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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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MARCO BATTISTOTTI,

Plaintiff,

Index No.101147/2024

- against -

SUZANNE AARONSON

VERIFIED COMPLAINT

Defendant.
-----X

STATE OF NEW YORK)
COUNTY OF NEW YORK)

ss:

PLAINTIFF Marco Battistotti, respectfully alleges the following, upon
information and beliefs:

COMPLAINT AND REQUEST FOR RELIEF

INTRODUCTION

**The International Parental Kidnapping, Pervasive Psychological Abuse,
and Neglect of a minor child, Leonard Michael Aaronson, a U.S. citizen,
and the ongoing Domestic Violence against the Plaintiff.**

This is a case of significant public importance. The International Parental
Kidnapping of a minor child and U.S. Citizen at the hands of his mother remains
unaccountable after almost five years.

This case comes to the Supreme Court of the State of New York, place of
residence of the Plaintiff/father as the previous venue, Connecticut, in 2023 released
jurisdiction of the child following the unlawful removal and retention of the child to
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Sadly, for the minor, since 2019 the Defendant/mother has refused to allow the Plaintiff/father to have any contact with his son or to provide information.

All the efforts for the safe return of the child under the Hague Convention on the Civil Aspects of International Child Abduction (“Hague”) have been exhausted. In the best interest of the child Judicial intervention is sought.

This complaint now seeks a change in custody, a psychological evaluation of the Defendant, child support, and compensation.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action as the three basic criteria have been met:
 - a. There is a substantial constitutional issue. (*Id.* at p.9)
 - b. The lower court was wrong in its decision. (*Id.* at p.31)
 - c. All remedies available in the lower court have been exhausted. (*Id.* at p.28)

PARTIES

2. Plaintiff, Marco Battistotti is an individual residing in New York City for over three decades and the biological father of a minor child, Leonard Michael Aaronson (“Leo”), born in Greenwich, CT, on June 11, 2014.
3. Defendant, Suzanne Aaronson is the biological mother of the minor child and to the best of Plaintiff’s knowledge resides in the town of Calvia, on the Balearic

Island of Mallorca, Spain, under the care of Attorney Rosa Pederá, Calle Jose Anselmo Clave 8, Palma de Mallorca, Spain.

THE CLAIM

4. The Plaintiff seeks full physical and legal custody of his son, Leonard Michael Aaronson.
5. The Plaintiff seeks an order to immediately compel the Defendant to undergo a full psychological evaluation by a licensed medical professional in the U.S.
6. The Plaintiff seeks child support from the Defendant/mother.
7. The Plaintiff seeks retroactive financial sanctions against Defendant.
8. The Plaintiff seeks future financial sanctions to deter Defendant from further noncompliance with a court order.

BACKGROUND

9. The parties were never married and after a brief relationship, in 2014 at the age of 42, Defendant was gifted with the birth of an amazing child.

Despite having reached a written agreement called the Go Forward Plan (GFP v4) where it was agreed that the name of the child to be born would be Leonard Aaron Battistotti and that Plaintiff would be named the father on the child's birth certificate, at birth Defendant refused to acknowledge the Plaintiff as the biological father of the child and then called the child with her last name.

10. On July 31, 2014, during the Defendant's deposition, she was asked if she agreed to such an agreement, and she would respond by saying, *"I agreed then, I don't agree now."*

Upon Defendant's imposition of only brief and supervised visits ⁽¹⁾, Plaintiff commenced a Family Court case (Index No. FST-FA14-4031121-S) in the city of Stamford, Fairfield County, Connecticut, by way of jurisdiction, two days after the child was born. Shortly after the parties reached an agreement allowing Plaintiff to have unsupervised visitations with his son, set child support, and a stipulation was entered by the court.

However, Defendant would not allow Plaintiff to see his son unsupervised, deviating from a freshly made stipulation, and unilaterally set supervision by a baby nurse, Defendant's parents, or threatened no visitation at all.

11. On August 22, 2014, during a visit with his child at the Defendant's parent's house, Plaintiff was physically assaulted by Defendant, and transported to the E.R. where he was diagnosed with head trauma.

Despite the Plaintiff being the only victim, he was arrested for disorderly conduct based on false accusations by the Defendant and her parents. The fabricated criminal case against Plaintiff was later dismissed and sealed.

12. In fear of criminal charges being sought against Defendant for the incident of August 22nd, Defendant, and her father, as a proxy, reported Plaintiff to

(1) Plaintiff was bullied into exercising his parenting time either supervised by the baby nurse, the Defendant's parents, or a supervisor whom Plaintiff had to pay \$150/hr. then using a friend of Defendant, then an acquittance, a part-time bartender who will also be asked to report to the court on Plaintiff's parenting skills, as another way for Defendant to assert control over Plaintiff.

Immigration and Customs Enforcement (ICE)⁽²⁾ in an attempt to have him deported from the U.S., and in 2015 Plaintiff was shortly detained by ICE.

13. In 2015 and 2016 the parties went through a lengthy and contentious custody trial that lasted over ten days over a period of one year. During this process, and in order for the trial to move forward, Defendant was compelled to acknowledge Plaintiff as the father of the child, or the received child support would have been ordered to be returned. The defendant then agreed.
14. In September 2016, Hon. Judge Erika Tindill of Connecticut Family Court issued a ruling awarding the Defendant full legal and physical custody of the child, and visitations between Plaintiff and his son. The Judge ordered that visitations⁽³⁾ were to be only in the town of Greenwich, CT, as the Defendant complained about her fear that the Plaintiff was plotting to kidnap the child, sadly something that she would ultimately do.
15. Tumultuous years went by as the Defendant refused to comply with the visitation order on a routine basis, non-compliance that produced numerous motions for contempt against her, most of them never heard by the court, in addition to three orders of protection against the Defendant protecting the

(2) If the Aaronson were to be successful in their complaint to ICE, Plaintiff would have been deported to Italy for ten years, there would have been no victim in the U.S. Therefore, no charges for the Defendant, and upon Plaintiff's return to the U.S. the statute of limitation would have kicked in.

(3) Visitations were set in the middle of the day, in the middle of the week disrupting Plaintiff's work schedule and negatively impacting his ability to earn a living. He was ordered to remain in the town of Greenwich, compelled to rent an apartment at his own expense solely to exercise visitations, and ordered to text Defendant before leaving his house with the child spelling where he would be in the town of Greenwich, for how long, and then text back once returned home. The plaintiff fully complied.

Plaintiff.

16. In June, and August of 2019, Hon. Judge Truglia of Connecticut Family Court modified the original visitation order removing the geographic restriction, granting Plaintiff additional visitation time, removing the preposterous supervision by a third party, and allowing the overnight stay of Leo at Plaintiff's apartment in New York City. **(EXHIBIT #1)**
17. The Judge also granted Plaintiff's request that the exchange of the child should occur exclusively at the police station as Plaintiff feared Defendant.

The defendant became livid and publicly criticized the Judge online, while at the same time only partially complying with the new court order.
18. Fast forward to July 2019, in an attempt to discredit Plaintiff's reputation, Defendant made and posted false and slanderous statements about Plaintiff on her online YouTube account. Upon Plaintiff's discovery of such a false article, he sought relief and applied for an order of protection from the New York Family Court. Such order of protection was later amended compelling the Defendant to comply with the court order visitations that she unilaterally halted in retaliation from being served with the order of protection.
19. In September and October 2019, the Defendant violated the Order of Protection eight (8) times, resulting in three police complaints against her for Criminal Violation of an Order of Protection, also generating two Wanted Cards for her inevitable arrest in New York City.

20. Moreover, in retaliation against Plaintiff's Order of Protection, and while claiming harassment by the courts, Defendant obtained an order of protection against Plaintiff in Connecticut Family Court, while at the same time, Defendant and her father increased the number of complaints against Plaintiff leveraging ICE, hoping to have him deported from the U.S. for ten years.
21. In November 2019, Defendant made a police complaint in Greenwich, CT. stating that Plaintiff's texts regarding the child violated her order of protection as only emails were allowed.
22. On December 4, 2019, upon arriving at a scheduled visit, Plaintiff was arrested by the Greenwich police on charges of harassment and violation of an order of protection. ICE was immediately alerted, and a detainer was issued preventing Plaintiff from posting bond.
23. Plaintiff remained detained for one and one-half months, or until the ICE detainer expired allowing him to post bond.
24. Unhappy with Plaintiff's release from custody on bond and dissatisfied with the lack of positive enforcement by ICE, Defendant returned to the Greenwich police and was allowed to make a duplicative complaint of harassment against Plaintiff for facts allegedly occurred that were already included in the previous complaint.
25. Upon Plaintiff's second arraignment, the Judge acknowledged the duplicity of the charges and released Plaintiff on his own recognition, also stating that the texts sent such as "*ETA please*" were not in any way threatening.

26. On March 5, 2020, as Plaintiff entered the Stamford Court to have his ludicrous criminal charges dismissed, he was arrested by the Department of Homeland Security (DHS) based on a second detainer and detained by ICE in Massachusetts in an overcrowded dorm, in the middle a Global Pandemic. Finally, Defendant's effort to have Plaintiff taken into custody by ICE and potentially deported came to fruition.
27. Ultimately, eleven months later, after an unnecessary barbaric treatment as a civil detainee, Plaintiff was released from custody. ⁽⁴⁻¹³⁾

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- (4) On March 13, 2020, the President of the United States declared a National Emergency concerning the Novel Coronavirus Disease Outbreak dubbed COVID-19. Immediately after, the Plaintiff commenced a fierce advocacy within the detention facility demanding compliance with the CDC rules, and appropriate measures to prevent mass infection at his detention center, by contacting State and Federal representatives, ICE, DHS, and numerous media outlets. The plaintiff organized a team of detainees and commenced a work strike putting pressure on the warden.
- (5) On March 27, 2020, upon the Plaintiff's pressure, Harvard University, Yale Law School, Lawyer for Civil Rights, Prisoner Legal Services, Rights Behind Bars, and the law firm Wilmer Hale, among others filed a lawsuit in Boston Federal Court requesting an injunction for the immediate release of certain ICE detainees suffering from medical precondition. The landmark class action lawsuit "20-10617-WGY" *Savino v. Souza*, 459 F. Supp. 3d 317, (D. Mass. 2020) challenged the unsafe conditions at the Bristol County House of Correction (BCHOC-BCSO) in light of the COVID-19 pandemic. Shortly after Hon. Judge Young found that the lawsuit had merits and a high likelihood of prevailing at trial and immediately ordered the release of certain detainees suffering from medical pre-existing conditions, enraging Sheriff Thomas Hodgson who was in charge of the prison. The plaintiff was targeted by the Sheriff and named the ringleader.
- (6) On Friday, May 1, 2020, there were heightened tensions at BCHOC because of concerns regarding COVID-19's possible exposure, the consequent work strike, and because Plaintiff the following Monday was scheduled to testify in federal court advocating for even more releases. Because the *Savino* lawsuit had been filed on behalf of the Plaintiff and other detainees against BCSO and its staff, but most importantly because he was scheduled to appear in federal court remotely, the Plaintiff was physically assaulted by Sheriff Thomas Hodgson inside the unit while threatening to be placed in segregation pending COVID testing. All other detainees, 26 of whom came to Plaintiff's defense and a disturbance occurred.
- (7) Despite the later calm state of the unit's sixteen STR officers, the BSCO K9 Division, some of them unmuzzled, and several other corrections officers responded, and the STR Bravo Squad Leader came in armed with a flash-bang grenade, in addition to chemical agent spray canisters baton, and automatic rifles. Then the door of the unit burst open, one officer began throwing the flash-bang grenade that detonated feet away from the Plaintiff, and officers shot pepper balls at eye level, along with the canine unit for an illegal forced extraction. It was a pandemonium.

- (8) Hours later, Plaintiff was transported to segregation and held in solitary confinement for sixty (60) consecutive days in deplorable conditions. Once released he would be brought back again and again without cause or justification.
 - (9) DHS Office of Civil Rights became involved, and Plaintiff successfully advocated for a full independent investigation from the Massachusetts Attorney General's Office. (AGO)
On December 15 the AGO issued a 50-page report condemning the use of extreme force and canine extraction demanding the closure of BCHOC.
 - (10) During Plaintiff's detention at BCHOC, he was targeted, retaliated upon, threatened, harassed, and sexually assaulted by the officers, sexually harassed, his civil and human rights were violated numerous times, he was called "a fucking Jew", and asked to perform oral sex upon the guards. In protest, Plaintiff would commence a five-day hunger strike until transferred to Plymouth, MA, for his own safety, where he would again become the target of the wards, and his rights were violated again. In protest, Plaintiff commenced a second hunger strike that lasted twelve (12) consecutive days. Then while in the middle of a prolonged hunger strike, and without medical clearance, transferred to Batavia, NY on an eight hours car ride, for his last hunger strike while infected by COVID-19.
 - (11) On June 15, 2021, DHS's Secretary Alejandro Mayorkas revoked BCHOC credentials, ordered the immediate closure of BCHOC ICE units, and transferred all the remaining ICE detainees.
 - (12) On November 15, 2021, and upon Plaintiff's fierce advocacy against the abuse perpetrated while at BCHOC, the 25-year tenure of Sheriff Thomas Hodgson's unchallenged leadership came to an end as Plaintiff supported State Representative Paul Heroux who became the new Sheriff in town. Former Sheriff Hodgson will go public in various TV outlets blaming Plaintiff for the closure of BCHOC calling it a political hit.
 - (13) There is currently a tort claim against BCHOC in Boston federal court titled *Morocho v. Bristol County Sheriff's Office et al.* 1:22-cv-10652-WGY where the Plaintiff in this action is named as a plaintiff and represented by counselors.
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28. Upon Plaintiff's return home to NYC, he would request visitation to no avail.

Shortly after Plaintiff filed a Motion for Contempt (#495.00).

Stamford Family Court unjustly denied hearing such a motion reasoning that the Defendant's Motion to change jurisdiction (#499.00) would take precedence.

This act of unwillingness to make the Defendant accountable further emboldened her.

THERE IS A SUBSTANTIAL CONSTITUTIONAL ISSUE:

29. The Fourteenth Amendment guarantees that parents will not be separated from their children without due process of law except in emergencies.

The Fourteenth Amendment of the United States Constitution protects against the state's taking a person's life, liberty, or property, without due process of law. This is also known as the Due Process Clause.

The Supreme Court has interpreted this in the family law context to encompass "the right of the individual to marry, establish a home and bring up children,...and generally to enjoy those privileges long recognized at common law as essential to the orderly pursuit of happiness by free men." *Meyer v. Nebraska*, 262 U.S. 390 (1923).

More recently, the "liberty interest...the interest of parents in the care, custody, and control of their children— is perhaps the oldest of the fundamental liberty interests recognized by this [Supreme] Court...It is cardinal with us that the custody, care, and nurture of the child reside first in the parents..." *Troxel v. Granville*, 530 U.S. 57 (2000) (citations omitted).

This constitutional right to parent without government oversight overlaps with other constitutional interests. For example, freedom of religion and speech (First Amendment), the right to travel and so live where a parent chooses (Fifth Amendment), and the right to live one's life as one chooses (Fourteenth Amendment discussed above). So, a parent has the constitutional right to believe and behave as he or she chooses, provided such behaviors are legal.

But are these constitutional rights absolute – and without limitation?

In contested parenting and child custody litigation, the court must determine what custodial arrangement is in the children's best interests.

This includes deciding physical custody/parenting time (so, where a child lives and when a child spends time with each parent), legal custody/decision making (so, who makes decisions about a child's health, education, and religious upbringing), and any conditions necessary to protect a child from actual harm⁽¹³⁾ when with a parent.

The court (and, so, the State) is entitled to decide parenting and child custody for parents who cannot agree because the State is entitled to act as *parents patriae*, to protect the health, safety, and welfare of its citizens who cannot take care of themselves, such as minor children. *Boswell v. Boswell*, 352 Md. 204 (1998). Otherwise put, the State is entitled to step in to protect minor children and to put the children's rights above the parents.

(13) We as a society have the moral obligation to prevent human suffering and irreparable harm to health and stay clear from "The Conscious or Reckless Disregard of the consequences of one's acts or omission", AKA Deliberate Indifference. Science tells us that a parent-child separation is proven severe adversity and a stressor, and because of such the child will be exposed to Toxic Stress, Toxic Stress that will generate a cascade of prognosis of maladaptive responses, that could induce a miserable life of suffering if not suicide attempts and early death, in the aggregate with precipitant stressors such as fear of abandonment can become a precipitant stressor for the child that can cause irreparable injury for the health of the child, irreparable harm that cannot and should not be ignored with indifference, or better said Deliberate Indifference. Proof of Deliberate Indifference requires a showing of greater culpability than negligence but less than a purpose to do harm (citing Farmer, 511 US at 835), and it may consist of showing a conscious failure to provide remedies where they would be reasonably appropriate and available. Failure to do so would deprive the Citizen-Minor Child of his Constitutional Rights, which will unquestionably constitute Irreparable Injury. Irreparable Injury is defined as an injury that cannot adequately be compensated for either "a permanent injury", or by "a later issued damages remedy that is not accurately measurable or adequately compensable by money damages", Irreparable Harm is a natural sequel. In the matter of Ross-Simons of Warwick, Inc. v. Baccarat, Inc., 102 F.3d 12,19 (1st Cir. 1996) Failure to act and prevent Child suffering and produce irreparable harm is likely "Akin to Reckless Disregard." It is always in the public interest to prevent human suffering. Moreover, there can be no public interest in exposing a young child to Substantial Risk of Serious Harm to Health, especially among the ones who completely depend on us.

30. Consistent with the State’s prioritization of children over parents, the governing standard for courts in deciding parenting and child custody is the “best interests of the child”. In New York, parental fitness is a required “best interests” consideration, among many others.
31. A parent’s behavior, if lawful, is an exercise of constitutional rights. Those constitutional rights extend to how a parent raises his or her child. However, parental constitutional rights take a back seat to the child’s best interests *if* the parents’ behavior itself has an adverse effect upon or actual harm to the wellbeing of the child. The courts refer to this as a “nexus”.
32. The nexus approach requires courts first to identify if there is actual harm. If there is actual harm, then the court must consider whether the harm is connected to the parent’s behavior. And the courts have taken this one step further by recognizing that the actual harm need not have actually occurred yet.
33. A court need not “sit idly by and wait until a child is actually harmed...
- If there is sound evidence demonstrating that a child is likely to be harmed down the road, but there is no present concrete finding of harm, a court may still consider a child’s future best interests and restrict visitation. The need for a factual finding of harm to the child requires that the court focus on evidence-based factors and not on stereotypical presumptions of “future harm.”
34. Yes. *Boswell v. Boswell* tells us that “[i]n a custody or visitation dispute, the question should be ‘[w]hat is the effect of this parental behavior on the children?’ *not*, ‘[i]s this behavior good or bad?’”.

35. A more recent decision, *Azizova v. Suleymanov*, a November 19, 2019, Court of Special Appeals opinion, on the subject of judicial bias in child custody decisions, states: “Unequivocally, the test with respect to custody determinations begins and ends with what is in the best interest of the child...In between, a trial judge must determine whether a particular issue related to a parent presents harm to the health and welfare of a child or affects the child’s development and whether there is a nexus between the parental issue and any adverse impact on the child’s overall well-being...
36. In situations, however, where a trial judge, while assessing a particular factor, has been guided by their personal beliefs in fashioning an outcome rather than by the evidence, the Court of Appeals has vacated that decision.”
37. At its simplest, in child custody litigation, the Judge’s or Magistrate’s decision is a substitution of the jurist’s judgment for the parents about what is in the child’s best interests. This required substitution of judgment is fraught with the potential for stereotyping and bias. Especially when a parent’s constitutionally protected behavior may be offensive or non-traditional.
38. And this risk for stereotyping and bias is by no means unique to the jurist hearing and deciding the case. Rather, this potential risk arises from everyone in the courtroom. The parents themselves, their attorneys (if represented), as well as fact and expert witnesses. Not because people are bad. But, because the human brain is designed to think that way.

39. In addition to the nexus to actual harm to the child standard discussed above, there are other ways of insulating against stereotyping and bias. Chiefly, the ethical standards governing attorneys, Judges, and Magistrates.
40. Current Rules allow attorneys to decline or terminate client representation when “the client insists upon action or inaction that the attorney considers repugnant or with which the attorney has a fundamental disagreement”. Otherwise stated, attorneys should not represent clients if the attorney’s beliefs fundamentally undermine the attorney’s representation and duty of loyalty.
41. This calls for attorney awareness and self-selection from representation if the attorney is not well suited to the client and the facts of the case.
42. The Equal Protection Clause of the 14th Amendment to the U.S. Constitution applies to children. Equal protection is the concept that a government owes all of its citizens equal protection under the existing laws. This protection cannot be inhibited by factors such as race or religion.

Child Victims of International Parental Kidnapping:

43. Every year, situations of International Parental Kidnapping are reported in the United States. It is common for the removal of a child to occur during a heated or emotional custody dispute, in the early stages of separation or divorce, or in the waiting period for a court custody order or agreement.
44. Child victims of international parental kidnapping are often taken from a familiar environment and suddenly isolated from their community, family, and friends. They may miss months or even years of schooling. The child may be

moved to multiple locations in order to stay hidden or out of reach of the parent remaining in the United States. In some cases, the child's name, birth date, and physical appearance are altered or concealed to hide identity. In some extreme cases, the child could acquire a second citizenship and even a different last name.

45. In addition, the tense and unfavorable situation between the parents may be emotionally troubling to a child. Kidnapped children are at high risk for long-term psychological problems including anxiety, eating disorders, nightmares, mood swings, sleep disturbances, and aggressive behavior. As adults, child victims of international parental kidnapping may struggle with identity, relationship, and family issues.

Children's Bill of Rights:

46. Every child has rights, particularly when mom and dad are splitting up. Below are some rights children should have, and parents shouldn't forget when the family is in the midst of a break-up.
 - a. The right to love and receive unconditional love from both of their parents without feeling guilt or disapproval. This means a child should not be made to feel guilty about wanting to see their dad or mom at any time and should be able to talk about their mom or dad or things they do in that person's home to the other parent without a negative response.
 - b. The right to be protected from their parents' anger with each other, the right to be kept out of the middle of their parents' conflict, including the

right not to pick sides, carry messages, or hear complaints about the other parent. A child doesn't choose separation or divorce; the parents do.

Even amidst the conflict of separation and divorce, a child should be able to continue living their lives with as little change as possible.

- c. The right not to have to choose one of their parents over the other and the right to be treated as a person and not as a pawn, possession, or negotiating chip. If a child has an opinion about which parent they wish to live with, they should be allowed to express that opinion. However, no one should force a child to make that choice. If the parents cannot work it out, a Judge will make that decision for them.
- d. The right not to have to be responsible for the burden of either of their parent's emotional problems. Separation and divorce are difficult for adults as well. If an adult is having emotional issues managing the separation and divorce, therapy is where this distress and anger needs to be expressed, not to the child.
- e. The right to freely and privately communicate with both parents and the right to have a relationship with extended family members on both sides. A child should be allowed to have a healthy relationship with both parents and both sides of their family. This includes being able to communicate with both parents and extended family members, without the interference or control of the other parent.

- f. The right not to be put in the middle of the two parents. Sometimes, parents get so caught up in their own problems that they forget their child is a child and that the child cannot handle their adult worries.
- g. The right to know well in advance about important changes that will affect their lives. For example, a child deserves to know where one of their parents is when one parent is going to move or get remarried.
- h. The right to have feelings, to express their feelings, and to have both parents listen to how they feel. It is scary when parents break up and a child is allowed to be scared or embarrassed, sad, angry, or whatever emotion it is that the child is feeling.
- i. The right to have a life that is as close as possible to what it would have been if their parents stayed together and the right to have what is in their best interests protected at all times. Stability and consistent parenting are key for a child; maintaining that stability and consistent parenting during a divorce and separation can make the process easier for a child.

Healthy parenting is the fabric of well-being for a child.
- j. The right to be in a safe environment and the right to expect healthy relationship modeling, despite recent events. This means that no one is allowed to put a child in danger, either physically or emotionally. A child learns how to develop relationships from adults; if a child is surrounded by unhealthy relationship modeling, that child is likely to develop unhealthy relationships as they mature.

- k. The right to be a child. A child shouldn't have to worry about adult problems, *and a child should have the right to live a normal life (added)*.

FACTUAL ALLEGATIONS

Witness Tampering – a Hate Crime:

47. Following the August 22, 2014 (*Id.* at 11), incident, Defendant and her father as a proxy so callously reported Plaintiff, an Italian citizen, to ICE in an attempt to have him deported.

48. Tampering with a victim under USC18 §1512(d) is a crime and causing the prosecution of a victim with the intent to hinder, delay, prevent, or dissuade any person from falls square into section (d) of such U.S. code. Defendant and her father cold-heartedly reported Plaintiff to immigration with the sole intent of intimidating him and tampering with a witness in an attempt to skirt Defendant's likely prosecution on criminal violation of protective order as Plaintiff was the victim of domestic violence.

They will then continuously and maliciously pursue their hate against the Plaintiff based on bias with a total disregard for the child's wellbeing.

49. In 2016, the Defendant's father attempted to disrupt a Federal hearing until a Federal Judge would empty the courtroom, seal the father's case, and deem the proceeding private.

50. Intimidation, harassment, retaliation, tampering, obstruction, and causing the witness physical, psychological, and emotional injuries, including sexual abuse, sexual harassment, and torture ⁽¹⁴⁾ by direct and proximate acts leveraging ICE are per se Hate Crimes in New York, Connecticut, and it becomes a federal crime when conducted interstate within the U.S. like in this instance. ⁽¹⁵⁾

Premeditation:

51. The defendant acted with premeditations since before the birth of the child by not letting Plaintiff attend medical visits or updating him on the status of her pregnancy. She would then omit Plaintiff as the father of the child in the minor's birth certificate ⁽¹⁶⁾, and only when threatened to have child support returned did Defendant agree that the child had a father.
52. While Plaintiff was wrongfully detained by ICE, Defendant went to the Spanish Consulate in New York City and filed an old birth certificate of the child with no father named, along with an updated apostille making it look like the birth certificate was current. As such, Defendant was able to obtain a visa for the minor child by way of fraud and deceit by circumventing the dual parental consent requirement and fled the jurisdiction to avoid prosecution.

(14) The United Nations in 2020 defined prolonged solitary confinement as psychological torture. The Plaintiff was segregated in a cell 7 ft. x 12 ft. alone for sixty consecutive days, then five days, then twelve days in retaliation for his advocacy against maltreatment while in ICE detention.

(15) The Defendant and her father mailed their letters from Connecticut to Massachusetts triggering the interstate clause.

(16) In September 2014 the Defendant was sworn in and deposed. In such deposition, she was asked, *"Did you tell the hospital that Marco was the father?"* The Defendant responded, *"It wasn't relevant, so, no, I did not tell the hospital."*

Fleeing the Jurisdiction to Avoid Prosecution, AKA The Fugitive Act and Obstruction of Justice:

53. On November 6, 2020, the Defendant fled the United States to avoid prosecution under USC18 §1073.

Fleeing the jurisdiction to avoid prosecution triggers Federal Obstruction of Justice under USC18 §1503. Of significance, a person does not have to successfully obstruct justice to be charged with this offense. If some kind of attempt to willfully obstruct a federal proceeding or investigation, such as International Parental Kidnapping under 18USC §1204., charges of obstruction may follow.

The disappearance of the minor child.

54. Since Plaintiff's false arrest on December 4, 2019, Defendant vanished with the minor child without any notice to Plaintiff or the Court and did not update her address on court records. Only years later Plaintiff was made aware that they had absconded in the town of Litchfield, CT., for some time prior to Spain.
55. Of relevance for the sanction computation is that upon Plaintiff's release from ICE detention, on April 16, 2021, Plaintiff emailed Defendant requesting to resume visitations. The Defendant has yet to respond to such an email.

The crime of International Parental Kidnapping. 18USC §1204

56. On September 7, 2021, Plaintiff and the Connecticut Family Court were made aware in writing by Defendant that on November 6 of the previous year, she

and the minor child permanently relocated to Mallorca, Spain, without Court approval or the father's consent. **(EXHIBIT #2)**

57. Of relevance for sanction computation is that on September 18, 2021, Plaintiff emailed Defendant requesting to resume visitations and promised to advocate for leniency in her criminal case, and not to pursue financial sanctions against her. The Defendant never responded to such email and continued in her course of conduct as two or more acts established a pattern of course of conduct.

58. On November 1, 2021, the Spanish Consulate in New York informed Plaintiff that Defendant applied for a visa for the minor child by submitting an obsolete birth certificate of the child with no father mentioned, avoiding the required dual parental consent for the visa issuance. **(EXHIBIT #3)**

As such, Defendant received the visa by fraud and deceit setting the stage for forum shopping hoping to remove any visitation between the father/Plaintiff and the minor child.

59. The following day the New York City field office of the F.B.I. was informed of the International Parental Kidnapping of the minor child, and on November 16, 2021, the Office of Children's Issues of the U.S. State Department in Washington, DC received the Plaintiff's complaint and commenced the case for the return of the child under the Hague.

60. The Hague Convention seeks to deter parents who are dissatisfied with current custodial arrangements from abducting their child and seeking a more favorable custodial ruling in another country, AKA forum shopping. ⁽¹⁷⁾⁽¹⁸⁾⁽¹⁹⁾⁽²⁰⁾

61. In December 2021, the FBI concluded its investigation and determined that the Defendant kidnapped the child as defined in 18USC §1204.
62. Shortly after arriving in Spain the Defendant in her pursuit of forum shopping filed a case in the Spanish Family Court requesting the court to take jurisdiction of the minor child and in an attempt to further pursue parental alienation, to suppress all visitation and contact between the Plaintiff and child.
63. Simultaneously, the Defendant filed a Motion in Connecticut Family Court asking the court to relinquish the jurisdiction of the minor child arguing Forum Non-Convenient.
64. Of relevance again is that on January 17, and August 2, 2022, Plaintiff emailed Defendant requesting to resume visitations. The Defendant would not comply.
65. On June 30, 2022, The U.S. State Department informed Plaintiff that a voluntary request to return the child was made to Defendant, who refused to cooperate. Parental kidnapping *is* domestic violence.
66. Then again, on April 18, 2023, and May 20, 2024, Plaintiff emailed Defendant requesting to have video calls with the minor child and to receive medical and academic records to no avail.

(17) *Avendano v. Smith*, 806 F. Supp. 2d 1149, 1163-1164 (D.N.M. 2011)

(18) *Navani v. Shahani*, 496 F.3d 1121,1124 (10th Cir. 2007) (citing *Shealy v. Shealy*, 295 F.3d 1117-1121 (10th Cir. 2002)

(19) *Tann v. Bennett*, 807 F.3d 51,52-53 (2^d Cir. 2015)

(20) *Mota v. Castillo*, 692 F.3d 108, 112 (2d Cir. 2012) quoting *Gitter*, 396 F.3d at 129)

The Welfare check by the U.S. Embassy in Madrid:

67. On August 7, 2024, having received concerning information about the child's well-being from a local source in Mallorca, the U.S. State Department contacted the U.S. Embassy in Madrid requesting an urgent welfare check. The Foreign Affair Manual of 2023 (FAM) dictates the parameters of a welfare check requested by one parent of a minor child residing abroad as the U.S. authority in a foreign country is limited, and the other parent must consent to it.

It is the Plaintiff's view that only a few possible scenarios for the Defendant's refusal: **(EXHIBIT #4)**

- a. The Defendant hides something about the child's wellbeing.
- b. This is one of the most outrageous from of parental alienation.
- c. The Defendant feels inconvenienced by the visit and puts her own interests before the best interest of the child.

Either one is chosen a red flag is raised.

68. Moreover, Defendant continues to deny producing the child's medical and academic records to the father in defiance of a court order in effect and in her pursuit of complete alienation.

Defendant's attempt to liquidate US assets to finance the kidnapping:

69. Since her departure from Greenwich in early 2020, the Defendant rented her house located at 190 Lake Avenue in Greenwich, CT, 06830, for approximately \$22,000 per month, allowing her to abscond with the child, and ultimately finance the International Parental Kidnapping and unlawful retention of Leo.

70. On or about May 2024 it came to Plaintiff's attention that Defendant listed her Greenwich house for sale for about \$6M, her last known piece of asset in the U.S. pointlessly concealed under Lake, Ave FT Trust, controlled by Defendant **(EXHIBIT #5)** as the real estate brokers would take the bait and confirm was the individual behind 190 Lake Avenue property, AKA Lake, Ave FT Trust was Defendant Suzanne Aaronson.
71. The FBI was immediately notified as this signaled the Defendant's intention of never returning to the U.S. while using the proceeds of the sale to further finance the International Parental Kidnapping of the minor child, among other crimes.
72. At the same time, Plaintiff contacted all the real estate listing agents in Connecticut who listed the property for sale and sent a Legal Notice (Red Flyer) **(EXHIBIT #6)** making them aware of the ongoing kidnapping and warning them of possible civil or criminal charges against anyone who aids and abets a person who is committing a crime. The plaintiff also referred to the Pinkerton doctrine, stating: *Anyone who, upon reading this Red Flyer aids or abets Suzanne Aaronson in her pursuit of criminal activity can be found guilty of Conspiracy under U.S. Law Title 18, U.S.C. § 371, and under the theory of vicarious liability, the co-conspirator(s) will also be charged with the crime of International Parental Kidnapping unless that individual immediately withdraws themselves from any participation in the crime of International Parental Kidnapping, which is currently ongoing.*

This provision is further explained in the Pinkerton Ruling (Pinkerton v. United States, 328 U.S. 640 (1946)) where any co-conspirator will also be charged with the primary offense, in this case, International Parental Kidnapping under 18, U.S.C. §1204.

This would also apply to professional individuals, including but not limited to attorneys or real estate agents attempting to liquidate Susanne Aaronson's asset in the U.S., a \$6M house, or buyers of any asset controlled by the Defendant who are aware of this Red Flyer.

73. Days later, and upon speaking with the lead real estate agent at Sotheby's in Greenwich, who by pure coincidence was a former family attorney and a board member of the Connecticut Coalition Against Domestic Violence, the property was taken off all the listings and marked as "off-market", confirming that the property, legally owned by Lake, Ave FT Trust is, in fact, an asset controlled by the Defendant. (*Id.* at Exhibit 5)

An Organized Crime Family:

74. In 2017, the Defendant's parents financed the building of an attached portion of the house where they moved in.
75. While the main house was purchased by the Defendant's proxy in 2014 (and later transferred to her) for \$1.75M in cash, according to the record, further invested \$940,000 in building the 996 SF addition. **(EXHIBIT #7)**
76. The Defendant and her parents, Robert and Louise Aaronson as a family acted and are currently acting as an Organized Crime in financing the International

Parental Kidnapping of Leo also attempting to liquidate their last U.S. asset, the real estate property in Greenwich, CT., a \$6M house by splitting the proceeds with the Defendant to finance the International Parental Kidnapping and absconding of the child. This is the U.S.'s definition of the crime of Money Laundering which falls square into the Racketeer Influenced and Corrupt Organizations Act. The Racketeer Influenced and Corrupt Organizations Act (RICO) is a United States federal law that provides for extended criminal penalties and a civil cause of action for acts performed as part of an ongoing criminal organization.

77. The Aaronsons' during their brief tenure in Greenwich fooled everyone, from friends to the local police to advocacy groups to the Judges, and then fled. They are now repeating their course of conduct in Spain in an attempt to conceal the kidnapping while becoming co-conspirators in the commission of numerous other crimes.

International Parental Kidnapping is Domestic Violence:

78. Yes, International Parental Kidnapping *is* considered a form of domestic violence, particularly when it involves the same elements of control, manipulation, and psychological harm that are central to other forms of domestic violence.

Here's how Parental Kidnapping aligns with domestic violence:

- a. Control and Power: Like domestic violence, Parental Kidnapping often involves one parent exerting control over the other by taking the child out of

the state/country without consent. This act can be a way to manipulate or punish the other parent, especially in contentious custody disputes.

- b. Emotional and Psychological Harm: The act of kidnapping a child, particularly across international borders, can inflict severe emotional and psychological harm on both the child and the left-behind parent. The child may experience fear, confusion, and trauma from being removed from their familiar environment, while the left-behind parent may suffer from immense distress, anxiety, anguish, and helplessness.
- c. Legal and Safety Concerns: International Parental Kidnapping complicates the legal situation due to differing laws and jurisdictions between countries. This can make it harder for the left-behind parent to secure the return of their child, adding to the distress and sense of powerlessness, which are common in domestic violence situations.
- d. Recognition in Law and Policy: Various international treaties and laws, such as the Hague Convention on the Civil Aspects of International Child Abduction, recognize the gravity of International Parental Kidnapping and provide mechanisms for the return of the abducted child. In many cases, the underlying act is also viewed through the lens of domestic violence, particularly when it is part of a broader pattern of abuse. ⁽²¹⁾
- e. Intersection, Motivation: In some cases, International Parental Kidnapping

is committed as an act of Domestic Violence. In this case, an abusive partner might abduct a child as a way to exert control or cause harm to the other parent.

79. In essence, International Parental Kidnapping is considered a severe violation of parental rights and is viewed as a form of domestic violence because it involves coercion, manipulation, and emotional harm. People who abuse their partners use a variety of tactics to coerce, intimidate, threaten, and frighten their victims.
80. The plaintiff is not a survivor of domestic violence but is a victim of as the crime of International Parental Kidnapping is still in progress. Domestic violence is a pattern of abusive behaviors that adults use to maintain power and control over their intimate partners, or former partners.

The defendant falls square into this category of abusers. Most importantly, Defendant has shown no remorse nor intent to end the violence against Plaintiff or to prevent any further neglect towards the child. As such Plaintiff in 2024 was the recipient of the DHS I-918 certification as a victim of a serious crime.

(21) The FBI classifies the crime of Parental Kidnapping as a violent crime against children, and the U.S. State Department defines it as a crime against children as the emotional or psychological abuse is a harmful behavior that affects a child's mental health and emotional well-being, and it is considered neglect, while the Department's International Child Abduction Remedies Act (ICARA) is abundantly clear in its mission "to protect the well-being of the child involved" while outlining that a "person should not be permitted to obtain custody of children by virtue of their wrongful removal or retention" and making it clear that "the term 'right to access' means visitation rights."

**ALL REMEDIES AVAILABLE IN THE LOWER COURTS
HAVE BEEN EXHAUSTED**

The Hague Convention on the International Parental Kidnapping:

81. Upon ascertaining the unlawful removal and retention of the child abroad, on May 20, 2022, the U.S. State Department contacted the Defendant requesting the voluntary return of the minor child to the U.S. as a way to mitigate the criminal consequences. The Defendant refused to return to the U.S.
82. On June 21, 2022, the Spanish State Attorney's Office on behalf of the U.S. State Department filed a case against the Defendant requesting the immediate return of the minor child under the Hague Convention.
83. Of importance is that under the Hague Convention, the court may deny the return of an abducted child if one of the following defenses applies:
 - a. There is a grave risk that the child's return would expose the child to physical or psychological harm or otherwise place the child in an intolerable situation.
 - b. When the child objects to being returned. This requires the child to reach an age and degree of maturity for the court to take their views into account.
 - c. The child has become settled in their new environment. This may only apply if the person seeking return files in court one year after the wrongful removal or retention.
 - d. The person seeking return consented to or later acquiesced to the child's removal or retention.

- e. The return would violate the fundamental principles of human rights and freedoms in the country where the child is being held.
- f. The person seeking return was not exercising custodial rights at the time of the removal or retention.

The underlined defense (c.) above was the Defendant's only defense.

- 84. On July 5, 2022, the Spanish court heard the case for the return of the minor child.
- 85. On July 12, 2022, the Spanish court ruled that one year had elapsed causing the adaptation of the child to Spain, establishing by default his habitual residency, which is one of the few exclusionary clauses of the Hague Convention, although stating, *“Even admitting, therefore, the existence of an illicit transfer of the child to Spain...”*
- 86. Of relevance is that the ruling Judge clearly stated, *“In the present case, there is no doubt about the existence of an unlawful transfer...”*, then stated, *“without having the right to decide on the son’s residence...”*, also *“with the express disapproval of Mr. Battistotti...”*, while also stating, *“As in Spanish law, the granting of custody to one parent does not grant him/her (unless the judicial decision determines otherwise) the exclusive right to decide on the child’s place of residence, given the importance of such power, so that the place of residence must be agreed with the other parent or, failing that, the decision must be submitted to the judicial authority.”*

87. On July 20, 2022, the Spanish Prosecutor on behalf of the U.S. State Department immediately filed an appeal arguing that the Hague Convention could not have been activated since the Plaintiff was unaware of the child's location before the one-year time lapsed. The Appellate Court on October 7, 2022, although reiterating, *"the fact that there was an unlawful removal of the child to Spain"*, confirmed the original ruling and dismissed the appeal.
88. After these rulings, the Spanish Family Court (before Connecticut relinquished jurisdiction) heard the Defendant's Motion to grant her full custody of the child and to suppress all visitation and contact between the father/Plaintiff and the child. The court also heard the Defendant's request for child support while there is an order currently in effect in the U.S. ordering the Plaintiff to pay child support.
89. Plaintiff purposely declined to participate in such a hearing as Connecticut at the time was still retaining jurisdiction, and most importantly because Spanish residency was obtained by way of fraud and deceit and therefore Plaintiff refused to acknowledge the Spanish court authority.
- The defendant did not follow proper procedure, as one court needs to relinquish its jurisdiction before another court can take on, and the Spanish Court erred in not recognizing forum shopping.
90. In a twisted move, Defendant is currently threatening Plaintiff with an arrest warrant in the E.U. if he doesn't pay duplicative child support ordered by the Spanish court, ironically financing a crime in progress.

91. On December 12, 2022, the Spanish Family Court, in absentia of the father, and while the State of Connecticut was still retaining jurisdiction, recognized jurisdiction of the minor child and granted the Defendant's Motion in full.
92. Having prevailed using the exclusionary clause of the Hague (habitual residency) further empowers the Defendant who can replicate this in perpetuity in any country in the world, perhaps getting away with it again and again. This is extremely troubling to Plaintiff.

THE LOWER COURT WAS WRONG IN ITS DECISION

93. On November 1, 2023, Hon. Judge Donna Heller from the Superior Court in Stamford, CT, erroneously and contrary to her previous ruling, and in defiance of forum shopping, granted the Defendant's motion to dismiss (relinquish jurisdiction of the minor child as forum non-convenient) and paved the way for another venue to take jurisdiction. **(EXHIBIT #8)**

In her memorandum of decision in, *Jermera Parker v. William R. DeFreitas* (2013) Stamford, CT. Family Court Docket FST-FA12-4023151 S, Judge Heller stated that the plaintiff, Jermera Parker, filed an application for custody in Connecticut in which she sought sole custody of her daughter Gabriella. The defendant/father filed a motion to dismiss while seeking custody and visitation. The plaintiff claimed that she was justified in secretly taking Gabriella from Florida and in preventing any contact between the defendant and Gabriella for nearly one year because she had been emotionally abused by the defendant ⁽²²⁾.

The court dismissed the plaintiff's motion for jurisdiction, granted the defendant's motion to dismiss, and awarded the defendant full custody of the minor child, justifying her ruling by saying that:

- a. By leaving Florida ⁽²³⁾ with Gabriella and hiding her from the defendant for nearly one year, the plaintiff has engaged in unjustifiable conduct ⁽²⁴⁾.
- b. The Plaintiff did not have the right to decide unilaterally that the defendant would have no contact with his daughter.
- c. To ensure Gabriella's safety and to prevent any unjustifiable conduct by the plaintiff in the future, the defendant shall have sole custody of Gabriella.
- d. The defendant is permitted to take Gabriella to Tampa, Florida (the place

(22) In the present case, the Defendant never claimed abuse, it only claimed habitual jurisdiction under the Hague, while on January 7, 2023, during a welfare check on the child Defendant justified the taking of Leo to the personnel of the U.S. Embassy in Madrid as an “*ease to alleviate her financial burden and spend more time with Leo.*”

(23) The state of residency of the child before being taken to Connecticut.

(24) Connecticut courts have found a parent's conduct to be “unjustifiable” under §115r where a parent has absconded with a child, withheld the child's contact with the other parent, and sought through deception and delay to obtain an advantage in a custody proceeding in another jurisdiction. See *Devone v. Finley*, Superior Court, judicial district of Fairfield, Docket No. FBT-FA-134042130-S (March 8, 2013, Owens, J.T.R.) (after numerous promises, father withheld child's contact with mother and refused to return child to mother in Georgia following child's agreed-upon visit with father and his parents in Connecticut); *Berg*, supra, Docket No. LLI-FA-124012307-S (Jan. 31, 2013, Danaher, J.) [55 Conn. L. Rptr. 547] (mother disregarded automatic orders; left Connecticut with the children, thus denying father reasonable visitation; fled competing custody applications in Indiana; and delayed resolution of the case for “strategic advantage”); *Ferretti v. Ferretti*, Superior Court, judicial district of Middlesex, Docket No. MMX-FA- 010094097-S (December 23, 2002, Parker, J.) (after mother filed custody petition in Delaware, father filed action for dissolution of marriage in Connecticut and sought custody of children; father refused to return children to Delaware following holiday visit in Connecticut, in violation of injunction previously issued by Delaware Family Court). See also *Adoption House, Inc. v. P.M.*, 2003 WL 233S4141 (Del.Fam.Ct.2003) (“The comments and cases indicate that ‘unjustifiable conduct,’ for purposes of denying jurisdiction, is limited to conduct that actually creates the jurisdiction, such as moving a child from one jurisdiction to another”). Echoing the previous caselaw, in the *Agnello v. Becker*, 184 Conn. 421, 432-433, 440 A.2d 172 (1981), the defendant also claims that ‘reprehensible conduct’ of the plaintiff, in taking the child from the home of the defendant and allegedly ‘concealing’ her from the defendant, supports the trial court’s conclusion that the New Jersey decree should not be recognized...

of residency before the abduction occurred).

e. The plaintiff shall have reasonable supervised visitation with Gabriella in Tampa, Florida.

94. Importantly, Judge Heller of the Connecticut Family Court did not vacate the latest court orders regarding visitations with Leo dated June 24 and August 16, 2022, entered by Judge Truglia (*Id.* at 16), nor did the Judge authorize the transfer of Jurisdiction to the country of Spain, but simply granted Defendant's motion to dismiss or discontinue the case, de-facto relinquishing the jurisdiction of the minor child based on the fact that the parties and the minor child no longer have a connection with the State of Connecticut. So, here we are in New York.

95. The decision dated November 1st (entry #499.02) simply said, “*Order Granted, the Defendant motion to dismiss, post-judgment (#499.00) is hereby GRANTED. Further articulation to follow.*” (*Id.* at Exhibit 8)

Ten (10) months later after the November 2023 ruling, the promised articulation is yet to be given to the parties preventing the Plaintiff from filing an appeal.

96. By leaving Connecticut and absconding with the child for nearly five (5) years, the Defendant engaged in unjustifiable conduct as defined in the *Parker v. DeFreitas* or reprehensible misconduct, (AKA clean hands doctrine), or reprehensible conduct as defined in the *Agnello v. Becker*, 184 Conn. 421, 432-433, 440 A.2d 172 (1981) – Law Library page 49, or UCCJEA page 2, or the

UCCJEA section G 2 (page 924) which once again defines unjustifiable conduct by way of “*removing, secreting, retaining or restraining*” a child, with one exclusion, which was never raised by Ms. Aaronson because it did not exist.

**FIRST CAUSE OF ACTION:
Change in the custody awarding Plaintiff
full legal and physical custody of the minor child,
Leonard Michael Aaronson**

97. Plaintiff repeats and realleges each and every allegation set forth above.

Several conditions are required for a change in custody as the defendant’s sole custody of the child for the past 10 years produced a catastrophic series of events that led to this action.

Changes in circumstances:

98. When seeking a change in custody arrangements, courts require demonstrating that there has been a significant change in circumstances since the original ⁽²⁵⁾ custody order was established. Here are some common examples of circumstances that might warrant a change in custody:
99. As children grow, their needs change. For example, a child’s educational, medical, or emotional needs might evolve, and a custody arrangement that worked previously might no longer be suitable.

(25) Plaintiff refers to the 2019 order (*Id.* at Exhibit 1) Although there is a custody order in place in Spain, Plaintiff refuses to recognize the Spanish court’s authority as the child was unlawfully moved to another country in pursuit of forum shopping engaged by Defendant. With that said changes in circumstances occurred even in considering the order was entered by the Spanish court.

100. Significant changes in a parent's physical or mental health that affect their ability to care for the child could be grounds for modifying custody.
101. If a parent develops issues such as substance abuse, criminal behavior, or other behaviors that negatively impact the child's well-being, it might be necessary to reassess custody.
102. If a parent relocates or wishes to relocate a significant distance away, it might impact the current custody arrangement and require modification.
103. Increased conflict between parents that affects the child or the ability to co-parent effectively might be a reason to revisit custody arrangements.
104. If one parent has consistently violated the terms of the existing custody arrangement, this could be grounds for seeking a modification.
105. All of the above have occurred since the last U.S. court order.

Co-Parenting Abilities:

106. Even in cases of separated living arrangements, parents are expected to demonstrate effective co-parenting abilities. It is natural for co-parents to occasionally encounter minor disagreements, as even married parents may not always see eye to eye on parenting decisions. However, the Court must have confidence that both parents can navigate these disagreements and find compromises that lead to mutually agreeable resolutions. If one parent consistently undermines the other and prioritizes their personal agenda over the best interests of the child, it may raise concerns for the court and sole custody should be awarded to only one parent, the Plaintiff in this instance case.

107. Despite numerous requests from Plaintiff to have contact with his son (*Id.* at 26,55,57,64,65,66,167 and 224,) and the absence of a court order to the contrary, Defendant refuses to allow any contact between father and child, without a court order that prohibits contact between father and child.
108. Defendant has shown her absolute unwillingness and inability to co-parent the child over the past ten (10) years, has shown no remorse for the kidnapping, and continues in her pursuit of criminal activities, including domestic violence.
109. Conversely, Plaintiff always advocated for a fair share of parental visitation over the past ten years and will continue to do so even in case Defendant is incarcerated, as it is in the best interest of the child.

Emotional and Physical Capacity:

110. The actions of Defendant over the past five years raise questions of mental fitness and warrant a full psychological evaluation of Defendant, by a court-appointed psychologist or psychiatrist in New York, to be paid by Defendant as explained further in (*Id.* at 185)
- a. Relevance to the Case: The Defendant in this case is the sole caregiver to the child and operates without any checks as she conceals and retains the child abroad. No one can ascertain her ability to properly parent a child as she shields herself from scrutiny absconds from accountability and denies the well-being check by the U.S. Embassy.
- The best interest of the child was not paramount as the Defendant opted for concealment over transparency and sharing.

- b. Legal Basis: Based on the prior and current behaviors of the Defendant it is fair to say that there is a reasonable suspicion of mental health issues that could impact parenting and the child.

In the best interest of the child and for his protection a psychological evaluation is warranted in this instance.

- c. Prior Efforts: While Plaintiff in 2024, voluntarily submitted himself to a full psychological evaluation by a licensed psychiatrist and PhD medical professional in Connecticut, and transparently confirmed his mental fitness, while stating that Plaintiff's state of mind and M.O. would more likely not change over time, Defendant over the years dodged the bullet and refused to be examined by a professional, and refused to comply with court-ordered family sessions with a psychologist where both parties were ordered to attend. (Plaintiff has successfully completed his part)

More troubling, but consistent with the Defendant's pattern of court disobedience is that in 2018 Judge Tindill of the Stamford Family Court ordered the Defendant's full psychological evaluation, but since there was no set date for compliance such evaluation was never done.

In fairness to the child and to the other parent, and in the best interest of the child, if one parent goes through a psychological evaluation, the other one should do the same.

Disabilities of one parent:

111. In 2014, Plaintiff came across a Service Animal ID Card with the Defendant's name on it. Such an ID card was issued by a Connecticut state agency and identified the Defendant as a disabled person, spelling out that such a card is given to an individual with disabilities.
112. The Americans with Disability Act of 1990 (ADA) defines the word "Disability" in a manner that leaves no equivocation as Defendant does not have any physical disabilities that impair bodily function. She can perform any manual tasks, she can see, hear, eat, sleep, walk, stand, lift, bend, speak, breathe, learn, read, concentrate, think, communicate, and work.
113. Accordingly, the Defendant's Victim Impact Statement was sent to the DHS prosecutor (*Id.* at 196), one thing that she cannot do, according to her letter, is to care for herself requiring sedation and hospitalization at times, making her disability a mental impairment.
114. Although Plaintiff is not a medical professional, and cannot provide a medical opinion to this Court, Defendant's statements are self-explanatory and alarming given the fact that Defendant *is* the sole caregiver of the child, at that time 6 ½ years old, Plaintiff has no idea of how deteriorated Defendant's emotional health is at the present time and she remains the sole custodian. If the Defendant had experienced that type of emotional and psychological meltdown at a time when a threat was just the result of her wild imagination, one can only imagine the emotional and psychological well-being she can experience now that she become

a wanted fugitive from the U.S. No person in their right state of mind will commit the crime of Parental Kidnapping, continue to do so, and justifies the crime as an “*ease to alleviate her financial burden*”, while showing no intention to end the suffering of another human being, while neglecting and abusing her only child.

115. Conversely, the Plaintiff is a fit parent in excellent physical health, a perfectly functioning individual, and the writer of this complaint.

The Importance of Consistency:

116. Consistency plays a vital role in ensuring children feel secure in their lives.

Knowing their parent’s daily work schedule, mealtimes, bedtime routine, and having a predictable routine all contribute to a child’s well-being.

Due to the prolonged absence of Defendant and the child, Plaintiff is unable to accurately assess Defendant’s ability to provide consistency to the child.

In any event, it is fair to assume that the ongoing pressure of being a wanted fugitive from the U.S. with a clock ticking, along with the mounting financial stress, can only negatively affect her predictability and therefore consistency negatively impacting the child.

117. Conversely, Plaintiff’s life is the definition of consistency and predictability.

Born in Milan where he lived for 27 years, moved to New York City in 1993 where he has lived for the past three decades, is an interior designer for more than three decades, lived in his last apartment for 17 years, has friends that he’s been in touch consistently with for over 30 years, and a member of the same gym

for 23 years where he goes 7 days per week, are just as a few examples. The plaintiff will provide the kind of consistency and predictability that a child needs to grow healthy.

118. Unlike Defendant, Plaintiff's predictability can be seen in his social media where he transparently posts for several years showing consistency.

119. Conversely, in her pursuit to elude detection, Defendant deleted all of her social media.

Past Incidents of Domestic Violence:

120. If a parent has a history of domestic violence towards the other parent (*Id.* at 19) or the child, it is highly improbable that they will continue to enjoy full custody or be granted custody. In such cases, the court often restricts visitation rights and may even require supervised visitation, depending on the severity and duration of the violence.

121. While it is also relevant to say that a charge and arrest, absent of a conviction is nothing also than an unproven allegation, and while the alleged charges of domestic violence against the Plaintiff (none of them violent or involving the minor child) have been favorably resolved with no conviction, the only parent that currently faces at least eight (8) charges of criminal contempt-domestic violence in New York and federal charges for International Parental Kidnapping, is the Defendant.

122. Conversely, the Plaintiff does not have convictions or charges pending for any crime, and he's never been accused of child neglect.

Current acts of Domestic Violence:

123. When a parent pursues acts against his/her intimate partner (or former one) that involve patterns of abusive behavior used by one partner to gain or maintain control over another party, this is classified as domestic violence.
124. While physical abuse is not current at present, (due to geographic conditions), and sexual abuse has never been an issue, the following are persisting acts of domestic violence against Plaintiff:
125. Emotional and Psychological Abuse involving manipulation threats of deportation, witness intimidation as explained above, constant criticism, or use of offensive language by referring to Plaintiff as a “cockroach” in dozens of emails as recent as 2023, are designed to undermine the victim’s self-esteem and mental well-being.
126. Financial Abuse is when Defendant with her vast net worth and wealthy parents can afford \$1.5M in legal fees (as of 2020) and will continue to spend massively in their pursuit of parental alienation, while Plaintiff’s financial resources deteriorated over time, and he’s left to be a pro-se party.
127. Isolation is used daily as Plaintiff is not allowed to have any contact with his son while disparaging him on a consistent basis.
128. The pervasiveness of acts of domestic violence perpetrated by Defendant against Plaintiff are situations where abusive behavior is not an isolated incident but rather occurs consistently and repeatedly across various aspects of parenting. It

signifies a pattern where domestic violence is deeply ingrained and recurrent, affecting multiple facets of the victim's life.

129. In a recent email dated May 22, 2024, **(EXHIBIT #9)** Defendant would call Plaintiff "*Stupid, a scumbag, a total loser in life, a cruel and sick person, a liar and a thief*" after he politely requested a video call with his son on his tenth birthday, treating Plaintiff like internet spam, in a pattern of domestic violence behavior that never ends, while treating Plaintiff with deliberate indifference.
130. Daily Impact is when Defendant affects Plaintiff's daily life and overall well-being, creating an ongoing state of fear, control, and distress like in this case.
131. Chronic Patterns of repeated instances of abuse over a long period like in this instance with no sign of redemption from the abuser, are inexcusable.

Prior (and ongoing) Criminal History, and the likelihood of one parent being incarcerated.

132. Having a prior criminal history refers to any previous convictions or encounters with the law that resulted in criminal charges. It encompasses a wide range of offenses, including but not limited to theft, assault, drug-related crimes, fraud, and driving under the influence.
133. Unlike Plaintiff, Defendant only has a brief history in the United States since she spent most of her life abroad. It is therefore challenging to accurately verify the Defendant's criminal background in the various countries in which she lived.
134. With that said, in 2014, during a deposition, the Defendant on the record admitted to shoplifting while pregnant with Leo in Greenwich, CT., made a false claim to an insurance company for \$25K, and received free medical insurance

coverage (Husky) for herself and the child by way of fraud. (**EXHIBIT 10** *Id.* at p.119)

135. As alleged above, it is indisputable that the Defendant at the very least committed the sinister crime of International Parental Kidnapping under 18USC §1204, a crime that is currently ongoing. It is delusional for the Defendant to think that there will be no criminal consequences for her, and this must be considered heavily by the court while ordering a full psychological evaluation of the Defendant.

Crimes against children are considered to be one of the most heinous crimes known to humankind.

136. Child neglect, also as detailed above (*Id.* at 162) is especially heinous when one parent has the unwillingness to recognize that permanent psychological damage is done to the child daily. This in and of itself warrants a full psychiatric evaluation.

137. The alleged criminal violations of the order of protection by the Defendant span from criminal contempt/domestic violence in New York City, to witness tampering, to fleeing the jurisdiction to avoid prosecution, obstruction of justice, child neglect, and conspiracy, which are only a few that will be added to the already abundant buffet of charges. The Defendant will have to spend the majority of her time in the courts in the foreseeable future, and perhaps considerable time in prison. Wealth and connections will not preclude the delivery of justice, but they only delay it.

138. The severity and duration of the alleged crimes are also a factor that this Court should weigh in as multiple chances for either voluntary return or leniency have been given to the Defendant, who refuses to take responsibility, while it raises significant concerns about the Defendant's ability to provide a safe and stable environment for the child.
139. The Court should also weigh on whether the Defendant's past and current behavior indicates a potential risk for the child's well-being and poses a threat to his safety.
140. Factors such as the severity and recency of the criminal history, as well as any efforts made toward rehabilitation and personal growth should be taken into consideration.
141. The Defendant so far has shown no remorse no has shown any intent to redeem herself.
142. Conversely, the Plaintiff does not have any criminal convictions or pending criminal charges anywhere in the world.

Issues with Substance Abuse:

143. Due to the prolonged absence of Defendant, Plaintiff can only rely on Defendant's Victim Impact Statement sent to DHS in 2020 (*Id.* at 196) outlining the severity of her condition and the prolonged use of certain medications such as Lorazepam ⁽²⁶⁾.
144. Conversely, Plaintiff does not have any substance abuse issues.

Parental alienation:

145. In September 2014 Defendant was deposed. In such deposition, she was asked, *“Did you tell the hospital that Marco was the father?”* The defendant responded, *“It wasn’t relevant, so, no, I did not tell the hospital.”*
146. The follow-up question was, *“Do you think it’s important that your son has a father?”* and the response was, *“No.”*
147. In her pursuit of parental alienation (which is a form of child abuse), Defendant continues to prevent any contact between father and child and refuses to provide any medical or academic records of the child despite being ordered to do so weekly by the court.
148. In 2014, as the child's birth date approached, Defendant realized that her net worth was greater than Plaintiff's and that she could not easily extract money from him. Then, she became hostile and turned adversarial, combative, and ultimately pugilistic.
149. That is precisely when the Greenwich Police was roped in with over 30 police complaints against Plaintiff in four years.

(26) Lorazepam is used in the short-term management of severe anxiety. It is used to treat anxiety disorders and alcohol withdrawal, among other conditions, and among those who are depressed, there may be an increased risk of suicide. It is also useful in treating the onset of panic anxiety attacks and can induce sleep, hypnosis, and amnesia. It is sometimes used as an alternative when there is a need for rapid sedation of violent or agitated individuals and can produce adverse effects such as behavioral disinhibition. Acute delirium is sometimes treated with Lorazepam. In the US, the FDA advises against the use of benzodiazepines such as Lorazepam for longer than four weeks. In September 2020, the FDA required the boxed warning to be updated for all benzodiazepine medicines to describe the risk of abuse, misuse, addiction, physical dependence, and withdrawal reactions. With long-term use, larger doses may be required for the same effect. Physical dependence and psychological dependence may also occur. Lorazepam use is generally only recommended for up to 2 to 4 weeks.

150. Three weeks before the birth of the child, Defendant went to the Greenwich police to report Plaintiff, the father of the soon-to-be child as an undocumented immigrant. She'll demand the police intervention to communicate to Plaintiff that she did not wish to have any more contact with him anymore, then would randomly return to the police station complaining and alerting them that Plaintiff will soon be in Greenwich driving an unregistered vehicle while without a driver license while at the same issuing or causing to issue more than eight (8) no-trespass orders against Plaintiff demanding that Plaintiff remained at a distance from her residences in Southampton and Greenwich, her parent's house also in Greenwich, the child's tennis club, his preschool, church, soccer field, and the Greenwich Coalition Against Domestic Violence. In this place, victims of domestic violence seek help in Greenwich.

She would do so in such a callous way to prevent the truth from becoming known to others, diminishing, and humiliating the Plaintiff in public, and leveraging her wealth to destroy the father of her child.

151. One incident of relevance is August 7, 2015, when the Defendant's father called the Greenwich police reporting an attempt abduction of the child at the hands of Plaintiff falsely stating that Plaintiff was not allowed to leave his house with the child nor be in a car with the child. ⁽²⁷⁾ Within minutes, five (5) police vehicles arrived at the quiet scene, Defendant arrived minutes later and falsely stated to

(27) The Plaintiff and the child were heading to a nearby place for lunch and took UBER as the temperature was in the 90^s.

the Police that Plaintiff was not allowed to leave his house and board a car. The police dispatched one unit to Stamford family court to retrieve a true copy of the latest court order and one hour later Plaintiff was cleared of any wrongdoing, at which point his visitation time ended.

The child was traumatized, and Plaintiff was mortified in front of his community, while there were no repercussions for the Defendant or her father.

152. In 2019, Defendant hired a criminal defense attorney, Attorney Felsen, to push for Plaintiff's arrest on fabricated charges and did so with the aid of the Greenwich police. Fortunately, the CT district attorney's office was able to read into it and declined to proceed against Plaintiff.

153. During the years, Plaintiff will become the target of various investigations, from the I.R.S. ⁽²⁸⁾ to the Office of Public Discipline ⁽²⁹⁾, while Defendant's father will contact Plaintiff's landlord to disparage him.

154. In 2018, Defendant's father, Robert J. Aaronson, impersonated Plaintiff by falsely presenting himself as the father of the child approving plastic surgery on the minor child (age 4) who was injured while with Defendant. Simply deviant.

155. The defendant's mind was even more deviant when she sent the child into a bathroom with her (former) partner "so he could see a male's genital", then emailed Plaintiff as an FYI. Leo was 2 at the time.

156. In these years Defendant will miss a large number of visitations claiming the

(28) The Plaintiff's business and he personally were audited for over 2 ½ years.

(29) Defendant reported Plaintiff complaining that he was performing the job of a licensed architect hoping that a guilty find (felony) would trigger an ICE detainer, and eventually deport him.

child was teetering, under the weather, sick, in a bad mood, on vacation, the weather wasn't ideal, claimed that nothing was scheduled, scheduled but not confirmed, she had no driver, the car couldn't start, visitations just happened, or no show no cancellation accumulating thousands of hours of missed visitations, all of them without accountability. This only empowered the Defendant to do more, until their disappearance.

157. In this fragment of time, sadly, both paternal grandparents passed away without ever having an opportunity for the child to meet his extended Italian family.

The defendant's plan to eradicate the child's heritage worked.

158. On July 3, 2023, Hon. Judge Donna Heller of the Stamford family court held a remote hearing on the Defendant's motion to relinquish jurisdiction of the child. At such a last hearing before the ruling, and while sworn in, Defendant, sua sponte, stated that she would be married by the following weekend.

If true, by now, the Defendant could have obtained additional citizenship by way of marriage, and a new passport under her married name in an attempt to elude the authorities. Then change the child's last name on his passport and vanish anywhere in the world.

159. She could also have claimed that since there is no contact between the Plaintiff/father and the child, she could argue that the child has been abandoned by his father, clearing the way to a possible adoption by the new husband.

The twisted mind of the Defendant has no limits.

History provides Plaintiff with the knowledge of Defendant's sinister modus operandi or pattern of behavior; Plaintiff believes that this is a real possibility.

160. According to her statement, the Defendant spent more than \$1.5M in legal fees hiring eleven (11) different law firms while Plaintiff was and still pro-se.

161. As explained under 22 USC Ch. 97 (a)(1) the international abduction or wrongful retention of children is harmful to the child's well-being.

The kidnapping of Leo, the prolonged separation between father and child, and the poisoning of the child's mind are and would cause irreparable harm to Leo, and it is defined as child neglect/child abuse in 48 states of the U.S. Parental alienation is emotional child abuse. This is deprivation of love for a minor child.

History of Abuse or Neglect:

162. On June 5, 2023, in the matter of *Aisha R. (Ariel T.)* a New York State Judge, Hon. Erik S. Pitchal ruled that separation between [parent and child] amounts to child neglect, stating, *"Given Family Court's responsibility to respond to the multitude of ways in which children can be impacted by parental behavior, and the moral imperative to exercise its jurisdiction as broadly as required to effectively respond to the needs of families and children, this Court is prepared to conclude that a petition alleging a coercive and controlling relationship can be sufficient to state a cause of action for neglect."*

163. New York Family Court Act § 1012 provides that a child is neglected if his or her physical, mental, or emotional condition has been, or is in imminent danger of being impaired, as a result of the failure of his or her parent to exercise a

minimum degree of care in providing proper supervision or guardianship, "by unreasonably inflicting or allowing to be inflicted harm, or a substantial risk thereof." Family Ct Act 1012(f)(i)(B); John S. v. Peter B., 224 AD2d 617, 639 (2d Dep't. 1996).

164. The Defendant is causing irreparable harm to the child and continues to do so undisturbed.

Each parent's ability to provide a stable and nurturing environment.

165. While Defendant apparently holds the advantage of showing the ability to provide a stable environment for the past four and one-half years, she acquired such a status by default as she exiled herself from the U.S. to the small island of Mallorca by way of fraud, deceit, and contempt of court, among others, while no one can verify such condition, not even the Embassy personnel in Spain.

166. The Defendant, an American citizen, deceived the Consulate of Spain to acquire a visa for the minor child and herself and shielded herself from domestic violence prosecution in the U.S. by becoming a fugitive and remaining in Spain.

As she will have to face the consequences of her criminal activity, she will undoubtedly lose the ability to provide a stable environment for the child.

167. As for the nurturing part of the requirement, no one has been able to verify if such a condition is in existence.

The defendant's recent denial to consent to a well-being check by the personnel of the U.S. Embassy in Madrid speaks volumes and raises a whole new set of concerns about the child's wellbeing.

168. The fact that Defendant by not allow any contact between father and child is another indicator that Defendant is engulfed with rage against Plaintiff and only prioritizes herself while not properly caring for the child's wellbeing.
169. Her parents, who followed her around the world for decades and moved to Mallorca in 2021 with her, might face criminal charges as well with the likelihood of being ordered only to have contact with the child while fully supervised. They are at risk of catastrophic financial ruin as they continue to aid and abet the lawbreaker. They will no longer be able to concert with the Defendant or provide any financial help to the child.
170. The similarity of child neglect since 2020, as outlined by Hon. Judge Erik S. Pitchal in paragraph (*Id.* at 162) in and on itself should be the deciding point for this Court to order a change in custody in favor of the Plaintiff.
171. Conversely, Plaintiff has proven the ability to provide a stable and nurturing environment for the child as per the most recent court order in CT. Judge Truglia (*Id.* at Exhibit 1) removed the absurd geographic restriction, removed the ludicrous supervision, granted sleepovers over the weekend, almost doubled the parenting time, and granted Plaintiff's request to exchange the child only at the local police station.

A history of stable residence and frequent relocations:

172. In 2014, the minor child was born in Greenwich, CT, and after he left the hospital lived with the Defendant at the Defendant's parent's house.

173. Within one month he traveled to the island of Bermuda (according to his passport application), then resided in Southampton, NY, for two months, just to return to the grandparent's house in Greenwich for another two months.
174. In October 2014, the child moved into the Defendant's new home in Greenwich.
175. In 2017, Defendant rented her house and temporarily relocated with her new companion in New Canaan, just to return to the previous address.
176. In 2020, Defendant rented her house for the second time and relocated to Litchfield, CT.
177. Additionally, as stated by the Defendant in Connecticut Court and on her social media, www.sfiles.co/meet-team/ (approximately 2019)" lived *in 5 countries since she was 19 years old; 20 years in Europe & Latin America. A short stint in Buenos Aires, 10 years in the USA*". This is the polar opposite of stability.
178. In late 2020, Defendant moved to Mallorca, Spain to an address unknown to Plaintiff who cannot for sure ascertain that Defendant remained at the same address for the past four years.
179. The aggregate number of houses where the child resided in the past 10 years is 6, or approximately one house every 1.6 years.
180. Upon information and belief, the Defendant was born in Baltimore, MD, and moved to New Jersey, California, France, Italy, Argentina, the U.K., Switzerland, New York, Greenwich, Southampton, Greenwich, New Canaan, Litchfield, and Spain.

181. A staggering fourteen (14) relocations as far as Plaintiff knows, or approximately one place every 3.3 years, while vacationing around the globe monthly.
182. The average 3.3 period is due now, and based on the Defendant's history of relocation she might already plan to relocate further, most certainly using the proceeds of the sale of her house.
183. Having acquired the knowledge on how to circumvent the Hague ⁽³⁰⁾, there is an elevated risk that the Defendant will flee Spain with the child and disappear again.
184. Additionally, Defendant travels on business regularly as her new company, Haeres Venture Studio, a venture capital, and private equity company is based in Geneva, Switzerland.

The best interest of the child.

185. The Defendant's outrageous and continued disobedience to the rule of law warrants a change in custody of the minor child, and a psychological evaluation.
186. The Defendant engaged in conduct that is extreme and outrageous so as to exceed the bounds of decency in a civilized society and continue to do so undisturbed neglecting and further abusing the minor child causing irreparable harm to the minor child, while doing so maliciously, intentionally, and recklessly.

(30) During the last proceeding in the Spanish Court the Defendant used the exclusionary clause of acquisition of habitual residency for the child after one year elapsed, and this mannerism can be used repeatedly by further absconding the child for 365 days, shielding the child from being ordered returned to the U.S.

187. Conversely, Plaintiff will allow supervised visits between Defendant and her family with the minor child as proper, taking into consideration the risks and the child's willingness and desire.
188. In the best interest of the minor child legal and physical custody of Leonard Michael Aaronson should be granted to the Plaintiff/father, Marco Battistotti.

**SECOND CAUSE OF ACTION:
Full psychological evaluation of the Defendant**

189. The basis for the Plaintiff's request is spelled in a few basic criteria that need to be met to make a compelling case to the court as the courts require.
190. Substantial Concerns: Evidence of dysfunctions was provided by the Defendant in her letter to the immigration Judge in 2020. (*Id.* at 196)

The Defendant provided evidence of lack of judgment during her deposition where she admitted to shoplifting while pregnant (*Id.* at 134) without showing any remorse for it, as her inability to comply with a written agreement when she stated, "*I agreed then, I don't agree now.*" (*Id.* at 10)

The multiplicity of criminal violations of a court order and her inability to accept that parental kidnapping is a crime of domestic violence, a violent crime against children as defined by the FBI, it is a crime against children as the emotional or psychological abuse if harmful behavior that affects the child's mental health and emotional well-being (*Id.* at p.28 footnote 21), and it is considered neglect (*Id.* at 162) will have life-lasting detrimental effects for the child raises questions

of reckless behavior that will undoubtedly negatively affect the minor child over time.

191. The unwillingness to allow the father/Plaintiff to have a meaningful relationship with the child is detrimental to the well-being of the child.
192. The unwillingness to consent to a visit from the consular personnel (*Id.* at 67) to prove that the child is well is very troubling and shows intent to conceal.
193. The pattern of parental alienation (*Id.* at p.46) is a clear sign that the Defendant places herself above the needs of the child.
194. The unwillingness to share medical and academic records of the child with the other parent a per-se an attempt to conceal.
195. The defendant's pattern of domestic violence that is currently ongoing is perhaps the most disturbing factor.
196. In 2020, while Plaintiff was detained by ICE, Defendant in her fierce advocacy to have Plaintiff deported wrote two "Victim" Impact Statements that were sent to the DHS's prosecutor and then given to the Immigration Judge during the trial. One in a particular letter dated September 9, 2020, the Defendant made the following statements:
 - *"Thus far [we moved] to a place Mr. Battistotti would not or could not know/find us",*
 - *"I have taken other measures I could over the years to help keep my son safe from certain of his father's threats that he'd "take him when I least expect it"...*
 - *"In 2015 I was diagnosed with PTSD by a PhD Psychologist, was prescribed Lorazepam, an anti-anxiety drug I still take nightly ⁽³¹⁾.*

I have continued YWCA counseling; began Eye Movement Desensitization ⁽³²⁾ psychotherapy in January 2020, after being diagnosed with acute chronic PTSD by a trauma specialist doctor.”

- *“On February 20, 2020, I experienced my first ever panic attack for which I had to be medically sedated. It was some of the most harrowing hours of my life”...*
- *“On February 27, 2020, I had another debilitating panic attack at home. The symptoms were different and even worse from the first time. EMT arrived and doctors hospitalized and medicated me, then prescribed new daily meds. Within days I made plans for us to leave our home and live elsewhere at a place Mr. Battistotti does not know.”*
- *“I’ve tried hard to get another small business off the ground but have been unsuccessful due to my time not being my own and my deteriorating emotional health and physical manifestation of long-term stress.”*

197. The Defendant’s pattern of behavior overshadows the best interest of the child.

THIRD CAUSE OF ACTION: Child support

198. Plaintiff repeats and realleges each and every allegation set forth above.

199. The plaintiff requests to be awarded child support in the amount to be determined but necessary to assure the maintenance of the standard of living and lifestyle that the child is accustomed to and proportioned to the party’s individual financial net worth.

200. By Plaintiff being awarded child support he will be able to properly prepare an appropriate home in New York City for the child (a place that the child loved),

(31) Lorazepam use is generally only recommended for up to 2 to 4 weeks; In the U.S., the FDA advises against the use of benzodiazepines such as Lorazepam for longer than 4 weeks.

(32) Eye Movement Desensitization and Reprocessing Psychotherapy (EMDR) is used to alleviate distress and reformulate or reprocess negative beliefs. The triggers are desensitized, and 3 imaginal templates of future events are incorporated. This is done to assist the patient in acquiring the skills needed for adaptive Functioning.

provide top-notch education, health insurance, etc. once the child is returned to the U.S.

**FOURTH CAUSE OF ACTION:
Retroactive financial sanctions against the Defendant**

201. The plaintiff repeats and realleges each and every allegation set forth above.

Sanctions for Civil Contempt:

202. A spouse who interferes with or refuses to allow court-ordered visitation may be found in contempt (see *Fuerst v. Fuerst*, 131 A.D.2d 426, 427, 515 N.Y.S.2d 862, 864 (2 Dept., 1987), where mother willfully and repeatedly impeded the father's right to visit with his daughters).

203. In *Kasal v. Kasal*, 297 A.D.2d 624, 747 N.Y.S.2d 38 (2d Dep't 2002) the parties' so-ordered stipulation, which was incorporated but not merged into the judgment of divorce indicated that "[n]either party shall relocate his or her residence outside of the counties of Nassau and/or Queens, without prior permission of the Court or written consent of the other party."

204. In this current case, the Defendant/mother unlawfully relocated with the child from Greenwich, CT approximately 4,000 miles away to her new residence in (an address unknown to Plaintiff), Mallorca, Spain, without court permission or father's knowledge, or written consent in clear defiance of the father's right to visitation and court order.

205. The remedy against a spouse (or a parent) who violates a custody or visitation order by removing the child from the state (or country) is by way of contempt (*McGrady v. Rosenbaum*, 62 Misc. 2d 182, 308 N.Y.S.2d 181 (Sup 1970), judgment aff'd, 37 A.D.2d 917, 324 N.Y.S.2d 876 (1st Dep't 1971).
206. In *Young v. Young*, (129 A.D.2d 794, 514 N.Y.S.2d 785 (2 Dept., 1987) the Appellate Division found that the plaintiff was properly adjudged to be in civil contempt. The testimony adduced at the hearing established that the plaintiff's disobedience of the prior order awarding the defendant visitation frustrated and impeded the defendant's right to visit with her son.
207. However, Plaintiff in this action does not ask the Court to sanction Defendant with a term of imprisonment, because of its possible further detrimental impact upon the child where a sentence directing the mother's immediate incarceration "*would serve no purpose*" (see *Rubin v. Rubin*, 78 A.D.3d 812, 911 N.Y.S.2d 384, quoting *Berkman v. Berkman*, 57 A.D.2d 542, 542, 393 N.Y.S.2d 60; *Thimm v. Thimm*, 137 A.D.3d 775, 28 N.Y.S.3d 693, (2 Dept., 2016)), and she will purposely never return to the U.S. skirting one more Court Order in perpetuity.

Instead, Plaintiff asks this Court to impose retroactive and future financial sanctions leveraging Defendant's real asset in Connecticut as collateral to secure the payment of any sanctions, past, present, or future child support.

208. While Defendant could claim that she should be allowed to purge herself of her contempt, she cannot purge herself from future sanctions as there will be no collateral available for Plaintiff in case she'll be able to liquidate her asset.
209. The court is not obligated to give a respondent an opportunity to purge herself of contempt based upon the omission to perform an act or duty, where the act or omission is no longer within the respondent's power to perform (see, Judiciary Law §774[1]). *Kruszczynski v Charlap*, 124 A.D.2d 1073, 1073, 508 N.Y.S.2d 861, 862 (4 Dept., 1986).
210. In *Matter of Marallo v. Marallo*, 128 A.D.2d 710, 513 N.Y.S.2d 204 (2 Dept., 1987) a contempt proceeding to enforce a prior order which awarded the petitioners temporary visitation with their grandchildren, the court found the mother in contempt of court and directed that she be incarcerated on the first and third weekends of each month for a period of six months.
211. The primary purpose of civil contempt is remedial. Any penalty imposed "is designed not to punish but, rather, to compensate the injured private party or to coerce compliance with the court's mandate, or both" (*Matter of Department of Environmental Protection of City of New York v. Department of Environmental Conservation of State of New York*, 70 N.Y.2d 233, 239, 519 N.Y.S.2d 539). Punishment is the purpose of criminal contempt, not civil contempt (*Palmitesta v. Palmitesta*, 166 A.D.3d 782, 89 N.Y.S.3d 94 (2 Dept., 2018)).

212. Courts aim to impose sanctions proportionate to the misconduct. *See M.F. ex rel. Durivage*, 217 A.D.3d 103, 107 (3d Dep’t 2023) (“In determining the appropriate sanction, courts should consider the facts on a case-by-case basis, balancing the strong public policy favoring resolution of cases on the merits with the court’s interest in ensuring efficient litigation through court orders, deadlines, and sanctions.”); *see also Aldo v. City of New York*, 210 A.D.3d 833, 834 (2d Dep’t 2022).
213. A second source of authority for the imposition of financial sanctions is the contempt power. The power to punish for civil contempt includes the power to punish a party for any "abuse of a mandate or proceeding of the court" (Judiciary Law § 753 [A] [2]).
214. Where a party is adjudged to be in civil contempt, a fine sufficient to indemnify the aggrieved party for the loss or injury occasioned by the contempt may be imposed or, where such actual loss or injury is not shown.
215. It is in Plaintiff’s view that Courts of record (Judiciary Law § 2) are vested with inherent powers, which are neither derived from nor dependent upon express statutory authority and which permit such courts to do all things reasonably necessary for the administration of justice within the scope of their jurisdiction (*Langan v First Trust Deposit Co.*, 270 App. Div. 700, *aff’d* 296 N.Y. 1014).
216. The so-called "inherent powers doctrine" has been aptly described as follows: "Under the inherent powers doctrine, a court has all powers reasonably required

to enable a court to perform efficiently its judicial functions, to protect its dignity, independence, and integrity, and to make its lawful actions effective.

217. These powers are inherent in the sense that they exist because the court exists; the court *is*, therefore, it has the powers reasonably required to act as an efficient court. Inherent judicial powers derive not from legislative grants or specific constitutional provisions, but from the fact it is a court which has been created, and to be a court requires certain incidental powers in the nature of things. (Carrigan, Inherent Powers of the Courts, National College of the State Judiciary, Reno, Nevada [1973].)" (*Matter of People v Little*, 89 Misc.2d 742, 745, *affd* 60 A.D.2d 797.) A Court's inherent powers are derived from the very fact that the court has been created and charged with certain duties and responsibilities; they are those powers which a court may call upon to aid in the exercise of its jurisdiction, in the administration of justice, and in the preservation of its own independence and integrity; such powers have been recognized since the days of the Inns of Court in common-law English jurisprudence (*Eichelberger v Eichelberger*, 582 S.W.2d 395, 398-399 [Tex]; *see also, Jacobson v Avestruz*, 81 Wis.2d 240, 244-248, 260 N.W.2d 267, 269-270; 20 Am Jur 2d, Courts, §§ 78-79).

218. Plaintiff computes the financial retroactive sanctions to be imposed upon Defendant by calculating such claim in separate tiers, taking a conservative approach, and based on the multitude of non-compliance and the number of given notices to Defendant.

219. Finally, although the contempt power has now been codified in this State (*see*, Judiciary Law art 19), it has long been recognized that courts have the inherent power to enforce respect for and compliance with their judgments and mandates by punishment for contempt, which power is not dependent upon any statute (*Roadway Express v Piper*, 447 U.S. 752, 764-765; *Shillitani v United States*, 384 U.S. 364, 370; *De Lancey v Piepgras*, 141 N.Y. 88, 96; *People ex rel. Stearns v Marr*, 88 App. Div. 422, *mod on other grounds* 181 N.Y. 463; *McKendry v McKendry*, 202 Misc. 312, *revd on other grounds* 280 App. Div. 440).
220. At English common law, courts were recognized to possess the inherent power to punish, by process of contempt, any disregard of judicial authority, both for the benefit of litigants, i.e., civil contempt, and for the preservation of their own order and dignity, i.e., criminal contempt (*Matter of Douglas v Adel*, 269 N.Y. 144, 146; *Matter of Barnes*, 204 N.Y. 108, 113-114; *People ex rel. Platt v Rice*, 144 N.Y. 249, 263; *People ex rel. Munsell v Court of Oyer Terminer*, 101 N.Y. 245, 249-250; *Continental Mtge. Guar. Co. v Whitecourt Constr. Corp.*, 164 Misc. 56; *Silverman v Seneca Realty Co.*, 154 Misc. 35).
221. This power became a part of the State's common law and formed the source of the early State statutes pertaining to contempt (*Matter of Douglas v Adel*, *supra*; *Matter of Barnes*, *supra*; *People ex rel. Platt v Rice*, *supra*).

222. Because the common-law contempt power vested the courts with unrestrained discretion, statutes were enacted to bring the power within definite and fixed rules (*People ex rel. Munsell v Court of Oyer Terminer, supra*).

These early statutes (*see*, 2 Rev Stat of NY, part III, ch VIII, tit XIII, § 1; ch III, tit II, art I, § 10 [1st ed]), and their present-day counterparts (*see*, Judiciary Law §§ 750, 753), recognized and perpetuated the distinction between the two classes of contempt, by preserving the common law with respect to private or civil contempts (*see*, Judiciary Law § 753 [A] [8]), while strictly limiting the scope of public or criminal contempt to those acts proscribed by statute (*see*, Judiciary Law § 750 [A]).

223. Thus, a court seeking to punish for criminal contempt must look only to the statute, while a court invoking its power to punish for civil contempt may, if necessary, look beyond the specific provisions of the statute and resort to its inherent common-law contempt power (*People ex rel. Munsell v Court of Oyer Terminer, supra*; *see also*, *People ex rel. Nunns v County Ct.*, 188 App. Div. 424; *People ex rel. Brewer v Platzek*, 133 App. Div. 25).

224. The Defendant's prolonged and ongoing willful disobedience of a Court Order, disrespect of the courts, and complete disregard for the rules of law, paired with the cruel and inhuman treatment and the mental anguish inflicted on the child and the Plaintiff, warrants the imposition of proper financial sanctions calculated retroactively (starting on February 1, 2020) for the willful multitude of contempt over the past four and one-half years. The plaintiff discounts the

amounts of a maximum of \$1,000 per contempt, (time three visits a week), times 4.5 years, totaling about \$5M.)

and instead, conservatively compute the sanctions, discounted, and calculated on an increasing scale based on how many opportunities the Defendant was given to correct the wrongdoings and redeem herself.

225. Defendant was made aware of the fact that Plaintiff would seek financial sanctions against her with an email dated September 18, 2021, (*Id.* at 57) yet decided to ignore it.

COMPUTATION OF RETROACTIVE SANCTIONS

<i>Id. At ¶</i>	Their	Notification to Defendant	Message conveyed	Days	Penalty amount	Total
224		Email dated 2/1/2020	Request to resume visits			
	1			33	\$250	\$8,250
26		Taken into ICE custody 3/5/2020	In custody			
	2			406	\$500	203,000
55		Email dated 4/16/2021	Request to resume visits			
	3			154	\$750	\$115,500
57		Email dated 9/18/2021	Financial sanctions will be sought			
	4			120	\$1,000	\$120,000
64		Email dated 1/17/2022	Request to resume visits			
	5			122	\$1,250	\$152,500
65		US D.O.S. Email dated 5/20/22	Request for voluntary return			
	6			73	\$1,500	\$109,500
64		Email dated 8/2/2022	Return and I'll ask for lienency			
	7			258	\$1,750	\$451,500
66		Email dated 4/18/2023	Please allow video with the child			
	8			413	\$2,000	\$826,000
66		Email dated 5/20/2024	Allow video, produce medical			
	9			78	\$2,250	\$175,500
167		8/7/24	Refusal of Embassy check			
	10			39	\$2,500	\$97,500
		9/16/24	Date of Court action			
					TOTAL	\$2,259,250

FIFTH CAUSE OF ACTION: Future financial sanctions against the Defendant

226. The Plaintiff repeats and realleges each and every allegation set forth above.

227. Future financial sanctions against the Defendant are warranted based on the Defendant's history of noncompliance and contempt and shall serve as a deterrent not to pursue any further violations. Offenders who violate orders and push justice systems in various other ways have little respect for the law. These individuals are statistically more prone to increased violence toward their victims and bystanders. Defendant Suzanne Aaronson falls squarely into this category.

228. Where any person willfully disobeys a lawful mandate of the Supreme Court issued pursuant to subdivision twelve of section sixty-three of the executive law, the punishment for each day that such contempt persists may be by a fine fixed in the discretion of the court, but not to exceed five thousand dollars per day. In this instance, Plaintiff requests that the full amount of \$5,000 in fine per day be imposed upon Defendant for every day of failed full compliance with a court order.

PRAYERS FOR RELIEF

WHEREFORE, it is respectfully requested that the Court enter judgment in favor of Plaintiff, Marco Battistotti and against Defendant Suzanne Aaronson as follows:

- a) On the First Cause of Action, award the Plaintiff full legal and physical custody of the child, Leonard Michael Aaronson.

- b) On the Second Cause of Action ordering the immediate psychological evaluation of the Defendant in person, in the United States.
- c) On the Third Cause of Action, award the Plaintiff child support in the amount to be calculated after such award is made, but before the return of the child.
- d) On the Fourth Cause of Action, award the Plaintiff retroactive financial sanctions in the amount of \$2,259,250. -
- e) On the Fifth Cause of Action, impose a sanction in the amount of not less than \$5,000 per day against the Defendant for every day the Defendant fails to comply with the court's order moving forward.
- f) Granting such other relief as may be just and proper.

A PRIOR APPLICATION HAS NOT BEEN MADE FOR THE RELIEF NOW REQUESTED.

I, Marco Battistotti, Plaintiff, affirm this 17th day of September 2024, under the penalties of perjury, under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Dated: New York, New York

September 17, 2024

Respectfully submitted,

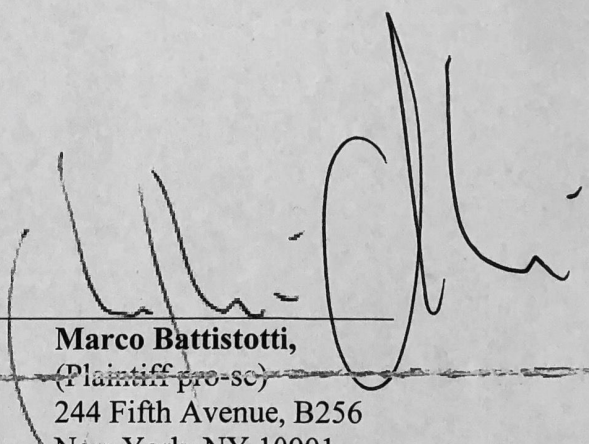
By



Marco Battistotti,
(Plaintiff pro-se)
244 Fifth Avenue, B256
New York, NY 10001
(212) 777.7304
(917) 930.6200
marco@justmarco.com

TO:
Suzanne Aaronson,
in care of Attorney Rosa Pederá
Carrer de Josep Anselm Clave' 8
07002 Palma, Illes Balears, Spain

By


Marco Battistotti,
(Plaintiff pro-se)

244 Fifth Avenue, B256

New York, NY 10001

(212) 777.7304

(917) 930.6200

marco@justmarco.com

TO:

Suzanne Aaronson,

in care of Attorney Rosa Pederà

Carrer de Josep Anselm Clavé' 8

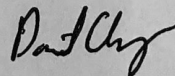
07002 Palma, Illes Balears, Spain

State of New York

County of New York

Sworn to before me this

20 day of September 2024



DANIEL T. CHENG

Notary Public, State of New York

Reg. No. 04CH0015293

Qualified in New York County

Commission Expires Oct. 30, 2027

TABLE OF CONTENTS

INTRODUCTION	1
JURISDICTION AND VENUE	2
The three basic criteria:	
A. There is a substantial constitutional issue	9
B. The lower court was wrong in its decision	32
C. All remedies available in the lower court have been exhausted	29
PARTIES	2
THE CLAIM	3
BACKGROUND	3
THERE IS A SUBSTANTIAL CONSTITUTIONAL ISSUE:	
The Fourteenth Amendment	9
The Nexus approach	12
The Equal Protection Clause	14
Child victims of international parental kidnapping	14
Children Bill of Rights	15
FACTUAL ALLEGATIONS:	
Witness Tampering – a Hate Crime	18
Premeditation	19

Fleeing the Jurisdiction to Avoid Prosecution and Obstruction of Justice	20
The Disappearance of the Minor Child	20
The Crime of International Parental Kidnapping	20
The Welfare check by the U.S. Embassy in Madrid	23
Defendant's attempt to liquidate the U.S. asset to finance the kidnapping	23
An Organized Crime Family (RICO Act)	25
International Parental Kidnapping is Domestic Violence	26
ALL REMEDIES HAVE BEEN EXHAUSTED:	
The Hague Convention on International Parental Kidnapping	29
The importance of the Hague Convention (Defense)	29
THE LOWER COURT WAS WRONG IN ITS DECISION	32
<u>FIRST CAUSE OF ACTION: CHANGE IN CUSTODY</u>	
Changes in circumstances	35
Co-Parenting abilities	36
Emotional and physical capacity	37
Disabilities of one parent	39
The importance of consistency	40
Past incidents of domestic violence	41
Current acts of domestic violence	42

Prior criminal history and the likelihood of incarceration	43
Issues with substance abuse	45
Parental alienation	46
History of abuse and neglect	50
Each Parents ability to provide a stable and nurturing environment	51
A history of stable residence and frequent relocations	52
The best interest of the child	54
<u>SECOND CAUSE OF ACTION:</u>	
Psychological Evaluation of the Defendant	55
<u>THIRD CAUSE OF ACTION:</u>	
Child Support	57
<u>FOURTH CAUSE OF ACTION:</u>	
Retroactive Sanctions for civil contempt	58
Computation of retroactive sanctions	65
<u>FIFTH CAUSE OF ACTION:</u>	
Future Financial Sanctions	65
PRAYERS FOR RELIEF	66

INDEX OF EXHIBITS

06/24/2019	Judge Truglia’s first transcript of visitation ordered	1
08/19/2019	Judge Truglia’s second transcript of visitation ordered	1
9/7/2021	Defendant’s email to Connecticut Family Court <i>My son and I live in Spain.</i>	2
11/1/2021	Email from the Consulate General of Spain in NY <i>Birth certificate with no father stated.</i>	3
8/7/2024	Email from the U.S. Department of State and U.S. Embassy in Madrid <i>...the visit requested was declined</i>	4
8/27/2024	Defendant’s house in Greenwich, CT. <i>Held by Lake, Ave FT Trust and controlled by Suzanne Aaronson.</i> <i>Text from a real estate agent acknowledging that the Defendant controls</i> <i>the property that was shortly after delisted.</i>	5
7/26/2024	Text with Broker, Legal Notice, and Red Flier	6
8/23/2017	Application for addition	7
11/1/2023	Connecticut Family Court Order <i>Dismissing the case of Leonard Aaronson</i>	8
5/22/2024	Defendant’s email to Plaintiff <i>You are stupid, a scumbag, a total loser in life, a cruel and sick</i> <i>person, a liar and a thief. All doors are closed.</i>	9
5/2/2019	Defendant’s latest Financial Affidavit <i>House purposely undervalued at \$1.8M to deceive the court is determining</i> <i>child support, and purposely undated and deceptively not certified to skirt</i> <i>penalties of perjury.</i>	10

EXHIBIT #1

NO: FST-FA-8 4030863 S : SUPERIOR COURT
MARCO BATTISTOTTI : JUDICIAL DISTRICT OF
STAMFORD/NORWALK
v. : AT STAMFORD, CONNECTICUT
SUZANNE AARONSON : JUNE 24, 2019

EXCERPT: COURT FINDINGS/ORDERS

BEFORE THE HONORABLE ANTHONY TRUGLIA, JUDGE

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

Self-Represented Plaintiff:

MARCO BATTISTOTTI

Representing the Defendant:

ALICIA CHALUMEAU
Chalumeau Law Group
40 Richards Avenue
Norwalk, Connecticut 06854

Recorded & Transcribed By:
Carrie Provenzale
Court Recording Monitor
123 Hoyt Street
Stamford, Connecticut 06905

1 (Previous colloquy and/or testimony omitted from
2 transcript)

3 THE COURT: The Court has listened carefully to
4 the testimony of both parties and has carefully
5 considered all of the exhibits introduced in support
6 of and in opposition to the plaintiff's claims for
7 relief.

8 After an evidentiary hearing on the motion, the
9 Court finds good cause to grant part of the relief
10 requested.

11 The Court's current order of October 15th, 2018,
12 entry 424, contemplates that the plaintiff's
13 visitation and parenting time with the child will be
14 unsupervised after April 15th, 2019.

15 The defendant opposes resumption of unsupervised
16 visitation. The defendant argues that all of the
17 plaintiff's parenting time should be suspended until
18 he completes additional counseling.

19 The Court finds that it is in the child's best
20 interest to resume unsupervised visitation at this
21 time.

22 The Court has carefully considered the
23 defendant's testimony and that testimony of her
24 witnesses.

25 Although concerning, the issues raised by the
26 defendant are not sufficient to require supervision.
27 For example, the Court agrees with the defendant that

1 the plaintiff should not discuss any part of these
2 proceedings with the child and certainly should not
3 criticize the defendant in any way in the child's
4 presence.

5 These issues should be raised by way of a motion
6 for contempt and should not be the basis for
7 continuing supervised visitation.

8 The Court finds no basis in the evidence now
9 before the Court that psychological evaluations of
10 either party are warranted at this time.

11 The defendant asserts, inter alia, that the
12 plaintiff has failed to take advantage of visitation
13 time offered to him in that he has numerous lawsuits
14 now pending against him, including immigration
15 proceedings and eviction action.

16 None of the grounds asserted by the defendant
17 even when considered in the totality of the
18 circumstances as argued by the defendant persuade the
19 Court that the plaintiff should have a psychological
20 evaluation before he is allowed to have unsupervised
21 visitation with his son.

22 The Court also finds no basis in the evidence
23 for the defendant's claim that the plaintiff should
24 not have overnight visitation with the child.

25 The Court finds that it is in the child's best
26 interest at this time to have as much quality time
27 with his father as possible, which includes overnight

1 visitation.

2 The Court orders the defendant to comply fully
3 with the weekly visitation schedule set forth in the
4 memorandum of decision dated October 15th, 2018
5 starting July 1st, 2019.

6 For purposes of this order, week one will be the
7 week starting July 1, 2019. The Court also orders
8 that the visitation schedule henceforth shall include
9 overnight visitation from Saturday 9:00 a.m. to
10 Sunday at 12:30 p.m.

11 The Court also orders -- the Court also removes
12 the restriction limiting the plaintiff's visitation
13 to the Town of Greenwich during daylight hours,
14 overnights to continue in Greenwich.

15 The Court finds no good cause to continue the
16 geographical restriction at this time.

17 Pick up and off will occur at the Greenwich
18 Police Station until further orders of this Court.
19 The Court's other orders regarding custody and
20 visitation remain in effect, entries 255 and 424.

21 It is so ordered.

22 And that is for motion No. 458.

23 With respect to motion No. 464, the Court takes
24 no action on it, no action necessary.

25 So ordered.

26 ATTY. CHALUMEAU: Your Honor --

27 THE COURT: Okay. So that concludes Battistotti

NO: FST-FA-8 4030863 S	:	SUPERIOR COURT
MARCO BATTISTOTTI	:	JUDICIAL DISTRICT OF STAMFORD/NORWALK
v.	:	AT STAMFORD, CONNECTICUT
SUZANNE AARONSON	:	JUNE 24, 2019

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Stamford, Connecticut, before the Honorable Anthony Truglia, Judge, on the 24th day of June, 2019.

Dated this 25th day of June, 2019 in Stamford, Connecticut.

Carrie Provenzale
Court Recording Monitor

NO: FST-FA14-4031121-S : SUPERIOR COURT
MARCO BATTISTOTTI : JUDICIAL DISTRICT
 : OF STAMFORD/NORWALK
V. : AT STAMFORD, CONNECTICUT
SUZANNE AARONSON : AUGUST 19, 2019

PM SESSION

BEFORE THE HONORABLE ANTHONY TRUGLIA, JUDGE

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

Representing the Plaintiff:

MR. MARCO BATTISTOTTI
Self-Represented
30 E 95th Street
New York City New York 10128

Representing the Defendant:

ATTORNEY ALICIA CHALUMEAU
40 Richards Avenue
Norwalk, Connecticut 06854

Recorded By:
Dawn Chase

Transcribed By:
Dawn Chase
Court Recording Monitor
123 Hoyt Street
Stamford, Connecticut 06905

1 ATTY. CHALUMEAU: All right. Did the parties
2 want to report back on Aaronson versus Battistotti?

3 ATTY. CHALUMEAU: Yes, Your Honor.

4 THE COURT: Battistotti versus Aaronson. Okay.
5 Just -- you can stay there just accommodate the --

6 UNKNOWN SPEAKER: Thank you.

7 UNKNOWN SPEAKER: Sure.

8 THE COURT: All right.

9 ATTY. CHALUMEAU: Your Honor, may I approach the
10 clerk?

11 THE COURT: Please.

12 ATTY. CHALUMEAU: With the report back forms.

13 THE COURT: Please. Please.

14 ATTY. CHALUMEAU: Your Honor, the family visited
15 the family -- visited with Family Relations, Family
16 Relations conducted an intake and a screen. They
17 have slated this for an issue focus evaluation with a
18 report back date I think sometime in October, mid-
19 October.

20 The parties also discussed the expansion of the
21 current access schedule during the weekday
22 considering the variance there was no agreement on
23 that at this time. My client still stands behind her
24 offer that the Wednesday period can be expanded to
25 allow him the entire after preschool period until the
26 child's bedtime.

27 THE COURT: So four hours basically every

1 Wednesday as opposed to an hour and a half on Monday,
2 an hour and a half on --

3 MR. BATTISTOTTI: Two hours and fifteen minutes
4 and two hours and fifteen minutes --

5 THE COURT: Oh, okay.

6 MR. BATTISTOTTI: -- total four and a half. Now
7 they're giving four. And, Your Honor, we're homeless
8 in Connecticut we don't --

9 ATTY. CHALUMEAU: I think it's four and a half.

10 MR. BATTISTOTTI: We don't know what to do in
11 Greenwich.

12 THE COURT: Yeah, but I lifted the geographical
13 restriction you can take the child to New York.

14 MR. BATTISTOTTI: In four and a half hours I can
15 take him and we can stay in the City for two hours
16 and come back. Your Honor, why not having an
17 overnight stay during the week, the child is relaxed,
18 he's not confused, there is nothing detrimental about
19 it, he's five years old it's about time. So I can
20 pick him up, I will absorb all the cost and the time
21 to pick him up and drop him back without
22 inconvenience Ms. Aaronson any way shape or form.
23 This is a person like myself, Your Honor, that has
24 the time to spend with the child.

25 THE COURT: So what you want to do is you want
26 to do one overnight during the week like Wednesday
27 night?

1 MR. BATTISTOTTI: One overnight during the week
2 then one overnight during week and then one overnight
3 during the weekend. So we consolidate instead of two
4 small portions Monday and Wednesday --

5 THE COURT: Right.

6 MR. BATTISTOTTI: -- into a very simple one
7 which I will pick-up my child at ten o'clock in
8 Greenwich on Tuesday on week one and I will drop him
9 off at seven Greenwich myself. Then on weekend pick-
10 up at ten deliver again at seven.

11 THE COURT: Sir, I can't do this without an
12 evidentiary hearing that's the thing. I can't do it
13 without an evidentiary hearing.

14 MR. BATTISTOTTI: But we just done -- this is
15 just modify something that is three years old.

16 THE COURT: I know the law says I can't do that
17 without an evidentiary hearing.

18 ATTY. CHALUMEAU: Your Honor, the child is also
19 enrolled in school.

20 ATTY. BATTISTOTTI: It doesn't start until
21 September 9.

22 THE COURT: Honestly if Mr. Battistotti is
23 willing to pick-up the child up in Connecticut, take
24 him overnight in New York, and bring him back to
25 Greenwich the following morning and so the child --
26 is he in daycare?

27 ATTY. CHALUMEAU: He is in daycare, Your Honor.

1 MR. BATTISTOTTI: No now --
2 THE COURT: No?
3 ATTY. CHALUMEAU: Right now he's not in a
4 daycare program --
5 THE COURT: No.
6 ATTY. CHALUMEAU: -- but he's about to start one
7 in a week or two.
8 MS. AARONSON: School.
9 MR. BATTISTOTTI: And I will drop him off by
10 nine o'clock.
11 THE COURT: It really doesn't sound --
12 ATTY. CHALUMEAU: Five year old child.
13 THE COURT: -- unreasonable.
14 MR. BATTISTOTTI: I will drop him off, Your
15 Honor.
16 THE COURT: Even a five year old child and
17 overnight during the week for a five year old child
18 does not seem unreasonable to me.
19 MR. BATTISTOTTI: Not at all.
20 THE COURT: It really doesn't.
21 ATTY. CHALUMEAU: Your Honor, I believe that the
22 -- my client --
23 THE COURT: But I will not order it without an
24 evidentiary hearing.
25 ATTY. CHALUMEAU: Thank you.
26 THE COURT: So -- and the problem is I can't do
27 it this afternoon I'm just jammed pack with stuff, I

1 can't do it this afternoon.

2 So we made some progress today.

3 ATTY. CHALUMEAU: A lot of progress.

4 MR. BATTISTOTTI: No I don't think we went
5 anywhere because --

6 THE COURT: Sure we did they lifted the
7 geographical restriction for overnights, right, by
8 agreement.

9 MR. BATTISTOTTI: Well, she consented to that on
10 Friday but --

11 THE COURT: Right.

12 MR. BATTISTOTTI: -- yes.

13 THE COURT: That's a big deal.

14 MR. BATTISTOTTI: Okay.

15 THE COURT: And you know she's willing to
16 consolidate the Monday and Wednesday which I think is
17 at least a decent accommodation or halfway, meeting
18 you halfway. Do I think it should be overnight on
19 Wednesdays yeah I do but I can't order it without an
20 evidentiary hearing or an agreement.

21 MR. BATTISTOTTI: When is the sooner because Ms.
22 Aaronson again now will take the child away, she just
23 came back from the vacation.

24 THE COURT: Okay.

25 ATTY. CHALUMEAU: Your Honor, he's --

26 MR. BATTISTOTTI: And she's threatening to take
27 him --

1 ATTY. CHALUMEAU: -- Mr. Battistotti just --
2 MR. BATTISTOTTI: -- on vacation again.
3 THE COURT: Sir, I can't --
4 ATTY. CHALUMEAU: -- is a don't (sounds like)
5 THE COURT: I can't do it now.
6 MR. BATTISTOTTI: Can we do any --
7 THE COURT: I'm sorry, sir.
8 MR. BATTISTOTTI: -- time on Wednesday, Your
9 Honor?
10 THE COURT: No the best thing I can do, the best
11 thing I can do at this point is --
12 (Pause)
13 MR. BATTISTOTTI: Your Honor, we spending time
14 at Home Depo and Whole Foods --
15 ATTY. CHALUMEAU: Your Honor?
16 MR. BATTISTOTTI: -- to go an use a toilet.
17 ATTY. CHALUMEAU: Your Honor, Mr. Battistotti
18 has just come off of five years of access with the
19 minor child where he's used two hours. By his own
20 request we've extended it and now he's acting as if
21 he's now burdened by his own request for an
22 extension, Your Honor, that's essentially what's
23 happened.
24 MR. BATTISTOTTI: No that's absolutely --
25 THE COURT: So maybe there has to be a little
26 bit of give so it's --
27 ATTY. CHALUMEAU: Oh we've done nothing but

1 give, Your Honor.

2 MR. BATTISTOTTI: Oh yeah two and a half percent
3 a year.

4 ATTY. CHALUMEAU: I mean Mr. Battistotti, just
5 so the Court is aware, my client, my motion for
6 continuance sought that my client have these -- not
7 be here today so that she can spend two weeks' time
8 with her --

9 THE COURT: Okay.

10 ATTY. CHALUMEAU: -- client (as spoken), Your
11 Honor. She's moved that trip back and Mr.
12 Battistotti's enjoying overnight access this week as
13 the minor child is out of school, Your Honor.

14 MR. BATTISTOTTI: Ms. Aaronson can --

15 THE COURT: Sir?

16 MR. BATTISTOTTI: Yes, Your Honor.

17 THE COURT: If I were you I would take the
18 combined Wednesday visitation, do the best you can
19 with it. Other than that I'm marking everything off
20 for today, that's the best I can do right now.

21 MR. BATTISTOTTI: Should we have something with
22 Attorney Diamond for the overnight stay, Your Honor?
23 This is torturing for the child.

24 THE COURT: It'll be up to you to speak with
25 Attorney Chalumeau. The two of you should meet with
26 Attorney Diamond and work something out but it's not
27 going to happen today. I appreciate the

1 consideration so far, if I were you I'd do the
2 overnight on Wednesday but I can't push it, I can't
3 force people to agree to anything.

4 MR. BATTISTOTTI: How about compliance with the
5 current Court orders.

6 THE COURT: Sir, it's off for today.

7 ATTY. CHALUMEAU: Thank you, Your Honor.

8 THE COURT: I can't do it, I can't do anymore.

9 MR. BATTISTOTTI: Thank you, Your Honor.

10 MS. AARONSON: Thank you, Your Honor.

11 THE COURT: Okay. Good luck to both parties I
12 hope you guys can work something out.

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* * *

NO: FST-FA14-4031121-S : SUPERIOR COURT
MARCO BATTISTOTTI : JUDICIAL DISTRICT
OF STAMFORD/NORWALK
V. : AT STAMFORD, CONNECTICUT
SUZANNE AARONSON : AUGUST 19, 2019

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Stamford/Norwalk at Stamford, Connecticut, before the Honorable Anthony Truglia, Judge, on August 19, 2019.

Dated August 5, 2021 in Stamford, Connecticut.



Dawn Chase
Court Recording Monitor

EXHIBIT #2

From: suzanne aaronson suzanneaaronson@yahoo.com
Subject: Fst fa144031121-S battistotti vs AARONSON
Date: September 7, 2021 at 5:03 PM
To: Kelly O'Brien KellyLynn.O'Brien@jud.ct.gov, Family.Stamford@jud.ct.gov
Cc: Marco Battistotti Marco@justmarco.com, Jackie Conlon jconlon@cmlawct.com, Brian Kaschel brian@briankaschel.com



Dear Attorney O'Brien,

Submitted by hand at the family clerks office at stamford court today is my, Defendant motion to dismiss this case for lack of jurisdiction including the local Spain court's filing of this case which was served on Mr BATTISTOTTI directly by the Local Spanish court in late July (*the court here serves a the defendant party directly*). Mr. Battistotti has not responded to the local court nor to my lawyer representing me here where my son and I live in Spain.

I have waited more than 6 weeks for Mr Battistotti to respond to give ample time for his response before filing this motion. Prior to this , he was in prison being held on no bond for a year and a half, then released for COVID , still remaining on a gps ankle bracelet as his criminal Attorney at Stamford formally filed.

All submitted / filed at court today is attached here via PDFs.

1) The order to show cause on my motion to dismiss can be mailed to me at my ct Hartford P.O. Box address or to my lawyers address in Spain per my appearance form.

OR:

If it's easier for you to hold the order to show cause at your office , I can have a local friend pick it up whenever you tell me to do so and then have it served it on Mr Battistotti in New York , his address listed in the court docket website which is the same address he has lived for 15 years to my knowledge.

2) Please advise: Is the September 16 th date for resolution plan now irrelevant per the facts of my motion to dismiss the case ? It seems more logical and a better use of everyone's time if the motion to dismiss is heard and then the outcome determines if a family relations meeting should occur.

Please can you inform if it is off the court calendar for September 16 th or if it will go forward. If it must go forward I will attend via video per instructions.

Thank you,

Suzanne Aaronson
Self represented

Fst fa144031121-S battistotti vs AARONSON



sept 2021
appearance.pdf



sept 2021
motion...ave.pdf



motion
jurisdic...rt1.pdf



jurisdiction
cases...iss.pdf

EXHIBIT #3

From: . Con. Nueva York cog.nuevayork@maec.es
Subject: Visa - Leonard Michael Aaronson
Date: November 1, 2021 at 11:12 AM
To: marco@justmarco.com



Dear Mr. Battistoti,

After a careful review of the case and with the information provided, the Visa Department of this Consulate General issued a visa to the minor in question based on an Apostilled birth certificate with no father stated. In order to pursue further actions, please provide original of the minor's Apostilled birth certificate, the Court documents and proof of your ID.

Atentamente/Cordially,

Consulado General de España en Nueva York
Consulate General of Spain in New York
150 East 58th Street, 30th Floor, New York, NY 10155
Tfno: +1 (212) 355-4080 Fax: +1 (212) 644-3751
Email: cog.nuevayork@maec.es



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CERTIFICATION OF VITAL RECORD

DEPARTMENT OF PUBLIC HEALTH

CERTIFICATE OF LIVE BIRTH

CHILD'S NAME:
LEONARD MICHAEL AARONSON

SSN: 2014-07-16181

SEX:
MALETIME OF BIRTH:
01:45 PMDATE OF BIRTH:
JUNE 11, 2014WEIGHT:
7 LBS 6 OZSBIRTHPLACE:
GREENWICH HOSPITALCITY/TOWN:
GREENWICHCOUNTY:
FAIRFIELDMOTHER'S NAME:
SUZANNE DENISE AARONSONMOTHER'S SURNAME:
AARONSONMOTHER'S BIRTHPLACE:
MARYLANDMOTHER'S DATE OF BIRTH:
MARCH 26, 1972MOTHER'S RESIDENCE:
44 HUSTED LANE, GREENWICH, CONNECTICUT 06830FATHER'S NAME:
NOT STATEDFATHER'S BIRTHPLACE:
NOT STATEDFATHER'S DATE OF BIRTH:
NOT STATEDCERTIFIER'S NAME:
CATHERINE E BERZOLLA M.D.DATE CERTIFIED:
JUNE 11, 2014ADDRESS:
55 HOLLY HILL LANE, SUITE 130, GREENWICH, CONNECTICUT 06830REGISTERED BY:
CARMELLA C BUDKINSTITLE:
REGISTRARDATE REGISTERED:
JUNE 26, 2014CITY/TOWN:
GREENWICH

I HEREBY CERTIFY THAT THIS IS A TRUE CERTIFICATE OF LIVE BIRTH ISSUED FROM THE OFFICIAL RECORDS ON FILE

DATE ISSUED:
JUNE 26, 2014PLACE OF ISSUANCE:
GREENWICH

SIGNATURE OF ISSUING REGISTRAR

Phelia Murphy Costello

This is a true and correct copy of the original as filed in the office of the Registrar.




M 3637528



ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

TOTAL P.02

EXHIBIT #4

From: [REDACTED]@state.gov 
Subject: RE: Welfare check on my son is needed
Date: August 7, 2024 at 5:14 PM
To: Marco Battistotti Marco@justmarco.com



Dear Mr. Battistotti,

Our colleagues in Spain reached out to request a visit for your son, however the visit request was declined. There are a couple of options that you could consider pursuing at this point.

You could contact Child Protective Services in Spain and request that they conduct a welfare visit for your son. The Embassy in Madrid has provided the following contact information for them:

Instituto Mallorquín para Asuntos Sociales

<https://www.imasmallorca.net/>

Attention to the Public:

C/ Pere Dezcallar i Net, 11 07003 - Palma

Opening hours:

9:00 a.m.-5:00 p.m. M, W, Th

9:00 a.m.-2:00 p.m. T, F

Tel. +34 900 100 444

Headquarters:

C/ del Gral. Riera, 67

07010 - Palma

Opening hours: 9:00 a.m.-2:00 p.m. M-F

Tel. +34 971 763 325

Fax: +34 971 292 581

In addition, you could also work with your attorney in Spain to determine appropriate next steps through the Spanish court system.

I hope this information is helpful.

Kind regards,

[REDACTED]

Office of Children's Issues | Overseas Citizen Services

U.S. Department of State | Bureau of Consular Affairs

From: [REDACTED]@state.gov>
Sent: Friday, August 2, 2024 4:28 PM
To: Marco Battistotti <Marco@justmarco.com>
Subject: Re: Welfare check on my son is needed

Dear Mr. Battistotti,

I have forwarded your request for a welfare and whereabouts visit for your son to the appropriate embassy colleagues in Madrid. They will reach out to Ms. Aaronson in an effort to arrange a visit.

Best regards,

[REDACTED]
Office of Children's Issues | Overseas Citizen Services
U.S. Department of State | Bureau of Consular Affairs

From: Marco Battistotti <Marco@justmarco.com>
Sent: Friday, August 2, 2024 10:23 AM
To: [REDACTED]@state.gov>
Subject: Re: Welfare check on my son is needed

You don't often get email from marco@justmarco.com . Learn why this is important

Mr. Steele.

I have to let you know that the attached letter (visit request) was accidentally not attached to my previous email, just in case is needed.

I remain confident that the visit will be performed pursuant to the FAM criteria outlined in my previous communication.

Many thanks,

Marco

From: Madrid ACS madridacs@state.gov
Subject: E12 - LEONARD (LEO) MICHAEL AARONSON - Minor welfare check in Mallorca
Date: August 13, 2024 at 4:14 AM
To: Marco Battistotti Marco@justmarco.com
Cc: Consular Agency, Mallorca pmagency@state.gov



Dear Mr. Battistotti,

Thank you for your email.

Yes, the US Embassy in Madrid is aware of the situation you describe.

The U.S. Embassy in Madrid was contacted by the Office of Children's Issues in at the State Department in Washington, DC, who informed us you were requesting another welfare visit for Leonard. We reached out to our Consular Agent in Mallorca, who, in turn, contacted Leonard's mother and asked if she would agree to another welfare visit. The welfare visit was not authorized.

As our colleagues in the Office of Children's Issues office explained to you in previous emails, the State Department cannot enforce a welfare visit. We have no legal authority in Spain, and we are unable to compel the mother to agree to a visit.

Given the situation, we suggest the following:

- Contact an attorney in Mallorca to inquire how they can assist you legally; perhaps they have legal authority to reach out to the local child protective services in Mallorca. We are attaching a list of English-speaking attorneys in Mallorca.
- You may also contact child protective services in Calvia, Mallorca to report a suspected abuse. Here is the webpage, it includes a phone number and an email address: <http://www.calvia.com/responsive/area.plt?KPAGINA=3225&KIDIOMA=2>
- Also, [REDACTED] you mentioned in your email that provided you with credible information about Leonard's welfare. [REDACTED] in Spain has the authority and obligation to inform the Spanish Child Protective Services of any suspicion that a minor might be in a vulnerable situation. Reach out to him and ask he report his concerns to the Spanish Child Protective Services in Mallorca. As soon as they receive notice, they will most likely investigate the situation.

We hope the above information is helpful.

Thank you.



ACS Madrid - CL

U.S. Embassy Madrid

Calle Serrano, 75 - 28006

Phone: (+34) 91 587 2200

Email: MadridACS@state.gov



SENSITIVE BUT UNCLASSIFIED

From: Marco Battistotti <Marco@justmarco.com>
Sent: Monday, August 12, 2024 4:57 PM
To: Madrid ACS <madridacs@state.gov>
Subject: E12 - LEONARD (LEO) MICHAEL AARONSON - MISSING U.S.CITIZEN/VICTIMS OF CRIME
Importance: High

You don't often get email from marco@justmarco.com. [Learn why this is important](#)

--Full name of the U.S.citizen: Leonard Michael Aaronson
--Date and Place of birth of the U.S.citizen: June 11, 2014, Greenwich, CT
--Passport number of the U.S. citizen: Book Number A04517137
--Location of the U.S.citizen: Calvia, the island of Mallorca, Spain
--Your full name and contact phone number: Marco Battistotti, father.
--Please provide a brief description of the situation: Welfare check is needed from Child Protective Service.

Your contact was provided to me by Officer [REDACTED] from the U.S. Department in Washington, DC. As your Embassy might be already familiar with the case involving my son, a U.S. citizen who was kidnapped by his mother in 2020, and moved to Mallorca, (www.suzanneaaronson.com and www.superleo.nyc) I need the Embassy's assistance by involving the Spanish Child Protective Services to execute a welfare check on my son after I received credible information from [REDACTED] about the wellbeing of my son.

I do not speak Spanish, nor I am a resident of Spain, and that might be an impediment.

Kindly let me know if the Embassy can assist in facilitating the involvement of CPS.

Many thanks,

Marco

Marco Battistotti
CRCL Advocate | Activist
Founder of
www.internationalparentalkidnapping.org
father of a kidnapped child
& wearer of many, many Hats



CHILD ABDUCTION

EXHIBIT #5

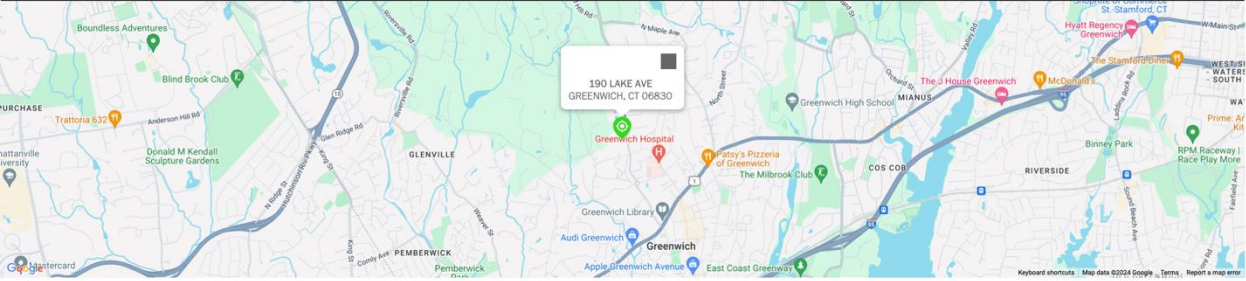
US Realty Records

Your Account

Property Report

All Reports

New Search



190 Lake Ave
GREENWICH, CT 06830

7 Bedrooms 7 Bathrooms 5,450 Sq. Ft. Built in 1900

Downloading...

Value & Financial Overview



USRealtyRecords.com property valuations are calculated from a variety of sources. Confidence ratings shown are based on how recent and reliable these sources are. Our estimate is not an appraisal and should be used as a starting point to determine a home's value.

Property Details

Structure & Size Details			
Bedrooms	Bathrooms	Heating Type	Air Conditioning
7	7 (7 Full, 2 Half)	HOT WATER	YES
Fireplace	Total Rooms	Building	Stories
1	17	1	2+AB
Total Size	Areas	Basement Type	Parking Type
5,450 sq. ft.	400 Sq. Ft. ATTIC 2,280 sq. Ft. BASEMENT 2,280 sq. Ft. BASEMENT UNFINISHED	UNFINISHED BASEMENT	ATTACHED GARAGE
Parking Space			
1			

Additional Details

Architecture COLONIAL	Building RESIDENTIAL	Exterior Walls WOOD SIDING	Basement UNFINISHED BASEMENT
Condition GOOD	Construction FRAME	Garage Type ATTACHED GARAGE	Roof ASPHALT
Roof Style GABLE	Fuel GAS		

Site Information

Census Tract 10300	County Fips 09001	County FAIRFIELD	ZIP+4 Code 06830-4518
Zoning Category RESIDENTIAL	Zoning Description SINGLE FAMILY RESIDENTIAL	Size 43,560 sq ft.	Acres 1
Township GREENWICH	Building Count 1	Parcel Id GREEM10B1525S	Tax Account Id 246/062

Owner Records

Type	Name(s)	Address	Occupied
 Owner	LAKE, AVE FT TRUST	190 Lake Ave Greenwich, CT, 06830	TRUE

Financial History

Deeds

Document Type:
QUIT CLAIM DEED

Sale Price:
-

Recording Date:
January 3, 2020

↑

↓

SELLER INFORMATION:

LK AVE 2014 T GREENWICH

-

BUYER INFORMATION:

LAKE,AVE FT TRUST

190 LAKE AVE GREENWICH CT 068304518, GREENWICH, CT 06830

LENDER INFORMATION:

-

Loan Amount:

Lender Type:

Loan type:

Loan due date:

Finance Type:

Interest Rate:

-

-

-

-

-

-

Transfer tax:

Original contract date:

Deed book:

Deed page:

Document ID:

-

2019-12-18

007609

000248

7609-248

Sale price description:

-

Document Type:
QUIT CLAIM DEED

Sale Price:
-

Recording Date:
March 26, 2018

↑

↓

SELLER INFORMATION:

-

-

BUYER INFORMATION:

AARONSON,SUZANNE TRUST

190 LAKE AVE GREENWICH CT 068304518, GREENWICH, CT 06830

LENDER INFORMATION:

LENDER INFORMATION:


-

Loan Amount:	Lender Type:	Loan type:	Loan due date:	Finance Type:	Interest Rate:
-	-	-	-	-	-

Transfer tax:	Original contract date:	Deed book:	Deed page:	Document ID:
-	2018-03-22	007364	000097	7364-97

Sale price description:

-

Document Type: **QUIT CLAIM DEED** Sale Price: - Recording Date: **February 14, 2018** 

SELLER INFORMATION:	BUYER INFORMATION:
-	SUZANNE AARONSON
-	190 LAKE AVE GREENWICH CT 068304518, GREENWICH, CT 06830

LENDER INFORMATION:


-

Loan Amount:	Lender Type:	Loan type:	Loan due date:	Finance Type:	Interest Rate:
-	-	-	-	-	-

Transfer tax:	Original contract date:	Deed book:	Deed page:	Document ID:
-	-	007350	000268	7350-268

Sale price description:

-

Document Type: **TRUSTEE'S DEED** Sale Price: - Recording Date: **October 15, 2014** 

SELLER INFORMATION:	BUYER INFORMATION:
-	J BRIAN FATSE
-	-

LENDER INFORMATION:

-

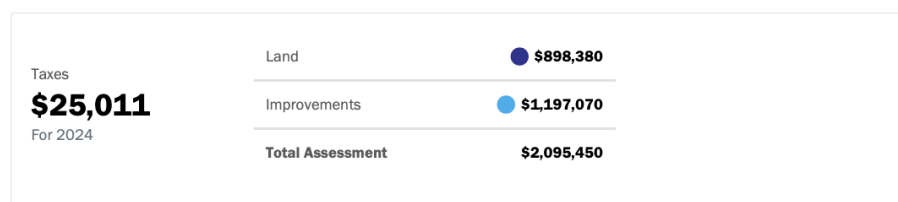
Loan Amount:	Lender Type:	Loan type:	Loan due date:	Finance Type:	Interest Rate:
-	-	-	-	-	-

Transfer tax:	Original contract date:	Deed book:	Deed page:	Document ID:
-	-	006800	000288	6800-288

Sale price description:

-

Tax History



Year:	Taxes:	Land:	Improvements:	Total Assessment:
2024	\$25,011	\$898,380	\$1,197,070	\$2,095,450

* The tax information above may not be used to determine tax payments, or for legal purposes. Please consult your local tax assessment authority for verification.

EXHIBIT #6

LEGAL NOTICE

I'd like to inform you that the seller, Suzanne Aaronson, or acting agent/entity of the property listed at 190 Lake Avenue, Greenwich, CT, 06830, is the mother of our son Leo, who kidnapped him according to U.S. Law Title 18, U.S.C. §1204 in 2020 and is currently residing abroad without my consent or a court order. She is also wanted by the NYPD for domestic violence, although she fled the U.S. to avoid prosecution.

ANYONE who, upon reading this Legal Notice aids or abets Suzanne Aaronson in her pursuit of criminal activity can be found guilty of Federal Conspiracy under U.S. Law Title 18, U.S.C. §371, and under the theory of vicarious liability, the co-conspirator(s) will also be charged with the crime of International Parental Kidnapping unless that individual immediately withdraws themselves from any participation in the crime of International Parental Kidnapping, which includes aiding and abetting.

This provision is further explained in the Pinkerton Ruling (Pinkerton v. United States, 328 U.S. 640 (1946)) where any co-conspirator will also be charged with the primary offense, in this case, Parental Kidnapping.

This would also apply to professional individuals.

For further information, please visit www.superleo.nyc or contact me via email at marco@justmarco.com

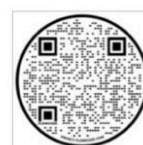


KIDNAPPED CHILD



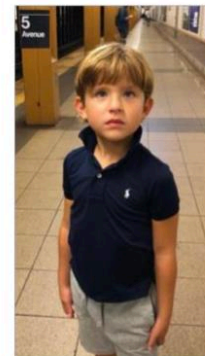
DONATE
[Go-Fund-Me](#)

LEONARD AARONSON (A.K.A. LEO BATTISTOTTI)



READ MORE
www.superleo.nyc

PICTURED BELOW IN 2019



DESCRIPTION

Date of Birth: June 11, 2014	Hair: Light Brown/Blonde
Place of Birth: Greenwich, Connecticut	Eyes: Blue/Green
Height: 4'-0" (at the time of disappearance)	Sex: Male
Weight: 45 pounds (at the time of disappearance)	Race: White
Nationality: American	Last seen: Greenwich, Connecticut, USA

DETAILS

My son Leo was kidnapped by his mother, Suzanne Aaronson on November 6, 2020.

My son was 5 ¹/₂ when his mother absconded Leo, and then kidnapped him.

The mother, a U.S. citizen, unilaterally, without parental consent or court approval unlawfully removed Leo from the United States and permanently relocated to Calvia, Palma de Mallorca, Spain, according to the FBI.

Suzanne Aaronson filed a false birth certificate to circumvent the Spanish Consular requirement of dual parental consent, de facto committing visa fraud, among other crimes, and fled the U.S.

She's also wanted by the New York Police Department for felony domestic violence but fled the jurisdiction to avoid prosecution under 18 U.S. Code §1073.

In 2021, the FBI, New York City Field Office concluded their investigation and determined that the mother, Suzanne Aaronson committed the crime of International Parental Kidnapping under 18 U.S. Code §1204 among other crimes, at which point the case was referred to the U.S. Attorney's Office, Southern District of New York. In tandem, the U.S. Department of State exhausted all the avenues under the Civil Aspects of International Child Abduction under the Hague Convention as Spain refused to order the return of the child.

So far, the prosecutor at the U.S. Attorney's Office, Southern District of New York has yet to draft an arrest warrant for the mother, three years after the FBI determined that crimes were committed.

Her parents are complicit in the kidnapping and acted as Co-conspirators. They also fled the U.S.

Signed: Marco Battistotti, Father. marco@justmarco.com

EXHIBIT #7



AUG - 1 2017

PERMIT NO. 11-2410
ISSUE DATE 8-23-17
PARCEL ID 10-1525/5

F

BUILDING PERMIT APPLICATION FOR

ADDITIONS and/or ALTERATIONS

The undersigned owner or authorized agent applies for a permit to add or alter an existing building or structure in accordance with the laws and ordinances of the State of Connecticut and of the Town of Greenwich and as set forth in the accompanying plans and specifications insofar as the same shall be found not to conflict with the abovesaid State and Town laws, and also for a Certificate of Occupancy for the use of the altered part of the building or addition.

OWNERS AND AGENTS

Property Owner Suzanne Aaronson Address 190 Lake Avenue, Greenwich

Tenant/Lessee _____ Address _____

Authorized Agents / Permittee	
(Person responsible for supervision of work, compliance with approved plans & specifications & all codes and ordinances)	
Name (print) <u>Legacy Custom Builders, Inc.</u>	Address <u>125 Chestnut St. Lescus, CT 06807</u>
CT Registration No. <u>HIC 014652</u>	Phone No. <u>203-456-5067</u> Email: _____
Plans and specifications by _____	Address <u>JD & LCB Construction</u>
Architect or Prof. Eng. _____	CT Reg. No. _____

BUILDING LOCATION	
Building Address <u>190 Lake Avenue</u>	on the <input type="checkbox"/> North <input type="checkbox"/> South <input type="checkbox"/> East <input checked="" type="checkbox"/> West side
Approximately [distance] <u>25'</u>	<input checked="" type="checkbox"/> N <input type="checkbox"/> S <input type="checkbox"/> E <input type="checkbox"/> W from the intersection with <u>Prescott Ln</u>
SECTION OF TOWN	
<input checked="" type="checkbox"/> Central <input type="checkbox"/> Outlying <input type="checkbox"/> Byram <input type="checkbox"/> Pemberwick <input type="checkbox"/> Glenville <input type="checkbox"/> Cos Cob <input type="checkbox"/> Riverside <input type="checkbox"/> Old Greenwich	

BUILDING INFORMATION		Building Code Information	
Present Use <u>Single family</u> If changed New Use <u>—</u>		Applicable Building Code	
No. of Family Units _____	If Addition _____	<input type="checkbox"/> 2012 IBC W/ 2016 CT AMEND.	
Existing <u>1</u>	Area of Addition <u>996</u> sq ft	<input checked="" type="checkbox"/> 2012 IRC W/ 2016 CT AMEND.	
New <u>0</u>	Dimensions <u>55' x 33'</u>	USE GROUP(S) <u>R-3</u>	
Total <u>1</u>	No. of New Rooms <u>11</u>	CONSTRUCTION TYPE <u>5B</u>	
New Bath Rooms <u>3</u>		DESIGN OCCUPANT LOAD _____	
Description of work: <u>One story addition including bedroom, study, sitting room, living room, elevator and three bathrooms.</u>		SPRINKLER SYS. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		THRESHOLD BLDG <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		FLOOD ZONE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		ELEVATION _____ NAVD	
Value of Work: <u>\$940,000</u>	Permit Fee: <u>12,220.00</u>	TYPE OF SEWER DISPOSAL <input checked="" type="checkbox"/> Town Sewer <input type="checkbox"/> Septic System	
Investigation Fee: _____	State Educ. Fee: <u>294.40</u>		
Total Fee Due: <u>\$12,464.40</u>			

C. O. may be withheld until final value of work has been established, fee adjusted and paid.

Amendments: 9-21-17 chg contractor #110-11-325 OFFICE USE ONLY

Building Code Review Conditions:		TAX STAMP
<input type="checkbox"/> Plan Review Conditions Apply	<input type="checkbox"/> Final Evaluation Req'd.	
<input type="checkbox"/> Load Tables for Truss Req'd.	<input type="checkbox"/> Proof of Flood Elev. Req'd.	NO DELINQUENT SEWER OR REAL ESTATE TAXES DUE PROP ID # <u>10-1525/5</u> DATE <u>8/1/17</u>
<input checked="" type="checkbox"/> State Elevator App. Req'd.	<input type="checkbox"/> GFM App. Req'd.	
<input checked="" type="checkbox"/> Town Storm Drain Manual	<input checked="" type="checkbox"/> Energy Code Affidavit	
<input checked="" type="checkbox"/> Wall Bracing Affidavit	<input checked="" type="checkbox"/> Alarm System Affidavit	
Reviewed by <u>11/18/17</u>	<input type="checkbox"/> Approved Field Plan given to Applicant	
<input checked="" type="checkbox"/> Permit Pick-up Required		

EXHIBIT #8

DOCKET NO: FSTFA144031121S

BATTISTOTTI, MARCO
V.
AARONSON, SUZANNE

SUPERIOR COURT

JUDICIAL DISTRICT OF STAMFORD
AT STAMFORD

11/1/2023

ORDER 433233

ORDER

ORDER REGARDING:
09/03/2021 499.00 MOTION TO DISMISS PB 10-30

The foregoing, having been heard by the Court, is hereby:

ORDER: GRANTED

The defendant's motion to dismiss, post-judgment (#499.00) is hereby GRANTED. Further articulation to follow.

433233

Judge: DONNA NELSON HELLER

This document may be signed or verified electronically and has the same validity and status as a document with a physical (pen-to-paper) signature. For more information, see Section I.E. of the *State of Connecticut Superior Court E-Services Procedures and Technical Standards* (<https://jud.ct.gov/external/super/E-Services/e-standards.pdf>), section 51-193c of the Connecticut General Statutes and Connecticut Practice Book Section 4-4.

FSTFA144031121S 11/1/2023

Page 1 of 1

499.02

EXHIBIT #9

From: suzanne aaronson suzanneaaronson@yahoo.com
Subject: Re: Update Leo Aaronson
Date: May 22, 2024 at 4:19 AM
To: Marco Battistotti marco@justmarco.com



Marco:

What Leo has always deserved is a healthy, sane, non abusive father who prioritizes him over his perceived needs and cons, who doesn't use and abuse him as a pawn without a single care for him.

This includes the Google/ internet legacy you've created that will not only continue to harm Leo in many ways I've helped him to overcome in every possible way, but will be a forever obstacle and blocker for many things he wishes to do in his life, things he will work hard to obtain, that he'll be rejected from. Relationships he'll seek and want: that he'll be ostracized from.

No one deals well with chaos and perceived weirdness. All of this: his own biological father created out of pure fiction to try to use his son ongoing quests for his gains in every way he saw he may benefit. Though you've benefited nothing and only lost more.

How stupid you are to even write the below. no caring parent would do all you've done to him and did to me when you had the forums you created to do so. All doors are closed. You're a scumbag and a total loser in life to miss out on the best most amazing child and person Leo is: solely because of me, my family and close friends & the Epigenetics that has been his day to day we have all provided for him. You have not a thing to do with his blessed soul.

Leo wants nothing to do with you. I've spoken to him about it. He thinks of you as a cruel and sick person who is a liar and a thief. If ever he is curious to contact you, he knows he will be given your contact details by me. It will always be his choice.

If you want to do one thing right by Leo and hope that someday he will think it's a good idea to meet you, would be to remove every single post with his name from every single place you've posted.

Suzanne Aaronson

On 20 May 2024, at 15:59, Marco Battistotti <marco@justmarco.com> wrote:

Suzanne.

This email follows my previous two requests to have contact with Leo.
Leo is about to turn 10 and deserves to have contact with his father.

Please make all the necessary arrangements to facilitate a video of about 30 min starting this weekend. My numbers and contacts remain the same.

Also, I need to know how Leo is doing, is he still residing in Palma de Mallorca? His whereabouts, academic achievements, current and planned school, medical, and anything else since your last email two (2) years ago, and when he plans to return to the US.

Many thanks,

Marco

Marco Battistotti
CRCL Advocate | Activist
Founder of
www.internationalparentalkidnapping.org
father of a kidnapped child

EXHIBIT #10

Production



○ **suzanne aaronson** <suzanneaaronson@yahoo.com>

To: ☹ Marco Battistotti



Thursday, May 2, 2019 at 12:45 PM

<https://www.dropbox.com/s/8w6lxhofou1n8ek/%231.pdf?dl=0>

<https://www.dropbox.com/s/mniqj1f3s036803/%232.pdf?dl=0>

<https://www.dropbox.com/s/x18cn4noib5kasa/%233.pdf?dl=0>

<https://www.dropbox.com/s/g82z826msm4t7j9/%234.pdf?dl=0>

Produced by email 5/2/19

#13

FINANCIAL AFFIDAVIT

JD-FM-6-LONG Rev. 2-16
P.B. §§ 25-30, 25a-15

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

Court Use Only

FINAFFL



ADA NOTICE

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

Docket number

FST - FA - 14 - 4031121 - S

Instructions

Use this long version if either your gross annual income is more than \$75,000 (see Section I. Income) or your total net assets are more than \$75,000 (see Section IV. Assets), or if both are more than \$75,000. Otherwise, use the short version, form JD-FM-6-SHORT.

For the Judicial District of

STAMFORD/NORWALK

At (Address of Court)

123 HOYT ST, STAMFORD, CT

Name of case

MARCO BATTISTOTTI v. SUZANNE AARONSON

Name of affiant (Person submitting this form)

SUZANNE AARONSON

☐ Plaintiff

☒ Defendant

Certification

I understand that the information stated on this Financial Statement and the attached Schedules, if any, is complete, true, and accurate. I understand that willful misrepresentation of any of the information provided will subject me to sanctions and may result in criminal charges being filed against me.

I. Income

1) Gross Weekly Income/Monies and Benefits From All Sources

Computed based on year-to-date, but no less than the last 13 weeks. If computation is based on less than 13 weeks or if your computations are not reflective of current wages, explain:

* Income inconsistent due to nature of profession and compensation schedule. Income sources: 1. Commissioned based compensation related to travel services; 2. Marketing consultant for clients in hospitality industry.

Paid: ☒ Weekly ☐ Bi-weekly ☐ Monthly ☐ Semi-monthly ☐ Annually

* AVERAGE OF LAST 12 MONTHS

If income is not paid weekly, adjust the rate of pay to weekly as follows:

Bi-weekly → divide by 2	Semi-monthly → multiply by 2, multiply by 12, divide by 52
Monthly → multiply by 12, divide by 52	Annually → divide by 52

(a)	Employer(s)	Address(es)	Base Pay:
Job 1	SELF	190 LAKE AVE, GREENWICH, CT	<input type="checkbox"/> Salary <input checked="" type="checkbox"/> Wages \$ 884.61
Job 2			<input type="checkbox"/> Salary <input type="checkbox"/> Wages \$
Job 3			<input type="checkbox"/> Salary <input type="checkbox"/> Wages \$

Total of base pay from salary and wages of all jobs..... \$ 884.61

(b) Overtime.....	\$	(o) Unemployment.....	\$
(c) Self-employment.....	\$	(p) Worker's compensation.....	\$
(d) Tips.....	\$	(q) Public Assistance (Welfare, TFA payments).....	\$
(e) Commissions.....	\$	(r) Child Support (Actually received).....	\$
(f) Bonuses.....	\$	(s) Alimony (Actually received).....	\$
(g) Dividends.....	\$	(t) Rental and income producing property....	\$
(h) Interest.....	\$	(u) Royalties and other rights.....	\$
(i) Trusts.....	\$	(v) Contributions from household member(s).....	\$
(j) Annuities.....	\$	(w) Cash income.....	\$
(k) Pensions.....	\$	(x) Veterans Benefits.....	\$
(l) Retirement/Tax Deferred Funds.....	\$	(y) Other.....	\$
(m) Social Security.....	\$		
(n) Disability.....	\$		

Hours worked per week 30

Gross yearly income from prior tax year. Provide amount of income, not copies of forms \$ 21,993.00

List here and explain any other income including but not limited to: non-reported income; and support provided by relatives, friends, and others:

2) Mandatory Deductions (If consistent deductions don't occur every pay check provide average amounts.)

	Job 1	Job 2	Job 3	Totals
(1) Federal income tax deductions (claiming <u>1</u> exemptions)	\$	\$	\$	\$
(2) Social Security or Mandatory Retirement	\$	\$	\$	\$
(3) State income tax deductions (claiming <u>1</u> exemptions)	\$	\$	\$	\$
(4) Medicare	\$	\$	\$	\$
(5) Health insurance	\$	\$	\$	\$
(6) Union dues	\$	\$	\$	\$
(7) Prior court order — child support or alimony	\$	\$	\$	\$
(8) Total Mandatory Deductions (add items 1 through 7)	\$	\$	\$	\$

3) Net Weekly Income..... \$ 884.61

Subtract the Total Mandatory Deductions [see item I., 2), (8)] from the Total Gross Weekly Income/Monies and Benefits From All Sources [see item I., 1), z)]

4) Other Deductions

(1) Credit Union Loan	\$	(5) Health Savings Account(s) or Plan(s).....	\$
(2) Savings	\$	(6) Deferred Compensation or 401K	\$
(3) Retirement.....	\$	(7) Other Pre-Tax Deductions.....	\$
(4) Subsequent Other Order of Court..... (i.e., child support, alimony)	\$	(8) Other Wage Executions	\$
(9) Total Other Deductions (add items 1 through 8)	\$		

II. Weekly Expenses Not Deducted From Pay

If expenses are not paid weekly, adjust the rate of payment to weekly as follows:

Bi-weekly → divide by 2	Semi-monthly → multiply by 2, multiply by 12, divide by 52
Monthly → multiply by 12, divide by 52	Annually → divide by 52

Insert an ("x") in the box if you are not currently paying the expense, or if someone else is paying the expense.

Home:

Rent or Mortgage (Principal, Interest — ☐ \$ 50.00 2nd Mortgage/Home Equity Line of Credit ☐ \$
Real Estate Taxes and Insurance if escrowed) or Other Lien

Property taxes and assessments ☐ \$ 269.00 Household Improvements

Condominium Fees..... ☐ \$ (Specify) Yard, Utility Maint, Snow, etc. ☐ \$ 76.00

Utilities:

Oil ☐ \$ Telephone/Cell/Internet..... ☐ \$ 45.00

Electricity ☐ \$ 137.00 Trash Collection ☐ \$ 15.00

Gas ☐ \$ 35.00 T.V./Internet..... ☐ \$

Water and Sewer..... ☐ \$ 35.00

Groceries (after food stamps): Including household supplies, formula, diapers ☐ \$ 171.00
(Not including take out meals)

Restaurants (Including take out meals)..... ☐ \$ 15.00

Transportation:

Gas/Oil ☐ \$ 25.00 Auto Loan or Lease ☐ \$ 124.00

Repairs/Maintenance ☐ \$ Public Transportation..... ☐ \$

Automobile Insurance/Tax/Registration ... ☐ \$ 48.00

Insurance Premiums:

Medical/Dental (Out-of-pocket expense ☐

Insert an ("X") in the box if you are **not** currently paying the expense, or if someone else is paying the expense.

Personal Care (e.g., haircuts, etc.)	<input type="checkbox"/> \$ 30.00	Clothing	<input type="checkbox"/> \$
Dry Cleaning	<input type="checkbox"/> \$ 10.00	Entertainment	<input type="checkbox"/> \$ 20.00
Alcohol, Smoking Products	<input type="checkbox"/> \$	Vacation	<input type="checkbox"/> \$ 20.00

Child(ren):

Child Support of this case	<input type="checkbox"/> \$	Child(ren)'s Education (elementary, secondary, college, occupational)	<input type="checkbox"/> \$ 129.00
Child Care Expense (after deductions, credits and subsidies)	<input type="checkbox"/> \$ 700.00	Child(ren)'s activities (e.g., lessons, sports, etc.)	<input type="checkbox"/> \$ 75.00
Child Support of other children other than this case (attach a copy of the order) ...	<input type="checkbox"/> \$	Child(ren)'s camp	<input type="checkbox"/> \$
		Child(ren)'s clothing and footwear	<input type="checkbox"/> \$ 15.00

☐ Check here if any part is court ordered

Education (self)

Alimony: Payable to this spouse

Alimony: Payable to another spouse

Employment related expenses (which are not reimbursed):

Uniforms

Travel

Required continuing education

Other (Specify):

Charitable Contributions

Child(ren)'s allowance

Extraordinary travel expenses for visitation with child(ren)

Other (Specify): Visitation supervisor - when son with Plaintiff

Total Weekly Expenses Not Deducted From Pay

III. Liabilities (Debts)

Do not include expenses listed above. Do not include mortgage current principal balance or loan balances that are listed under "Assets."

Creditor Name/Type of Debt	Balance Due	Date Debt Incurred/Revolving	Weekly Payment
Credit Card Debt			
AMEX - 1000	<input checked="" type="checkbox"/> Sole <input type="checkbox"/> Joint \$ 0	REVOLVING	\$
CHASE - AMAZON - 5265	<input checked="" type="checkbox"/> Sole <input type="checkbox"/> Joint \$ 0	REVOLVING	\$
CHASE - MARRIOTT - 7928	<input checked="" type="checkbox"/> Sole <input type="checkbox"/> Joint \$ 0	REVOLVING	\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
Other Consumer Debt			
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
Tax Debt			
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
Health Care Debt			
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
Other Debt			
ROBERT AARONSON	<input checked="" type="checkbox"/> Sole <input type="checkbox"/> Joint \$ 150,000.00	ONGOING	\$
SHARON HANDLER LOEB	<input checked="" type="checkbox"/> Sole <input type="checkbox"/> Joint \$ 100,000.00	ONGOING	\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
	<input type="checkbox"/> Sole <input type="checkbox"/> Joint \$		\$
(A). Total Liabilities (Total Balance Due on Debts)	\$ 250,000.00		

IV. Assets

Note: Under "Ownership" indicate S for sole, JTS for joint with spouse, and JTO for joint with other. You must complete the last column to the right "Value of Your Interest" in each applicable section.

A. Real Estate (including time share)

Address	Ownership			a. Fair Market Value (Estimate)	b. Mortgage Current Principal Balance	c. Equity Line of Credit and Other Liens	d. Equity (d = a minus (b + c))	e. Value of Your Interest
	S	JTS	JTO					
Home								
190 Lake Ave, Greenwich, CT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 1,805,000.00	\$ 0	\$	\$ 1,805,000.00	\$ 1,805,000.00
Other \$1.9M less 5% agent fee	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$	\$	\$	\$
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$	\$	\$	\$
Total Net Value of Real Estate:								\$ 1,805,000.00

B. Motor Vehicles

Year	Make	Model	Ownership			a. Value	b. Loan Balance	c. Equity (c = a minus b)	d. Value of Your Interest
			S	JTS	JTO				
1:			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$	\$	\$
2:			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$	\$	\$
3:			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$	\$	\$
Total Net Value of Motor Vehicles:									\$

C. Bank Accounts

Do not include custodial accounts or child(ren)'s assets — complete Section V, below.

Institution	Account Number (last 4 numbers only)	Ownership			Current Balance/ Value	Value of Your Interest
		S	JTS	JTO		
Checking						
CHASE	1165	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 6,486.00	\$ 6,486.00
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
Savings						
CHASE	7673	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 17,855.00	\$ 17,855.00
BARCLAY'S	2421	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 400.00	\$ 400.00
Certificate of Deposit						
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
Credit Union						
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
Other Account (i.e., money market, U.S. Savings Bonds, etc.)						
PAY PAL	0259	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 1,033.00	\$ 1,033.00
Total Net Value of Bank Accounts:						\$ 25,774.00

D. Stocks, Bonds, Mutual Funds, Bond Funds

	Company	Account Number (last 4 numbers only)	Listed Beneficiary	Current Balance/ Value
Stocks				\$
Bonds				\$
Mutual Funds				\$
Bond Funds				\$
Total Net Value of Stocks, Bonds, Mutual Funds, Bond Funds:				\$

E. Insurance (exclude children) D = Disability L = Life

Name of Insured	D	L	Company	Account Number (last 4 numbers only)	Listed Beneficiary	Current Balance/ Value
SUZANNE AARONSON	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Brighthouse Financial	0086	Leonard Aaronson	\$ 0
					\$500K term policy death benefit	\$
						\$

F. Retirement Plans (*Pensions on Interest, Individual IRA, 401K, Keogh, etc.*)

Type of Plan	Name of Plan/Bank/Company	Account Number (last 4 numbers only)	Listed Beneficiary	Receiving Payments	Current Balance/ Value
IRA	TD AMERITRADE		Leonard Aaronson	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	\$ 75,034.00
				<input type="checkbox"/> Yes <input type="checkbox"/> No	\$
				<input type="checkbox"/> Yes <input type="checkbox"/> No	\$
				<input type="checkbox"/> Yes <input type="checkbox"/> No	\$
				<input type="checkbox"/> Yes <input type="checkbox"/> No	\$
Total Net Value of Retirement Plans:					\$ 75,034.00

G. Business Interest/Self-Employment

If you own an interest in a business, or are self-employed, complete this section.

Name of Business	Percent Owned	Value
Suzanne Aaronson - self employment, independent consultant	%	\$
	%	\$
Total Net Value of Business Interest/Self-Employment:		\$

H. Institutional Held Assets

	Institution/Individual	Account Number (last 4 numbers only)	Listed Beneficiary	Current Balance/ Value
Annuity				\$
Cash in Brokerage Account(s)				\$
Funds Held in Escrow Including Money Held by Attorney				\$
Profit Sharing				\$
Total Net Value of Institutional Held Assets:				\$

I. Other Assets

Name of Asset	Current Balance/ Value	Name of Asset	Current Balance/ Value
Arts and Antiques	\$	Firearms	\$
Cash on hand	\$	Home Furnishings	\$
Collections	\$	Jewelry	\$
Contents of Safe or Safe Deposit Box	\$	Money Owed to You (by Plaintiff)	\$ 109,340.00
Crops/Livestock	\$	Tools/Equipment	\$
Name of Asset	Name of Beneficiary		Current Balance/ Value
Inheritances			\$
Other (specify)	Camperio Loan 2012 - (likely write-off - overdue 6 years - \$330,000		\$
			\$
Total Net Value of Other Assets:			\$ 109,340.00

J. Total Net Value All Assets (add items A through I) \$ 2,015,148.00

V. Child(ren)'s Assets

Include Uniform Gift to Minor Account, Uniform Trust to Minor Account, College Accounts/529 Account, Custodial Account, etc.

Institution	Account Number (last 4 numbers only)	Listed Beneficiary	Person Who Controls the Account (Fiduciary)	Current Balance/ Value
Wells Fargo - 529		Leonard Aaronson	Suzanne Aaronson	\$ 23,500.00
				\$
				\$
				\$
				\$

VI. Health Insurance (Medical and/or Dental Insurance)

Company	Name of Insured Person(s) Covered by the Policy
HUSKY / CONNECTICARE	Suzanne & Leonard Aaronson

Do you or any member of your family have HUSKY Health Insurance Coverage? ☒ Yes ☐ No ☐ I Don't Know
If Yes, whom?

Suzanne & Leonard Aaronson

(part of 2019)

Important:

If you have other financial information that has not yet been disclosed, you have an affirmative duty to disclose that information. List additional information below:

CHILD SUPPORT OWED TO ME BY PLAINTIFF - Marco Battistotti: \$89,040 + (\$2,500 accrues monthly per child support orders)

Counsel Fees Owed by Plaintiff per court order of 9/12/2018: \$13,500 - per PB 1-25 Sanctions

Counsel fees owed by plaintiff for contempt prosecution: \$6,800

Summary (Use the amounts shown in Sections I. through IV.)

Total Net Weekly Income (See Section I. 3).....	\$ 884.61
Total Weekly Expenses and Liabilities (Total From Section II. + III.(B)).....	\$ 2,334.23
Total Cash Value of Assets (See Section IV. J.)	\$ 2,015,148.00
Total Liabilities (Total Balance Due on Debts) (See Section III. (A)).....	\$ 250,000.00

Certification

I certify under the penalties of perjury that the information stated on this Financial Statement and the attached Schedules, if any, is complete, true, and accurate. I understand that willful misrepresentation of any of the information provided will subject me to sanctions and may result in criminal charges being filed against me.

I, SUZANNE AARONSON the ☐ Plaintiff ☒ Defendant herein, residing at 190 LAKE AVE, GREENWICH, CT 06830, telephone number 203-249-0259, being duly sworn, depose and say that the following is an accurate statement of my income from all sources, my liabilities, my assets and my net worth, from whatever sources, and whatever kind and nature, and wherever situated.

Signed (Affiant)

Suzanne Aaronson

Date signed

Signed (Notary, Commissioner of Superior Court, Assistant Clerk, Other Proper Officer under Sec. 1-24 of the Connecticut General Statutes)

Print name and title of person signing at left

Date signed

↓

?

↓

?

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
MARCO BATTISTOTTI,

Plaintiff,

Index No.

- against -

SUZANNE AARONSON

Defendant.

-----X

AFFIRMATION IN SUPPORT

Plaintiff/pro-se:

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(212) 777-7304
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