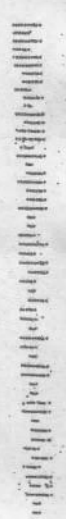


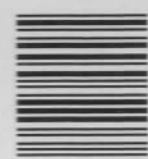
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*Kimberly Lawson*

1 MR. McANDREW: That was Exhibit 22  
2 to the motion in liminae.

3 The Court: Right.

4 MR. McANDREW: And the point of  
5 it, Ms. Lawson has been talking about the TPR  
6 litigation, the trial, this is the decision.  
7 These are the factual findings of the Court.  
8 The Court entered an order on the motion in  
9 liminae saying that the findings of the Family  
10 Court referenced in paragraph 16 of the  
11 indictment, and these are the findings, this  
12 decision are admissible but with a cautionary  
13 instruction from the Court that the findings do  
14 not definitively determine that abuse did or did  
15 not take place, but rather are relative to the  
16 defendants' state of mind and motive in  
17 continuing to make allegations against  
18 Ms. Belford, and as motive for the defendants'  
19 stalking conduct. And as we argued in our  
20 briefs, it's this decision that takes things to  
21 the next level thereafter.

22 The Court: You have accurately  
23 conveyed my ruling. I have the redacted 308.  
24 Defense, is everyone clear on what the proper

*Ms. Kimberly Lawson  
Guardian  
ad  
litem*

1 scope is?

2 MS. CHAVAR: Yes, Your Honor.

3 MR. IBRAHIM: Yes, sir.

4 MR. EDELIN: Yes.

5 MR. McANDREW: With that I think  
6 we're prepared to proceed.

7 The Court: The only thing I would  
8 say is keeping in mind the patience of the jury,  
9 rather than in too much detail covering all the  
10 nuances of the decision, to the extent we can  
11 move it forward, I am watching them, and I do  
12 think that in terms of painting a bigger  
13 picture, that's the most important thing to do.

14 MR. McANDREW: I do not want to  
15 wear out my welcome with them, so I'm sensitive  
16 to that.

17 The Court: Why don't we bring in  
18 Ms. Lawson while we're getting the jury and then  
19 we'll be ready.

20 (Jury entering the courtroom at  
21 9:25 a.m.)

22 The Court: Good morning, ladies  
23 and gentlemen, please be seated, everyone. You  
24 will have one important vote to take later today

1 and that is whether the lunch the Court is going  
2 to provide is any good. It doesn't need to be  
3 unanimous, but by all means let us know. And  
4 I'm glad we're able to do that on a rainy day.

5 Mr. McAndrew, we have Ms. Lawson  
6 on the stand?

7 MR. McANDREW: We do, Your Honor.  
8 And we're prepared to proceed.

9 The Court: Please.

10 MR. McANDREW: Good morning,  
11 everyone.

12 BY MR. McANDREW:

13 Q. Good morning, Ms. Lawson. Welcome  
14 back. We left off yesterday talking about  
15 various pieces of correspondence that you had  
16 received from Tom and Lenore Matusiewicz. Do  
17 you recall that?

18 A. Yes, I do.

19 Q. And we went through a number of  
20 documents; correct?

21 A. Yes, we did.

22 Q. Now, just to be clear for the  
23 jury, is that the sum total?

24 The Court: Mr. McAndrew, the

1 absence of the mics -- I think we're live.

2 BY MR. McANDREW:

3 Q. Just to be clear, was that the sum  
4 total of documentation you received from Tom or  
5 Lenore Matusiewicz or any other member of the  
6 Matusiewicz family?

7 A. No, I did receive other  
8 correspondence from other members. I believe  
9 that was everything I received. I mean, not  
10 everything I received in the package was  
11 included in these, but I believe these were all  
12 of the mailings from Tom and Lenore Matusiewicz.  
13 But I did get other correspondence from other  
14 family members. There was Gloria, I remembered  
15 her name in the shower, Gloria Kula and also  
16 Melinda Kula sent me documents and  
17 correspondence.

18 Q. Were they along the lines in terms  
19 of subject matter the types of documents we  
20 looked at yesterday?

21 A. Yes. The one from Gloria Kula was  
22 the letters to Dr. Marsha Orlov, and it was just  
23 I was asked to send these to you by Lenore  
24 Matusiewicz.

1 Q. I believe, correct me if I'm  
2 wrong, but I believe we were, we were discussing  
3 a correspondence in the March 2011 time frame  
4 when we stopped yesterday?

5 A. Yes.

6 Q. And I believe we also covered that  
7 there was a hearing on or about March 2nd, one  
8 of the TPR trial hearing dates was in March as  
9 well?

10 A. Yes.

11 Q. I want to move forward now from  
12 March and there was another hearing in June?

13 A. Yes, there was.

14 Q. And was that the last evidentiary  
15 hearing of the TPR trial?

16 A. It was the last evidentiary  
17 hearing, yes.

18 Q. And that was on or about June  
19 23rd?

20 A. Yes.

21 Q. And during that hearing, Christine  
22 Belford testified?

23 A. I believe she did.

24 Q. All right. David Matusiewicz

1 testified as well?

2 A. I believe he did.

3 Q. Okay. If you're not clear, that's  
4 fine.

5 After that hearing, is there  
6 another court session at which evidence is  
7 presented?

8 A. There is one more hearing where we  
9 did the closing arguments and also Don Roberts,  
10 who is the attorney for David Matusiewicz, in  
11 the interim had filed a motion to present  
12 additional evidence after the close of trial so  
13 we considered that, but then it was just closing  
14 arguments, no witnesses.

15 Q. Without getting too much in the  
16 weeds on the procedural details. After the  
17 Court hears argument, does it issue a decision?

18 A. It takes it under advisement, not  
19 from the bench it did, then the Court issues an  
20 opinion in August.

21 Q. I am pulling up what you should  
22 have there is Government Exhibit 308?

23 A. Yes.

24 Q. Can you take a look at that and

1 tell me if you have seen it before?

2 A. Yes, this is the opinion of the  
3 Court on the petition to terminate parental  
4 rights.

5 Q. Is this the final decision that  
6 the Court issues at the end of the case deciding  
7 the issue?

8 A. Yes.

9 Q. And it is submitted on July 13,  
10 2011, meaning -- what does submitted mean?

11 A. That means that the closing  
12 argument was completed and the decision was  
13 submitted to the Court. So we were done with  
14 everything that was going to be given to the  
15 Court and it's submitted and that's when the  
16 Court considers.

17 Q. So the issue is under  
18 consideration of the Court at that point?

19 A. Yes. The next one down.

20 Q. Says written decision signed.  
21 What is that date?

22 A. August 18th of 2011.

23 Q. What does that mean, decision  
24 signed?



1           A. That means that the judge signed  
2 the opinion on that day, so on the back there's  
3 a signature of the judge and there's a line and  
4 they will write the date that they sign the  
5 opinion.

6           Q. When you say on the back, you're  
7 referring to the last page of the decision?

8           A. Yes.

9           Q. All right. And just to be clear,  
10 these were the attorneys who appeared in the  
11 case listed here?

12          A. Yes.

13          Q. And that's the judge and how do  
14 you pronounce the judge's name?

15          A. Judge Crowell.

16          Q. And she's a judge of the Family  
17 Court of the State of Delaware?

18          A. Yes.

19          Q. All right. Now, we're not going  
20 to read this entire thing, but I do want to  
21 orient the jury to what it contains.

22          A. Okay.

23          Q. It's a judicial decision, so we're  
24 going to go rather quickly, but if you flip to

1 the next page you see there's an introduction  
2 and procedural background, right?

3 A. Yes.

4 Q. That lays out -- that's exactly  
5 what it sounds like, right?

6 A. Yes, it's what happened before we  
7 got to her closing the case, everything that's  
8 happened to date.

9 Q. If you proceed a few more pages  
10 you get to the background facts; is that right?

11 A. Yes.

12 Q. And then there are subsections in  
13 the background facts discussing different  
14 portions of the factual history of the case; is  
15 that right?

16 A. That's correct.

17 Q. If you go to page 8, I think it  
18 is, and I'm just going to highlight a few, but  
19 there are various aspects here, correct?

20 A. Yes.

21 Q. You'll see page 8 has a Subsection  
22 E, the psychological effects of the kidnapping  
23 of the children, correct?

24 A. Yes.

1 Q. If you continue on, you will see  
2 that Subsection F is entitled the children's  
3 attitude toward father?

4 A. Yes.

5 Q. If you continue onto page 14,  
6 right above the section that begins mother's  
7 mental health, you'll see there's, for example,  
8 a discussion on March 2nd, 2011, you see that?

9 A. Yes.

10 Q. Can you read just that line to  
11 give the jury a sense of this?

12 A. Starting with on March 2nd?

13 Q. Yes.

14 A. On March 2nd, 2011, when father  
15 was asked by the GAL in these proceedings  
16 whether he still believes that mother is abusing  
17 the children, he replied I can't answer whether  
18 she is or not at this moment, I know that she  
19 did. He told Doctor Romirowsky and Doctor Orlov  
20 that he still believes that mother sexually  
21 abused Laura.

22 Q. Okay. Now, these are the findings  
23 of the Court, right? And then there's the  
24 mother's mental health, another section on that.

1 There's a section on that?

2 A. Yeah. And just in case, I don't  
3 know, GAL is what the family court refers to in  
4 shorthand as the attorney guardian ad litem.  
5 Any time you see GAL, they are referring to the  
6 position of attorney guardian ad litem.

7 Q. There's a section at the end of  
8 the mother's mental health where the Court  
9 describes the mother's demeanor; is that right?

10 A. Yes. Mother's demeanor in the  
11 courtroom on seven different days and during her  
12 extended testimony on two different days  
13 reflected an extremely composed, very  
14 reasonable, appropriately concerned parent with  
15 surprisingly little anger or animosity toward  
16 father and no apparent desire for any revenge,  
17 especially admirable, the Court finds  
18 considering all the trauma to which father's  
19 actions have subjected her and her children.

20 Q. All right. Moving on, we get to a  
21 portion of the opinion where the judge sort  
22 of -- where the Court is discussing the  
23 termination of parental rights and the standard  
24 for such, right?

1 A. Yes.

2 Q. Those are the legal standards, so  
3 to speak?

4 A. Yes.

5 Q. We're going to skip over those.  
6 And if you go to page 22 of the document, I'm  
7 referring to the page when I say page 22, they  
8 are these numbers down to the bottom right  
9 corner?

10 A. Right.

11 Q. There's a section on best interest  
12 of the children, of the child here, but --

13 A. Yes.

14 Q. The actual language. And this  
15 describes various factors that relate to that  
16 analysis, correct?

17 A. Correct.

18 Q. All right. And including a  
19 Subsection 2, do you see that on page 23?

20 A. Yes. And these are following the  
21 best interest factors that I am required to  
22 assess and present an opinion on to the Court.  
23 They are in the statute set up directly.

24 Q. So this is the analysis -- these

1 were the judge's findings, but you had to look  
2 at these same factors and argue them to the  
3 Court, correct?

4 A. Correct, these and other factors,  
5 but these are what are included in what they  
6 have to consider.

7 Q. Subsection 20, page 23, is  
8 entitled what?

9 A. The wishes of the child as to his  
10 or her custodian and residential arrangements.

11 Q. All right. And if you could just  
12 read the first line.

13 A. All three children are said by the  
14 therapist who talked with them to be very happy  
15 and feeling very safe and secure living with  
16 mother.

17 Q. And then down below, what is  
18 clear?

19 A. What is clear is that at least  
20 Laura and perhaps Leigh feared being removed  
21 again from mother by father and his family.  
22 Laura is particularly angry at him both for what  
23 he did and for his lies about going to Disney  
24 World and about her mother's alleged death. She

1 wrote in a letter to him that she wants an  
2 explanation from him and that she was scared to  
3 see him but may want to see him when she is 18  
4 and in quotes, old enough to call the police.  
5 She also stated in a letter that, quote, I'm  
6 sorry that I don't have any good feelings for  
7 you.

And if David  
actually did  
write that  
explanation that  
Laura wanted  
from David  
Christine would  
have definitely  
filed another  
charge on  
David.

8 Q. Okay. There's a section on page  
9 24, I'll read the subheading, the interaction  
10 and interrelationship of the child with his or  
11 her parents, grandparents, siblings, persons  
12 cohabitating in the relationship of husband and  
13 wife with a parent of the child, any other  
14 residents of the household or persons who may  
15 significantly effect the child's best interest.

16 A. Yes.

17 Q. May be the longest subheading I've  
18 read. If you go to the next page, 25, there's a  
19 section at the top?

20 A. Yes.

21 Q. And if you could read that first  
22 sentence.

23 A. Laura is adamant about not wanting  
24 to see any of her father's relatives, in

1 parenthesis, his parents and sister. And Leigh,  
2 the autistic child, screams when she is shown a  
3 picture of her paternal grandmother whom she  
4 last saw over two and a half years ago.

who + what  
made these  
children go  
from loving  
their father  
& grandmother  
to infecting  
them with  
such hatred  
toward them  
to actually  
cause them to  
scream when  
shown picture?  
REALLY???

5 Q. All right. And I'm going to read  
6 these headings, but they continue on, the  
7 child's adjustment to his or her home, school  
8 and community. Obviously that says his or her.  
9 That language is not tailored to the particular  
10 children in this case; is that right?

Why did  
Karen have  
to hide a  
picture of  
David in her  
drawer?  
would she  
get in  
trouble for  
still loving  
her dad?

11 A. Right. That's just a direct  
12 language from the statute.

13 Q. That's right out of the statute.  
14 Okay. Section 5 is mental and physical health  
15 of all individuals involved and then it's broken  
16 down between mother and father, right?

17 A. Yes.

18 Q. All right. There's a section  
19 entitled father, a subsection entitled father's  
20 neglect attitude toward mother?

21 A. Yes.

22 Q. All right. And then another  
23 section 2 that begins father's accusation of  
24 mother's sexual abuse; is that right?



1 A. Yes.

2 Q. And this recounts the accusations?

3 A. Yes.

4 Q. And I'll just highlight quickly.

5 Including that Laura's hymen had been torn, that

6 she was wearing two pairs of underpants and I

7 believe there's a mention of the lollipop in

8 here, but I'm not sure.

9 A. Yes.

10 Q. Do you know?

11 A. I believe there is.

12 Q. All right. Well, this will --

13 obviously the jurors will be able to read this.

14 On the second page the judge's report goes into

15 a bit of the rationale for her belief that or

16 her conclusions with regard to the allegation;

17 is that right?

18 A. Yes.

19 Q. And the factual finding that the

20 Court makes is here; is that right?

21 A. Yes.

22 Q. And if you could read that.

23 A. Yes. This judge does not find

24 father's accusations to be credible and believes

1 they were made up to provide father and his  
2 mother, once they were caught, with a defense in  
3 their criminal proceedings. Even father's own  
4 expert, Doctor Orlov, stated in these  
5 proceedings, in quotes, it's almost like it, and  
6 then in parentheses, the sexual abuse  
7 allegations came up after he was found. And  
8 that's the part that I have a genuine concern  
9 there, end quote.

10 Q. All right. And it continues on  
11 here?

12 A. Yes.

13 Q. Could you read that?

14 A. So father is vague about exactly  
15 when he learned about the sexual abuse other  
16 than that it was in July or August, 2007, even  
17 though he also stated that it took two months to  
18 prepare to leave. Notwithstanding what he  
19 claims was evidence horrible enough to justify  
20 his kidnapping his children, to sell his home  
21 and his practice and to flee to Central America,  
22 he continued to let the children spend their  
23 usual time with mother in the interim before he  
24 left. And for a father who went to the ends of

This is  
contrary to  
the testimony  
of Peggy  
Mitchell, Linda  
Morris, Mille  
Bruno &  
Christine  
Evans.

The sexual  
abuse  
allegations  
were told to  
the authorities  
after they were  
found, but  
discussed with  
several others  
prior to this.

1 the earth to find a treatment for his daughter's  
2 autism, he never sought out any therapy or  
3 treatment for Laura. Most importantly he never  
4 went to any of many possible resources in the  
5 community for help for Laura. He did not call  
6 the police, he did not contact the children's  
7 doctor, A.I. Dupont --

8 Q. And then we go over to the next  
9 page, which is 29.

10 A. -- Hospital for Children or the  
11 Children's Advocacy Center. He did not take  
12 Laura to any counselor, nor did he contact his  
13 own counselor at the time. He did not contact  
14 Laura's school. He did not contact any of the  
15 many experienced layers he had had during the  
16 course of his divorce proceedings. He did not  
17 contact the family nor file an emergency PFA, a  
18 procedure with which he was familiar, nor  
19 request an emergency order to suspend  
20 visitation. This court can only conclude that  
21 the contacts were not made, the help never  
22 sought and the counseling never requested  
23 because father did not then really  
24 mother had abused Laura at that time

And the lawyer  
he did discuss  
abuse with  
told David that  
if it was his  
kids he would  
take the kids  
& leave the  
country because  
no matter what  
you say about  
the mother in  
the state of DE  
they want take  
the kids from her.

REALLY? so why then  
would a man leave  
his loving friends &  
family, beautiful home,  
thriving, successful  
optometric practice if  
it weren't for the safety  
of the children that  
he would give his  
last breath?

Q. And this just continues on. We're not going to read through the Court's entire findings, but there's another subsection, father's limited remorse; is that correct?

A. Yes.

Q. Another subsection onto page 31 entitled father's deceit and manipulation; is that correct?

A. Yes.

Q. With discussions about particular things on page 32 that Laura had reported and if you could just read this to give the jury a sense of this.

A. When father was told that Laura reported that he had told her in Central America that her mother had committed suicide and was dead, he denied telling her that and said that if Laura said it, she was a liar.

Q. All right. And it continues on, there's another subsection called distrust of authority?

A. Yes.

Q. And if we could just read the beginning portion of that.

Regarding David telling Laura that Christine was dead in Central America - David's email response when I asked him to explain this incident (as I've sent previously):

"We were walking back up the hill from the town center (in Catarina) & Laura actually said, "I think mommy is dead." There was no prompting & I don't remember what we were talking about at the time. I was surprised & do not remember what I said in response."

Previous transcripts also verify Lee saying that Laura was the one to say, "I think mommy is dead." Lee explained what being dead really means.

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1           A.    Father's distrust of anyone but  
2    his family is also a disturbing feature of his  
3    personality.  If he really did believe that his  
4    daughter was sexually abused, it is scary to  
5    think that he trusted no one outside his  
6    immediate family, not the police, not the  
7    medical profession, not the child protective  
8    system, not the educational system, not his  
9    counselor, not his attorneys and not the legal  
10   system.  The fact that he would intentionally  
11   violate the family court.

*This is not a feature of David's personality. I'm sad to say that this distrust with all of these systems is also with a good majority of the people in the US.*

12           A.    The fact that he would  
13   intentionally violate the Family Court order  
14   also is very concerning, raising questions about  
15   future compliance with court orders.  His  
16   violation was not a quick impulsive knee-jerk  
17   reaction, but one that took at least several  
18   months, if one believes his story, and most  
19   likely longer to plan and --

20           Q.    We can stop there.  This continues  
21   on and the Court ultimately reaches the  
22   conclusion.  And if I can just get to that, this  
23   is one statement, thus --

24           A.    Thus with great reluctance,

1 considering all the factors of Section 722, the  
2 GAL's position and the grave concerns expressed  
3 above, the Court finds by clear and convincing  
4 evidence that it is in the children's best  
5 interest for the father's parental rights to be  
6 terminated.

7 Q. Thank you.

8 The Court: Does that complete the  
9 discussion of the findings, Mr. McAndrew?

10 MR. McANDREW: It does. I was  
11 simply going to mention the appeal, but if Your  
12 Honor prefers.

13 The Court: Ladies and gentlemen  
14 of the jury, in terms of the admissibility of  
15 some of the history of the case, I have told you  
16 that from time to time we will hear about  
17 different events.

18 So I have allowed you to hear the  
19 findings of the Family Court with respect to the  
20 termination of parental rights. All right. As  
21 relevant background information. That does not  
22 definitively conclude that no abuse took place  
23 because that issue is in front of the Court  
24 here, but what you just heard about what the

1 Family Court held might be considered as  
2 relevant to potentially a motive for future  
3 things that occurred including the stalking that  
4 the Government alleges occurred.

Don't you think this probably swayed the jury into a guilty verdict hearing previous opinions of a Judge?

5 Remember, I said this before, when  
6 a judge says this is admissible, what that  
7 means, it is something for you to consider. All  
8 right? But you must consider it in light of all  
9 the evidence that you hear and in light of the  
10 arguments of down. All right? So you have now  
11 heard this, I have told you why you heard it,  
12 these findings are not automatically binding on  
13 you, but they're part of the evidence for you to  
14 consider in the case.

No doubt in my mind that it did. Some people believe if a Judge said it then it must be true. Judges are also HUMAN & make mistakes.

15 MR. McANDREW: Thank you, Your  
16 Honor.

17 BY MR. McANDREW:

18 Q. Ms. Lawson, once the decision of  
19 the Court is issued, was there an appeal?

20 A. There was an appeal filed by David  
21 Matusiewicz.

22 Q. And to what court is the decision  
23 appealed under Delaware law?

24 A. The Supreme Court of the State of

1 Delaware.

2 Q. And the appeal goes all the way  
3 through to the decision in the Supreme Court of  
4 the State of Delaware?

5 A. Yes, it does.

6 Q. Without getting into the details,  
7 did the Supreme Court of Delaware affirm or  
8 uphold the decision of the Family Court?

9 A. The Supreme Court affirmed or  
10 agreed with the opinions that it stand as  
11 written.

12 Q. And about when did that occur, if  
13 you know?

14 A. I believe that happened around  
15 February of 2012, somewhere in that range.

16 Q. The Supreme Court of Delaware is  
17 the highest court in Delaware?

18 A. Yes.

19 Q. After the appeal is concluded and  
20 the decision is affirmed, is that the end of the  
21 TPR litigation?

22 A. That is the end of the TPR  
23 litigation.

24 MR. McANDREW: Thank you. Your

And just because the highest court in the state of DE affirms the decision of the lower court, would you EVER give up on your children?



1 Honor. I'll tender the witness. Thank you.

2 The Court: All right. Counsel,  
3 who wishes to go first?

4 MR. EDELIN: Your Honor, with the  
5 Court's permission.

6 The Court: Of course.

7 CROSS-EXAMINATION

8 BY MR. EDELIN:

9 Q. Good morning, ma'am.

10 A. Good morning.

11 Q. How are you?

12 A. I'm good. How are you?

13 Q. Wonderful. Thank you.

14 I'm going to ask your indulgence  
15 for a minute because I want to go back to some  
16 of what you said yesterday just to help remind  
17 myself.

18 You were appointed by the Court to  
19 serve as the guardian ad litem; is that right?

20 A. Yeah, the attorney guardian ad  
21 litem.

22 Q. Attorney guardian ad litem?

23 A. Yes.

24 Q. In that capacity, it is your role,

1 your function to serve as the children's in this  
2 case, or child if there is only one child, best  
3 interest?

4 A. To represent their best interest,  
5 yes.

6 Q. Okay. And this is in an official  
7 capacity, you have been appointed by the Court  
8 to do that?

9 A. Yes.

10 Q. And this is something that you do  
11 on a fairly regular basis?

12 A. Yes.

13 Q. And in your official capacity, you  
14 reach out and you speak to the parties involved  
15 in the matter?

16 A. I do.

17 Q. And in your official capacity, you  
18 request and expect those parties to give you  
19 their side of the story?

20 A. I do.

21 Q. And part of their side of the  
22 story could certainly include receiving  
23 documents, and you asked them to send me  
24 whatever documents you want to me to look at to

1 help me make my decision?

2 A. I do.

3 Q. You want as big and complete a  
4 picture as you can possibly get because  
5 naturally we want to get this right?

6 A. Correct.

7 Q. And in this case in particular,  
8 you followed that protocol?

9 A. I do.

10 Q. You reached out, you asked them  
11 for documents, you told them to tell you  
12 whatever they wanted to tell you to help you  
13 make your decision?

14 A. Yes.

15 Q. And I believe you testified  
16 yesterday and part of today about all of the  
17 documents that you received in the mail from Tom  
18 and Lenore?

19 A. Correct.

20 Q. And it was a significant stack of  
21 documents?

22 A. Yes.

23 Q. Okay. And just so we're clear,  
24 those mailings came from Tom and Lenore, they

1 didn't come from Amy and they didn't come from  
2 David?

3 A. I got an E-mail from David, but I  
4 didn't get packages from David. And I know I  
5 got a tape, but I'm not sure who gave me the  
6 tape, so I honestly can't remember who gave me  
7 the tape, but I know it was from, originally  
8 from O'Rourke Investigative Agency.

9 Q. But the packages that you  
10 testified about yesterday, those are with the  
11 packages you received from Tom and Lenore?

12 A. Correct.

13 Q. Not Amy and not David, just so  
14 everybody is clear?

15 A. Yes.

16 Q. Now, contained in those packages  
17 may have been letters or e-mails that either Amy  
18 or David had written, but they didn't send them  
19 to you, those were in the packets from Tom and  
20 Lenore?

21 A. Yes. David did tell me that, you  
22 know, his parents had his documents because he  
23 was in prison at the time, and they're not  
24 allowed to keep a lot of things. So I don't

1 know who was instructed to send what where. I  
2 can tell you they came from Tom and Lenore, but  
3 I was told by David that they had information  
4 from him on his behalf.

5 Q. Right. And again, I'm merely  
6 speaking about the mailing. Who mailed them to  
7 you?

8 A. The envelopes were from Tom and  
9 Lenore Matusiewicz.

10 Q. Fair enough.

11 And so as you're receiving -- as  
12 you're receiving these packets, and again, it's  
13 considerable, you're obviously reading through  
14 them, and I believe you testified you read  
15 through everything because again, you're trying  
16 to figure out what's going on and you want to  
17 get it right?

18 A. Yes.

19 Q. I also believe I remember you  
20 saying that your initial reaction as you were  
21 \* reading these packets was if this is true, this  
22 is absolutely horrible what's happening to this  
23 little girl?

24 A. Correct.

1 Q. And so, ma'am, would it be fair to  
2 say that if you believed, if you believed -- and  
3 please let me know if you need a minute.

4 If you believed what was contained  
5 in the packets, if you believed the allegations  
6 about what was happening to Laura, your actions  
7 would have been different than what they were;  
8 is that fair to say?

9 A. If I had reasonable belief that  
10 she was being abused, at the time I would have \*  
11 taken different actions, yes.

12 Q. That makes sense; right?

13 A. I'm required to by law, so yes.

14 Q. If you believe the allegations  
15 that were contained in the package, you  
16 certainly -- your recommendation would have been  
17 different to the Court?

18 A. My recommendation would have been  
19 different to the Court and by law every person,  
20 not just -- any person who has reasonable \*  
21 suspicion of abuse has to report it to the state  
22 hotline, so I would have called the state  
23 hotline number and reported it as required by  
24 law.

1 Q. And if the state hotline received  
2 the information and they believed that the  
3 allegations about what was happening to Laura  
4 were true, they would have acted upon it?

5 A. Yes, they would have.

6 Q. And if when you made your  
7 recommendation to the judge, she believed that  
8 the allegations that were happening to Laura  
9 were accurate, she would have acted upon it?

10 A. Yes, she would have.

11 Q. And if the attorney that was  
12 appointed, I believe you called it a Fraser  
13 attorney?

14 A. Correct.

15 Q. If the attorney that was appointed  
16 to represent the child or children's interest  
17 believed that the allegations were true about

Gillian Blair testified that when the DFS staff documented that some of the allegations were concerning they didn't act upon it, per their protocol.

20 A. Yeah. I just want to clarify one  
21 thing, she was not appointed to represent their  
22 interest, she was appointed solely to represent  
23 their wishes. It's a very limited, very limited  
24 scope. But if she had uncovered any information

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2 the information and they believed that the  
3 allegations about what was happening to Laura  
4 were true, they would have acted upon it?

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7 recommendation to the judge, she believed that  
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9 were accurate, she would have acted upon it?

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12 appointed, I believe you called it a Fraser  
13 attorney?

14 A. Correct.

15 Q. If the attorney that was appointed  
16 to represent the child or children's interest  
17 believed that the allegations were true about  
18 what was happening to Laura, they would have  
19 acted, he or she would have acted differently?

20 A. Yeah. I just want to clarify one  
21 thing, she was not appointed to represent their  
22 interest, she was appointed solely to represent  
23 their wishes. It's a very limited, very limited  
24 scope. But if she had uncovered any information

Gillian Blair  
testified that  
when the  
DFS staff  
documented that  
some of the  
allegations  
were concerning  
they didn't  
act upon it,  
per their  
protocol.



1 that gave her a reasonable suspicion that any of  
2 the three children were being abused, as a  
3 person, not as a court appointed fiduciary body,  
4 but as a person she was required to report that  
5 to the State of Delaware.

6 Q. And it would be fair to say that  
7 had she believed that the allegations about what  
8 was happening to Laura were true, she would have  
9 acted differently than she did, her  
10 recommendations may have been different and that  
11 type of thing?

12 A. I can say that probably, but I'm  
13 not her, I don't know what she was thinking, but  
14 I can tell you that by law if she had reasonable  
15 suspicions that any of the girls were being  
16 abused, she was required by law to report it as  
17 a person in the State of Delaware.

18 Q. Ma'am, would you also agree with  
19 me that even if you believed the allegations  
20 about what was happening to Laura were true, and  
21 the judge believed the allegations about what  
22 was happening to Laura were true, you could  
23 disagree on what the remedy should be?

24 A. I don't know about if we could

1 disagree. I'm trying to figure out what you're  
2 asking me. I mean, there is no disagreement  
3 that all of us have under Delaware statute an  
4 obligation to report it. So I don't think any  
5 of us would disagree on that issue. The statute  
6 is very clear. Any person, reasonable  
7 suspicion, you shall report, done. So I don't  
8 think any of us would have disagreed on that, as  
9 anyone who has ever represented children or  
10 parents or would know that you have an  
11 obligation to report it. It's not debatable,  
12 it's not questionable. You can't report it to  
13 your supervisor and let them report it. It is  
14 you who has the obligation as an individual in  
15 the State of Delaware that must report it. So I  
16 don't think we would differ on that.

17 If you're asking me --

18 Q. Let me ask it this way. Maybe  
19 this will be a little clearer. Let's step away  
20 from this case just for a second. Let's say you  
21 were representing -- you were appointed as an  
22 attorney guardian ad litem, and you find X set  
23 of facts to be true. You go before a court and  
24 the Court agrees with you that X set of facts

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**A2164**

1 are true.

2 A. Yes.

3 Q. You as the attorney guardian ad  
4 litem can recommend Y as what you think the  
5 course of action should be?

6 A. Yes.

7 Q. The judge, although he or she  
8 agrees with you that X set of facts are true,  
9 could decide that Z course of action is what  
10 they will take?

11 A. Yes.

12 Q. Okay.

13 A. The Court does not always agree  
14 with my position, absolutely. And they don't  
15 have to. It's an independent decision maker.

16 Q. And what I can promise you is they  
17 don't follow my recommendations, either.

18 A. Exactly.

19 Q. So in that scenario, X is agreed  
20 to by everybody. Everybody believes X to be  
21 true, but you want Y to happen, and suggest Y to  
22 happen. The Court decides to do Z.

23 A. Yes. That is possible, as a  
24 hypothetical, yes.

1 Q. And you could be so convinced that  
2 Y should happen that you could think the course  
3 and conduct of Z is wrong?

4 A. Yes, I could.

5 Q. And, in fact, you could be so  
6 convinced that Y should happen, when the judge  
7 says let's do Z, you could be offended by that?  
8 You could say Z, doing Z is a tragedy?

9 A. I mean, yes. Have I represented  
10 particularly people in Family Court where I  
11 thought -- I had a parent recently that I was  
12 appointed to represent, which is not typically  
13 the side I'm on. I always represent the  
14 children. But I was appointed to represent a  
15 parent who someone was trying to take their  
16 child away from them, a relative. And I was  
17 charged with representing the parent, and  
18 advocating for the parent, which is the opposite  
19 side of where I have been for ten, twelve years.

20 But I understood and acknowledged  
21 some of the allegations and am still able to  
22 advocate my client's position to the Court.  
23 Ultimately that court disagreed with me. Was I  
24 upset by it? I think lawyers like to win. We

1 fight with each other and one side wins and one  
2 side loses, sometimes there is a compromise. I  
3 wasn't personally devastated or upset by the  
4 decision, it just sort of is what it is. I  
5 advised the client and I move on.

6 I will tell you with children, I  
7 do try to do exactly what is in their best  
8 interest because they don't really have a voice,  
9 they're young, they're not capable of telling  
10 people what their positions are in court. They  
11 can't come in here, this scares them to death to  
12 come into court like this, and they can't come  
13 in and tell the judge all these things, so I  
14 find that my role is extremely important to  
15 present their best interest because in a lot of  
16 these cases, the parents, the state, the parents  
17 disagree with each other and they're all  
18 fighting with each other and nobody is there to  
19 be the neutral party who says hey, put your  
20 stuff aside and let's look at what's best.

21 So I do take it seriously and if  
22 the Court doesn't agree, the Court doesn't  
23 agree. If other sides don't agree, then they  
24 don't agree. And it just sort of comes out

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**A2167**

1 where it is and you know you address it the way  
2 you can. You appeal it, you challenge it or you  
3 find other solutions, or you, you know, hope --  
4 I lost one of my first cases, I didn't get what  
5 I wanted for the child, hoped for the best. I  
6 don't know what -- I know, I learned  
7 subsequently what happened to that child, but  
8 it's a decision you just move on from.

9 Q. And you've learned to do that in  
10 your role as a professional and as an attorney?

A. I learned to do that in my role as  
a mental health professional because patients  
repeatedly, you know, come back and don't do  
what's recommended and you can't help everybody,  
but yes, you have to separate yourself and move  
forward.

17 Q. Absolutely. And conceptually, you  
18 would agree that there could be instances where  
19 you felt so strongly that X was what was in the  
20 best interest of the child, that if a judge  
21 decided to do Z -- and let me use the same  
22 letters I was using last time. If you decide Y  
23 is in the best interest of the child, and the  
24 judge decided to do Z, that you thought was not

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**A2168**

*This statement reminded me of Christine not staying on her prescribed psychological medications which Dr. Richman testified was a problem with Chris.*

1 in the best interest of the child and may, in  
2 fact, put the child in harm's way, you would be  
3 offended by that, you would view that as a  
4 tragedy, just like any of us would?

5 A. I don't know if I would be  
6 offended, but I would not be happy with the  
7 decision.

8 Q. Fair enough. And so again,  
9 conceptually you can agree with me that even  
10 though both or all parties can agree that X set  
11 of facts is accurate, you could decide Y is the  
12 course of action, judge could decide Z is the  
13 course of action, the Frasier attorney could  
14 decide M is the course of action, the parties'  
15 individual attorneys could also decide that  
16 different course of actions are what are most  
17 appropriate?

18 A. Yeah. I mean that's the whole  
19 reason we all end up in court in pretty much  
20 every case. If we all agreed or could work it  
21 out, all of us would not be in court on a  
22 regular basis, every day or every month. I mean  
23 that's -- and that's one of the ways I explain  
24 it to the kids, is one of your parents wants one

1 thing for you, the other parent wants the other  
2 thing for you, and they can't agree and so the  
3 judge is going to decide. We take it to the  
4 Court and the Court is going to make a decision.  
5 We all argue our positions, but the judge gets  
6 to do what the judge wants to do after  
7 considering all of the information that we  
8 provide to the Court. We may win, we may lose,  
9 but it's ultimately the Court that makes the  
10 decision.

11 Q. And I guess the only slight  
12 distinction I would make in your scenario is I  
13 want it to be clear, that everybody could come  
14 up with different opinions and different  
15 strategies as to what should happen with the  
16 children or what should -- how to best resolve  
17 that scenario, even if they agree on the core X  
18 set of facts?

19 A. I would agree with that, yes, that  
20 everybody could agree on facts. I think in this  
21 case I don't think there was any dispute that --  
22 like the different terms of ways to terminate  
23 parental rights, one of them is that a parent  
24 has committed a felony against the children. No



1 one was disputing that David had been convicted  
2 and pled guilty of international parental  
3 kidnapping, which is a felony under the statu  
4 Nobody disagreed.

Big  
difference  
with this  
case - you  
can't plead  
guilty to a  
crime you  
are not  
guilty of  
committing.

5 Q. And I think you would agree with  
6 me, we can even take it out of the context of  
7 this case and just speak, we can apply that same  
8 theory, that same line of logic generally,  
9 everybody could agree on X, but the different  
10 parties involved could have different ways to  
11 resolve it?

12 A. Suggestions to resolve it, yes.

13 Q. Okay.

14 A. The Court doesn't, unfortunately,  
15 get the ability to, you know -- they consider  
16 multiple ones, but in the end the judge has to  
17 make a decision.

18 Q. Right. And I understand that.  
19 And at the risk of beating a dead horse, you  
20 could agree or disagree with the judge's  
21 decision?

22 A. Yes, I can.

23 Q. As could all the other parties?

24 A. Yes.

1 Q. So ma'am, and finally, would you  
2 agree with me that in the course of receiving  
3 all of this material from Tom and Lenore,  
4 included in those several packets, was a report  
5 that they took and passed a lie detector test  
6 saying they believed these allegations to be  
7 true about what was happening with Laura?

8 A. Well, actually I never received  
9 the lie detector tests from Lenore, Tom  
10 Matusiewicz, Amy Gonzalez or David Matusiewicz.

11 Q. That was not included in any of  
12 the packets?

13 A. Never.

14 Q. Okay.

15 A. I received that from somewhere  
16 else.

17 Q. Okay. Then I apologize. You are  
18 aware that it existed at some point. You did  
19 see it?

20 A. It was sent to me by the girls'  
21 school and it was sent, North Star Elementary  
22 and it was sent to me by Doctor Bocanegra.

23 Q. Okay.

24 MR. EDELIN: Thank you, Your

1 Honor. Nothing else.

2 MR. IBRAHIM: May I, sir?

3 The Court: Yes.

4 BY MR. IBRAHIM:

5 Q. Good morning, Ms. Lawson. How are  
6 you?

7 A. Good morning. How are you.

8 Q. I'm good. Thank you. I just have  
9 really one brief area I'd like to talk to you  
10 about. In Delaware, correct me if I'm wrong,  
11 there is a statutory provision that allows for \*  
12 third-party visitation after parental rights are  
13 terminated, correct?

14 A. That is correct.

15 MR. IBRAHIM: How do I turn this  
16 Elmo on? Thank you.

17 BY MR. IBRAHIM:

18 Q. Attorney Lawson, I'm just going to  
19 first put up the first page of this document.  
20 Do you recognize the statute and the provision?

21 A. Yes. It's Title 13 of the  
22 Delaware Code.

23 Q. Excellent. I'm going to turn to  
24 or at least direct you to a specific provision

1 which I'm presuming you anticipate I'm going to.

2 A. Possibly.

3 Q. All right. Section D, it talks  
4 about if a parents' rights have been terminated?

5 A. Yes.

6 Q. In the child with whom a party  
seeks third-party visitation, the terminated  
parent and the terminated parents relatives are  
prohibited from filing third-party visitation  
unless.

A. Unless.

12 Q. So it's possible so long as  
13 certain conditions apply?

14 A. Correct.

15 Q. The first one is three years have  
16 to pass?

17 A. Correct.

18 Q. Since the termination. So in this  
19 case if my memory serves me correctly, the  
20 termination was August 18th, 2011?

21 A. Right.

22 Q. So it would have been August  
23 18th --

24 A. 2014.

Dad + I both  
motioned  
for 3rd  
party visitation  
through our  
attorney  
Amy Butler.

1 Q. 2014. Okay. And before I turn  
2 the page, let me just highlight. And then  
3 there's an or?

4 A. Correct.

5 Q. It's not that both of these have  
6 to apply, one of these has to apply?

7 A. Right.

8 Q. And then there's a second part  
9 talking about if, if there was a situation of an  
10 adoption and the parents or the person that  
11 adopted the child had made an agreement that  
12 hey, listen at some time later on I'll allow  
13 visitation, is that a fair paraphrase of that?

14 A. I don't know, I think it's the top  
15 section. I know there's something about the  
16 age, a certain age, but so can you move it so I  
17 can see it? I don't read these every single  
18 day. Sorry.

19 Q. Okay. I'll give you an  
20 opportunity to read it, just lift your head when  
21 you're prepared.

22 A. I see what it says. I will be  
23 honest with you. I'm not sure how the word  
24 adoptive parent is interpreted, because I know

t an adoptive parent is. If you're looking  
this in term of this case with these parents,  
n it says the adoptive parent, if there was  
y one adoptive parent, I believe and I may be  
ng, I haven't reserved it, but I believe this  
referring to when a child is adopted.

Q. Right.

A. By one parent, so the other  
ents don't have rights or are deceased or  
ething happens and they are adopted by a  
gle person. Or, you know, if their rights  
e terminated as of both parents and a single  
ents adopts them. So I'm not sure.

Q. I think we can agree that it's the  
st section that would apply in this situation  
someone such as a relative or even if David  
usiewicz wanted to, that after three years he  
ld fall under that provision to have the  
lity to apply for visitation?

A. I believe that's correct.

Q. Okay.

A. That they would have three years  
petition, yes.

Q. They would have to wait for three

So according to the Delaware code statutory provision when a parent's rights have been terminated that parent + their relatives can seek 3rd party visitation after 3 yrs since the termination or adoption of the children (This adoption portion is unclear even to the lawyers).  
So how does wanting to stay a part of these children's lives be considered stalking in any way?

1 years to pass?

2 A. Yes.

3 Q. Okay. And then there is a section  
4 that provides the contents of the third-party  
5 visitation provision?

6 A. Yes.

7 MR. IBRAHIM: Your Honor, I'm  
8 going to ask that this be marked AG Defense  
9 Exhibit 1.

10 The Court: Any objection,  
11 Government?

12 MR. McANDREWS: It's a statute,  
13 Your Honor, so I don't want it to become  
14 confusing, Your Honor.

15 The Court: Purpose of  
16 identification is fine. I'll accept that.

17 MR. IBRAHIM: May I approach the  
18 witness with the document?

19 The Court: You may.

20 BY MR. IBRAHIM:

21 Q. And you're doing -- I was going to  
22 ask you to take a look at it. Let me know if  
23 those three pages are a complete reproduction of  
24 that statute.

1 A. Well, I have to be honest, I'm not  
2 sure. I can tell you that this is a complete  
3 Chapter 24, but I don't know -- I don't memorize  
4 how many parts of this are, so I'm not sure.

5 Q. Okay.

6 A. I mean, it looks like the Delaware  
7 Code, you know, this is the way it would appear  
8 in our computer. The sections are, you know, in  
9 the right order. I just can't tell you this is  
10 the entire section or, you know, if there's  
11 more.

12 The Court: And counsel, any  
13 relevance to this will be covered by the Court's  
14 instructions.

15 MR. IBRAHIM: Yes. Okay.

16 BY MR. IBRAHIM:

17 Q. Let me put it to you this way and  
18 I appreciate your sense of accuracy. It's fair  
19 to say that third-party visitation would permit  
20 a relative to apply for visitation after three  
21 years have passed since the termination of  
22 parental rights?

23 A. I believe that is correct.

24 However, what I can't find in here is I



1 believe -- I don't know if there's some  
2 limitation if the child is adopted. I'm not --  
3 but this is what this provision does say. I'm  
4 just not sure if there's another section that  
5 limits that in certain circumstances.

6 Q. And as an attorney, you would do  
7 legal research to determine whether or not, if I  
8 were a client asking you that, whether or not  
9 that were possible?

10 A. Correct. I mean, on the facts of  
11 this case, I didn't have -- it was going to  
12 solely be Christine and no second adoptive  
13 parent, so that wasn't researched or argued or  
14 considered.

15 Q. All right.

16 MR. IBRAHIM: Thank you very much,  
17 ma'am.

18 The Court: Ms. Chavar?

19 MS. CHAVAR: We have no questions  
20 for this witness, Your Honor.

21 The Court: Any redirect for this  
22 witness?

23 MR. McANDREW: Yes, Your Honor.

24 BY MR. McANDREW:

1 Q. Ms. Lawson, I just want to clarify  
2 a few things. Mr. Ibrahim was just asking you  
3 about third-party visitation, correct?

4 A. Yes.

5 Q. What is visitation and third-party  
6 visitation as you understand it?

7 A. Well, third-party visitation can  
8 be sort of all over the place. It could be with  
9 the State in what the Hudson Center or some  
10 other state center where it's monitored by state  
11 employees through two-way mirrors and  
12 microphones. It could be with a state employee  
13 in the room, it could be -- it could be limited  
14 to solely letter writing, it could be limited  
15 just to phone calls, it can be visitation going  
16 to the child's house or meeting at a mutual  
17 location and seeing the child. It could be to  
18 taking them on overnights. It ranges from every  
19 possible thing of contact between a child and  
20 someone who is seeking visitation.

21 Q. Okay. So it's some sort of  
22 contact with the child and the person who is  
23 petitioning for visitation; is that right?

24 A. That's correct.

1 Q. But it's not custody?

2 A. It is absolutely not custody. And  
3 I believe that there's also -- and maybe it's  
4 not in here, maybe it's somewhere else, but a  
5 lot of times there's provisions where it has to  
6 be in the best interests of the child, so for  
7 example, if you terminate someone's parental  
8 rights --

9 Q. Go ahead.

10 A. You know, they could seek  
11 something later, but the Court would have to  
12 consider if it's in the best interest of the  
13 child.

14 Q. In determining whether visitation  
15 is appropriate?

16 A. I believe, yes. I believe that --

17 Q. There's some legal standard that  
18 needs to be met?

19 A. Yes, almost every time somebody  
20 wants access to a child in Delaware, the Court  
21 will consider the best interests of the child.

22 Q. Very well. Now, Mr. Edelin asked  
23 you a few questions and I just want to go back  
24 over them, because he was asking you about if

1 you had believed the allegations, would your  
2 actions be any different. Do you remember him  
3 asking you that?

4 A. Repeat your question. I'm sorry.

5 Q. Mr. Edelin had asked you about if  
6 you believed the allegations that were being  
7 made of the sexual abuse, would your actions  
8 have been different in this case.

9 A. Yes, they would have.

10 Q. And you remember him asking you  
11 that and you said that?

12 A. Yes.

13 Q. You talked about reporting,  
14 correct?

15 A. Yes.

16 Q. I just want to be clear for the  
17 jury to whom or to where are allegations of  
18 sexual abuse required to be reported because you  
19 said they were required to be reported.

20 A. Well, there is a statute which  
21 most people don't read the Delaware Code, it's  
22 fairly boring and most people don't know where  
23 to look or what it is. But the state has a  
24 website and there is an 800 number. The statute

1 that's on their website that's published, you  
2 can look anywhere on the state website and find  
3 it. It's called the Child Abuse Hotline. It's  
4 an 800 number and you have to call that number.

5 Q. So there is a hotline?

6 A. Yes.

7 Q. When you're talking about  
8 reporting something, you're talking about  
9 reporting it to a hotline run by the state?

10 A. Yes, even as an attorney guardian  
ad litem, I had concerns with one child who was  
in a foster home and I thought they were being  
treated poorly and there was abusive language  
and other things going on in the home, even  
though I am an attorney the first thing I did

16 was call the hotline. I didn't call the  
17 Division of Family Services worker, I didn't go  
18 to the Court, I did later, but my obligation is  
19 to call the hotline, so I call the hotline and I  
20 make a report at the moment that I know this is  
21 going on and then I deal with it in the Family  
22 Court through the proceeding separately.

23 Q. Okay. So cases that you had,  
24 then, have started as a report and ended up in

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**A2183**

I did that  
& the only  
thing that  
was done  
was DFS  
contacted  
Jeffrey Shriner  
& he verified  
an interview  
was done of  
Laura in March  
2009 regarding  
the kidnapping  
only.

1 Family Court?

2 A. I have to report during a case.  
3 The cases may have been reported and ended up in  
4 court and then I get appointed, but for me  
5 personally during a case, if I have known there  
6 was abuse then you report it. In my mental  
7 health days, if I had a suspicion a child was  
8 being abused in any way, I would call the  
9 hotline and report them, yes.

10 Q. The Family Court has jurisdiction  
11 over child abuse litigation?

12 A. Yes.

13 Q. So these reports when they come in  
14 can often end up in Family Court being dealt  
15 with later on?

16 A. Yes. In my mental health days I  
17 was called as a witness in several of those  
18 cases where I reported abuse.

19 Q. All right. Now, you were also  
20 asked -- I mean, just to be clear, you did not  
21 believe the allegations that had been made with  
22 regard to the abuse; is that right?

23 A. That's correct, I did not.

24 Q. I don't want you to repeat

1 yourself, I think you have already told us why,  
2 we looked at the court's decision. Was there  
3 anything in the court's factual findings that  
4 you disagree with on that point?

5 A. No, I do not.

6 Q. All right. You were also asked  
7 about polygraphs, and whether you had received  
8 polygraphs from Amy Gonzalez and Lenore  
9 Matusiewicz?

10 A. Yes.

11 Q. Polygraphs taken of Amy Gonzalez  
12 and Lenore Matusiewicz?

13 A. Correct.

14 Q. You do recall receiving them at  
15 some point?

16 A. I do.

17 Q. Do you know when relative to the  
18 end of the proceeding you received them?

19 A. I received them from  
20 Dr. Bocanagra, so we had two hearings in  
21 November, and they were like.

22 Q. 2010?

23 A. Of 2010, and I can look at the  
24 opinion to make sure, but --

Q. Actually if you don't remember.

A. One was the 10th and one was the

I believe. I got the polygraphs from  
Brananegra on the 11th, she sent me documents

her files. And then I got them later in

case and I don't remember, I know it's

and or after March.

Q. I don't want to tie you down to

A. But I got them from the school who

and they had received them and they

them to me.

Q. Did you review them?

A. Yes.

Q. Had you ever seen polygraph

s before?

A. Maybe in law schools, but not

lly.

Q. So you're not an expert on

aphs?

A. No.

Q. Let me ask you, after you reviewed

did it change your view at all?

A. No, it did not.

Isn't it ironic how the government + the courts tied us down with the dates regarding when each of us had our 1st suspicions of child abuse, but they don't want to tie Ms. Lawson down to dates? I'll show you why. The polygraph couldn't possibly have EVER been sent to Ms. Lawson by Dr. Brananegra anytime in Nov 2010 because the polygraphs weren't even taken until Jan. 8, 2011.

Look for yourselves - there are copies of this fact on the webpage.

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1 MR. McANDREW: Thank you. Nothing  
2 further, Your Honor.

3 MR. EDELIN: Nothing, Your Honor.  
4 Thank you.

5 MR. IBRAHIM: May I?

6 RECROSS-EXAMINATION

7 BY MR. IBRAHIM:

8 Q. Hello again.

9 A. Hello.

10 Q. Just some quick questions on this  
11 visitation definition. You're familiar with the  
12 Family Court website; correct?

13 A. Yes.

14 Q. And on the website, there is -- if  
15 someone is interested in third-party visitation  
16 or something of that nature, the Court sends  
17 them a bunch of forms they can fill out;  
18 correct?

19 A. Yes.

20 Q. But somewhere on there, it tells  
21 folks this is not legal advice, this is really  
22 just telling you what the forms are?

23 A. That's correct.

24 MR. IBRAHIM: Thank you.

1 The Court: All right. You may  
2 step down.

3 THE WITNESS: Thank you.

4 MR. McCALL: Your Honor, we would  
5 call Victor Weedn.

6 The Court: All right.

7 THE CLERK: Please place your left  
8 hand on the bible and raise your right hand.  
9 State your full name for the record.

10 THE WITNESS: My name is Victor  
11 Walter Weedn. I spell my name W-E-E-D-N, five  
12 letters.

13  
14 VICTOR WALTER WEEDN, M.D.  
15 the deponent herein, having first  
16 been duly sworn on oath, was  
17 examined and testified as follows:

18 MR. McCALL: Your Honor, may I  
19 proceed?

20 The Court: You may.

21 Mr. McCALL: Thank you.

22 DIRECT EXAMINATION

23 BY MR. McCALL:

24 Q. Thank you. Good morning, sir.