 It is worth mention that Hanna:

- 23 - Refused to share location where she abducted our son in April 2023 (Evidence 17, 18),  
24 - Blocked all our contact, including calls and chats (Evidence 19, 11, 12, 13, 14, 15),  
25 - Pulled out sim card from Max's phone to prevent Max from calling for help (Evidence 11),  
26 - Blocked our chat in Roblox (Evidence 12),  
27

- 1 - Called police on me and threatened to put me into jail for visiting Max on his 8<sup>th</sup> Birthday and  
2 Thanksgiving (video Evidence 7 <https://youtu.be/Lsr1Jp8U8K8>),  
3 - Blocked Court ordered emergency screening (Evidence 23, 30, 31),  
4 - Made impermissible pressure on emergency screener (Evidence 32)  
5 - Made impermissible pressure on professional supervisors (Evidence 33, 34),  
6 - Has documented history of international child abduction back in 2019 – 2020 (Evidence 20)  
7 - Shared plans of child abduction to Ukraine with witnesses in 2021 - 2022 (Evidence 21).

8  
9 All these pieces of evidence were completely ignored by Judge Flint, who is suspected of  
10 bribery.

11  
12 Please review Hanna's behavior on Max's 8<sup>th</sup> Birthday, video recorded on 11/23/2023 (Max's  
13 8<sup>th</sup> birthday) in Evidence 6 – Video evidence 1 <https://youtu.be/m33POsKnXYk>

14 Max was happy to see father on his Birthday. It was a pleasant surprise for my son (Evidence 3)

15 Max was happy and cheerful – right until moment when mother-abuser came and dragged him  
16 inside the house forcibly (Evidence 1). Which caused a fight between Max and his mother, and  
17 arguing (Evidence 2) – after which Max's birthday was destroyed (Evidence 4). Then Hanna  
18 dragged Max into house and slapped door in front of my face (Evidence 5)

19 I offered to put aside this nonsense misunderstanding, grab a coffee and donuts and make a little  
20 Birthday Party to our son, to give Max chance to feel freedom and respect to him as our son and  
21 PERSONALITY (Evidence 8).

22  
23 To which Hanna didn't respond – but instead called police on me when I came to see Max.  
24  
25  
26  
27

1 It is obvious that Hanna is completely blocking all Max's contact with me, his father, and is  
2 determined to do so even on Max's birthday. Which is a sign of not just extremely unhealthy  
3 parental alienation but confirms her intentions to remove father from Max's life completely – in  
4 preparation for international abduction.

5  
6 It is worth mention that Hanna completely changed circle of friends, moved Max to new school  
7 to avoid any contact with our common friends, completely changed afterschool activities, enforcing  
8 complete isolation of Max.

9  
10 This is not only unhealthy and damaging to Max's personality, this also is the clear preparation  
11 to removal of Max from United States – because in Ukraine Max won't need any connections with  
12 his old friends from the United States, and Hanna clearly threatened to “bury our son in Ukrainian  
13 soil, so you will never see him again”.

14 Which at best could mean life in complete isolation in Ukrainian village under Russian missile  
15 strikes (until the end of war, which nobody can predict), but could also mean that Hanna really  
16 plans to harm Max... That with her obviously obsessive and violent behavior and history of mental  
17 health treatment (which by the way was recommended by Emergency Screener Dr. Mary Rolison),  
18 could lead to terrifying consequences for my son.

19  
20 Please review Hanna's and Max's behavior when I came to checkup on Max after Hanna locked  
21 up my son and stopped responding, video recorded on 11/24/2023 (before Police Wellness  
22 Checkup) in Evidence 7 – Video evidence 2 <https://youtu.be/Lsr1Jp8U8K8>

23 Please also pay attention to the fact that during this video recording Hanna absolutely  
24 unreasonably blocks our contact with Max and threatens me to call police because I'm violating  
25 order from 06/29/2023 (Evidence 24), by which Judge Flint, suspected of bribery, ordered only paid  
26 professionally supervised visits with my son (unreasonably and against recommendations of  
27 Emergency Screener and multiple pieces of evidence and witness statements).

1  
2 It is obvious that Max is running away from me today, because yesterday (on Max's Birthday)  
3 Hanna punished Max and forcibly ordered Max to stay away from father, most probably by physical  
4 abuse and obviously by emotional abuse.

5 Notice how Max is constantly running away from me and avoiding physical contact – most  
6 probably to avoid giving me chance to observe his body for bruises, because Hanna most probably  
7 was beating Max yesterday.

8  
9 The same behavior was observed in December 2022, when I noticed bruises on Max's body  
10 (Evidence 9) and Hanna prohibited Max from peeing in my presence – my son obviously scared,  
11 and was literally avoiding restroom for multiple visitations in a row, being afraid of mother's  
12 punishment.

13 It is also worth to mention, that on the first visitations Max was constantly looking over the  
14 shoulder (checking if mother is watching), and was talking kindly to me only whispering – being  
15 afraid that mother could hear. Max was afraid to take any gift that could remind about me.

16  
17 These screaming signs of PTSD were completely ignored by paid supervisors Jesus Santos and  
18 Dylan Storme, who on my notice that Hanna is prohibiting Max having phone, said that “those are  
19 probably just different parenting styles”

20  
21 Unfortunately, bruises (Evidence 9), pulled out sim card (Evidence 11), dragging Max forcibly  
22 away from father (Evidence 1), and calling police on father for visiting Max on his Birthday  
23 (Evidence 7) is too obvious and systematic, and is much more than just a “parenting style”.

24 Especially taking into account massive falsifications of court records by Judge Flint, suspected  
25 of bribery, and orders (Evidence 24) that clearly facilitate international child abduction outside of  
26 the United States.

1 **II. BRIBED JUDGE**

2 **ANDREA ELIZABETH FLINT, LIC. NO.: 186714**

3 *Disclaimer:*

4 *I'm here not to fight corruption in the Superior Court of California. It seems to be everyday*  
5 *thing – some judges are caught on bribery, others resign due to scandals, attorneys facilitate*  
6 *bribery, and clerks do falsification of filings. All of that is not of my business.*

7 *I'm here to ask for help to replace bribed judge and get impartial hearing.*

8 *Getting impartial judge who will at least review evidence and consider Emergency Screener*  
9 *recommendations – would be already a great relief after experience with Judge Flint.*

10 *In the end – getting chance to protect my son from international abduction and give him free*  
11 *unsupervised visits is already a win. If I'll get full legal and joined physical custody – that would be*  
12 *a great transition from unlawfully detained hostage to normal life for my son.*

13  
14  
15 By child abduction, blocking all contact and interfering with emergency screening and  
16 professionally supervised visitations, Hanna:

17 - Violated Court orders from 10/31/2023 that ordered “that parties participate and cooperate in  
18 private screening” (Evidence 28)

19 - Violated [California Penal Code 278.5 “Deprivation of Custody”](#)

20  
21 Due to these violations, 06/22/2023 I filed Motion to Hold Respondent into Contempt of Court  
22 – which 08/01/2023 was absolutely unreasonably denied by Judge Flint, investigated for bribery,  
23 without consideration – Evidence 36.



1 On 06/29/2023, Judge Flint, suspected of bribery, absolutely unreasonably removed from court  
2 records signed Emergency Screener Recommendations (Evidence 23), denied Child Abduction  
3 Prevention Orders, Mental Health Treatment for Hanna, Minor's Counsel, Parenting Counseling,  
4 Relief of Custody and Visitations, and ordered full sole legal and physical custody to mother-abuser  
5 and no contact with the child to me (Evidence 24).

6  
7 Suspecting that Judge may be misled by extremely unethical Hanna's attorney Nancy L Roberts,  
8 I filed with the Court Motion to Disqualify Respondent's Attorney Nancy L Roberts for misleading  
9 Court by falsehood allegations, impermissible pressure on emergency screener and professional  
10 supervisors, for unethical conduct, and violation of professional and ethical standards.

11 But on 08/01/2023 Judge Flint unreasonably denied this motion without consideration -  
12 Evidence 36.

13  
14 After couple of months of investigation, and bunch of thoroughly analyzed hearings, I came to  
15 conclusion that Judge Flint is obviously bribed, because there are too many pieces of evidence  
16 confirming Judge Flint's personal interest in the case.

17  
18 I filed 8 (EIGHT) motions to recuse Judge Flint for cause (11/13/2023, 10/25/2023, 10/02/2023,  
19 09/13/2023, 09/11/2023, 09/07/2023, 09/05/2023, 08/09/2023). All of them were denied without  
20 consideration – which by itself confirms Judge's extreme personal interest in the case.

21  
22 On 10/25/2023, when I requested Court Reporter for upcoming partial trial 11/13/2023 and filed  
23 7<sup>th</sup> Motion to Recuse Judge Flint, she cleared courtroom and kicked out from Teams all witnesses,  
24 and ensured that there are no either court reporter, nor witnesses – after which Judge Flint punished  
25 me by ordering \$200/month payments for requesting court reporter for partial trial 11/13/2023, and  
26 stated that she doesn't care about allegations of bribery, will stay on the case and threatened to  
27 punish me with all the severity on partial trial 11/13/2023.

1  
2 On partial trial 11/13/2023 Judge Flint violated CCP 170.1, 170.3 in 8<sup>th</sup> time, completely  
3 ignoring my request to recuse stated on record, continued trial despite legal obligation to recuse  
4 immediately due to stated on record undeniable personal conflict of interest with the party on the  
5 case, and made harmful and wrongful orders based on falsified numbers of community balances,  
6 provided by Hanna's attorney Nancy L. Roberts.

7 I would emphasize, that I significantly simplified "bribed judge test" for Judge Flint – by stating  
8 on record that I reported her, and since this very moment Judge Flint is in undeniable personal  
9 conflict of interest with me, Petitioner, and party in the case. And Judge is legally obliged to recuse  
10 themselves in situation of personal conflict of interest with the party in the case.

11 I do understand that real reason why Judge Flint must recuse – is personal financial interest,  
12 which she confirmed, and which is obvious from all the history of the case, massive falsifications  
13 and ruling solely in favor of Respondent. Though, I gave Judge Flint amazing chance to recuse  
14 avoiding allegations of bribery – because personal conflict of interest is much simpler and  
15 transparent cause.

16 Though, Judge Flint completely ignored opportunity and shamelessly retaliated me on the  
17 partial trial 11/13/2023.

18  
19 Judge Flint ordered wrongful equalizing payment that was shifted from ~\$3,000 that Hanna  
20 owes me, to ~\$6,000 that Judge wrongfully ordered me to pay Hanna (obviously retaliating me).

21  
22 Despite relatively small amounts of equalizing payment, orders from partial trial 11/13/2023 are  
23 crucial for confirming that Judge Flint is obviously bribed, and is severely retaliating to me,  
24 Petitioner on the case, for reporting Judge for suspect of bribery by following actions:

- 1 1. Judge forces me to disobey Court order 11/13/2023 by ordering absolutely unreasonable and  
2 unbearable equalizing payment \$6,000 that goes against bank statements and evidence, and  
3 cannot be paid because I don't have any savings and have extremely low cashflow, which is  
4 caused by previous harmful orders of Judge Flint of maximum child and spousal support,  
5 hefty unnecessary paid supervised visitations fees, emergency screening fees, attorney fees –  
6 and my financial collapse was confirmed by the most recent bank statements, filed with the  
7 Court in the List of Evidence for Trial Brief, and which were completely ignored by Judge  
8 Flint in retaliation attempt
- 9 2. Judge Flint knowingly and intentionally ordered me to give up my son's passport and  
10 documents 06/29/2023 and allow international child abduction, which cannot be obeyed –  
11 because Judge Flint knows that Respondent threatened to abduct my son outside of the  
12 United States to Ukraine, has documented history of international child abduction, has  
13 Travel Authorization Consent that allows her to travel with my son outside of the United  
14 States without my permission for the next 10 years, was recommended Mental Health  
15 Treatment by Emergency Screener, and if Respondent obtains passport of my son – she will  
16 abduct my son to Ukraine immediately.

17 Since I started investigating suspect of bribery of Judge Flint in June 2023, my assumption was  
18 that Hanna with her father Serhii Nahorny (who has extensive experience in bribing judges in  
19 Ukraine), bribed Judge Flint with the help of Hanna's attorney Nancy L Roberts (Evidence 26, 27,  
20 36) in April 2023, when Hanna's father visited United States as tourist. It is well known that Serhii  
21 Nahorny is using lump sums of untraceable cash for bribing judges and government officials in  
22 Ukraine – the same approach is suspected to be used with Judge Flint.

23 It is suspected that in October 2023 Judge Flint might be not bribed yet – though, there are no  
24 evidence of that, because it was very beginning of the case, and stipulations that Steven Dinneen  
25 was giving me to sign, could possibly be an attempt to force me to sign off custody and give up  
26 documents of my son through stipulation to avoid bribing Judge – that so far is suspected to happen  
27 in about April 2023.

**III. INTERNATIONAL CHILD ABDUCTION**  
**DECEMBER 2019 – JULY 2020, THREATS IN 2022**

*Disclaimer:*

*There are no other reasons to hold Max hostage, except to obtain permanent full legal custody and re-issue passport.*

*As caring parent, I cannot imagine how cruel Hanna should be to abduct her own son and put Max into life of “abused child” and unlawfully detained hostage for more than year – simply to obtain passport for international abduction.*

*We both know that abduction to Ukraine is dangerous until war is going.*

*We also both know that I offered healthy co-parenting that will inevitably lead to opportunity to freely travel with the child abroad after some time, by mutual agreement and support.*

*The only reason of child abduction which I see is Hanna’s severe mental health disorder, because of which she cannot allow any possibility of healthy co-parenting with the main focus on our son’s safety and wellbeing.*

*While Hanna is playing “custody games” with unlawfully detaining Max as hostage, hour son suffers severe damage to his personality, that will lead to years of child counseling.*

*As caring parent, I cannot imagine how sick Hanna’s mind is to do this terror to our son.*

Why Hanna abducted Max in first place, and why she is unreasonably blocking all our contact?

Because if I abandon Max, Hanna will have a “legal precedent” to re-issue new passport for Max and abduct Max outside of the United States to Ukraine, exactly as she threatened in July-August 2022, before child abduction.

1 Which is easy with the presence of Travel Authorization Consent (that Hanna forced me to sign  
2 back in 2020 for upcoming 10 years), and with absence of Child Abduction Prevention Orders  
3 (unreasonably denied by Judge Flint 3 (THREE) times).

4 And of course, with the full custody (which Judge Flint unreasonably granted while removing  
5 signed Emergency Screener Recommendations on 06/29/2023 – Evidence 24).

6  
7 Besides Hanna’s threat to abduct and “bury our son in Ukrainian soil so you will never see him  
8 again” (which might be said only to hurt me – same as threat to kill my mom, which Hanna  
9 unfortunately did), abduction to Ukraine is extremely dangerous.

10 There is ongoing war in Ukraine, and absolutely random and unpredictable missile strikes on  
11 peaceful Ukrainian cities are killing innocent civilians in multiple cities across all the country.

12 Back in 2022 UNICEF counted almost 1,000 children killed or injured since the war began  
13 (Evidence 22)

14  
15 Hanna has documented history of international child abduction (Evidence 20), child and elderly  
16 abuse. And I tend to believe in her threats to abduct and “bury our son in Ukrainian soil so you will  
17 never see him again”, because Hanna did intentionally terminally hurt defenseless 95 years old  
18 senior woman with disabilities, abducted and holds my son hostage for more than year, absolutely  
19 unreasonably blocking all our contact, and behaves extremely unwell (Evidence 6, 7, 1 – 15, 17-19)

20  
21 Back in 2019 – 2020 Hanna abducted Max to Ukraine and held my son there for extensive 7  
22 (SEVEN) months, multiple times postponing return from planned in February to July (Evidence 20)

23  
24 While postponing return, Hanna by deceit and threats to never return my son, forced me to sign  
25 Travel Authorization Consent, that allows her to travel with Max outside of the United States  
26 without my permission for the next 10 years.

27 I signed that document in exchange for return of my son back home to the United States.

1  
2 Hanna was extremely homesick after return in 2020 and was on constant treatment with mental  
3 health therapist due to her obsessive bipolar disorder. Hanna was violent against Max and against  
4 my grandmom, defenseless 95 years old senior woman with disabilities (who Hanna kicked out  
5 from home and to whom she caused terminal condition in September 2022)

6  
7 Being extremely homesick about Ukraine, Hanna attempted to cancel Max's Green Card  
8 (sponsored by me to Max and Hanna) multiple times in 2022.

9 She stated extremely alarming things like "F\*ck America! F\*ck Green Card! I will take our son  
10 to Ukraine and you will never see him again!"

11  
12 Later in 2021 – 2022, Hanna shared her plans to abduct Max outside of the United States to  
13 Ukraine with multiple of our family friends. They shared their concerns about possible Hanna's  
14 mental health issues with me, and it was captured in witness statements – Evidence 21

15  
16 When I spoke to her parents about these alarming signs of mental health issues, and risks of  
17 child abduction to Ukraine in times of war (which is dangerous for both Hanna and Max), her  
18 parents stated that they will take care of Hanna's mental health issues in Ukraine, but I have to give  
19 up my son and allow Hanna to abduct Max to Ukraine.

20 I asked them to reconsider what they said, and help to calm down Hanna, give her time to  
21 receive Green Card and stay in safety of the United States. Though, they sounded very determined  
22 and aggressive, and threatened me to abduct my son by all possible legal and illegal means.

23  
24 With respect to Hanna's parents, I think we stuck on this conflict of interest, and I cannot agree  
25 with abduction of my son outside of the United States to Ukraine in times of war – my son's life is  
26 precious, and Max deserves to live in safety of the United States and have both loving parents.

1 Especially taking into account that I brough Max to the United States years before beginning of  
2 the war in Ukraine. Max never saw war and doesn't need to.

3  
4 I sponsored Green Card for Max. And Max received Green Card, despite his mother's multiple  
5 attempts to cancel his Green Card in 2022.

6  
7 Max is the Legal Permanent Resident of the United States, and my son has all legal rights to  
8 stay in the United States, safe and sound, away from dangers of war.

9  
10 And it also will be good also to stay away from physical and emotional violence of his  
11 biological mother, who abducted Max and holds him as hostage for more than year, constantly  
12 threatening to re-issue passport, abduct and "bury our son in Ukrainian soil, so you will never see  
13 him again".

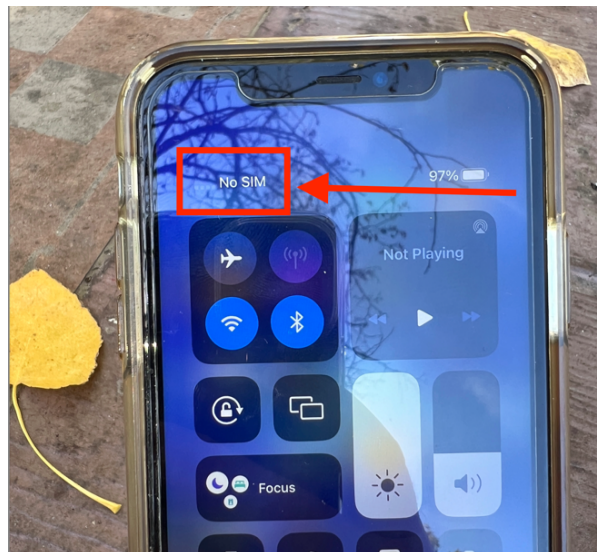
14  
15 But for that to happen, we need to get harmful orders of Judge Flint, suspected of bribery, to be  
16 reconsidered by another, impartial Judge, who hopefully will consider extensive evidence that was  
17 completely ignored during past year by Judge Flint, suspected of bribery.

#### IV. CHILD – HOSTAGE



Pic. 1 – Me and my son Max on paid professionally supervised visit 11/10/2023.

Look into those kind and teary eyes – Max is missing his happy moments with father, being forced to live the life of a hostage, completely isolated from father, without any means for communication, prohibited any contact with loving father (Evidence 16)



Pic. 2 – NO SIM. Mother pulled out sim card and requested supervisors to enforce me never looking into Max's phone settings, to ensure that I will not be able to help Max to restore contact with the world (Evidence 11, from visit 11/10/2023)





Pic. 3 – Hanna is forcibly grabbing and dragging my son Max inside house away from me, while Max is fighting back and trying to get out from mother’s clinch (Evidence 1)

On Max’s 8<sup>th</sup> Birthday, 11/13/2023, I managed to find address where Hanna is holding my son, despite she refused to share address (Evidence 18), and despite she blocked all our visits and calls (Evidence 19, 11, 12, 13, 14, 15, 6, 7).

I managed to find Max’s location (which costed me a lot), and I visited my son Max to greet him with 8<sup>th</sup> Birthday, with gifts and birthday card, with the best wishes and positive vibes for my son – but while I was greeting Max with birthday, Hanna created scandal in front of my son, pulled Max forcibly away, loudly slapped and shut the door in front of me, prohibiting Max to take postcard, prohibiting to read it, forcibly grabbing and dragging my son inside house away from me – while Max was fighting back and asking to give him chance to see dad.

Please check out video Evidence 6 from Max’s 8<sup>th</sup> Birthday 11/23/2024 -

<https://youtu.be/m33POsKnXYk>

1 Max was angry that mother is grabbing and forcing him, and asked mother to step back and  
2 give him chance to see father.



4  
5  
6  
7  
8  
9  
10  
11  
12  
13 Pic. 4 – Max is asking mother-abuser to step back and allow him to see father (Evidence 2)



16  
17  
18  
19  
20  
21  
22  
23  
24  
25 Pic. 5 – Max was very happy to see father, who made him Birthday surprise (Evidence 3)



Pic. 6 – But because mother-abuser harassed Max, and prohibited Max to see father, Max became very upset. Mother–abuser destroyed Max’ Birthday morning (Evidence 4)

I asked Hanna to stop harassing our son, and instead offered to grab a coffee and donuts together, and celebrate Max’ Birthday with the little party with balloons, cake or donuts.

Hanna refused, shoved Max back inside house and slapped door in front of my face.

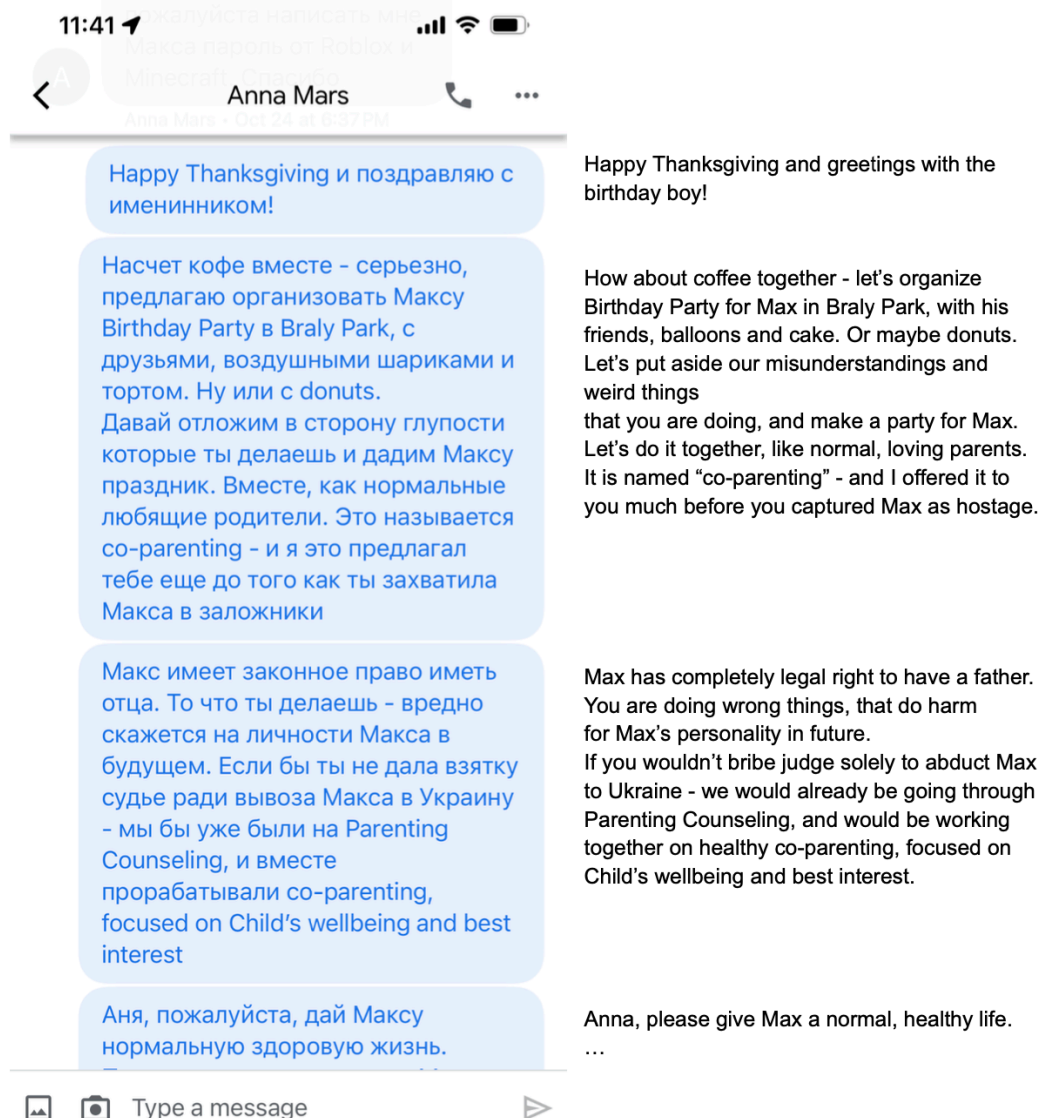


Pic. 7 – Mother-abuser is slapping door in front of my face, refusing to make a party with coffee and donuts to celebrate Max’s birthday (Evidence 5)



Please check out all these moments in video Evidence 6 from Max's 8<sup>th</sup> Birthday 11/23/2024 - <https://youtu.be/m33POsKnXYk>

I sent a text, asking if maybe Hanna could change her mind and allow us to grab a coffee and make a little Birthday Party for Max in Braly Park nearby (we celebrated Max's 7<sup>th</sup> Birthday there)



Pic. 8 – Text inviting Hanna to organize Max a Birthday Party together (Evidence 8)

1 My text was not answered – and taking into account that I already saw bruises on Max’s  
2 body in December 2022, few days after visit when Max asked to stay overnight and not return  
3 back to mother-abuser (Evidence 9), I was really worried.

4 I was worried also because Hanna has serious mental health issues and uncontrollable  
5 outbursts of violence against Max and great granny. She was on mental health treatment for  
6 about eight years, but her mental health significantly worsened due to beginning of war in  
7 Ukraine in February 2022. Hanna was beating my son multiple times on face and a head  
8 previously before abduction in 2022 – which I prohibited her doing, but in response she  
9 abducted my son with falsehood DVRO and threatened to abduct Max outside of the United  
10 States and “bury our son in Ukrainian soil, so you will never see him again”.



11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23 Pic. 9 – Bruises on Max’s body, observed in December 2022 (Evidence 9)

24 I asked about nature of those bruises – and Hanna prohibited Max peeing for few visits after  
25  
26  
27

1 Because I was worried that Hanna could be beating Max again for being happy to see father,  
2 and she wasn't answering, I asked Police for wellness checkup.

3 Because I did not hear from Police, and Hanna was not answering – I was worried, and came  
4 to checkup on Max by myself.

5 Please see video Evidence 7 with full recording of my visit <https://youtu.be/Lsr1Jp8U8K8>

6  
7 Hanna jumped out from the house and was chasing me, shouting and preventing me from  
8 talking with Max.

9 Max was obviously scared and was running away from me all the time. Please pay attention  
10 that Max keeps my gift – Halo blaster all the time in hands, which he definitely likes.

11 At the same time pay attention that Max is avoiding hugs and touches – which means  
12 mother-abuser either beaten Max heavily (so he is afraid that I can see bruises), or mother-  
13 abuser instructed Max to stay away from me or he will be beaten.

14 Pay attention to Max's phrases: "Just go away, we'll stay out of trouble", "We'll see each  
15 other on paid visit as mom said".

16 Also curious observation: When I asked Max if he wants to live his life without father – he  
17 doesn't answer. I'm there not to interrogate my son, and not to create any "trouble". But this  
18 was crucial moment – Max obeys dominance of mother-abuser, and is following her orders to  
19 run away, avoid hugs, say father that we can have only paid visits – but he doesn't say that he  
20 doesn't want to see father (!). Even more – such question stops him, and makes him think about  
21 what's going on.

22 Which leads us back to the question – why Hanna is forcibly prohibiting Max from seeing  
23 father, with whom Max is happy and has a strong bond?

24 Next Hanna shoved Max inside house and closed Max inside, while calling police on me.

25 Please see video Evidence 7 with full recording of my visit <https://youtu.be/Lsr1Jp8U8K8>

1 Since Hanna called police on me for visiting my son, and there was no information about  
2 yesterday wellness checkup – I also requested 2<sup>nd</sup> wellness checkup today.

3 Officers were highly professional and polite, talked to us both, and noted that there is no  
4 restraining order, and I'm not prohibited from seeing my son – but yes, schedule of visitations,  
5 ordered by Judge Flint requires me to visit Max only on paid supervised visits (Evidence 24).

6 Officers warned me that I must obey court orders, even if those are orders of bribed judge (I  
7 gave them this package of evidence, since it is anyways public and available to multiple  
8 government authorities).

9 Officers did not check on Max's bruises and simply confirmed that they saw child, and child  
10 is alive. When I explained child abduction situation, Hanna's domestic violence against my son,  
11 and issues with bribed judge, they recommended to reach District Attorney office.

12  
13 Police report case no.: EV#233280052

14 Officers: J. Lutrell, A. Gatchalian



27 Pic. 10 – Hanna created scandal to prevent Max from talking to me,  
28 shoved Max inside house and called police on me for coming to see Max (Evidence 7)

1 Officers clearly noticed that all what happened is some kind of custody-related games.  
2 Which I totally agree – though, custody part of this case is tightly coupled with international  
3 child abduction that would happen if bribed judge Flint will allow to re-issue Max’s passport on  
4 January 25, 2024 and will make final custody orders on February 5, 2024.

5  
6 Hanna is absolutely determined to do whatever it takes to leave Max without father and  
7 abduct Max to Ukraine.

8  
9 Max is just a little boy, who is held hostage for more than year, everyday brainwashed and  
10 physically and emotionally abused in preparation for the international child abduction.

11  
12 This little boy has loving father, is Lawful Permanent Resident of the United States, and was  
13 born to be FREE, LOVED and SUPPORTED.

14  
15 Instead, he got locked up, left without phone and without any means of communication, is  
16 forced to obey inhumane rules of paid visitations for more than year, and is threatened that he  
17 must be afraid to talk honestly with daddy, or hug daddy, because otherwise, as mother-abuser  
18 said, “there will be trouble”.

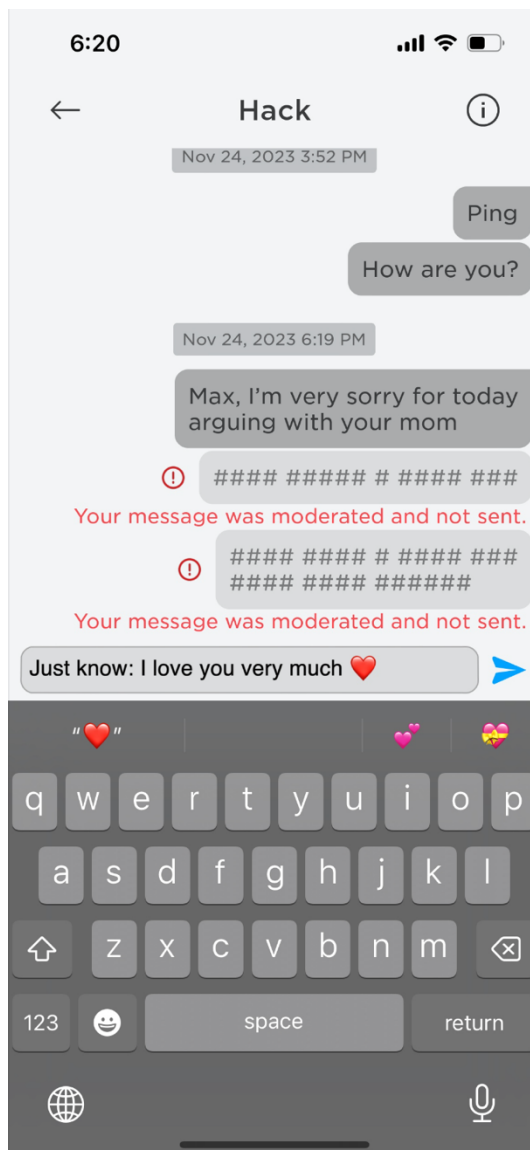
19  
20 ~~Max says that he cannot see any pictures on his phone. Dad says~~  
21 ~~Max says I have no internet. Dad says can you turn your phone towards Christina? Max turns his~~  
22 ~~Dad snaps a picture of Max’ phone showing no SIM card. Max asks, why do you always talk~~  
23 ~~about my mom? Dad says I cannot talk about your mom. These are the rules. Max says now you~~  
24 ~~cannot have my username to play with me. Dad says okay. Dad says can you put on your~~  
25 ~~sweater: it is cold. Max says no I'm not cold. Dad asks. what if I ask you to? Dad removes his~~

26  
27  
28 Pic. 11 – NO SIM is documented in supervisor’s report 11/10/2023 (Evidence 13)



VM asks, can I speak with you? Mom says yes. VM turns her back towards the car. VM says, I don't know if Max normally plays Roblox but he mentioned to Dad that he should get on Roblox so they can chat, Dad did not say he would, I'm just letting you know. Mom says okay, he cannot. VM says I understand, that is why I am letting you know about the conversation initiated by Max. Mom says thank you. VM says he also told Dad he switched schools and moved but didn't give any details of locations. Mom says okay. Mom walks around the vehicle and steps into the driver's side. Mom drives away, visit ends.

Pic. 12 – “He cannot”. Mother prohibits Max to chat with father even in games, documented in report 8/22/2023(Evidence 15)



Pic. 13 – Roblox chat blocked (Evidence 12)

1  
2 Previous year Max's birthday was different, yet also on paid supervised visitation – because  
3 Hanna artificially extended those paid visits for more than year, blocking healthy contact of  
4 Max with father.



5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15 Pic. 14 – Max's 7<sup>th</sup> Birthday, Braly Park, paid visit (Evidence 43)



16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28 Pic. 15 – Max's 7<sup>th</sup> Birthday, Braly Park, paid visit (Evidence 43)



**Kostiantyn Mars**

4/13/2023 1:42 PM

Hello Hanna, please let me know if I can talk to Max today at 5pm  
Thank you

Hanna Mars viewed this subject. 4/13/2023 3:17 PM



**Hanna Mars**

4/13/2023 3:23 PM

Hello Kostiantyn. I'm really worried about what you're saying to Max. Your inappropriate remarks hurt Max, please think about it.  
You can call Max after signing the agreement. Until then, you have only professionally supervised visits.

Kostiantyn Mars viewed this subject. 4/13/2023 3:28 PM

Pic. 16 – This is how terrorists do when they take hostage:

they do not allow a call with the hostage, until their demand will be fulfilled.

In our case – Hanna forces me to sign off custody and give up Max's passport to allow her international abduction of my son outside of the United States (Evidence 19)



**Kostiantyn Mars**

4/17/2023 3:05 PM

Dear Hanna,  
Hope you're doing well.  
Please share new address where you relocate our son.  
Thank you

Hanna Mars viewed this subject. 4/17/2023 3:08 PM



**Hanna Mars**

4/17/2023 3:15 PM

Dear Kostintyn,  
Thank you, hope you are doing good too.  
I spoke with my attorney, I can share my location only after signing the new agreement, and after that you will also have to share your location with me.

Kostiantyn Mars viewed this subject. 4/17/2023 3:26 PM

Pic. 17 – The same terrorist's approach:

after domestic child abduction in April 2023, Hanna refuses to share where she holds Max until I will sign off custody and give up Max's passport to allow her international abduction of my son outside of the United States (Evidence 18)



Hanna also mentioned that she wanted to go back to Ukraine, which (considering the ongoing war there) is dangerous for both her and her son. In my opinion, Hanna is quite depressed and stressed out about her current situation and I feel that she might want to seek professional psychologist help.

I feel that this whole situation with the family splitting up could have been easily avoided if both parties tried to be more considerate towards the needs of each other. They have a wonderful son Max, who deserves to have both loving parents. I think that for the sake of their son the parties should reconcile and find an arrangement suitable for everybody.

I hereby declare that whatever has been stated above is correct and true to my knowledge.

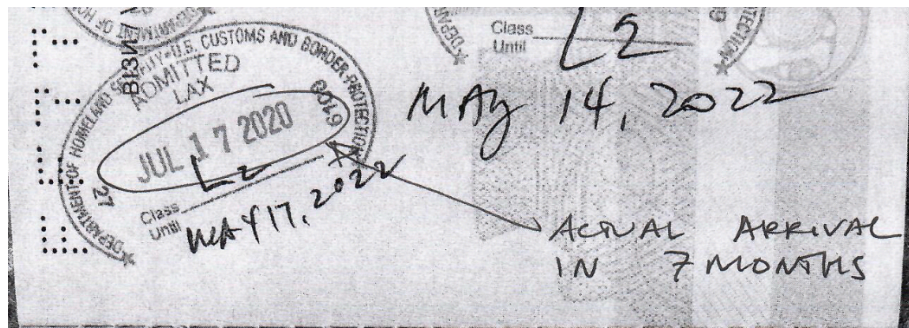
*E. Chepakovich*

Alena Chepakovich  
September 27, 2022

Pic. 18 – Witness Alena Chepakovich confirmed that Hanna shared plans of international child abduction of Max outside of the United States to Ukraine, in times of war (Evidence 21)

KYIV ZHULIANI INTL	WARSAW FREDERIC CHOPIN	LO750	08:40 01Feb2020	09:15 01Feb2020
Class: L Seat: Baggage (4): 1PC Fare basis: LLPRO178	Operated by: LOT POLISH AIRLINES Marketed by: LOT POLISH AIRLINES Booking status (1): OK			NVB (2): 01Feb2020 NVA (3): 01Feb2020 Duration: 01:35
WARSAW FREDERIC CHOPIN	LOS ANGELES LOS ANGELES INTL Terminal: B	LO21	11:00 01Feb2020	14:25 01Feb2020
Class: L	Operated by: LOT POLISH AIRLINES			

TO  
ORIGINAL TRAVEL PLAN  
1 MONTH



Pic. 19 – Previous international child abduction outside of the United States – planned return on Feb 01, 2020, actual return on Jul 17, 2020 (Evidence 20)

Those images from the funeral, which Iryna could not attend because of the severity of her injuries, are ones she tries not to look at because she feels as though her daughter is still with her.



The funeral for Liza on July 17. (Efrem Lukatsky/AP)

“The mental pain is worse than the physical pain,” she said.

She is 34 and, like other parents in Ukraine, struggling with wrenching, incalculable loss. Almost 1,000 children have been confirmed killed or injured since the war began, according to UNICEF, though the agency believes the true number to be much higher.

Pic. 20 – [Washington Post article about Elizaveta Dmytrieva](#), 4 years old girl killed on July 14, 2020, by missile strike on Vinnytsia, the central Ukrainian city, far from the front lines (Evidence 22).

When Hanna stated that she will abduct and “bury our son in Ukrainian soil, so I will never see him again”, I showed her this article – life is too short to risk lives of our children and loved ones, even if there is some critical misunderstanding. I asked Hanna to calm down and reconsider her decision in the sake of safety of our son.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**13. Co-Parenting/Parallel Parenting Counseling:** The parents shall commence a co-parenting/parallel counseling with a licensed or licensed supervised, mental health professional trained to work with separated parents, domestic violence and substance abuse within 30 days of the filing of this order. **Sessions shall occur at least once a month and shall be no fewer than 6 months duration.** The parents shall present a copy of this order to the selected class counselor or therapist. The therapeutic goals shall be to learn behavioral changes that the parents need to make in order to reduce the exposure of the child to their conflict, to improve cooperation and communication with the other parent, learn negotiating and conflict resolution skills in order to improve decision making regarding the child, to increase trust, and to learn problem-solving skills with the other parent. The parents shall provide the counselor with a copy of this order at the outset of treatment. The parent may have separate or staggered sessions with the coparenting counselor at the discretion of either party or the counselor.

**14. Individual counseling for mother:** The mother shall engage in individual mental health counseling at a minimum of two times per month with a licensed clinical therapist of her choice who has experience with high conflict divorce and life management skills. The counseling shall continue pending further orders of the court or for the duration of 3 months.

~~in rationale for their decision to withhold their permission.~~

**CHILD ABDUCTION PREVENTION ORDERS**

**21.** The parents shall contact the consulate of the Ukraine to request that no passport or visa be issued for Maxsym Mars (DOB: 11/23/15)

~~22. Both parents shall surrender the passports/visas of the child/ren to a neutral person~~

Pic. 21 – Child Abduction Prevention Orders and Mental Health Counseling for mother – recommended by Emergency Screener Dr Mary Rolison (Evidence 23)

Dated: 2/9/23

Mary Day Rolison, PhD, LCSW  
Screener: Mary Day Rolison, PhD, LCSW

THE UNDERSIGNED LITIGANT PARENTS AGREE TO THE ABOVE WRITTEN  
STATEMENT AND PLANS IN REGARD TO THEIR MINOR CHILDREN

FATHER: KOSTIANTYN MARS [Signature] DATE: 4/18/2023

Attorney for the father: \_\_\_\_\_ Date: \_\_\_\_\_

Emerg scrning: Mars/Mars Case #22-F1-003144 Dept. Date: 2/9/23

8

MOTHER: \_\_\_\_\_ DATE: \_\_\_\_\_

Attorney for the mother: \_\_\_\_\_ Date: \_\_\_\_\_

Pic. 22 – Emergency Screener Recommendations (Evidence 23) were signed by Emergency Screener and me, but Hanna refused to sign Recommendations, and even more – through her attorney did pressure on Emergency Screener, and blocked screening completely, violating Court order 10/31/2022 (Evidence 28)

The Court orders that parties participate in a private screening with Father to pay.

The Court orders that parties participate and cooperate in a private screening.

Pic. 23 – The Court orders that parties participate and cooperate in a private screening – Court order 10/31/2022, violated by Hanna when she blocked emergency screening (Evidence 28)



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

---

**Regarding case # 22FL003144 Mars emergency screening RX after meet and confer agreement 2/9/23**

---

nancy roberts <nrobertslaw@sbcglobal.net>

Wed, Apr 19, 2023 at 1:35 PM

To: Constantine Mars <constantinemars1@gmail.com>, Department 79 <department79@scscourt.org>

Cc: Mary Rolison <drmaryrolison@gmail.com>, Anna Mars <annamars2017@gmail.com>

To clarify: the post-emergency screening hearing will be necessary. Mr. Mars is confusing my request for Dr. Rolison's testimony at the post-emergency screening hearing with the ex parte hearing that he set. I am still awaiting another witnesses availability in order to get back to Dr. Rolison and the court as to dates.

A continuation of the ex parte hearing that Mr. Mars set for Friday, April 21st must be continued as (1) my office was not timely served, and (2) Ms. Mars has surgery on Thursday and cannot appear. I have several times provided Mr. Mars with dates on which I am not available.

Due to the increase in Mr. Mars' delusional behavior and the fact that the February 9, 2023 stipulation still contains inaccuracies that were rectified and agreed upon by counsel prior to Mr. Mars' former attorney's withdrawal, the post-emergency screening hearing will be necessary. Mr. Mars was never presented with a stipulation that allowed unfettered travel with the minor child and that provision remained the same throughout the modification of the stipulation. Again, this is part of Mr. Mars' delusional disorder. Mr. Mars submitted a fraudulent copy of Dr. Rolison's recommendation to the court with his ex parte motion. Ms. Mars has not yet moved to another less expensive apartment in the same area in which she currently resides and it is Mr. Mars who will not provide his residential address. Mr. Mars is not visiting the minor child because his chosen professional visitation supervisor refused to work any longer with Mr. Mars due to his failure to follow rules and Mr. Mars has failed to obtain a new professional supervisor. Mr. Mars does not have a court order to communicate with the minor child outside of supervised visits, but nonetheless sent highly inappropriate text messages to the minor.

Pic. 24 – Impermissible pressure on Emergency Screener Dr Mary Rolison and defamatory falsehood allegations of Hanna's attorney, Nancy L Roberts against me

---

**Kostiantyn Mars Supervised Visits**

---

nancy roberts <nrobertslaw@sbcglobal.net>

Mon, May 8, 2023 at 4:29 PM

To: Lorraine Ruiz <ruiz515115@aol.com>

Cc: Constantine Mars <constantinemars1@gmail.com>

Dear Ms. Ruiz,

I reviewed the note you sent to the court. I know that you are new to this case and I have no idea what Mr. Mars has stated to you. However, I am writing to verify that indeed the emergency screening recommendations of Dr. Rolison do recommend a mental health evaluation of Mr. Mars by a qualified psychiatrist. Mr. Mars has delusions regarding his wife's kidnapping and killing of Maksym in the Ukraine and in the past has continually discussed these delusions with Maksym during supervised visits which is why, in part, the former supervisor terminated visits with Mr. Mars. Mr. Mars compulsively discusses this kidnapping with Maksym, has inappropriately told him his grandparents will kidnap him, and has told Maksym that he will be killed in the Ukraine. This is why Ms. Mars was very concerned about your policy if this behavior continued during Mr. Mars visits with you supervising. It appears that Mr. Mars cannot regulate his behavior and has also spent visitation time with Maksym in the past telling Maksym that he will "have a new mother," hence Maksym's other comments to his father about his marriage and having other children. All of this is well documented in the prior supervised visitation reports.

Pic. 25 – Impermissible pressure on Professional Supervisor Lorraine Ruiz and defamatory falsehood allegations of Hanna's attorney, Nancy L Roberts against me



me "what happen if Dad say things about me?" Supervisor: "If Dad violates the Court Order, I will terminate the Visitation." As a Master teacher of English Language Development for Santa Clara County, I find it highly unusual that a child in First Grade would use the expression "We terminate Visitation."

**Safety Concerns:** During the initial Intake and Orientation, both parents shared their safety concerns, per contract and Rules of Court, both parties were advised of maintenance and disclosure of records, including confidentiality policies

**CONCERNS MOM-CP:** Mom said Dr. Rollins said Dad has a mental illness. Mom shared with Supervisor: "Dad said to Max: "First remember Mom abuse you go to teacher tell teacher to file Restraining Order against Mom. "Your Mom don't want to see you" Your Mom want to go to Ukraine to kill you."

**TEXT MOM: 7:57PM 5/3/2023**

Pic. 26 – Child uses expression "We terminate visitation", mother said that "dad has a mental illness", etc. – Visitation report of professional supervisor Lorraine Ruiz (Evidence 34)

**Child:** "Can I drink Coke?" **Dad:** "No, your Mother says no." **Child:** You talk about my mom we terminate visit." **Supervisor:** "We have three minutes left." **Child:** "When I see you?" **Dad:** "I see you next week."

Pic. 27 – "You talk about my mom we terminate visit" – Visitation Report May 4, 2022 (Evidence 34)

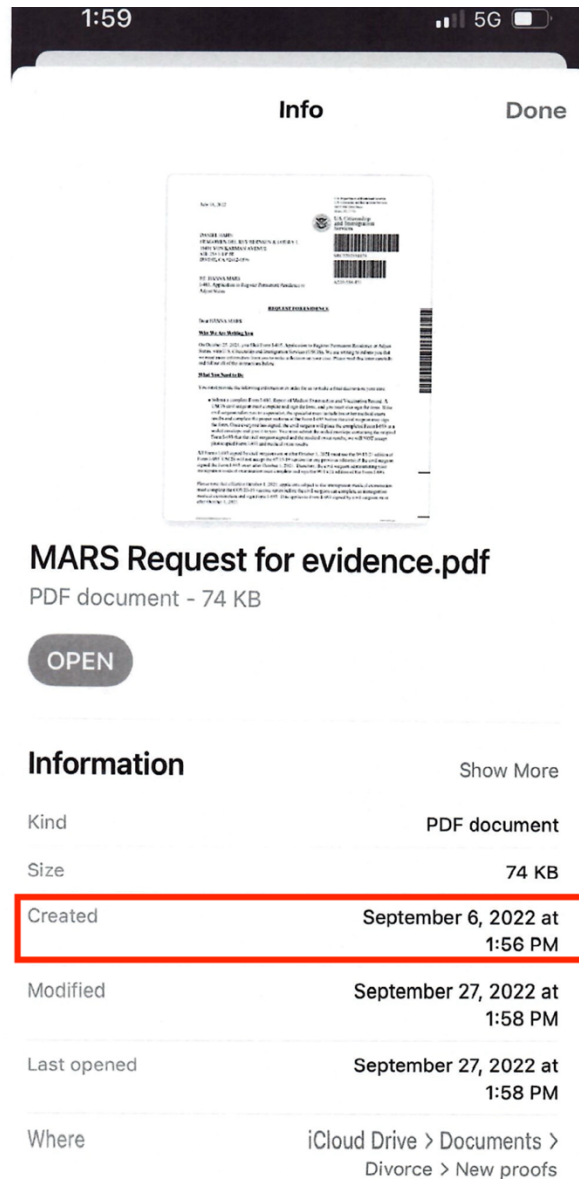
As a friend of the family, I've witnessed a strong bond between Mr. Mars and his son, the kind that fathers and sons should form. We've participated in multiple activities together, and every time I saw Mr. Mars being supportive and encouraging towards Max. Being a professional software engineer and a tech enthusiast, Mr. Mars has invested a lot of effort to spark and develop Max's interest in science and technology. In all our interactions the two of them have always acted as loving and caring father and child.

Pic. 28 – Witness statement of Alexander Pirozhenko, friend of family

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



Pic. 29 – Max received Green Card on August 25, 2022. Mother retaliated to our son by his abduction in September 2022, and later – moving child to undisclosed location and blocking all contact with the father (Evidence 44)



Pic. 30 – Hanna’s Green Card RFE received with delay on September 6, 2022 due to USCIS processing delays (Evidence A1 in DVRO against Hanna, 09/20/2022) .

Hanna stated in her DVRO that she abducted Max because assumed that I did not sponsor her Green Card – which is a falsehood statement, because she knew in September that we requested RFE via service center call, USCIS confirmed that there was processing delay and they are sending electronic copy – Pic. 30, Evidence A1 in DVRO against Hanna, 09/20/2022 (available online)

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**



Receipt Number SRC2202551074		Case Type I485 - APPLICATION TO REGISTER PERMANENT RESIDENCE OR ADJUST STATUS
Received Date 10/25/2021	Priority Date	Applicant A220 538 451 MARS, HANNA
Notice Date 10/26/2021	Page 1 of 2	Beneficiary A220 538 451 MARS, HANNA
HANNA MARS 970 CORTE MADERA AVENUE APT 716 SUNNYVALE CA 94085		Notice Type: Receipt Notice Amount received: \$1225.00 U.S. Section: Alien worker, Form I-140

EXHIBIT A2 -

Pic. 31 – Hanna’s Green Card I-797C, Received on 10/25/2021 – which confirms that I submitted all our family Green Card applications the same day, and Hanna’s allegations about me not submitting her Green Card are falsehood allegations, like many other her statements (Evidence A2 in DVRO against Hanna, 09/20/2022)





Pic. 32 – Happy Max, great granny and Hanna, celebrating 4<sup>th</sup> July together (Evidence 45)

Hanna was always sad, even on family photos – because she doesn't like United States, she hates English language, and wants to Ukraine. I did what I could to give her happy family and decent life in the United States. But it didn't work. It is ok to respect decisions of each other. But I don't know why our son should suffer because of her decision to destroy everything and abduct Max to Ukraine, with the words "F\*ck America! F\*ck Green Card! I will abduct your son and you will never see him again!"

It is not right – especially when Max has Green Card and is on his path to Citizenship. And has loving father who cares about Max despite everything what happened...



**constantine\_mars**  
San Francisco, California

...



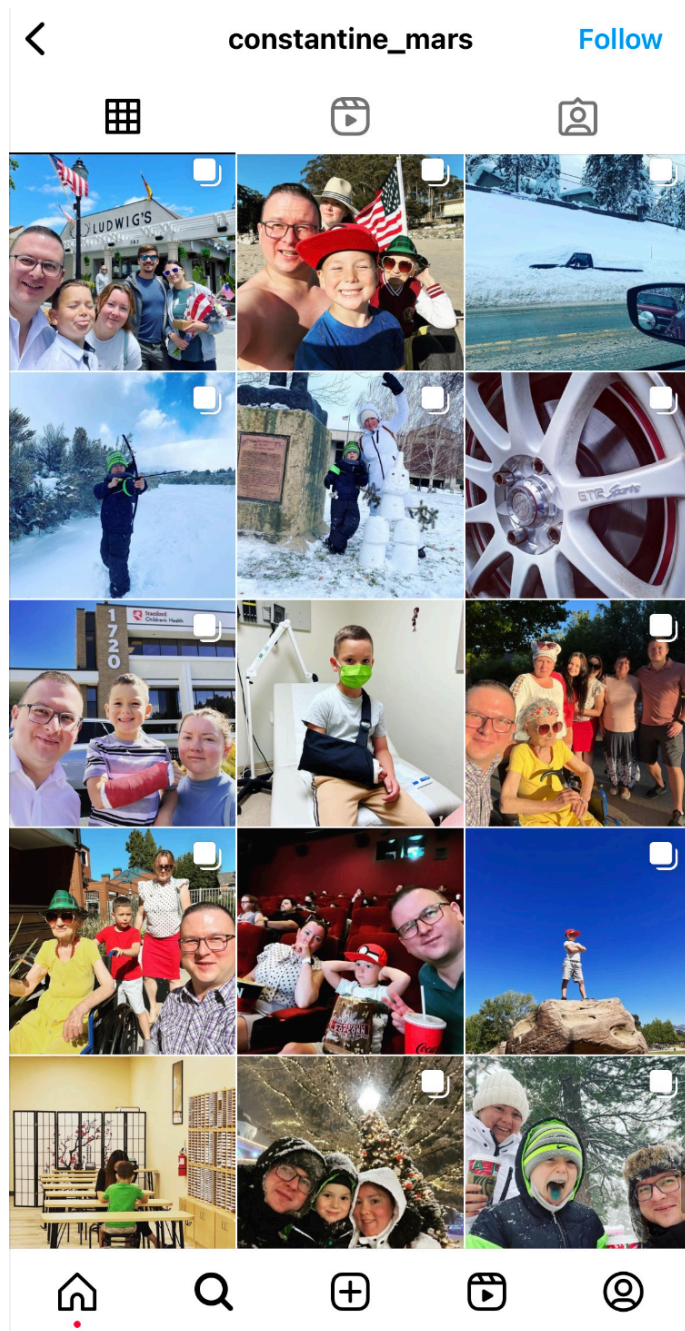
24 likes

**constantine\_mars** Max officially survived The First Day  
of The First Grade 📖 🍏 🇺🇸  
#firstgrade #backtoschool #school #sunnyvale #sf  
#california #usa

Pic. 5 – Happy Max at First Day of the First Grade with his dad, August 2022,  
one month before abduction (Evidence 44)







Pic. 34 – Moments of Max's happy life before abduction.

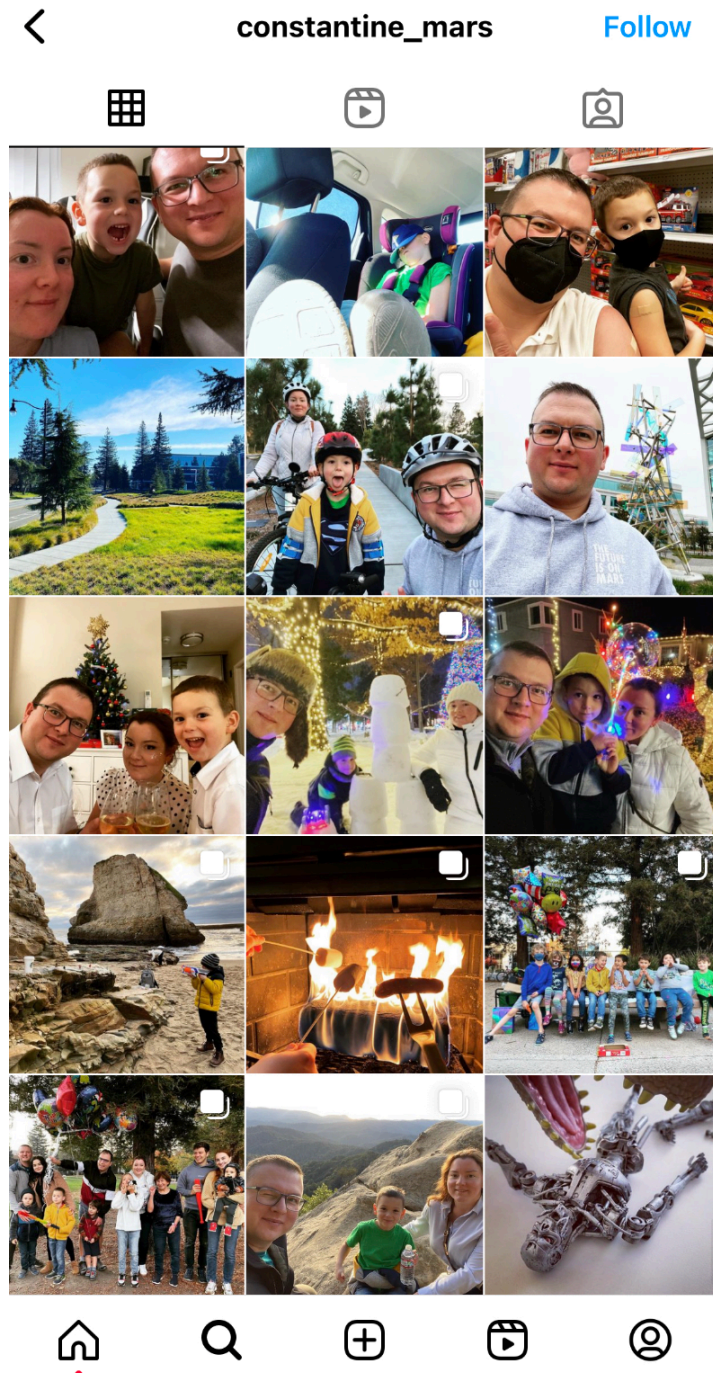
You can check out constantine mars on Instagram (Evidence 45)

Compare these moments to what Max has now after abduction – Evidence 6

<https://youtu.be/m33POsKnXYk> , Evidence 7 <https://youtu.be/Lsr1Jp8U8K8> -

I can't call what Hanna is doing to Max's life now neither normal, nor healthy or acceptable





Pic. 35 – Max’ life in whole, happy family. Lots of bright and kind moments. (Evid. 45)

Lots of friends in California, from school, from neighborhood.

Loving father, loving mother.

Even if some misunderstandings happen – it’s not the reason to abduct child and hold him hostage.

There is healthy co-parenting with the focus on the Child’s best interest, and it’s easy



**constantine\_mars**  
San Francisco, California

...



Liked by edubovik90 and 61 others

**constantine\_mars** One week before that ...  
eKids are amazing, and Max would love to come to this  
event again and again, thanks to great organizers!... He  
would come again if not that happen ...

[#myboy](#)

Pic. 36 – My son. One week before abduction. (Evid. 45)

We went on eKids event in my office in San Francisco.

Lots of new friends, interesting educational activities, learning about human-centered design  
I did not know that while I'm going with Max on kids events, Hanna is preparing DVRO to abduct  
my son outside of the United States to Ukraine. That's cruel



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



**constantine\_mars**  
San Francisco, California



Liked by **edubovik90** and **61 others**

**constantine\_mars** One week before that ...  
eKids are amazing, and Max would love to come to this  
event again and again, thanks to great organizers!... He  
would come again if not that happen ...  
[#myboy](#)

Pic. 37 – Max with the certificate from eKids event, one week before abduction

It is one of the last photos with Max before that terror happened.

I didn't have chance to normally and freely speak with my son or hug him since September 2022

All that we have now – paid supervised visits, and Max is afraid to even come close to me –  
because mother threatens him that “there will be trouble” and forcibly drags Max away

1 **V. CONCLUSION**

2

3 I kindly ask you for help to protect my son Max Mars from international abduction outside of

4 the United States by mother-abuser, who currently holds my son hostage in complete isolation and

5 without any means to contact neither me, nor 9-1-1.

6 I appreciate your prompt help with enforcing ban on travel of my son Max outside of the United

7 States, and prevention of re-issuing passport, until our custody case will be resolved with the help of

8 another, impartial judge.

9

10 I do understand that this case is “complex” and do not hope for quick resolution, but if we’ll get

11 bribed judge replaced, and step on the path of free visitations and parenting counseling – I hope

12 Max will get a light of hope and will understand that it’s not inevitable to “become evil like mom”

13 (those were words of my son after 3 months of being hostage. Now it’s more than year).

14

15 Max deserves to have both parents, have freedom of choice, have example of the best humane

16 values, and deserves to feel safe, protected and respected as any child deserves.

17

18 Please feel free to reach me directly if any additional information needed:

19 Phone: (408) 518-0088,

20 Email: Constantine.Mars@gmail.com

21

22 Thank you for your prompt attention to this matter in such a challenging situation.

23

24 [ENCLOSED: DECLARATION FOR DVRO, LIST OF EVIDENCE 1 – 45]

25 Sincerely,

26   
KOSTIANTYN MARS

27 DATED: November 28, 2023