

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SIXTH APPELLATE DISTRICT

KOSTIANTYN MARS,
Plaintiff and Appellant,
v.
HANNA MARS,
Defendant and Respondent.

H052364
Santa Clara County Super. Ct. No. 22FL003144

BY THE COURT:

The request by appellant Kostiantyn Mars to file new litigation by a vexatious litigant is denied for failure to show merit and that the proposed litigation has not been filed for the purposes of harassment or delay. (Cal. Code Civ. Proc. § 391.7.)

Date: 08/07/2024

Patricia Bamattie Manoukian P.J.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): ANNA MARS ANNA MARS 970 Corte Madera Ave., #716 Sunnyvale, CA 94085 TELEPHONE NO.: (424) 542-4870		FOR COURT USE ONLY
FAX NO. (Optional):		Filed
E-MAIL ADDRESS (Optional):		June 26, 2024
ATTORNEY FOR (Name): SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 201 N. First Street MAILING ADDRESS: 191 N. First Street CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME: Family Justice Center		Clerk of the Court Superior Court of CA County of Santa Clara 22FL003144
PETITIONER/PLAINTIFF: HANNA MARS		By: sanguo
RESPONDENT/DEFENDANT: KOSTIANTYN MARS		
OTHER PARTY:		
FINDINGS AND ORDER AFTER HEARING		CASE NUMBER: 22FL003144

1. This proceeding was heard

on (date): June 16, 2024 at (time): 9:00 a.m. in Dept.: 79 Room:
by Judge (name): Hon. Stephen P. Lowney

On the order to show cause, notice of motion or request for order filed (date): mult. dates by (name): Kostiantyn Mars

a. Petitioner/plaintiff present Temporary Judge
 b. Respondent/defendant present Attorney present (name):
 c. Other party present Attorney present (name): Nancy L. Roberts, Esq.
 Attorney present (name):

Petitioner's motions filed: 1/31/24, 1/1/24, 2/20/24, 2/20/24, 2/20/24, 2/29/24, and 12/1/23

THE COURT ORDERS Petitioner's OSC Contempt filed 1/12/24 and 3/15/24

2. Custody and visitation/parenting time: As attached on form FL-341 Other Not applicable

3. Child support: As attached on form FL-342 Other Not applicable

4. Spousal or family support: As attached on form FL-343 Other Not applicable

5. Property orders: As attached on form FL-344 Other Not applicable

6. Attorney's fees: As attached on form FL-346 Other Not applicable

7. Other orders: As attached Not applicable

8. All other issues are reserved until further order of court.

9. This matter is continued for further hearing on (date): 6/18/2024 4:11:27 PM at (time):
on the following issues:

Date: June 18, 2024

Approved as conforming to court order.

► Submitted without Petitioner's signature/did not appear

SIGNATURE OF ATTORNEY FOR PETITIONER/PLAINTIFF RESPONDENT/DEFENDANT OTHER PARTY


JUDICIAL OFFICER

Hon. Stephen P. Lowney

SHORT TITLE:

Marriage of Mars

CASE NUMBER:

22FL003144

1 OTHER ORDERS

2 1. A bench warrant is issued in the amount of \$5,000 for
 3 Petitioner's failure to appear for arraignment on Respondent's OSC
 4 re contempt filed 1/12/24 and 3/15/24.

5 2. Petitioner's request for domestic violence restraining orders
 6 against Respondent is denied.

7 3. Petitioner's motion regarding child custody, child visitation,
 8 child support, spousal support and abduction orders filed January
 9 31, 2024 is denied.

10 4. The Court denies Petitioner's motion filed on February 20, 2024
 11 for reconsideration of the Court's orders issued on February 1, 2024 and
 12 February 7, 2024.

13 5. The Court denies Petitioner's motion filed on February 20, 2024
 14 requesting that Respondent be found to be a vexatious litigant.

15 6. The Court strikes Petitioner's motion filed on February 20,
 16 2024 requesting for a third time that Judge Lowney be recused.

17 7. The Court denies Petitioner's motion requesting early
 18 termination of marital status.

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26 (Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, *not line*
 27 *numbers*):

27 This page may be used with any Judicial Council form or any other paper filed with the court.

Page _____

DV-130

Restraining Order After Hearing (Order of Protection)

Original Order Amended Order

1 **Protected Person** (name): HANNA MARS

2 **Restrained Person**

*Full Name: KOSTIANTYN/CONSTANTINE MARS

*Gender: M F Nonbinary *Race: White

*Age: 36 (estimate, if age unknown.) Date of Birth: 4/20/1987

Height: 6'0" Weight: 230

Hair Color: Light Brown Eye Color: Grey/Green

Relationship to person in ①: Spouse

Address of restrained person: Unknown home address

City: _____ State: _____ Zip: _____

(Information that has a star (*) next to it is required to add this order into a California police database. Give all the information you know.)

Clerk stamps date here when form is filed.

Filed

June 17, 2024
Clerk of the Court
Superior Court of CA
County of Santa Clara
22FL003144
By: limasa

Fill in court name and street address:

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

Clerk fills in case number when form is filed.

Case Number:
22FL003144

3 **Other Protected People**

In addition to the person in ①, the following persons are protected by orders as indicated in items ⑪ through ⑯.

Full name	Relationship to person in ①	Age
<u>Maksym Mars</u>	<u>Son</u>	<u>8</u>

Check here if you need to list more people. List them on a separate piece of paper, write "DV-130, Other Protected People" at the top, and attach it to this form.

4 **Expiration Date**

This restraining order, except the orders noted below,* end on:

(date): June 17, 2027 at (time): _____ a.m. p.m. or midnight

*Custody, visitation, child support, and spousal support orders remain in effect after the restraining order ends. Custody, visitation, and child support orders usually end when the child is 18.

- If no date is written, the restraining order ends three years after the date of the hearing in item ⑤a.
- If no time is written, the restraining order ends at midnight on the expiration date.

This order must be enforced throughout the United States. See page 9.

This is a Court Order.

30 Service

(Check a, b, or c)

a. **No other proof of service is needed.** The people in ① and ② attended the hearing, either physically or remotely (by telephone or videoconference), or agreed in writing to this order.

b. **The person in ② was not present.** Proof of service of form DV-109 and form DV-110 (if issued) was presented to the court. (Check all that apply):

(1) This order can be served by mail. The judge's orders in this form are the same as in form DV-110 except for the expiration date. The person in ② must be served, either by mail or in person.

(2) This order must be personally served. The judge's orders in this form are different from the orders in form DV-110, or form DV-110 was not issued. The person in ② must be personally served (given) a copy of this order.

(3) The court has scheduled a firearms and ammunition compliance hearing. The person in ① must have a copy of this order served on the person in ② by:

(A) Personal service by (date): _____

(B) Mail at the person in ②'s last known address by (date): _____

c. **Proof of service of form FL-300 to modify the orders in form DV-130 was presented to the court.**

(1) The people in ① and ② attended the hearing or agreed in writing to this order. No other proof of service is needed.

(2) The person in ① in ② did not attend the hearing and must be personally served (given) a copy of this amended (modified) order.

31 No Fee to Serve (Notify) Restrained Person

The sheriff or marshal will serve this order for free. If you want the sheriff to serve your papers, (1) complete form SER-001, *Request for Sheriff to Serve Court Papers*, and (2) give the completed form and a copy of this order to the sheriff.

32 Attached pages

All of the attached pages are part of this order.

a. Number of pages attached to this 10-page form: _____

b. Attachments include forms (check all that apply):

DV-140 DV-145 DV-900 DV-314(C) FL-342 FL-343 Other: _____

6/17/2024 2:19:40 PM

Judge's Signature

Date: June 17, 2024



Judge or Judicial Officer

Hon. Stephen P. Lowney

This is a Court Order.

PARTY WITHOUT ATTORNEY OR ATTORNEY NAME: KOSTIANTYN MARS FIRM NAME: STREET ADDRESS: PO BOX 8081 CITY: SAN JOSE TELEPHONE NO.: (408) 518-0088 E-MAIL ADDRESS: CONSTANTINE.MARS@GMAIL.COM ATTORNEY FOR (name):		STATE BAR NUMBER: STATE: CA ZIP CODE: 95155 FAX NO.:	FOR COURT USE ONLY ENDORSED 2024 FEB 29 P 2:04 CLERK OF THE COURT SUPERIOR COURT OF CA COUNTY OF SANTA CLARA BY M. DOMINGUEZ
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA STREET ADDRESS: 201 N FIRST STREET MAILING ADDRESS: 191 N FIRST STREET CITY AND ZIP CODE: SAN JOSE CA 95113 BRANCH NAME: FAMILY JUSTICE COURT			
PETITIONER: KOSTIANTYN MARS RESPONDENT: HANNA MARS OTHER PARENT/PARTY:			
REQUEST FOR ORDER <input checked="" type="checkbox"/> CHANGE <input type="checkbox"/> TEMPORARY EMERGENCY ORDERS <input checked="" type="checkbox"/> Child Custody <input checked="" type="checkbox"/> Visitation (Parenting Time) <input checked="" type="checkbox"/> Spousal or Partner Support <input checked="" type="checkbox"/> Child Support <input type="checkbox"/> Domestic Violence Order <input checked="" type="checkbox"/> Attorney's Fees and Costs <input type="checkbox"/> Property Control <input checked="" type="checkbox"/> Other (specify): NULLIFY ALL ORDERS OF BRIBED JUDGES LOWNEY, FLINT, TOWERY RETROACTIVELY BACK TO 09/13/2022			
CASE NUMBER: 22FL003144			

NOTICE OF HEARING

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

2. A COURT HEARING WILL BE HELD AS FOLLOWS:

a. Date: <u>7-16-2024</u>	Time: <u>1:30 pm</u>	Dept.: <u>79</u>	Room.:
b. Address of court	<input type="checkbox"/> same as noted above	<input type="checkbox"/> other (specify):	

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

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

COURT ORDER

(FOR COURT USE ONLY)

It is ordered that:

- Time for service until the hearing is shortened. Service must be on or before (date):
- A *Responsive Declaration to Request for Order* (form FL-320) must be served on or before (date):
- The parties must attend an appointment for child custody mediation or child custody recommending counseling as follows (specify date, time, and location):
- The orders in *Temporary Emergency (Ex Parte) Orders* (form FL-305) apply to this proceeding and must be personally served with all documents filed with this *Request for Order*.
- Other (specify): Each party is ordered to complete Orientation & schedule Mediation before the hearing. Go online to www.sccourt.org (search "Orientation"). Questions? Call FCS (408) 534-5760.

BROOKE BLECHE

Date: **FEB 29 2024**

JUDICIAL OFFICER

Page 1 of 4

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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REQUEST FOR ORDER

Note: Place a mark in front of the box that applies to your case or to your request. If you need more space, mark the box for "Attachment." For example, mark "Attachment 2a" to indicate that the list of children's names and birth dates continues on a paper attached to this form. Then, on a sheet of paper, list each attachment number followed by your request. At the top of the paper, write your name, case number, and "FL-300" as a title. (You may use *Attached Declaration* (form MC-031) for this purpose.)

1. RESTRAINING ORDER INFORMATION

One or more domestic violence restraining/protective orders are now in effect between (specify):

Petitioner Respondent Other Parent/Party (Attach a copy of the orders if you have one.)

The orders are from the following court or courts (specify county and state):

- a. Criminal: County/state (specify):
- b. Family: County/state (specify):
- c. Juvenile: County/state (specify):
- d. Other: County/state (specify):

Case No. (if known):

Case No. (if known):

Case No. (if known):

Case No. (if known):

2. CHILD CUSTODY

VISITATION (PARENTING TIME)

a. I request that the court make orders about the following children (specify):

Child's Name

Date of Birth

Legal Custody to (person who

decides: health, education, etc.):

Physical Custody to (person

with whom child lives):

MAKSYM MARS

11/23/2015

KOSTIANTYN MARS

KOSTIANTYN MARS

I request temporary emergency orders

b. The orders I request for child custody visitation (parenting time) are:

(1) Specified in the attached forms:

Form FL-305 Form FL-311 Form FL-312 Form FL-341(C)
 Form FL-341(D) Form FL-341(E) Other (specify):

(2) As follows (specify):

Attachment 2b.

Full legal and physical custody of my son Max Mars,

Mandatory mental health treatment of Respondent in specialized mental health care facility due to severe mental health disorder and socially dangerous behavior, documented history of parental child abduction, domestic violence, child and elderly abuse, international child abduction, intentional harm to THREE bribed judges of superior court, who were terminated for severe falsifications, abuse of judicial power and suspect of bribery.

c. The orders that I request are in the best interest of the children because (specify):

Max was abducted by mentally unstable mother-abuser on 09/15/2023 through fraudulent DVRO with the threat to "bury our son in Ukrainian soil, so you will never see him again".

Mother-abuser attempted to steal Max's passport, cancel Max's Green Card, abducted and held my son Max in undisclosed location, blocking all contact with my son, even phone calls, motivating parental child abduction by "court orders" signed by bribed judge Andrea Flint, terminated from Court for suspect of bribery, and by advise of corrupted attorney Nancy L Roberts, requested to be disqualified and her attorney license to be suspended.

Max has loving and caring father, is Lawful Permanent Resident of the United States and deserves FREEDOM and LOVE

d. This is a change from the current order for child custody visitation (parenting time).

(1) The order for legal or physical custody was filed on (date): 06/29/2023. The court ordered (specify):

Bribed judge Flint ordered: No contact with my son. Full custody to mother-abuser. Abandon my son, sign-off custody, give up passport and all documents of my son and allow international child abduction outside US.

(2) The visitation (parenting time) order was filed on (date): 06/29/2023. The court ordered (specify):

Bribed judge Flint ordered: No contact with my son. Only paid supervised visits for indefinite time.

Bribed judge Flint unlawfully removed signed Emergency Screener Recommendations, denied Child Abduction Prevention Orders, denied Minor's Counsel, denied Parenting Counseling, refused to hear matter.

Attachment 2d.

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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3. CHILD SUPPORT(Note: An earnings assignment may be issued. See *Income Withholding for Support* (form FL-195))

a. I request that the court order child support as follows:

Child's name and age

I request support for each child

Monthly amount (\$) requested

based on the child support guideline. (if not by guideline)

MAKSYM MARS

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0

b. I want to change a current court order for child support filed on (date): 02/08/2023
 The court ordered child support as follows (specify): \$1,650 based on fraud stipulation that Nancy L Roberts forced me to sign in exchange for freedom of my son. Nancy lied that her client does not have income, while her income is about \$12,389/mo. Nancy and her client voided stipulation by breach of verbal agreements and parental child abduction.

c. I have completed and filed with this *Request for Order a current Income and Expense Declaration* (form FL-150) or I filed a current *Financial Statement (Simplified)* (form FL-155) because I meet the requirements to file form FL-155.

d. The court should make or change the support orders because (specify): Attachment 3d
 Requested full legal and physical custody to father, Kostiantyn Mars, to protect Max from domestic violence and international child abduction, due to documented parental child abduction and socially dangerous behavior of Respondent, makes child support not warranted in this case.
 Fraud stipulation 02/08/2024 is requested to be vacated immediately, because of breach of prerequisite verbal agreements by Respondent, who made parental child abduction.
 Petitioner will not request child support from Respondent from ethical considerations.

4. SPOUSAL OR DOMESTIC PARTNER SUPPORT(Note: An *Earnings Assignment Order For Spousal or Partner Support* (form FL-435) may be issued.)a. Amount requested (monthly): \$ 0b. I want the court to change end the current support order filed on (date): 02/08/2024
 The court ordered \$ 1,974 per month for support.c. This request is to modify (change) spousal or partner support after entry of a judgment.
 I have completed and attached *Spousal or Partner Support Declaration Attachment* (form FL-157) or a declaration that addresses the same factors covered in form FL-157.d. I have completed and filed a current *Income and Expense Declaration* (form FL-150) in support of my request.e. The court should make, change, or end the support orders because (specify): Attachment 4e
 Requested full legal and physical custody to father, Kostiantyn Mars, to protect Max from domestic violence and international child abduction, due to documented parental child abduction and socially dangerous behavior of Respondent, makes spousal support not warrented in this case.
 Fraud stipulation 02/08/2024 is requested to be vacated immediately, because of breach of prerequisite verbal agreements by Respondent, who made parental child abduction.5. PROPERTY CONTROL I request temporary emergency ordersa. The petitioner respondent other parent/party be given exclusive temporary use, possession, and control of the following property that we own or are buying lease or rent (specify):b. The petitioner respondent other parent/party be ordered to make the following payments on debts and liens coming due while the order is in effect:

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

c. This is a change from the current order for property control filed on (date):d. Specify in Attachment 5d the reasons why the court should make or change the property control orders.

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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6. ATTORNEY'S FEES AND COSTS

I request attorney's fees and costs, which total (*specify amount*): \$ 45,586 . I filed the following to support my request:

- A current *Income and Expense Declaration* (form FL-150).
- A *Request for Attorney's Fees and Costs Attachment* (form FL-319) or a declaration that addresses the factors covered in that form.
- A *Supporting Declaration for Attorney's Fees and Costs Attachment* (form FL-158) or a declaration that addresses the factors covered in that form.

7. DOMESTIC VIOLENCE ORDER

- Do not use this form to ask for domestic violence restraining orders! Read form DV-505-INFO, *How Do I Ask for a Temporary Restraining Order*, for forms and information you need to ask for domestic violence restraining orders.
- Read form DV-400-INFO, *How to Change or End a Domestic Violence Restraining Order* for more information.

- The *Restraining Order After Hearing* (form DV-130) was filed on (*date*):
- I request that the court change end the personal conduct, stay-away, move-out orders, or other protective orders made in *Restraining Order After Hearing* (form DV-130). (*If you want to change the orders, complete 7c.*)
- I request that the court make the following changes to the restraining orders (*specify*): Attachment 7c.
- I want the court to change or end the orders because (*specify*): Attachment 7d.

8. OTHER ORDERS REQUESTED (*specify*):

Terminate from Court immediately bribed judge Stephen P. Lowney and corrupted attorney Nancy L Roberts.
Nullify all orders of bribed judges Lowney, Flint and Towery immediately retroactively back to 09/13/2022.
Specific orders to be nullified immediately: 09/13/2022, 10/31/2022, 02/08/2023, 06/29/2023, 07/31/2023/ 08/01/2023, 11/13/2023, 02/01/2024, 02/07/2024

 Attachment 8.9. TIME FOR SERVICE / TIME UNTIL HEARING I urgently need:

- To serve the *Request for Order* no less than (*number*): court days before the hearing.
- The hearing date and service of the *Request for Order* to be sooner.
- I need the order because (*specify*): Attachment 9c.

10. FACTS TO SUPPORT the orders I request are listed below. The facts that I write in support and attach to this request cannot be longer than 10 pages, unless the court gives me permission. Attachment 10.

- Verified Written Statement of Disqualification of bribed judge Lowney, with all evidence, filed 02/20/2024
- Verified Written Statement of Disqualification of bribed judge Flint, with evidence, filed 11/13/2023 (amended 11/30/2023)
- Motion to Disqualify unethical attorney Nancy L Roberts, evid., filed 02/20/2024 (previously filed 11/06/2023, 06/22/2023)
- DVRO to protect Max from domestic violence and abduction, with evidence, filed 12/01/2023 (previously filed 9/19/2022)
- Custody Review hearing with all evidence, and list of compromised supervised reports, with evidence, filed 01/17/2024
- Motion to hold Respondent in Contempt of Court, with evidence, filed 01/18/2024 (previously filed 11/06/2023, 06/22/2023)
- Request to reconsider harmful orders 11/13/2023, with evidence, filed 11/20/2023)

I declare under penalty of perjury under the laws of the State of California that the information provided in this form and all attachments is true and correct.

Date: 02/28/2024

KOSTIANTYN MARS

(TYPE OR PRINT NAME)



(SIGNATURE OF APPLICANT)



Requests for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the proceeding. Contact the clerk's office or go to www.courts.ca.gov/forms for *Request for Accommodations by Persons With Disabilities and Response* (form MC-410). (Civ. Code, § 54.8.)

PETITIONER: KOSTIANTYN MARS RESPONDENT: HANNA MARS OTHER PARENT/PARTY:	CASE NUMBER: 22FL003144
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REQUEST FOR CHILD ABDUCTION PREVENTION ORDERS

—This is not a court order—

TO Petition Response Request for Order Responsive Declaration to Request for Order
 Other(specify):

1. Your name: KOSTIANTYN MARS
 2. I request orders to prevent child abduction by (specify): Petitioner Respondent Other Parent/Party

3. I think that he or she might take the children without my permission to (check all that apply):

a. another county in California (specify the county):
 b. another state (specify the state):
 c. a foreign country (specify the foreign country): UKRAINE

(1) He or she is a citizen of that country.
 (2) He or she has family or emotional ties to that country (explain):

Respondent threatened to "abduct and bury Child in Ukrainian soil", attempted to cancel Child's Green Card and steal Child's passport. Parents, who live in Ukraine, help Respondent with abduction to Ukraine. Respondent abducted Child in 2019 - 2022, holding Child in Ukraine for 7 months. (Evidences 7, 8)

4. I think that he or she might take the children without my permission because he or she (check all that apply):

a. has violated—or threatened to violate—a custody or visitation (parenting time) order in the past.
Explain:

Abducted Child into undisclosed location, blocked all contact, interfered with emergency screening and professionally supervised visits. Violated Court order from 10/31/2023 and CCP 278.5 (l 31, 32, 33-35, 23-27, 12-16, 17-20, 21)

b. does not have strong ties to California.

Explain any work, financial, social, or family situation that makes it easy for the party to leave California.

Abducted Child to Ukraine in 2019-2020 (Evidence 8). Parents live in Ukraine, they threatened to help with abduction. Respondent told plans of abduction to Ukraine to witnesses (Evidence 7)

c. has recently done things that make it easy for him or her to take the children away without permission. He or she has (check all that apply):

quit his or her job. sold his or her home.
 closed a bank account. ended a lease.
 sold or gotten rid of assets. hidden or destroyed documents.
 applied for a passport, birth certificate, or school or medical records.
 Other (specify): Abducted child into undisclosed location, blocked all contact, attempting to obtain Child's passport

d. has a history of (check all that apply and explain your answers in the space provided in this section):

domestic violence. child abuse. not cooperating with me in parenting.
 taking the children without my permission.

Explain your answers to item d.

Child was physically abused by Respondent during marriage. After Respondent abducted Child with fraud DVRO, Child is coming with bruises on visitations (26, 27), asking to stay with Petitioner and not return to Respondent (28).

Respondent abducted child and blocked all contact (23-25, 17-20, 12-15), does impermissible pressure on Emergency Screener and Professional Supervisors (33, 34, 35), manipulated Court with fraudulent DVRO (21, 22), bribed judge of Superior Court to facilitate international child abduction through fraud, falsifications, abuse of judicial power, unlawful financial sanctions, attempting to force me to abandon my son, give up Max's documents and allow abduction

e. has a criminal record. *Explain:*

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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I REQUEST THE FOLLOWING ORDERS AGAINST (specify): Petitioner Respondent Other Parent/Party

5. **Supervised Visitation (Parenting Time)**

I ask the court to order supervised visitation (parenting time). I understand that the person I request to supervise the visits must meet the qualifications listed in *Declaration of Supervised Visitation Provider* (form FL-324). The specific terms are attached (check one): form FL-311 as follows:

6. **Post a Bond**

I ask the court to order the posting of a bond for \$ 50,000. If the party takes the children without my permission, I can use this money to bring the children back.

7. **Do Not Move Without My Permission or Court Order**

I ask for a court order preventing the party from moving with the children without my written permission or a court order.

8. **No Travel Without My Permission or Court Order**

I ask for a court order preventing the party from traveling with the children outside (check all that apply):

this county the United States
 California Other (specify):

without my written permission or a court order.

9. **Notify Other State of Travel Restrictions**

I ask the court to order the party to register this order in the state of _____ and provide the court with proof of the registration before the children can travel to that state for child visitation (parenting time).

10. **Turn In and Do Not Apply for Passports or Other Vital Documents**

I ask for a court order (check all that apply):

- requiring the party to turn in all the children's passports and other documents (such as visas, birth certificates, and other documents used for travel) that are in his or her possession and control.
- preventing the party from applying for passports or other documents (such as visas or birth certificates) that can be used to travel with the children.

11. **Provide Itinerary and Other Travel Documents**

If the party is allowed to travel with the children, I ask the court to order the party to give me before leaving (specify):

- the children's travel itinerary.
- copies of round-trip airline tickets.
- addresses and telephone numbers where the children can be reached at all times.
- an open airline ticket for me in case the children are not returned.
- other (specify):

12. **Notify Foreign Embassy or Consulate of Passport Restrictions**

I ask the court to order the party to notify the embassy or consulate of UKRAINE of this order and to provide the court with proof of that notification within 10 calendar days.

13. **Foreign Custody and Visitation (Parenting Time) Order**

I ask the court to order the party to get a custody and visitation (parenting time) order in a foreign country equal to the most recent United States order before the children can travel to that country for visits. I understand that foreign orders may be changed or enforced depending on the laws of that country.

14. **Other (specify):**

Grant Child Abduction Prevention Orders as recommended by Emergency Screener Recommendations (Evidence 10)

I declare under penalty of perjury under the laws of the State of California that the information on this form is true and correct.

Date: 02/12/2024




(SIGNATURE)

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

Dear Honorable Brooke A. Blecher,

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

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

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

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

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

Date: 02/12/2024

KOSTIANTYN MARS

(TYPE OR PRINT NAME)


(SIGNATURE OF DECLARANT)

Attorney for Plaintiff Petitioner Defendant
 Respondent Other (Specify):

1 **LIST OF EVIDENCE FOR CHILD ABDUCTION PREVENTION AND**
2 **CUSTODY REVIEW HEARING**
3 **(AS PART OF RETROACTIVE NULLIFICATION OF ORDERS OF**
4 **BRIBED JUDGES LOWNEY, FLINT, TOWERY)**

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7 P1. Child-hostage, my son Max, on paid supervised visit. Look into these kind teary eyes – Max is
8 missing father, like every boy. But it is prohibited. Max was violently abducted on 09/15/2022, and
9 is forced to live more than year life of hostage, in hands of mother-abuser who blocked all contact,
10 pulled out sim card from Max's phone, and completely prohibited all contact of my son with father.

11 P2. Pictures of Max with Father from crucial events of Max's life - including the day when Max received
12 his Green Card, for which Respondent retaliated against Max by abduction of my son, holding him
13 as hostage in an unknown location and putting bruises on Child's body, threatening to "bury our child
14 in Ukrainian soil so you will never see him again".

15 P3. Family photos, Granny, Max Birthday parties, and my Instagram, completely devoted to Max's life. I
16 can't imagine - how completely heartless and unethical Hanna should be to destroy all the life of our
17 son, and attempt to kill defenseless 95 years old granny?

18 P4. Max's 7th Birthday photos when I organized Birthday Party for Max on the professionally supervised
19 visitation in 2022 to give my son hope in those times of terror by mother

20 P5. Affidavit of Alexander Pirozhenko, family friend and neighbor, who observed Max and both parents
21 for quite a while and confirmed great caring parenting and strong bond between Max and his Father

22 P6. Affidavit and characteristic from Petitioner's Manager, Aliaksei Dziashko, who confirmed great
23 personal and people management skills, highest reputation and credibility of Max's Father

24 P7. Affidavit of Alena Chepakovich, family friend and neighbor who witnessed when Respondent was
25 telling her plans to abduct Child to Ukraine in 2022. Also Alena shared observations about strong
26 bond between Max and his Father, the fact that Father was caring about all family – including Max,

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LIST OF EVIDENCE FOR CHILD ABDUCTION PREVENTION AND
CUSTODY REVIEW HEARING

DISSOLUTION OF FAMILY MARS

CASE NO.: 22FL003144

1 P12. Mother-abuser grabs, drags, physically and emotionally abuses my son on Max's 8th
2 Birthday, 11/23/2023 – violently interrupting Max's brief moment of happiness by physical and
3 emotional child abuse

4 P13. But mother-abuser destroyed Max's brief moment of happiness – total overcontrolling,
5 prohibition of any contact with father, physical and emotional abuse. Max is upset and feels
6 extremely uncomfortable – because it is prohibited to be happy to see father, and it is prohibited to
7 have father.

8 P14. Max is happy to see father greeting him with his 8th Birthday on 11/23/2023 – despite all
9 prohibitions of evil mother-abuser.

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12 P15. Full video recording of Max's Birthday greetings with all further abuse by Hanna

13 P16. My text message, offering Hanna to grab coffee and donuts and make a Birthday party for
14 our son – like healthy, caring parents. This text was not answered – instead Hanna next day called
15 police on me and filed restraining order, to enforce and prohibit me from greeting my son with
16 birthday, care about Max's safety and even to prohibit me cheering up my son
17

18 P17. NO SIM – Hanna pulled out sim card from Max's phone to ensure that my son cannot
19 contact neither me, nor 9-1-1 (observed on professionally supervised visit 11/10/2023)

20 P18. Roblox chat is blocked too – after Hanna get know from professional supervisor that we
21 used Roblox chat to stay in contact with my son

22 P19. Supervised report 11/10/2023 – Hanna pulled out sim card from Max's phone to block any
23 contact of my son neither with me, nor with 9-1-1

24 P20. Supervised visit report 08/22/2023 – Mother-abuser prohibits Max talking about school, his
25 life, overcontrols any contact with father, **PROHIBITS CHATTING WITH FATHER EVEN IN**
26 **ROBLOX**

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1 travel authorization document which allows Hanna to travel with my son abroad without my
2 permission for the next 10 years. Since then I knew that she is planning new abduction and never
3 gave her my son's passport.

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5 It is the only reason why we still have this hearing here in the United States, and quite possibly the
6 only reason why my son is still alive (while biological mother promised to bury Max abroad, in
7 country where ongoing war already took thousands of children's lives)

8 P22. My responsive opposing DVRO 09/19/2022 which explains reasons why Hanna abducted
9 my son, describes acts of violence, child and elderly abuse by Hanna that happened before abduction
10 of my son with fraudulent DVRO, provides evidences of previous child abduction in 2019 – 2020,
11 provides evidences of me being primary parent and head of household. Please pay attention that I
12 was always in charge of my son's health, education, financial and legal matters. I provided Green
13 Card to my son (which Hanna attempted to cancel). I insisted on Max's right to start school at the
14 same age as other kids (not year later, as Hanna attempted to do). I was invited to School Council by
15 School Principal. I participated in PIQE (Parent Institute for Quality Education). I enrolled my son to
16 English, Math and KravMaga classes. And insisted on Max's participation in classes when Hanna
17 attempted to unenroll our son. I was taking care of Max's health when Max broke arm bones and
18 insisted on 2nd opinion doctor. I was carrying my son on my shoulders to school, making homework
19 and teaching Max English – when mother prohibited us to spend time together and physically and
20 emotionally abused my son for speaking English with me at home. I was taking Max to eKids events
21 for advanced child education. I was organizing Max's birthday and kids parties. I was taking care of
22 Max's safety and wellbeing. And yes, I prohibited Hanna beating my son and requested her to stop
23 domestic violence and start working on healthy co-parenting instead of parental alienation and
24 enforced violence as she did. To which she promised me to kill my grandmom, abduct and "bury our
25 son in Ukrainian soil so you will never see him again".
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1 visit ends – and I must return to mother") concealed any relationship between bruises and mother's
2 behavior

3 P28. Max's drawing of mother-monster eating child alive, 12/01/2022. Max created this picture
4 during our visitation in Stanford Rodin Sculptures Garden. Mother suggested to create a woodoo-doll
5 of somebody who you hate the most - and destroy it with all hatred. This suggestion was sent
6 through professional supervisors Jesus Santos and Dylan Smith. I refused to enforce hatred in my
7 son, and instead brought pencils and paper to create paper sailors and ornament them with some nice
8 pictures, as we did many years in a row, sending sailors for a journey in puddles after rain. When
9 Max took pencil and pen - his first picture was a monster who is eating child alive. The child is
10 screaming "help!" Max had those screaming signs of extreme depression and fear after abduction by
11 mother-abuser. Max refused to explain anything - this was simply silent scream for help after 4
12 months since abduction by Respondent. I tried to cheer up Max, turn this picture in a game and
13 added friends who help Child to escape from monster. But Max was did not cheer up, and after
14 visitation stated to me: "I have to become evil like mom, there is no other choice"
15

16 P29. Police report on Wellness Checkup 11/24/2023 – when Hanna shoved Max inside house and
17 called police on me for checking up on Max's safety after Hanna was physically and emotionally
18 abusing my son on his 8th Birthday 11/23/2023, locked up my son, and didn't answer for whole day,
19 giving me huge concerns about Max's safety, after documented history of domestic violence, child
20 and elderly abuse, beating my son in June – July 2022, and bruises observed on my son's body,
21 observed on paid visits in December 2022. Right after calling police on me, Hanna filed DVRO
22 prohibiting me from greeting my son with Birthday, prohibiting me from caring about my son, from
23 seeing, talking and even calling my son, who Hanna violently abducted to unknown location and
24 holds hostage for more than year.

25 P30. Child Protective Services Report 12/06/2023 about Physical and Emotional Abuse of my son
26 Max Mars by biological mother Hanna Mars on Max's 8th Birthday 12/23/2023 after which Hanna
27 called police on me to prohibit me from greeting my son with Birthday and supporting my son
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1 and sending false defamatory false allegations to make impermissible pressure on Emergency
2 Screener

3 P34. Nancy L Robert's defamatory false allegations in email to professional supervisor Lorraine
4 Ruiz, sent immediately after the first visitation to put pressure on professional supervisor.
5 Defamation allegations of Nancy L Roberts include "recommended a mental health evaluation of Mr.
6 Mars by a qualified psychiatrist", "Mr. Mars has delusions", "Mr. Mars compulsively discusses",
7 "Mr. Mars cannot regulate his behavior". All those defamatory false allegations were sent after all
8 parties were provided with Mental Health Evaluations and aware that Nancy L Roberts is lying with
9 the purpose to make pressure on professional supervisor and interfere with visitations

10 P35. Report of professional supervisor Lorraine Ruiz after defamatory false allegations of Nancy
11 L Roberts and defamatory false allegations of Respondent about "mental illness", "followed her" etc.
12 Lorraine Ruiz quoted high pressure messages in her report, provides screenshots of messages and
13 emphasizes that it's very suspicious that Child is talking about "terminating visit".

14 P36. Email from Respondent's Attorney Nancy L Roberts where she refuses to sign peaceful
15 agreement, offered by me (Petitioner) and states her intentions to block case completely, blocking
16 any contact with the Child and enforcing parental alienation for indefinitely without any reasons.

17 P37. Professionally supervised report of Jesus Santos, 11/24/2022 - when Petitioner organized
18 birthday party for Child, to cheer up Max and give him feeling of good old times when father was
19 organizing kids parties for Max almost every month.

20 P38. Professionally supervised report of Dylan Smith, 11/19/2022

21 P39. Professionally supervised report of Dylan Smith, 11/22/2022

22 P40. Professionally supervised report of Dylan Smith, 11/25/2022

23 P41. Professionally supervised report of Dylan Smith, 11/29/2022

24 P42. Professionally supervised report of Dylan Smith, 12/01/2022

25 P43. Professionally supervised report of Dylan Smith, 12/06/2022

1 visitations. In turn, Jesus Santos sent some defamatory allegations in email with the Court and Nancy
2 that I allegedly “violated rules of visitations by being late” (which happened couple of times, when I
3 notified Jesus and his partner Dylan ahead of time that I’ll be late because of urgent work meetings –
4 and which had nothing to do with “violation of rules”). Jesus emphasized even in supervised report
5 that according to his opinion being late is serious violation of the rules that leads to termination of
6 visits. This has nothing to do with safety and wellbeing of my son, and is obviously not a “violation
7 of the rules” (since I notified Jesus and Dylan ahead of time, respecting their time) – and it was
8 obvious, that Jesus simply helps Nancy L Roberts to obtain some formal “proof” from supervisor
9 that visits were terminated not by me due to inevitable financial ruin, caused by Nancy’s and Flint’s
10 fraud, but allegedly because of “violation of rules of supervised visitations” (which is obvious lie).
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12 Seeing such unethical defamatory statements from professional supervisor, who was repeating ugly
13 unethical lies of Nancy L Roberts and helping her to leave my son without father, I terminated
14 services of Jesus as supervisor.
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17 [P35] ... Report from Lorraine Ruiz could be found in P35
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19 **This is the most insightful and professional report.**
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21 After impermissible pressure from Nancy L Roberts and Hanna Mars, with defamatory falsehood
22 allegations said directly to Lorraine, and shamelessly sent in emails to Lorraine, Lorraine Ruiz
23 withdrew from supervising visits with Max due to ethical reasons.
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25 Report of Lorraine Ruiz (who Nancy shamelessly kicked from supervision after the very first and
26 only honest and highly professional report), is very insightful – you may see how shamelessly Hanna
27 Mars lies to professional supervisor about allegedly “Dr Mary Rolison” recommendations (which
28 you can check from Dr Mary Rolsion recommendations filed with the Custody Review evidence

1 - The fact that Max was born free

2 - The fact that Max has Green Card, sponsored by father, and have legal right to live in the United

3 States

4 - The fact that Max has loving and caring father, and neither bribed judge, nor mother-abuser

5 cannot force Max to be afraid or ashamed of having loving father

6 - The fact that Max's father did not sign-off custody despite terrifying pressure of bribed judge

7 Flint, Nancy L Roberts, and Max's biological mother

8 - The fact that Max has right for being loved, supported and respected

9 - Max's safety and wellbeing

10 - How to protect himself from domestic violence by mother-abuser

11 - How to protect himself from international child abduction – one of the reasons why mother-
12 abuser pulled-out sim card and left Max without any means for communication

13 - The fact that School, Child Protective Services and Police are notified about Max's abduction –
14 and are ready to help to protect Max's safety

15 - The fact that there is no shame to ask for help and protection against mother-abuser, even when
16 father is removed from Max's life by fraud, intentionally harmful wrongful orders of bribed
17 judge Flint, and Max is alone with violent abuser, kept hostage without any contact with father

18 - The fact that mother is doing impermissible intentional harm by calling police on father and
19 trying to put father arrested for greeting Max with Birthday, and for offering biological mother to
20 put aside misunderstandings and make birthday party for Max, like loving and caring parents

21 - The fact that Max has right to have phone and have access to means of communication – which
22 mother-abuser intentionally blocked and prohibited, to enforce fear and defenselessness in my
23 son, who is held hostage in undisclosed location without sim card in his phone, and all his chats
24 and messengers are blocked by mother-abuser

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1 because of deteriorating influence of Nancy L Roberts – who did all kinds of unethical influence on
2 authorities in this case, including lies, defamatory false allegations, and even bribery. Paid
3 supervised visits are not only unnecessary – but intentionally harmful and must be replaced by
4 healthy co-parenting and parenting counseling.

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