

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

MEGHANN R. MILLER,

Plaintiff,

v.

RANDY R. MCCALLA, in his individual

and official capacity as Guardian ad Litem,

JULIA C. BATTLE, in her individual capacity,

J. STEPHEN HAZEL, PhD,

in his individual capacity,

JOHNSON COUNTY, KANSAS,

Defendants.

Case No. _____

VERIFIED DECLARATION OF MEGHANN R. MILLER

**IN SUPPORT OF VERIFIED COMPLAINT AND EX PARTE MOTION FOR
TEMPORARY RESTRAINING ORDER**

I, Meghann R. Miller, declare under penalty of perjury pursuant to 28 U.S.C. §1746 and the laws of the United States, as follows:

This federal lawsuit challenges systemic abuses in my ongoing state custody case in Johnson County District Court (Case No. 17CV03002), where my trial scheduled for April 22-25, 2025, was canceled on April 1, 2025, due to my inability to pay \$13,531.25 in guardian ad litem (GAL) fees, despite a prior court promise to address my indigence at trial (See Exhibit GGG - ORDER CONTINUING TRIAL April 1, 2025,). This cancellation, driven by the GAL's unchecked authority, exemplifies the systemic "absolute moral corruption" in Kansas family courts that has deprived me of my constitutional rights, as detailed below.

BACKGROUND AND INITIAL HARM

1. On January 29, 2024, Defendant Randy McCalla, acting as Guardian ad Litem, filed

an Emergency Motion to Modify Custody in Johnson County District Court, resulting in the immediate removal of my five minor children from my care and custody. I was never questioned, interviewed, or given an opportunity to respond to the allegations prior to removal. The motion was granted during a fast in-camera hearing, without evidence, witness testimony, or procedural protections. Importantly, in January 2024, DCF Investigator Michelle Merritt had already interviewed my children and confirmed that no disclosures of abuse were made. In a recorded phone call on June 5, 2024, she stated, “I had no concerns, aside from maybe feeling like they had been a little bit prodded. The responses to some things were definitely not kid responses.” She further confirmed, “I feel like at this point, dad’s doing some harm... I’ve already stepped up with my supervisor and it’s going to be, um, unsubstantiated.” (See Exhibit C – DCF Transcript and Audio). Despite this exculpatory evidence, Defendant McCalla knowingly withheld DCF’s findings and proceeded with the emergency filing, constituting misrepresentation of material fact and a violation of due process and Kansas Supreme Court Rule 110A.

2. On January 29, 2024, during a fast hearing, Judge Kevin O’Grady reviewed Julia Battle’s confidential report in camera and granted the Guardian ad Litem’s Emergency Motion to Modify Custody (Exhibit A), ordering the immediate suspension of my parenting time with my five minor children (Doc 142). The order, formalized in a Journal Entry on February 21, 2024 (Exhibit P), stated:
 - a. Mother’s Parenting Time with the minor children is suspended pending further hearing.
 - b. Prohibited all contact with my children, including phone, electronic, or in-person interaction;
 - c. Ordered hair follicle testing within 24 hours, which I complied with on January 29, 2024. My results were negative for all illicit substances. The only substance detected was a therapeutic trace level of amphetamine consistent with my prescribed medication for Adult ADHD. This was later confirmed by my treating physician, Dr. Michelle R. Vieira, in her July 21, 2023 letter. (See Exhibits LL and

MM)

- d. Authorized Dr. Hazel and Ms. Cataudella to access therapy records from Julia Battle, despite my repeated objections and motions to compel access to those same records myself.
3. These actions were taken without any evidentiary hearing, without sworn testimony, and without affording me the opportunity to confront or respond to the allegations that triggered the emergency order. My custody and contact were eliminated entirely based on unsworn therapy reports that I was never allowed to see, in violation of my constitutional and statutory rights.
4. The court relied on a confidential report submitted by therapist Julia Battle, which Judge O'Grady read in camera during a fast hearing on January 29, 2024, directly leading to his immediate decision to suspend all my parenting time that day. This was formalized in a Journal Entry on February 21, 2024 (See Exhibit P - Journal Entry).
5. The GAL, acting under color of state law as a court-appointed Guardian ad Litem, engaged in a pattern of misrepresentation, suppression of exculpatory evidence, procedural manipulation, and ethical misconduct that directly contributed to the unlawful removal of my children and the prolonged deprivation of my custodial rights.
6. These acts were carried out in concert with my ex-husband, the GAL, the therapist, and the psychologist, through coordinated communications, reports, and legal filings. Their collaboration—documented in invoices, emails, and court records—reflects a joint effort to manipulate the court's perception while excluding me from the process.
7. The GAL's role in Kansas family courts exemplifies a systemic problem of unchecked power and lack of accountability within the judicial branch. The GAL effectively acts as judge and jury, wielding judicial authority and prosecutorial immunity, yet without the title of "judge." This absolute power allows the GAL to override all evidence, including exculpatory findings like DCF's determination that allegations against me were unsubstantiated (Exhibit E). As a court appointee directly

assigned by the judge, the GAL holds superior authority over the case, enabling him to act without consequence—a dynamic that has been described as “absolute moral corruption.” This systemic abuse of power, particularly in the GAL’s role, demands accountability, as it has directly contributed to the deprivation of my rights, including the cancellation of my trial on April 1, 2025, due to unpaid GAL fees. (See Exhibit FFF, Order Concerning Multiple Motions)

8. The court’s decision was based on a confidential court report submitted by the therapist, which was reviewed by counsel in camera under Rule 23. I was not permitted to review or retain a copy of this report, and when the judge read from it during the hearing, he only shared selected portions aloud.
9. Defendant Julia C. Battle, a licensed mental health professional, served as a therapist for my children during the custody proceedings. Acting under court appointment, she violated multiple legal, ethical, and procedural obligations. Her conduct was not only biased and exclusionary but also obstructed reunification efforts, defied explicit court orders, and undermined my rights to due process and parental participation.
10. During the hearing, the GAL told the court that my four children had made allegations of inappropriate sexual disclosures—specifically claiming that I taught them oral sex, watched pornography with them, and emotionally manipulated them to speak positively about me.
11. My only knowledge of these claims comes from the judge’s partial readings during the hearing. According to those limited references, Battle’s report falsely alleged:
 - a. That I was abusing alcohol. However, I submitted to and passed a urine drug screen the same day (Accession #26102863-027). (See Exhibit B.)
 - b. That I taught my children oral sex and watched pornography with them, allegations which were investigated and found unsubstantiated by DCF—yet GAL disregarded this and proceeded with the emergency filing. (See Exhibits C & E.)
 - c. That I emotionally and physically abused my children to such an extent that “they

had to sneak into my bed for affection.” Also found unsubstantiated.

12. To this day, Defendants Battle and McCalla have refused to provide access to the full report or the underlying documents and notes that formed its basis, despite my repeated motions requesting disclosure. These statements are false, defamatory, and were improperly adopted by the Court. I possess documentation and evidence disproving these allegations.
13. On July 9 and 10, 2024, I filed motions to vacate the emergency custody order, arguing that I had been denied notice, a hearing, and an opportunity to respond to the allegations before my children were removed from my care. The court denied these motions without holding a hearing, stating that the issue had “already been ruled upon” and dismissing the motions as a summary of evidence to be presented at trial (See Exhibit ZZ - Motions to Vacate; Exhibit AAA - Journal Entry and Order on Multiple Motions, July 12, 2024).
14. On the same date, I filed additional motions, including a Motion to Remove the Guardian ad Litem and Request for Appointment of an Unbiased Caseworker. That motion was denied in an Order issued on August 5, 2024. (See Exhibit BBB – Order Denying Motion to Remove GAL.)
15. This denial reinforces my claim that I have been systematically deprived of procedural due process under the Fourteenth Amendment. Despite repeated attempts to be heard, the Court has refused to address the underlying violations and has instead delayed any meaningful review until trial—further prolonging the deprivation of my parental rights.
16. An Order was entered on July 22, 2024, appointing the court-involved therapist and his counseling center as the sole Court-Involved Therapist (CIT) for all five of my minor children. The Order further stated that no other mental health professional may be involved in therapeutic services or evaluations without express approval from the appointed CIT or the court (See Exhibit Q).
17. Despite that Order, and despite a prior Journal Entry issued on February 13, 2023

(Exhibit T - Court Order Protocols)—which required that any communication with the therapist include both parents and the GAL—the therapist conducted 69 unauthorized therapy sessions between 2023 and 2025 (Exhibit K - Unauthorized Charge, Exhibit EEE - BSRB Formal Complaint). I was completely excluded from these sessions, while the father and stepmother were permitted full participation. These actions occurred without my knowledge or consent and directly violated both standing orders issued by the court. The therapist's conduct obstructed reunification, reinforced a biased therapeutic narrative, and materially contributed to my prolonged and unjustified separation from my children.

18. The defendant psychologist, a licensed clinical psychologist, Dr. Steve Hazel, conducted two psychological evaluations of me. The first, completed in 2023, was final. The second, conducted on March 18, 2024, was unauthorized (See Exhibit G – McCalla Email to Dr. Hazel), initiated solely by an email from the GAL falsely suggesting court approval. (See Exhibit I – McCalla Denial) No court order existed, and I was never informed of any judicial directive or given an opportunity to object. (See Exhibit H – Responsive Centers Staff Email Scheduling)
19. I attended the second evaluation under extreme emotional distress following the sudden removal of my children. (See Exhibit S: Hazel session transcript/Audio; Exhibit S-1: Plaintiff's self-recorded Audio/transcript.)
20. During the session, the psychologist acknowledged the results were inconclusive and would require further testing. No follow-up occurred. Despite this, he issued a written report without my knowledge, consent, or opportunity to review or respond. I have never been granted access to that report. Nevertheless, it has been used against me in custody proceedings. (See Exhibit S-2 Responsive Centers Billing Documents.)
21. On October 3, 2024, I filed a Motion to Exclude Psychological Testing (See Exhibit O - Motion to Exclude Psychological Testing) and a Motion for Injunctive Relief to Protect Petitioner and Minor Children from Third-Party Harassment and Defamation in Johnson County District Court, citing violations of due process, HIPAA, ADA, and professional ethics. The Motion to Exclude was denied. (See Exhibit V -

- Respondent's Response). The Motion for Injunctive Relief sought to stop Sarah Crawford and Beth Nichols from harassing and defaming me via social media, including posting unauthorized videos of my children on TikTok, which harms their emotional well-being.
22. In February 2025, I filed a formal complaint with the Kansas Behavioral Sciences Regulatory Board (BSRB) against the psychologist and the GAL, citing ethical misconduct, misrepresentation, and procedural abuse (See Exhibit Z).
23. The GAL's billing records reflect repeated, direct communication with the therapist, the psychologist, DCF investigators, and the respondent between December 2022 and July 2024 (See Exhibit U -Summary of McCalla's Invoices). He failed to produce any billing records for the period between August 26, 2023, and February 27, 2024—a critical time leading up to the January 2024 removal of my children (See Exhibits U, QQ- Email Thread).
24. I have taken repeated legal steps to obtain the therapy records, billing records, and communications underlying the reports prepared by the therapist and the GAL. These efforts include a subpoena for business records issued on April 15, 2024 (Exhibit L -Subpoena of Records), a Motion to Compel Therapy Access and Removal of the GAL filed on October 25, 2024 (Exhibit M- Motion to Compel Therapy), and multiple direct requests for invoices and call logs, which the GAL refused to provide absent a court order (See Exhibit QQ). Despite these efforts, I have been denied access to the very records now being used against me in the upcoming custody proceedings.
25. A formal complaint was submitted by me to the Kansas Behavioral Sciences Regulatory Board against the therapist, documenting professional misconduct during the course of custody proceedings. The complaint outlines her failure to coordinate with my treating therapist, misrepresentation of therapeutic facts to the court, and improper influence on judicial decisions. These actions materially obstructed reunification efforts and compromised the integrity of the proceedings. (Exhibit EEE - BSRB Formal Complaint)

26. Additionally, I submitted formal complaints against GAL Randy McCalla to the Kansas Office of the Disciplinary Administrator on July 9, October 13, and October 18, 2024. (See Exhibit AA.) These filings detail his refusal to communicate, demonstrated bias, mischaracterization of psychological evaluations, and repeated efforts to introduce unauthorized evidence, in violation of my due process rights under *Hyde Park Co. v. Santa Fe City Council*, 226 F.3d 1207 (10th Cir. 2000).
27. The conduct of both parties constitutes clear violations of Kansas Supreme Court Rule 110A, KRPC Rule 3.3 (Candor Toward the Tribunal), and KRPC Rule 1.4 (Communication). These allegations are substantiated by court records, correspondence, and billing documentation, as reflected in Exhibits X, Y, and Z.
- a. Defendants McCalla, Battle, and Hazel knew of the violations of my civil rights and had the power to prevent further harm but failed to act. McCalla was informed of Battle's false report (§47) and Hazel's unauthorized evaluation of me (§18) through my complaints to the Kansas Office of the Disciplinary Administrator on July 9, October 13, and October 18, 2024 (Exhibit AA), and my court motions (§13, §21), yet he took no steps to correct their misconduct or disclose exculpatory evidence. This includes DCF's June 5, 2024, finding that allegations against me were unsubstantiated (§29-30) and a psychological evaluation of Craig Miller by Dr. Hazel, which I read in court during a hearing in 2023 but was not allowed to copy or take notes on. That evaluation confirmed Craig has anger problems and recommended anger management therapy, yet McCalla ignored it, consistent with his pattern of shielding fathers (§33a). Battle knew of McCalla's bias against mothers (§33a) through their frequent communications (§54), yet continued 69 unauthorized sessions excluding me (§17), worsening the harm. Hazel conducted Craig's evaluation and my unauthorized one (§18), admitting mine was inconclusive (§20), but did nothing to prevent McCalla's misuse of his reports or address Craig's documented issues. Their inaction perpetuated a conspiracy targeting me, causing my ongoing separation from my children (§80).
28. As of January 28, 2025, the GAL has listed as trial exhibits the very reports prepared by the therapist, the psychologist, and the court-involved therapist—despite their

direct role in the deprivation of my parental rights and the ongoing due process violations outlined above (See Exhibit BBB – McCalla’s Trial Exhibit List).

29. In January 2024, DCF Investigator Michelle Merritt interviewed my children and confirmed no disclosures of abuse were made. In a recorded call on June 5, 2024, she stated, “I had no concerns, aside from maybe feeling like they had been a little bit prodded. The responses to some things were definitely not kid responses.” (Exhibit C, Timestamp: 00:05:40). She further confirmed, “I feel like at this point, dad’s doing some harm... I’ve already stepped up with my supervisor and it’s going to be, um, unsubstantiated.” (Timestamp: 00:13:27). (Exhibit C – Transcript and Audio of DCF)
30. Despite these findings, Defendant McCalla filed an Emergency Motion without disclosing DCF’s conclusions—constituting a knowing misrepresentation of material fact and a violation of due process and Kansas Supreme Court Rule 110A. (See Exhibit C.) Between May and October 2024, I repeatedly followed up with Ms. Merritt, as detailed in my communication log (Exhibit D). Marriott continued to state the case “should be closed,” and confirmed on June 7 and June 28 that she would follow up with her supervisor. (Exhibit C). Yet no formal closure occurred. During that same time, McCalla contacted DCF supervisors (Exhibit R), raising serious concerns of improper influence that delayed closure of an already-unsubstantiated case.
31. Beginning in July 2024, I called and emailed DCF repeatedly, including communications with investigator Michelle Merritt, to request closure of the investigation. (Exhibits D, OO.) On December 19, 2024, and January 20, 2025, I submitted formal complaints and closure requests to DCF and elected officials. (Exhibit PP.) On January 22, 2025, DCF General Counsel Marc Altenbernt confirmed in writing that the allegations were unsubstantiated and that the delay was due to an “unintentional oversight.” (Exhibit E.) Despite this, I had been separated from my children for nearly a year.
32. Meanwhile, Defendant McCalla communicated with DCF supervisors between May and October 2024, interfering with the investigation and suppressing exculpatory

evidence. (Exhibit R.) As advised by Altenbernt, I issued a subpoena on February 21, 2025, and filed a formal complaint against DCF on March 21, 2025. (Exhibits PPP, JJJ.)

33. I possess extensive documentation of Craig Miller's criminal, behavioral, and medical history, including prior abuse findings, police reports, and forensic interview summaries involving serious allegations of sexual misconduct toward our daughter. (See Exhibit BB – Johnson County Court Records) Exhibit EE – Cass County Judgment) Exhibit FF – Gardner Police Department Report) (Exhibit GG – Lee's Summit Police Department Report) (Exhibit HH – Sunflower House Forensic Interview)
34. Despite these serious records, Guardian ad Litem Randy McCalla has repeatedly failed to acknowledge or act on this information. He has ignored court findings regarding Craig's abusive conduct and denied knowledge of Craig's prescription drug use—despite confirming it himself in a 2017 email. (See Exhibit N, 2017 Email; Exhibit CC – McCalla Response to Petitioner's, ¶14.) These omissions demonstrate clear bias and constitute violations of Kansas Supreme Court Rule 110A and KRPC Rule 3.3. Additional documentation will be submitted as these proceedings progress.
 - a. I personally know three women who lost custody of their children in cases overseen by Guardian ad Litem Randy McCalla, and I have observed through interactions at Johnson County District Court and online forums like the National Safe Parents Organization that McCalla exhibits a pattern of targeting mothers in custody disputes. In late 2023, I spoke with a mother at the courthouse who said McCalla ignored her ex-husband's documented domestic violence history while focusing on unverified claims against her, leading to her losing all parenting time. In early 2024, another mother I met in person described how McCalla dismissed police reports of her ex-partner's substance abuse, instead using a therapist's biased report to justify removing her children. A third mother, whom I connected with via the online forum in mid-2024, reported that McCalla suppressed evidence of paternal misconduct in her 2023 case, resulting in her children being placed with their father despite safety concerns. While I lack their full case files, this

personal observations of a pattern matches McCalla's actions in my case, where he disregarded Craig Miller's extensive abuse history—documented in court records, police reports, and forensic interviews (Exhibits BB, EE, FF, GG, HH)—and instead relied on fabricated allegations against me (§9, §47). This consistent targeting of mothers over fathers suggests a gender-based animus that has disproportionately harmed me compared to Craig Miller.

35. The GAL attempted to suppress my constitutionally protected speech by pressuring the court-involved therapist to delay or suspend reunification based on my private social media activity. Therapy sessions were diverted to interrogate me over these posts, rather than focus on reunification.
36. McCalla also filed a motion to enforce restrictions based on content from a private Facebook group ("Friends of Meghann"), falsely characterizing it as public and using it to justify punitive measures. (See Exhibit FFF-MOTION TO ENFORCE ORDERS.)
37. I fully complied with all takedown requests, promptly removing the content in question and taking steps to deactivate the website "StandWithMeg.com"—a site I did not create. Although the site was originally built by someone else in support of my case, I have since repurposed it into an advocacy platform that highlights broader systemic issues faced by other families. It now serves to expose patterns of bias among judges, guardians ad litem, and court-involved therapists. Despite this clear shift in purpose and my good-faith compliance, Guardian ad Litem Randy McCalla has continued to cite these online postings as grounds to block reunification with my children.
38. These actions demonstrate viewpoint discrimination and retaliation in violation of my First Amendment rights, a pattern that continued with the court's April 4, 2025, order imposing new filing requirements, which further burden my ability to advocate for myself and raise awareness about my case (See Exhibit III - ORDER CONCERNING).
39. Further evidence of improper targeting includes the subscription of GAL McCalla's

wife to my business mailing list using the email “tammy5mccalla@gmail.com” on August 8, 2021. (See Exhibit W – Mailchimp Export.)

40. On January 7, 2025, I requested Mr. McCalla’s malpractice insurance information. He ignored the request entirely.(See Exhibit SS - Insurance Request Email) To date, his only direct communications have concerned fee assessments, parenting logistics, or billing—not the serious misconduct raised in this declaration. (See Exhibit QQ - Email thread dated April 2 & 10, 2024 with McCalla’s written refusal.)
41. These acts reflect a pattern of retaliation, suppression of speech, and ongoing ethical violations, including failure to communicate under KRPC Rule 1.4.
42. On January 22, 2025, I received formal written confirmation from DCF (Exhibit E) that the previous allegations of child abuse against me were unsubstantiated and that the prolonged investigation was due to an internal delay. However, less than 24 hours later, on January 23, 2025, a new report was filed with DCF alleging emotional abuse, based solely on content I had posted to social media—despite my prior full compliance with takedown requests and my First Amendment right to advocate. That retaliatory report, heavily influenced by the Guardian ad Litem’s monitoring of my online activity (see See Exhibit FFF), led to a substantiated finding by DCF on March 18, 2025 (Exhibit Y, Exhibit III), without notice, a hearing, or an opportunity to respond. This use of state power to suppress my protected speech forms the basis of a related federal lawsuit and demonstrates ongoing coordination between the GAL and state agencies to chill parental expression and advocacy.
43. On March 21, 2025, I filed a civil rights lawsuit in the United States District Court for the District of Kansas, Case No. 2:25-cv-02145-KHV-TJJ, asserting claims under the First and Fourteenth Amendments, the False Claims Act, and Kansas state law. This federal action challenges the retaliatory substantiation issued by DCF on March 18, 2025, which was based entirely on my constitutionally protected social media activity. I also filed an Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction to prevent further harm from that unlawful substantiation. (See Exhibit JJJ – Verified Federal Complaint; Exhibit KKK – Ex Parte Motion for

- Temporary Restraining Order.) The relief sought includes removal of my name from the Kansas abuse registry, protection from further retaliatory conduct by state actors, and exclusion of the March 18 DCF substantiation from use in any legal or custody proceeding.
44. These actions by McCalla and DCF have directly chilled my constitutional speech, interfered with therapeutic reunification, and prolonged the unlawful separation from my children.
 45. These coordinated actions by GAL Randy McCalla, the Kansas Department for Children and Families (DCF), and court-appointed therapists, Julia Battle, have directly chilled my constitutional speech, obstructed therapeutic reunification, and unjustly prolonged the unlawful separation from my children.
 46. From 2023 through 2025, Defendant Julia Battle conducted 69 unauthorized therapy sessions with my children without my knowledge or inclusion. These sessions occurred while my ex-husband and his wife were given full access, in direct violation of court orders requiring joint parental involvement. (See Exhibit EEE)
 47. These sessions took place in violation of the February 13, 2023 order requiring that all communications with Ms. Battle include both parents and the GAL. By systematically excluding me, Battle obstructed reunification, reinforced a biased narrative, and contributed materially to my continued alienation.
 48. On January 28, 2024, Battle submitted a report (Invoice #1690) containing extreme and fabricated allegations, including claims that I taught my children sexual acts and emotionally manipulated them. I was never allowed to review the report or respond. On January 29, 2024, Judge O'Grady reviewed it in camera, denied me access, and cited the content as "too graphic" to share on the record. (See Exhibits A, B, F)
 49. Despite the court's July 22, 2024 order appointing Dan Livingston as the sole Court-Involved Therapist, Battle continued providing therapy and billing for sessions under diagnostic codes like Z62.820 (Parent-Biological Child Conflict) without my consent or legal authority. (See Exhibit Q) Her continued involvement—outside the

- scope of court authority—has enabled psychological manipulation, parental alienation, and unlawful intrusion into my parent-child relationship. This ongoing misconduct has contributed to both emotional trauma and constitutional injury.
50. Less than 24 hours after DCF confirmed the allegations were unsubstantiated, a new report was filed on January 23, 2025, alleging emotional abuse based on my protected social media advocacy. That report led to a retaliatory substantiation issued on March 18, 2025. (Exhibit Y.)
51. On March 14, 2025, Judge O’Grady denied my objections to DCF’s restrictive Protective Order and required in-camera review, ignoring DCF’s own position that such a review was not necessary. (Exhibit PPP.) On April 4, 2025, he denied my motion to revise that order, further delaying my access to exculpatory records. (Exhibit III.)
52. Despite my exoneration confirmed in the January 22, 2025 letter (Exhibit E), I was denied access to the records necessary to prepare for trial—which was then canceled by the court on April 1, 2025 (¶70).
53. These therapy records are vital to disproving the false claims in the January 2024 report. Ms. Battle’s ongoing refusal to release them constitutes obstruction, retaliation, and a willful violation of state and federal parental rights statutes.
54. Evidence shows Battle continued to bill sessions and receive payments from Craig Miller after her role was terminated by court order. Unauthorized charges were also made to my credit card, despite no consent and no inclusion in sessions. (See Exhibits J, K)
55. Further, Battle repeatedly made unauthorized charges to my MasterCard ending in 3978—eventually maxing out the account—without my knowledge or consent (SEE Exhibit K). McCalla’s invoices show he contacted Dan Livingston (e.g., 5/13/2024, 6/19/2024, 7/17/2024) and Dr. Hazel (e.g., 2/28/2024, 4/1/2024) about me, likely spreading lies (e.g., implying I’m unfit) to delay reunification, as Livingston threatened cancellation unless I paid in full despite my compliance (Paragraph 65).

This harmed my reputation and parental rights (Exhibit U).

56. I have reason to believe that Battle, McCalla, and Craig Miller engaged in off-record communications, including calls and emails, to improperly shape the custody process and therapy narrative to my detriment. Specifically, Battle's invoices show lawyer communications on January 3 and January 15, 2024 (Exhibit EEE, Invoices #1643, #1671), just before her false report on January 29, 2024, which McCalla used to remove my children. Additionally, on June 11, 2024, Battle billed \$510 for a lawyer communication (Invoice #1926), the same day she emailed me stating McCalla requested an updated court report (Email dated June 11, 2024). These communications occurred without my knowledge or participation, violating court orders and fostering bias against me.

a. Beyond Battle's defamatory report, Randy McCalla made specific false statements to Dan Livingston, the court-involved therapist, to damage my reputation and obstruct reunification. On June 19, 2024, McCalla told Livingston that my social media posts—protected speech about my case—proved I was unfit to parent (Exhibit U), despite DCF's finding that allegations against me were unsubstantiated (Exhibit E). On July 17, 2024, he falsely claimed to Livingston that my inability to pay therapy fees in full showed I was uncommitted to my children (Exhibit U), even though I had paid \$5,580 under financial strain (§61). These statements led Livingston to threaten session cancellations (§59), harming my reputation and delaying my access to my children, consistent with McCalla's broader pattern of targeting mothers (§33a).

57. These actions, collectively, form a coordinated and unlawful effort to obstruct reunification, deny my access to due process, and permanently impair my parental rights.

a. The coordinated efforts of Defendants McCalla, Battle, and Hazel reveal a gender-based animus against me as a mother, evident in their focus on false allegations against me while shielding Craig Miller from scrutiny for his documented misconduct (§32-33). Battle's invoices show lawyer communications

on January 3 and January 15, 2024 (Exhibit EEE, Invoices #1643, #1671), just before her false report that triggered my children's removal (§47), and Hazel conducted an unauthorized evaluation at McCalla's direction on March 18, 2024 (Exhibit G), both tailored to support McCalla's narrative. Meanwhile, McCalla ignored Craig Miller's 2017 email admitting prescription drug use (Exhibit N) and court findings of his abusive behavior (Exhibit BB), consistent with his pattern of targeting mothers over fathers (§33a). These off-record communications and selective actions (§54) indicate an agreement to deprive me of my rights, motivated by my gender, as seen in the experiences of three other mothers I know who faced similar treatment from McCalla (§33a).

58. After the emergency custody order was entered on January 29, 2024, I was immediately and entirely cut off from all five of my children. Despite not being allowed to present evidence or testimony at that hearing, the Court delayed setting a return hearing until August 2024—a delay of over six months.
59. Throughout 2024, I filed multiple motions seeking expedited hearings, including a formal Motion to Advance Court Date in accordance with Kansas statutes, and several Motions to Continue to allow time for the Court-ordered reunification therapy to begin.(See Exhibit WW – Motion to Advance; Exhibit XX – Motion to Continue, Aug. 2024; Exhibit YY – Motion to Continue, Oct. 2024.)
60. At that time, I had not been permitted a single visit or phone call with my children, and Dan Livingston had not initiated any contact or reunification sessions until December 23, 2024, and only 1 session with my youngest 3 children, nearly a full year after our separation.
61. I have continued to beg the Court to restore parenting time and remedy these delays. My efforts have been ignored, postponed, or used against me—compounding the emotional trauma both to myself and my children.
62. On December 30, 2024, Mr. Livingston attempted to cancel my scheduled individual session unless I paid the full balance in advance—despite the fact that I had already covered the majority of session costs for myself and the children. Only after pleading

did he agree to allow the session to continue.

63. Mr. Livingston further confirmed that he will cancel any joint therapy session unless I pay the full balance in advance, regardless of whether Craig Miller has fulfilled his financial obligations. This policy contradicts the Court's order and has resulted in repeated financial pressure, therapy delays, and obstacles to reunification—despite my full participation and willingness to pay my lawful share. (See Exhibit EE – December 30 Email Thread.)
64. As of March 2025, I have paid a total of \$5,580 to Livingston Counseling Center—including for sessions I did not attend and costs that should have been split equally. These payments have imposed significant financial hardship while I continue to be denied equal access to my children.
65. Randy McCalla, Julia Battle, and Dr. Hazel are the only key witnesses listed in my upcoming hearing, which is now indefinitely postponed unless I pay the full fee demanded by the GAL—an amount I cannot afford. McCalla has confirmed this by listing himself, Battle, and Hazel as primary trial witnesses in his Preliminary Exhibit List submitted on January 28, 2025. (See Exhibit BBB.)
66. On March 24, 2025, Guardian ad Litem Randy McCalla sent an email to Judge Kevin O'Grady reporting that the Respondent had complied with GAL fee payments but stating that he had “not received any payments from Mother.” (See Exhibit TT). The email did not mention specific dollar amounts, yet it was accepted and uploaded into the official case record by the Court. (See Exhibit TT – Email from McCalla to Judge O'Grady Regarding GAL Payments.)
67. At the January 7, 2025, pretrial hearing, which I learned was a pretrial hearing only the night before or day of, forcing me to rush preparation, I pleaded with the Court to move the custody trial to an earlier date, as I had been separated from my children since January 29, 2024. The request was denied, and the trial was scheduled for April 22-25, 2025. Judge O'Grady barely reviewed my pending motions, including those on GAL fees and ADA accommodations, and did not issue clear rulings on them. I was unable to record the hearing due to the denial of my ADA request, impairing my

ability to recall the court's statements accurately. Judge O'Grady later stated that failure to pay GAL fees in full could result in a further delay of trial, despite no signed order requiring such payment.

68. As a pro se litigant, I have not received any signed or docketed court order enforcing the GAL fee demands. Additionally, I have been denied full access to the Kansas eCourt system, making it impossible for me to view filed motions, orders, and dockets in my own case. This obstructs my ability to participate meaningfully in litigation and violates the Kansas Open Records Act (KORA). (See Exhibit KORA Complaint – Exhibit MMM).
69. On November 5, 2024, my online access to case records was cut off without notice or legal basis. Despite repeated attempts to obtain records—including the January 7 pretrial order—I was not granted even partial portal access until April 1, 2025, after the trial was canceled. As of today, I still cannot access the actual filings, only docket notes. My formal KORA complaint seeks redress for these access denials and requests mandatory compliance training for Johnson County Court staff.
 - a. In his official capacity as Guardian ad Litem, Randy McCalla failed to ensure I received reasonable accommodations for my documented disabilities—PTSD, ADHD, and Litigation Abuse Syndrome—despite my formal request to the court on September 26, 2024, and my pleas at the January 7, 2025, pretrial hearing (§71b, §72c; Exhibit X). At the pretrial hearing, I asked for permission to record proceedings and have a support person due to my conditions (§83), but McCalla, present as GAL, offered no support or advocacy, remaining silent despite his duty under Kansas Supreme Court Rule 110A to ensure fair proceedings. His failure contributed to the court's denial of my accommodations without a hearing (§72c), severely impairing my ability to participate in the custody case, especially given my indigence and pro se status (§70).
 - b. On April 4, 2025, Judge O'Grady denied my claim of denied court access, stating I had 'the same access as any unrepresented litigant,' despite my documented eCourt exclusion from November 5, 2024, to April 1, 2025, and unaddressed ADA

accommodation requests (Exhibit [New: April 4, 2025 Order Concerning Multiple Motions]). This dismissal ignored my pro se status and disability-related barriers (§65).

70. The only pretrial document I received was an unsigned draft emailed by opposing counsel, Katie McClafin—not a court-issued or filed pretrial order. As a self-represented litigant, I never received an official or enforceable copy.(See Exhibit VV – Unsigned Pretrial Order)
71. On July 24, 2024, I filed a Motion to Question Additional GAL Fees and Request for Income-Based Apportionment. In response, the Court issued an order on July 26, 2024, (Exhibit LLL) stating that:
 - a. My request for an itemized GAL bill was reasonable, and the Court directed the GAL to submit one.
 - b. The Court would consider apportioning the GAL fees based on income at the final trial.
 - c. Although I objected to the \$10,000 retainer demand, the Court took no further relief and affirmed its reservation of jurisdiction to revisit fee apportionment only at trial, which has now been canceled. (See Exhibit LLL – Journal Entry Regarding Multiple Motions.)
72. On March 26, 2025, I submitted a written Objection and Request for Emergency Hearing, reiterating my inability to pay and asking the Court to:
 - a. Review McCalla’s billing practices;
 - b. Reinstate my right to trial;
 - c. Consider my prior motion requesting income-based fee apportionment. (See Exhibit UU – Petitioner’s Response Email to Court.)
73. On April 1, 2025, without a hearing or ruling on my pending motions, the Court unilaterally canceled my custody trial, citing unpaid GAL fees of \$13,531.25. (See

Exhibit GGG.) This sua sponte action:

- a. On April 4, 2025, Judge O'Grady denied my Emergency Motion to Reinstate the Cancelled Hearing, asserting I knew non-payment of GAL fees could cancel the trial and rejecting my claims of records access denial (Exhibit [New: April 4, 2025 Order Concerning Multiple Motions]). This ruling ignored my indigency status (§65) and McCalla's unitemized fee demands, effectively barring my access to justice and prolonging my separation from my children since January 29, 2024."
- b. Assumed, falsely, that I had no exhibits to present;
- c. Ignored my requests for ADA accommodations and my pending subpoenas and motions;
- d. Conditioned my access to custody proceedings on my ability to pay, in violation of the Fourteenth Amendment and Section 18 of the Kansas Constitution.

74. I filed an Emergency Motion and Memorandum of Law on April 1, 2025, requesting reinstatement of trial, access to records, and a ruling on the GAL fee objections. (See Exhibit HHH.) I argued that:

- a. The Court's actions violated procedural due process;
- b. The denial of ADA accommodations for my PTSD, ADHD, and Litigation Abuse Syndrome was unlawful;
- c. Fee-based trial exclusion constitutes unconstitutional economic discrimination.

75. On April 4, 2025, the Court summarily denied every motion I filed, including:

- a. Emergency Motion to Reinstate Trial;
- b. Motion to Compel Ruling on GAL Fees;
- c. ADA Accommodation Request;
- d. Protective Order Requests.

- e. The denial was issued without a hearing, without opposition briefing, and without addressing the substance of my supporting facts or cited legal authorities. (See Exhibit III.)
76. The April 4 order falsely claims I have full record access and that GAL billing was already resolved. It also mocked my use of Marsy's Law and VAWA by dismissing them as "technical errors" rather than acknowledging their relevance to my rights as a coercive control victim.
77. Finally, the Court imposed a filing restriction against me alone, citing speculative concerns that my pleadings may have been drafted using artificial intelligence without any inquiry, evidence, or procedural hearing.
- a. This violates my First Amendment right to petition the government for redress and imposes a discriminatory burden on pro se litigants.
 - b. Was not imposed on opposing counsel or the GAL;
 - c. Discriminates against me as a pro se litigant;
 - d. Chills my speech, blocks access to remedy, and further violates my constitutional rights.
78. As of today, April 4, 2025, I have been denied all access to my children for over a year. I am allowed only once-weekly, court-ordered reunification sessions, rotating between two of my three youngest children. My custody and visitation rights were stripped without due process, based entirely on the actions of Defendants Randy McCalla and Julia Battle, acting in concert with my ex-husband, Craig Miller, and in direct contradiction of:
- a. state court orders,
 - b. Kansas and federal constitutional protections,
 - c. and the ethical duties owed by officers of the court.
79. I am not permitted to call my children, attend their school or activities, or make any

legal, educational, or medical decisions regarding their well-being. These restrictions were imposed without evidentiary hearing, based on unverified and demonstrably false allegations, despite documented exoneration by both the Department for Children and Families (DCF) and licensed medical professionals. The sustained denial of parental rights, without valid legal cause, violates the most basic principles of fundamental fairness, parental liberty, and equal protection under the law.

FINANCIAL AND PHYSICAL HARM

80. As a result of the prolonged, unjustified separation from my children and the burdens imposed by the Defendants, I have suffered over \$16,545.63 in direct financial harm, documented as follows:
- a. \$2,100.00 for court-ordered psychological evaluations, paid to Responsive Centers and Dr. Hazel. (See Exhibit S-2)
 - b. \$5,580 for reunification therapy with Dan Livingston, paid via personal cards between August 2024 and April 2025. (See Exhibit NNN)
 - c. \$8,365.63 to therapist Julia Battle for court-related therapy, paid via MasterCard ending in 3978. (See Exhibit K)
 - d. \$500 in Guardian ad Litem fees under disputed and unverified invoices.
81. These charges were imposed without meaningful judicial review, access to itemized billing, or court-ordered apportionment. Payments were made under financial duress while I was denied custody, records access, or equal standing before the Court.
82. I was forced to sell my home to avoid foreclosure, and I currently reside in my mother's Airbnb rental—a temporary, unstable living situation that has directly impacted my ability to parent and remain involved in my children's lives.
83. Notably, on January 29, 2024, Judge Kevin O'Grady issued a court order suspending my custody rights and subsequently terminated my child support, based on an emergency motion filed by Defendant McCalla, using an unsworn court report

authored by therapist Julia Battle, which I was not permitted to read or respond to. (Exhibit P – Journal Entry) This action was not based on a DCF finding or any statutory grounds.

84. I have had no earned income since October 22, 2024, when I was placed on short-term disability leave due to litigation-induced trauma, diagnosed and certified by both my physician and therapist. I had planned to return to work in January 2025, but knowing that a custody trial was scheduled, I requested my employer hold my position until trial concluded. When the Court scheduled trial for April 22–25, 2025, my employer agreed to extend my leave and reserve my job. However, when Judge O’Grady canceled trial without notice on April 1, 2025, and failed to reschedule or rule on my motions, I was forced to notify my employer that I could not return. As a result, my job was terminated. I am now unemployed and simultaneously defending myself in two state courts, with no income other than contested spousal maintenance. The cancellation of trial directly caused the loss of my employment and ability to stabilize housing and care for my children. This abrupt and unjustified disruption continues to push me further into economic collapse. (See Exhibits JJ, KK, II, MM – Medical & Disability Documentation)

85. My treating therapist, Lauren King Mason, LSCSW, diagnosed me with:

- a. Post-Traumatic Stress Disorder (PTSD)
- b. Litigation Abuse Syndrome (LAS).
- c. Disabling psychological distress requiring ongoing treatment and leave from work.

86. She has confirmed that the ongoing separation from my children, and the actions of combined with the misconduct of the Defendants, has caused severe psychological harm. (See Exhibits JJ and KK)

87. As previously detailed in Paragraph 85, I was placed on short-term disability leave on October 22, 2024, due to the severe emotional trauma caused by the actions of the Defendants—including prolonged separation from my children, retaliatory filings, and ongoing litigation abuse. I subsequently lost my job in April 2025 when I could

not return to work. Since then, I have had no earned income and have relied solely on court-ordered spousal maintenance, which my ex-husband is now contesting in a separate Missouri proceeding. (See Exhibit II.) This forced job loss has left me financially destitute and unable to afford stable housing, forcing me to live temporarily in my mother's Airbnb rental.

88. I have also suffered physical harm from this sustained litigation trauma, including:

- a. Vision loss requiring corrective lenses of +3.0 strength (previously 20/20 in 2023);
- b. Recurring staph infections on my face, chest, and nose requiring repeated antibiotic treatments;
- c. Hair loss, sleep disruption, and cardiovascular stress symptoms.

89. These conditions are supported by my primary physician, Dr. Michelle Vieira, and my medical leave certification. (See Exhibits MM and II)

CURRENT STATUS AND CONCLUSION

90. As of April 7, 2025, I face an emergency: I've had no custody of my five children—aged 17, 14, 12, 11, and 11—for over 14 months since January 29, 2024. I have two court-ordered reunification sessions per week, costing me \$180 weekly: one with my son (12) every week, and one alternating weekly between my twins (11, 11)—one girl one week, the other the next. I'm barred from seeing my two older children (17, 14) entirely, straining the joyful bond we had—snuggling in bed and laughing together—before this separation tore us apart, and I'm unable to call, attend school events, or make decisions for any of them, with no trial in sight after the April 1, 2025 cancellation due to unaffordable GAL fees despite my indigence, pushing me toward irreparable loss (Exhibit A).

91. I'm required to pay \$180 out-of-pocket weekly for these two reunification sessions—one with my son every week, and one alternating between my twins—to maintain contact with my three younger children, with no consideration from the

Court for my financial status. These costs are ongoing and charged to nearly maxed-out credit cards.

92. This parental exclusion was imposed:

- a. Without an evidentiary hearing or due process safeguards;
- b. Based on unsworn, unchallenged reports, not admissible evidence;
- c. In direct contradiction to exonerating findings by Kansas DCF and licensed medical professionals;

93. Through coordinated misconduct by Defendants Randy McCalla and Julia Battle, acting in concert with my ex-husband, Craig Miller, to subvert lawful custody orders and parental rights.

94. This burden is unsustainable. The reunification orders function as a pay-to-parent system, requiring me to pay \$180 weekly for two sessions—one with my son every week, and one alternating between my twins—just to see my three younger kids for an hour or two each week, while my two older children remain cut off. The Court has ignored my requests for financial accommodation or income-based apportionment.

95. Before January 29, 2024, I enjoyed a joyful weekend with my five children—then aged 16, 13, 11, 10, and 10—in our new Gardner home, bought months earlier in their school district after years of saving. I moved us alone with a 15-foot truck, and my kids were thrilled with their rooms and proximity to friends, snuggling in bed with me and laughing all the time. That Monday, I took them to school, promising to attend my son's basketball game and help my twins with their 4th-grade project. Hours later, McCalla's emergency motion—based on lies DCF later debunked (Exhibit C)—took them away without a hearing, shattering our closeness and straining our bonds for 14 months (Exhibit A).

96. This nightmare began in 2013 when I left an abusive marriage to Craig Miller, a millionaire living in a \$2 million home, claiming \$18,000/month in disability while working and hiding income through his wife, who together earn over \$1 million

yearly (Exhibit EE). My Cass County, Missouri decree (2016) awarded me 80% custody after a 6-day trial costing \ \$350,000 (Exhibit EE), yet Johnson County has defied it since 2017, costing me another \ \$200,000 in legal fees. Now broke, I fight pro se, silenced by Defendants despite DCF and Dan Livingston confirming no abuse (Exhibits C, NNN).

97. For 11 years, I've been a hostage to courts, losing my career, relationships, and health—chronic staph infections plague my face and body from stress (Exhibit MM). All I've done since age 30 when I became a single mom, is love and provide for my babies, whom I birthed and nursed. Johnson County's actions—ignoring my decree, evidence, and pleas—rob us of a life together.
98. The system now weaponizes my financial status against me—conditioning parental rights on wealth, and threatening further restriction if I fall behind.
99. As of April 7, 2025, I face an emergency: I've been separated from my five children—aged 17, 14, 12, 11, and 11—for over 14 months since January 29, 2024 (§90, Exhibit A), losing our joyful bond of “snuggling in bed and laughing together” (§95). I urgently request a TRO today, April 7, 2025, to:
 - a. Remove Defendants McCalla, Battle, and Hazel from Case No. 17CV03002, halting their ongoing harm—fabricated reports (§2, Exhibit A), unauthorized evaluations (§18, Exhibit S-2), and retaliation (§36, Exhibit FFF);
 - b. Order immediate release of all withheld GAL and therapy records since August 26, 2023 (§24, Exhibits L, S-2), critical to my defense against false claims (§11);
 - c. Restore my parenting time with all five children now, as each day apart deepens our trauma, threatens irreparable loss (§90), and worsens my PTSD and physical decline (§85, §88, Exhibit MM);
 - d. Grant any further relief to end this crisis, as state courts have failed me (§73, Exhibit GGG), leaving federal action as my last resort.

SUPPORT FOR EX PARTE RELIEF

100. I request this TRO be issued ex parte, without notice to Defendants, as prior notice risks destruction or alteration of critical records (§24) and further retaliation, like the March 18, 2025 DCF substantiation (§42, Exhibit Y) after my advocacy (§35-36). Defendants' pattern—suppressing evidence (§29-30, Exhibit C), monitoring my speech (§35), and delaying justice (§73)—shows urgent action is needed to prevent irreparable harm (§90, §85).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: April 7, 2025

Meghann R. Miller
15783 S. Gardner Place
Gardner, KS 66030
816-977-8328
meg@standwithmeg.com
Plaintiff, Pro Se

Attached Exhibits in Support of This Declaration:

Exhibit A – Emergency Motion Filed by McCalla (Jan. 29, 2024)

Exhibit B – Negative Urinalysis (Jan. 29, 2024)

Exhibit C – Transcript and Audio of DCF Worker Michelle Merritt Confirming No Abuse, Civil Rights Concerns, and Plan to Close Case as Unsubstantiated (June 5, 7, 28, 2024)

Exhibit D – Call Log to DCF Michelle Merritt documented by Plaintiff (May–Nov. 2024)

Exhibit E – DCF Letter from Marc Altenbernt Confirming Allegations Were Unsubstantiated and Delay Was Oversight (Jan. 22, 2025)

Exhibit F – Respondent’s Response to Petitioner’s Post-Divorce (May 1, 2024)

Exhibit G – McCalla Email to Dr. Hazel Suggesting Court-Ordered Evaluation (Feb. 1, 2024)

Exhibit H – Responsive Centers Staff Email Scheduling Second Evaluation “Requested by GAL” (Mar. 5, 2024)

Exhibit I – McCalla Denial of Requesting Evaluation (Apr. 1, 2024)

Exhibit J – Invoices Paid by Craig Miller to Julia Battle for Unauthorized Sessions Post-July 22, 2024

Exhibit K – Unauthorized Charges to Plaintiff’s Credit Card by Julia Battle Post-Order (Card ending in 3978)

Exhibit L – Subpoena of Records McCalla and Battle (April 15, 2024)

Exhibit M – Motion to Compel Therapy Access Filed Oct. 25, 2024

Exhibit N – 2017 Email from McCalla Acknowledging Craig Miller’s Prescription Drug Use

Exhibit O – Motion to Exclude Psychological Testing (Oct. 3, 2024)

Exhibit P – Order Signed and wrote by McCalla Journal Entry (Feb. 21, 2024)

Exhibit Q – Court Order Appointing Dan Livingston as Sole Court-Involved Therapist (July 22, 2024)

Exhibit R – McCalla Invoice Log Showing Contact with DCF During Investigation (June–July 2024)

Exhibit S – Transcript/Audio of Plaintiff’s March 18, 2024 Talking through 2nd Test

Exhibit S-1 – Plaintiff’s Audio/Transcript Confirming Hazel’s Lack of Authority and Admission

Exhibit S-2 – Responsive Centers Billing Documents Confirming Duplicate Testing and Charges

Exhibit T – Order Governing Communication Protocols with Julia Battle (February 13, 2023)

Exhibit U – Summary of McCalla’s Invoices (Dec. 2022–July 2024)

Exhibit V – Respondent’s Response to Motion to Exclude Psychological Testing (Oct. 17, 2024)

Exhibit W – Mailchimp Export Showing “tammy5mccalla@gmail.com” Subscription (Aug. 8, 2021)

Exhibit X – Doctor’s Letter Supporting Disability Leave Due to Stress and Health Impact

Exhibit Y – March 18, 2025 DCF Substantiated Findings

Exhibit Z – Formal Complaint to BSRB Against Dr. Hazel and McCalla (Feb. 2025)

Exhibit AA – Randy Complaints (June 9, Oct. 13, Oct. 18, 2024) Appeal (Feb. 10, 2025)

Exhibit BB – Johnson County Court Records (Craig Miller’s 2015 Stalking Charge)

Exhibit CC – McCalla Response to Petitioner’s Motion to Remove Guardian Ad Litem

Exhibit DD – Motion to Question Additional Guardian ad Litem Fees and Request for Income-Based Apportionment (Filed July 24, 2024)

Exhibit EE – Cass County Judgment Declaring Craig Miller Not Credible and Detailing Surveillance Conviction Decree of Dissolution of Marriage, October 9, 2014 (Cass County, Missouri, Case No. 13CA-DR00900)

Exhibit FF – Gardner Police Department Report, Case No. 2202766 (October 10, 2022, with supplement on October 18, 2022)

Exhibit GG – Lee’s Summit Police Department Report, Case No. LSPD22-07862 (Reported October 18, 2022)

Exhibit HH – Sunflower House Forensic Interview Summary, Case No. 2022-446 (November 2, 2022)

Exhibit II – Medical Leave Certification Form, October 22, 2024

Exhibit JJ – Therapist Letter from Lauren King Mason, September 26, 2024

Exhibit KK – Therapist Letter from Lauren King Mason, June 24, 2024

Exhibit LL – Hair Drug Test Report, January 29, 2024

Exhibit MM – Physician Letter from Michelle R. Vieira, MD, July 21, 2023

Exhibit NN - Email Chain Between Petitioner and Christopher Brackman (Counsel for Julia Battle) Regarding Therapy Records Request (Feb. 20 – Mar. 12, 2025)
(Includes formal HIPAA request, legal citations, Battle's refusal to comply, and final warning.)

Exhibit OO - Call and Email Log with Michelle Merritt

Exhibit PP - DCF email Request for Immediate Resolution Unsubstantiated DCF Case (Dec. 19, 2024 and Jan. 20,2025)

Exhibit QQ - Email thread dated April 2 & 10, 2024, from Meghann Miller to Randy McCalla requesting itemized invoices and call logs, with McCalla's written refusal.

Exhibit RR - Emails from McCalla Regarding Fee Demands and Trial Threats (March 2025)

Exhibit SS - Insurance Request Email, No Response. (Jan. 7, 2025)

Exhibit TT – Email from Randy McCalla to Judge O’Grady Regarding GAL Payments (March 24, 2025)

Exhibit UU – Petitioner’s Response Email to Judge O’Grady Regarding GAL Billing, Access to Case Records, and Trial Concerns (March 26, 2025)

Exhibit VV – Unsigned Pretrial Order from Respondent Counsel. (Jan. 7, 2025)

Exhibit WW – Motion to Advance Court Date (Filed July 9, 2024)

Exhibit XX – Motion to Continue Hearing (Filed August 2024)

Exhibit YY – Motion to Continue Pretrial Hearing (Filed October 2024)

Exhibit ZZ –Petitioner’s Motion to Vacate Emergency Motion to Modify Custody, filed February 5, 2024.)

Exhibit AAA – Journal Entry Denying Motion to Vacate (Filed July 12, 2024)

Exhibit BBB – McCalla’s Guardian ad Litem Exhibit List (Jan. 28, 2025)

Exhibit CCC - Motion for Approval to Use Existing Therapist for Reintegration Therapy (July 3, 2024)

Exhibit DDD - Journal Entry Denying Motion to Remove GAL (Aug. 1, 2024)

Exhibit EEE - BSRB Formal Complaint Against Julia Battle, LCPC, with invoices. (Dec. 11, 2024)

Exhibit FFF - MOTION TO ENFORCE ORDERS OF THE COURT of the Court by GAL (June 9, 2024)

Exhibit GGG - ORDER CONTINUING TRIAL AND CONCERNING OTHER MATTERS (April 1, 2025)

Exhibit HHH - Plaintiff Motions and MEMORANDUM OF LAW IN SUPPORT OF EMERGENCY MOTION TO REINSTATE (April 1, 2025)

Exhibit III - ORDER CONCERNING MULTIPLE MOTIONS (April 4, 2025)

Exhibit JJJ –Verified Federal Complaint U.S. District Court for the District of Kansas, Case No. 2:25-cv-02145-KHV-TJJ (March 21, 2025)

Exhibit KKK – EX PARTE EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Exhibit LLL - JOURNAL ENTRY REGARDING MULTIPLE MOTIONS MOTION TO QUESTION ADDITIONAL GUARDIAN AD LITEM FEES AND REQUEST FOR INCOME-BASED APPORTIONMENT (JULY 26, 2024)

Exhibit MMM - KORA Complaint (April 3, 2025)

Exhibit NNN - Invoices Livingston Counseling Center (Aug 1, 2024- April 2, 2025)

Exhibit OOO - Emails to Katie and Judge About DCF Access (Feb. 20- March 11, 2025)

Exhibit PPP - Emails and subpoena to DCF Emails (Feb 25 - March 31, 2025)

Exhibit QQQ - DCF Report Jan. 23, 20215, emailed on March 18, 2025)

Exhibit RRR - Email to Committee on Judiciary (April 3, 2025)

Exhibit SSS - Order concerning Subpoena (March 14, 2025)

Exhibit TTT - Order Concerning 1) Motion to vacate or Modify Custody Order and 2) Request for Emergency Production of Financial Records (March 14, 2025)

Exhibit UUU - Email from Dan Livingston canceling my session with my children (Dec. 30, 2025)

Exhibit VVV - Complaint Regarding Violations of Constitutional Rights in Custody Case (Dec. 2, 2024)