1	PO BOX 8081 SAN JOSE, CA 95155				
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3	(408) 518-0088 CONSTANTINE.MARS@GMAIL.COM				
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9	SUPERIOR COURT OF TH	E STATE OF CALIFORNIA			
10	IN AND FOR THE COUNTY OF SANTA CLARA				
11					
12	KOSTIANTYN MARS) Case No.: 22FL003144			
13	Petitioner,	STATEMENT OF DISQUALIFICATION –EVIDENCE LIST			
14	VS.	(Code Civ. Proc. 170.1(a)(6)A(iii);			
15	HANNA MARS,) 170.1(a)(3)A; 170.3)			
16	Respondent.) TRIAL DATE: 11/13/2023			
17		TIME: 9:00 AM DEPARTMENT: 79			
18 19		Judicial Officer: Honorable Andrea E. Flint			
20		Department: 79			
21		-			
22					
23					
24	STATEMENT OF DISQUALII	FICATION – EVIDENCE LIST			
25					
26	Dear Honorable Court,				
27	Please find evidence list below:				
28	1				
	- 1 - STATEMENT OF DISQUALIFICATION – EVIDENCE LIST				
	DISSOLUTION OF FAMILY MARS	CASE NO.: 22FL003144			

CASE NO.: 22FL003144

- 16. Order from 10/31/2023 by Judge Flint, violated by Respondent emergency screening was blocked, impermissible pressure was done by Respondent and her attorney on emergency screener and professional supervisors, screener recommendations were never signed
- 17. Confirmation that Respondent's attorney refused to sign Emergency Screening Recommendations
- 18. Emergency Screener Dr. Rolison Recommendations signed by Dr Rolison and Petitioner, that were unreasonably removed by Judge Flint from court records without consideration
- 19. Minute order 06/29/2023 by which Judge Flint granted false allegations against Petitioner and removed Emergency Screener Recommendations from order despite clear evidence and Emergency Screener statements, clarifying authenticity of Emergency Screener Recommendations, signed by Emergency Screener Dr. Rolison. By this order Judge Flint also ordered Petitioner to abandon and give up child completely despite clear evidences filed with the Court that prove Petitioner's high credibility, good bond with the Child, Head of Household role in family, providing Green Card to Child and Respondent, high risk of abduction by Respondent, previous abduction attempts, mental health instability of Respondent. Judge Flint refused to grant abduction prevention orders, assign minor's counsel, parenting counseling, refused to give visitation relief and order mental health treatment to Respondent as was recommended by Emergency Screener Recommendations which Judge Flint removed without any explanation
- 20. Order 07/31/2023 when Judge Flint refused to grant continuance due to Petitioner's medical emergency and physically punished Petitioner by forcing him to suffer severe headache and stay on hearing despite complete inability to participate in hearing due to severe headache
- 21. Order 08/01/2023 by which Judge Flint refused to review clear evidences fo Respondent's violation of Court orders from 10/31/2023 and enforcing child custody deprivation; also

- denied to disqualify opposing counsel Nancy L Roberts for impermissible conflict of interest and impermissible pressure on emergency screener and professional supervisors
- 22. Bruise on Child's butt, reported to CPS 12/12/2023 that was never taken into account by Judge, despite direct connection of this bruise with Child's asks to stay with father and relieve supervised visitations (that were initially ordered without reviewing matter of the case and any evidences)
- 23. Child's drawing of mother-monster, eating child alive silent scream for help, that Max was drawing on supervised visitation, understanding that we cannot talk, and he cannot say anything about tortures that mother is doing to him after violent removal of father from Max's life
- 24. Proof of previous abduction attempt by Respondent flight tickets, when Respondent extended 1 month flight into 7 months, refusing to return Max home from Ukraine
- 25. Happy Max with loving and caring Father First Day of First Grade. This child was violently abducted and held as hostage by Respondent, who blocked all contact with the child, including even calls, and removed child into unknown location. Judge Flint ordered Father to abandon this lovely child, and endorsed abduction of Max to Ukraine in times of war by orders 06/29/2023
- 26. Evidence of impermissible pressure on emergency screener Dr Mary Rolison by
 Respondent's attorney, Nancy L Roberts. False allegations of "delusional disorder", "being delusional", "fraudulent copy" were made despite Petitioner provided Mental Health
 Evaluation and completed all required courses immediately when received first draft of Dr Rolison recommendations. Though, Judge Flint refused to review this evidence, granted false allegations against Petitioner and denied motion to disqualify Nancy L Roberts for

CASE NO.: 22FL003144

- impermissible conflict of interest, pressure on emergency screener and breaking attorney ethics.
- 27. Evidence of impermissible pressure on professional supervisor Lorraine Ruiz by
 Respondent's attorney Nancy L Roberts, made immediately after the first visitation and
 resulted in interference with supervised visits. False allegations of "mental health evaluation
 by qualified psychiatrist", "cannot regulate his behavior", etc were done after Court and Ms
 Roberts were provided Mental health evaluation of Petitioner and certificates of completion
 of all required courses. Judge Flint refused to review this evidence, and denied request to
 disualify opposing counsel, despite clear evidence of impermissible conflict of interest,
 pressure on professional supervisors and breaking attorney ethics.
- 28. Biased and highly alerting report of professional supervisor Lorraine Ruiz, that highlights false allegations of Respondent against Petititioner about "mental health illness", derrogatory comments of Respondent against Petitioner, false representation of high abduction risk by Respondent, who already attempted abduction and threatened to abduct Max in 2022. Professional supervisor founds highly unusual that Child is saying about "terminating visitation", and suspects that Respondent was doing pressure not only on supervisor (Evidence 25), but also on the Child.
- 29. Mental health evaluation of Petitioner completed immediately after mention of it was found in Emergency Screener Dr Rolison Recommendations. Also Petitioner completed Co-Parenting and Anger Management courses. Despite the fact that Petitioner was protecting child from violence of Respondent, Petitioner completed all required courses immediately to provide any possible proof of credibility to the Court. Judge Flint refused to review evidences, and multiple evidences of Petitioner's credibility were simply ignored without any reason.

- 30. Witness statement of Alena Chepakovich who observed Respondent's mental health instability, threats to abduct child to Ukraine, and highly unethical behavior on public, including impermissible comments about granny Nadiia, 95 years old senior person with disabilities, who Respondent violently kicked from home with fraudulent DVRO based on false allegations, which caused terminal condition to defenseless senior woman with disabilities. Witness also mentions high level of ethical parenting and care about both Child and Respondent.
- 31. Affidavit of Petitioner's manager, who confirms highest credibility and prof. ethics of Petitioner.
- 32. Witness statement of Alexander Pirozhenko, neighbor and friend of family, who confirms highest credibility and parenting ethics of Petitioner
- 33. Pictures of Max with Father. Judge Flint ordered to abandon and give up not only custody, but even visitations with this amazing, kind and cheerful child. On the first picture you see Max and Father on the day when Max received his Green Card, sponsored by Father. Less than month later Respondent retaliated to Child, abducting child without any documents into unknown location, blocking all contact with the father, and demonstrating that mother who is beating and abusing child can lock up child and abduct him outside of the United States to Ukraine, to endanger life of the Child. After this act of violence against Child, he was coming on visitations with bruises, and drawing monther-monster eating child alive, understanding that "there is no other way, I must become evil like mom". Judge Flint refused to review evidences, and ordered Petitioner to abandon this cheerful and kind child, and allow abduction of the Child to Ukraine, so life of the child will be endangered due to ongoing war there.

- 34. Talking Parents messages where Respondent refuses to share location where she abducted Child in April May 2023
- 35. Talking Parents messages where Respondent confirms that she blocked not only visits, but even calls with the Child to enforce parental alienation and custody deprivation. Judge Flint refused to review these evidences, refused to grant abduction prevention orders, refused to assing minor counsel, refused to grant Emergency Screener Recommendations, but in opposite, ordered Petitioner to give up and abandon Child, and endorsed abduction of the Child by Respondent outside of the United States to Ukraine, that endangers life of the Child due to ongoing war there.
- 36. Petitioner's Instagram story of family and happy Max's childhood before abduction by Respondent. Max had lots of bright moments, family support, great example of love and support from Father, example of being respectful and caring about granny Nadiia (who was put into terminal condition by Respondent's violence), lots of discoveries and social events with kids and parents, organized by Petitioner. Despite multiple clear evidences of Petitioner being Head of Household, Primary Parent, loving and caring parent, who devoted his life to Child's safety and wellbeing, Judge Flint refused to review any evidences and ordered Petitioner to give up and abandon Child in hands of Petitioner, who threatened to "bury Child in Ukrainian soil". This raises huge concerns about reasons of extreme bias of Judge Flint against Child's safety and wellbeing, and granny's life (who was put into terminal condition by Respondent's violence and fraud).

Respectfully submitted,

DATED: November 9, 2023

KOSTIANTYN MARS



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

OCT 0 2 2023

Clerk of the County of Santa Clara
BY DEPUTY

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

8 Case No.: 22FL003144 KOSTIANTYN MARS 9 RE: OBJECTION TO HEARING OR Petitioner, TRIAL PURSUANT TO CCP 170.3(C)(1) 10 VS. 11 HANNA MARS, TRIAL DATE: 11/13/2023 12 TIME: 9:00am Respondent. 13 Judge: Andrea E. Flint 14 Dept: 15 16

Dear Judge Flint,

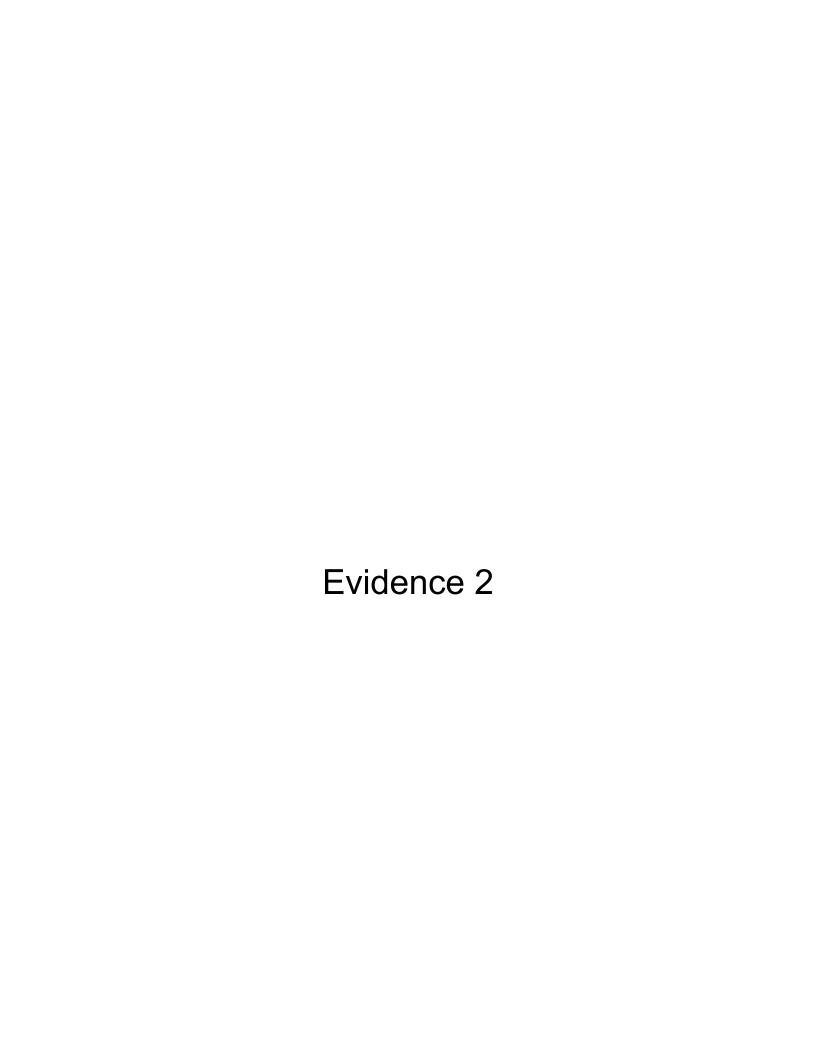
I trust this letter finds you in good health.

I write to formally object to the upcoming hearing or trial scheduled for 11/13/2023 9:00am in the matter of Dissolution of Family Mars, Case No. 22FL003144. This objection is submitted in accordance with the provisions of California Code of Civil Procedure (CCP) 170.3(c)(1).

Regrettably, I am compelled to request your recusal from presiding over this case due to a series of concerning incidents that have cast significant doubt on your ability to provide an impartial and fair hearing. The following circumstances have led me to file this objection:

 Repetitive Refusal to Recuse: On multiple occasions, including hearings 09/13/2023 (both served to you personally and stated on record), 09/07/2023 (both served to you and stated on

27 28



1710.47100		
ATTORNEY OR PARTY WITHOUT ATTORNEY OR GOVERNMENTAL AGENCY (under Family Code, §§ 17400,17406 (Name, State Bar number, and address):	FOR COURT USE ONLY	
KOSTIANTYN MARS		
PO BOX 8081		
SAN JOSE, CA 95155		
OAR OODE, CAROLIS		
54V410	OCT 0 4 2023	
TELEPHONE NO: (408) 518-0088 FAX NO:	001 0 4 2023	
ATTORNEY FOR (Name).	Clerk QLL Sourt	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA	Superior Court of OA County of Santa Clara	
STREET ADDRESS 201 N FIRST STREET	BY DEPUTY	
MAILING ADDRESS: 191 N FIRST STREET	J. HODGES	
CITY AND ZIP CODE SAN JOSE, CA 95113		
BRANCH NAME. FAMILY JUSTICE CENTER		
PETITIONER/PLAINTIFF: KOSTIANTYN MARS	CASE NUMBER	
RESPONDENT/DEFENDANT: HANNA MARS	22FL003144	
OTHER PARENT/PARTY:	(If applicable, provide).	
OHERTAKU.	HEARING DATE: 11/13/2023	
PROOF OF PERSONAL SERVICE	HEARING TIME: 9:00 AM	
PROOF OF FEROMINE SERVICE	DEPT.: 79	
	n any of the orders	
1. I am at least 18 years old, not a party to this action, and not a protected person listed i	if any of the orders.	
2. Person served (name): HON. ANDREA E. FLINT		
I served copies of the following documents (specify):		
OBJECTION TO HEARING OR TRIAL PURSUANT TO CCP 170.3(C)(1), LIST OF EV	IDENCES FOR WRITTEN STATEMENT	
OBJECTION TO HEARING OR TRIAL PORSOANT TO GOT THOSOGNAY, ELST OF EL		
4. By personally delivering copies to the person served, as follows: a. Date: 10/4/2023 b. Time: (055 tloves) c. Address: 201 N. FIRST STREET SKN JUSE, CA		
5. I am a not a registered California process server. b a registered California process server. c an employee or independent contractor of a registered California process server. d exempt from registered Code section 223 Code section 223 a California sherif		
6. My name, address, and telephone number, and, if applicable, county of registration an MAPIA PEPEZ MUPILLU ZZI M. FIRST STREET SAM JOSE, CA	d number (specify):	
7. I declare under penalty of perjury under the laws of the State of California that the laws of the California that th		
MARIA PEPEZ MUPILLO		
	ATURE OF PERSON WHO SERVED THE PAPERS)	
5	Page 1 of 1 Code of Civil Procedure, § 1011	
PROOF OF DERSONAL SERVICE	Code of Civil Procedure, § 1011	

Judicial Council of California FL-330 [Rev. January 1, 2012]

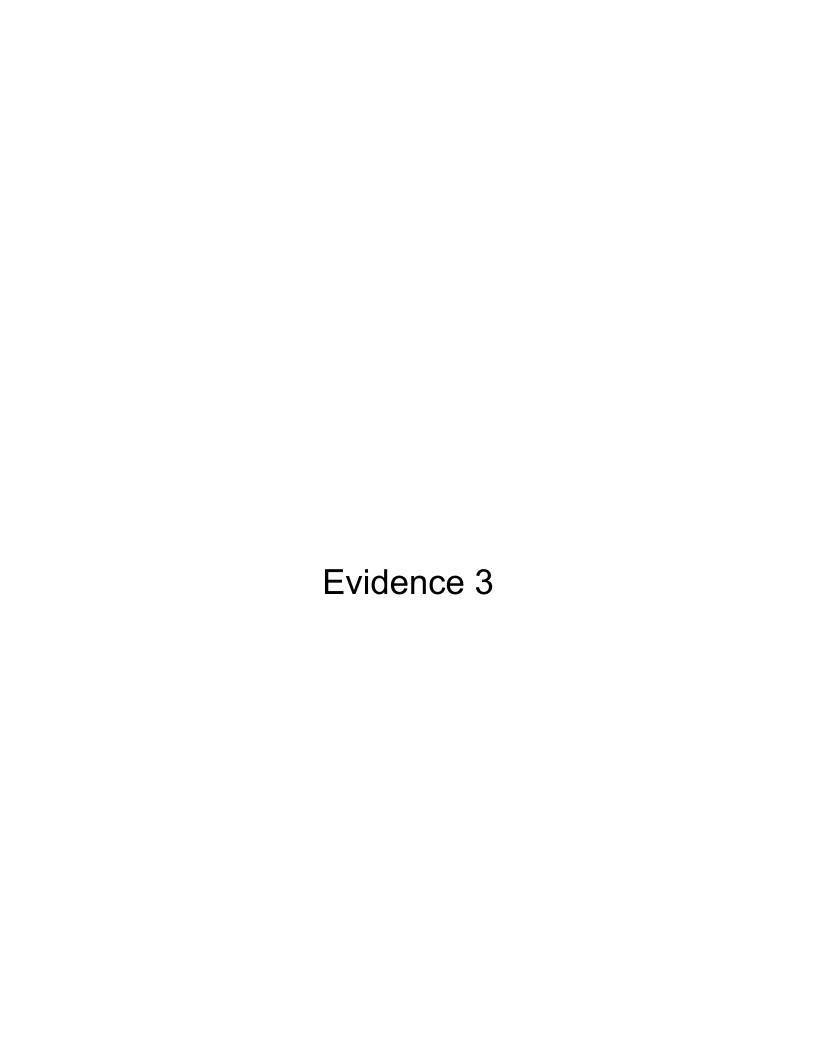
www.courts.ca.gov

For your protection and privacy, please press the Clear This Form button after you have printed the form.

Print this form

Save this form

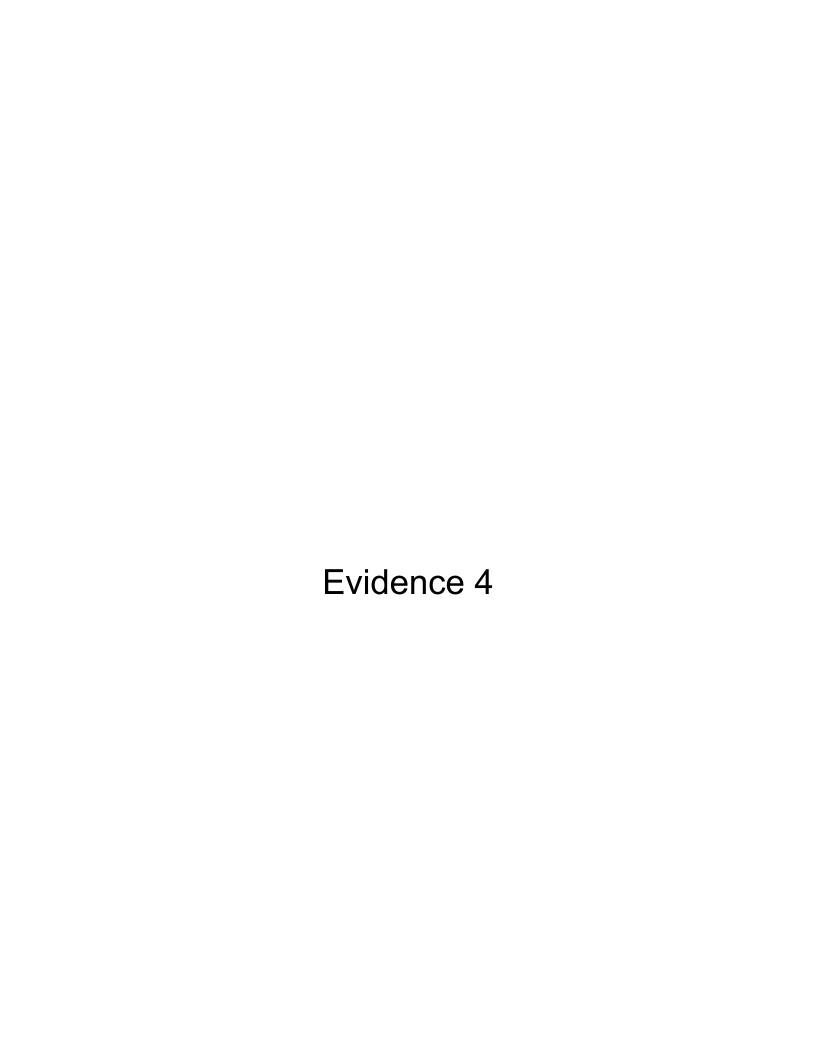
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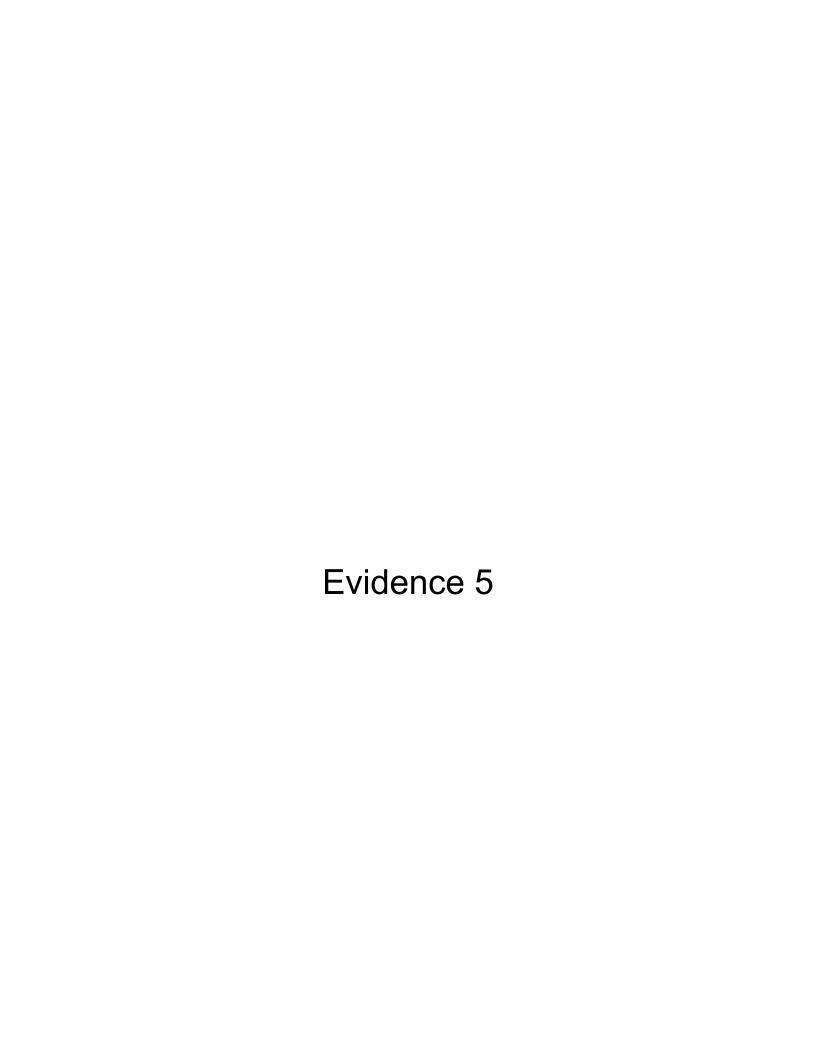
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5	IN THE SUPERIOR COURT OF TH	E STATE OF CALIFORNIA
6	IN AND OF THE COUNTY	91
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8		ase No.: 22FL003144
9	9	OTICE OF MOTION AND MOTION
10	0	O RECUSE JUDICIAL OFFICER OR CAUSE
11	1	CCP §170.1]
12		501 317031
13	Respondent)	dicial Officer: Honorable Andrea E. Flint
14	11 / 5	ept: 79
15	}	
16	}	
17	Dear Judge Flint,	
18		
19		
20		suant to California Code of Civil Procedure
21		
22	The grounds for this motion are as follows:	
23		
24	1. Extreme Prejudice: I assert that the presiding	g judicial officer, Judge Flint, has exhibited
25	extreme prejudice against me as the Petitioner i	n this case. This prejudice has manifested in
26	various forms, including repetitive refusal to	recuse (four times in a row), punishing by
27	physical pain when Judge denied request for o	continuance due to medical emergency and
28	forced me suffer extreme headache while sta	aying on hearing 07/31/2023, removing or
	II .	

		E	
1	KOSTIANTYN MARS PO BOX 8081	The second secon	
2	SAN JOSE, CA 95155 PRO PER	7023 SEP 13 A II: 08	
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5		SUPERIOR DOUBLE OF SANA CLARA BY DESUTY	
6	IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA		
7	IN AND OF THE COUNTY OF SANTA CLARA		
8	,		
9	KOSTIANTYN MARS) Case No.: 22FL003144	
10	Petitioner,) CHALLENGE TO) RECUSE JUDICIAL OFFICER	
11	VS.	FOR CAUSE [CCP §170.1]	
12	HANNA MARS,) [CCF 91/0.1]	
13	Respondent) 	
14		Dept: 79	
15	·		
16)	
17	TO THE HONORABLE ANDREA E. FLINT		
18	Dear Judge Flint,		
19			
20	I, Kostiantyn Mars, the Petitioner in the above-mentioned case, hereby submit this Challenge to		
21	Recuse Judicial Officer for Cause pursuant to California Code of Civil Procedure Section 170.1.		
22	The basis for this challenge is the presence of extreme prejudice exhibited by the presiding judicial		
23	officer, Judge Flint, which has compromised my right to a fair and impartial trial.		
24	This challenge is made in good faith and in the interest of justice.		
25	Grounds for Challenge:		
26	1. Extreme Prejudice: I assert that Judge Flint has demonstrated a clear and undeniable bias		
27	against me as the Petitioner in this case. This bias has been manifested in various forms		
28	including:		

KOSTIANTYN MARS PO BOX 8081 SAN JOSE, CA 95155 PRO PER 3 7023 SEP 13 A 10: 51 4 5 IN THE SUPERIOR COURT OF THE STATE OF 6 IN AND OF THE COUNTY OF SANTA CLARA 7 8 KOSTIANTYN MARS Case No.: 22FL003144 9 Petitioner, DECLARATION IN SUPPORT OF 10 OFFICER FOR CAUSE VS. 11 [CCP §170.1] HANNA MARS, 12 13 Respondent Judicial Officer: Honorable Andrea E. Flint Dept: 14 15 16 17 I, KOSTIANTYN MARS, am the Petitioner in the above referenced matter. I make this declaration 18 from my own personal knowledge, except for those matters stated on information and belief and so 19 to those matters, I believe them to be true. 20 In accordance with California Code of Civil Procedure Section 170.1 in general and 170.1 6(B) 21 specifically, I respectfully request that Honorable Andrea E. Flint recuse herself from presiding over 22 this case on the grounds of prejudice and bias. 23 I declare the following: 24 1. I am the Petitioner in the above-entitled matter. 25 2. The Honorable Judge Andrea E. Flint, to who the hearing of the above-entitled matter is 26 pending in Department 79 against is extremely prejudiced against Petitioner. 27 3. Petitioner believes that he cannot have a fair and impartial hearing before this judge. 28



Page 1 of



FILED

SEP 1 3 2023

SUPERIOR COURT OF CALIFORNIA COUNTY OF SANTA CLARA

KOSTIANTYN MARS,

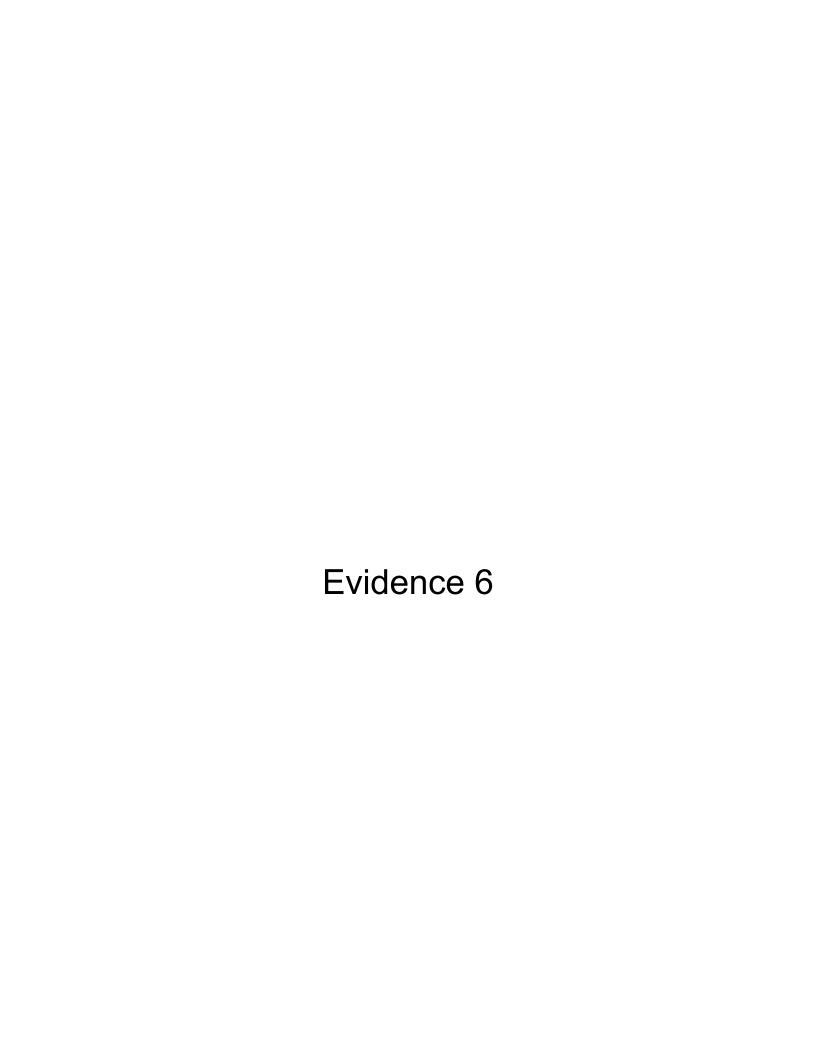
Petitioner,

ORDER STRIKING: PETITIONER'S
1) NOTICE OF MOTION AND MOTION
TO RECUSE JUDICIAL OFFICER FOR
CAUSE;

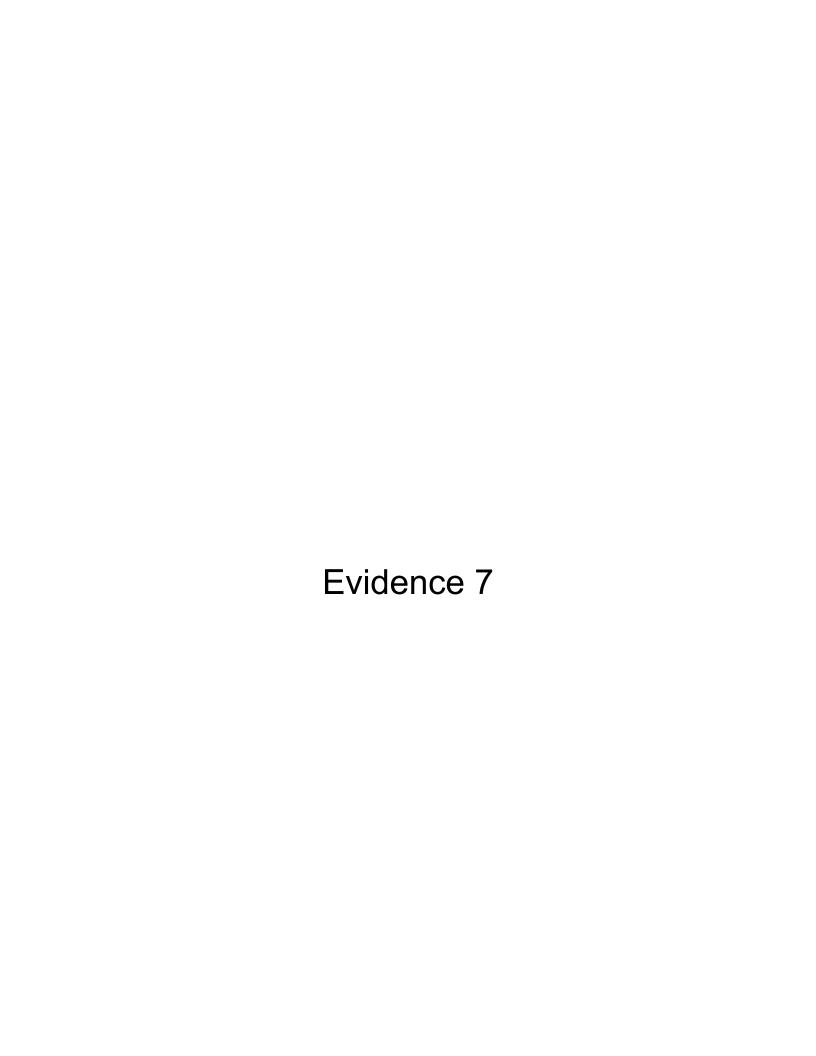
V.

2) CHALLENGE TO RECUSE JUDICIAL
OFFICER FOR CAUSE; AND
3) DECLARATION IN SUPPORT OF
MOTION TO RECUSE JUDICIAL
OFFICER FOR CAUSE;"

On August 9, 2023, petitioner Kostiantyn Mars filed 1) Challenge to Recuse Judicial Officer for Cause; 2) Notice of Motion and Motion to Recuse Judicial Officer for Cause; and 3) Declaration in Support of Motion to Recuse Judicial Officer for Cause (hereinafter, collectively, "Statement of Disqualification"). On September 5, 2023, petitioner Kostiantyn Mars filed 1) Notice of Motion and Motion to Recuse Judicial Officer for Cause; and 2) Declaration in Support of Motion to Recuse Judicial Officer for Cause (hereinafter, collectively, "Statement of Disqualification"). On September 12, 2023, petitioner filed both a challenge under CCP section



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1	KOSTIANTYN MARS PO BOX 8081	FILED	
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6	BUI EMOR COURT OF THE STATE OF CALIFORNIA		
7	IN AND FOR THE COU	NTY OF SANTA CLARA	
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9	KOSTIANTYN MARS) Case No.: 22FL003144	
10	Petitioner,) RE: OBJECTION TO HEARING OR TRIAL PURSUANT TO CCP 170.3(C)(1)	
11	VS.	}	
12	HANNA MARS,	TRIAL DATE: 09/28/2023	
13	Respondent.	TIME: 9:00am	
14	respondent.	Judge: Andrea E. Flint	
15		Dept: 79	
		}	
16		•	
17	Dear Judge Flint,		
18			
19	I trust this letter finds you in good health. I wi	rite to formally object to the upcoming hearing or	
20	trial scheduled for 09/28/2023 9:00am in the m	natter of Dissolution of Family Mars, Case No.	
21	22FL003144. This objection is submitted in acco	rdance with the provisions of California Code of	
22	Civil Procedure (CCP) 170.3(c)(1).		
23	Regrettably, I am compelled to request your recusal from presiding over this case due to a series		
24	of concerning incidents that have cast significant doubt on your ability to provide an impartial and		
25	fair hearing. The following circumstances have led me to file this objection:		
26	1. Repetitive Refusal to Recuse: On multiple occasions, including hearing 09/07/2023 (stated		
27	on record during hearing), 09/07/2023, 09/05/2023, 08/09/2023 (served by bailiff to you		
28			
	RE: OBJECTION TO HEARING OR TR	RIAL PURSUANT TO CCP 170 3(CYI)	
	IL. OBJECTION TO TEMENTO ON TO	Case No. 22FL003144	





Clerk of the Court
SUPERIOR COURT OF SUPERIOR

BY DECKE DEPUTY

True Parker

SUPERIOR COURT, STATE OF CALIFORNIA COUNTY OF SANTA CLARA

Case No.: 22FL003144 In re the Marriage of 11 KONSTIANTYN MARS 12 ORDER DENYING PEREMPTORY 13 Petitioner, **CHALLENGE** [C.C.P. §170.3(C)(1)] 14 VS. HANNA MARS 15 Department 79 16 Respondent.

Petitioner's challenge filed under California Code of Civil Procedure §170.3 is DENIED.

The Court finds there is no legal or factual basis for disqualification.

DATED: 9/12/2023

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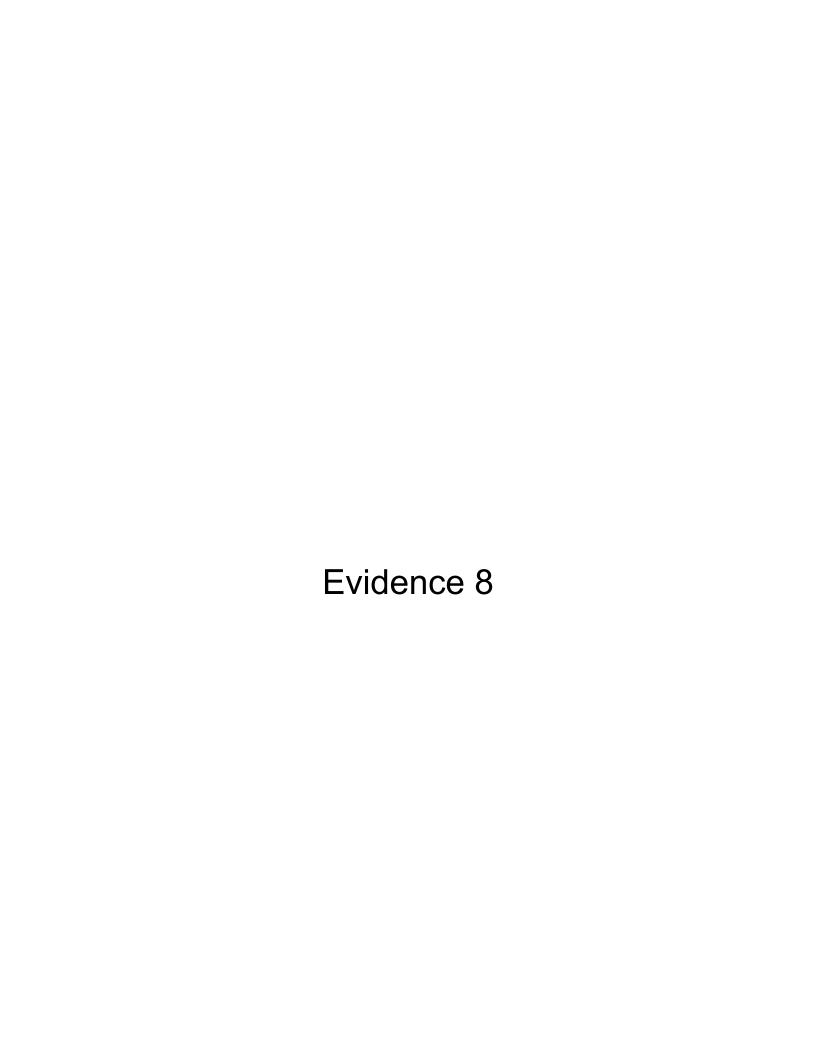
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HONORABLE ANDREA E. FLINT
Judge of the Superior Court

ORDER DENYING PEREMPTORY CHALLENGE [C.C.P. §170.3]

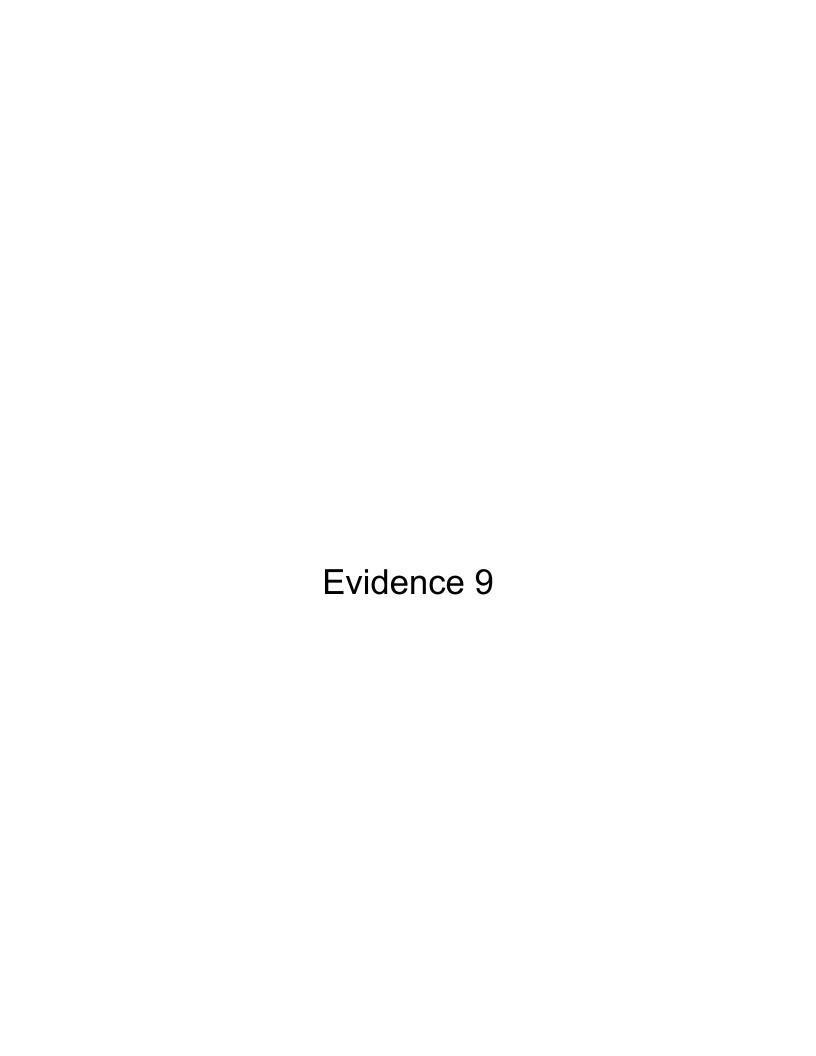


KOSTIANTYN MARS PO BOX 8081 SAN JOSE, CA 95155 SEP 1 1 2023 (408) 518-0088 3 the Court PRO PER 5 6 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA 7 IN AND OF THE COUNTY OF SANTA CLARA 8 9 KOSTIANTYN MARS Case No.: 22FL003144 10 Petitioner, NOTICE OF MOTION AND MOTION 11 FOR PEREMPTORY CHALLENGE VS. HANNA MARS, 12 [CCP § 170.6] Respondent. 13 Judgicial Officer: Hon. Andrea E. Flint 14 Department: 79 15 16 17 18 Petitioner, KOSTIANTYN MARS, hereby moves this court for an order in support of his 19 Peremptory Challenge to remove Judicial Officer Andrea E. Flint in Department 79 from those 20 proceedings. Petitioner's request is based on the belief that he cannot have a fair and impartial 21 hearing before this Judge. 22 23 24 DATED: September 8, 2023 25 26 KOSTIA Pro Per 27 KOSTIANTYN MARS 28 - 1 -

PEREMPTORY CHALLENGE [CCP § 170.6]

DISSOLUTION OF FAMILY MARS

CASE NO .:



SEP 1/2 2023

SUPERIOR COURT, STATE OF CALIFORNIA COUNTY OF SANTA CLARA

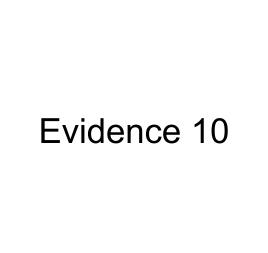
11	In re the Marriage of) Case No.: 22FL003144)
12	KONSTIANTYN MARS)
13		Petitioner,	ORDER DENYING PEREMPTORY CHALLENGE
14	vs.) [C.C.P. §170.6])
15	HANNA MARS) Department 79
16		Respondent.))

Petitioner's peremptory challenge filed under California Code of Civil Procedure §170.6 is DENIED as untimely, pursuant to §170.6 (a)(2).

DATED: September 12, 2023

HONORABLE ANDREA E. FLINT
Judge of the Superior Court

ORDER DENYING PEREMPTORY CHALLENGE [C.C.P. §170.6]



KOSTIANTYN MARS FILED PO BOX 8081 SAN JOSE, CA 95155 PRO PER AUG 09 2023 3 Clerk of the Court 4 5 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA 6 IN AND OF THE COUNTY OF SANTA CLARA 7 8 KOSTIANTYN MARS Case No.: 22FL003144 9 Petitioner, NOTICE OF MOTION AND MOTION 10 TO RECUSE JUDICIAL OFFICER VS. FOR CAUSE 11 HANNA MARS. [CCP §170.1, §170.4] 12 13 Respondent Judicial Officer: Honorable Andrea E. Flint 14 Dept: 15 16 17 Petitioner, KOSTIANTYN MARS hereby moves this court for an order in support of 18 his Motion to Recuse Judicial Officer for Cause to remove Judicial Officer Andrea E. Flint in 19 Department 79 from those proceedings. Petitioner's request is based on the multiple occurences of 20 biased and prejudiced orders and impermissible statements from the Judge, and belief that Petitioner 21 cannot have a fair and impartial hearing before this Judge. 22 23 24 DATED: August 8, 2023 25 26 PRO PER 27 28



FILED

AUG 1,7 2023

True Parker

SUPERIOR COURT OF CALIFORNIA COUNTY OF SANTA CLARA

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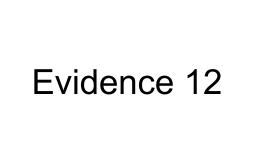
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9 10 Case No.: 22FL003144 KOSTIANTYN MARS, 11 ORDER STRIKING: PETITIONER'S 12 Petitioner, 1) NOTICE OF MOTION AND MOTION TO RECUSE JUDICIAL OFFICER FOR 13 CHALLENGE TO RECUSE JUDICIAL 14 **OFFICER FOR CAUSE; AND** 3) DECLARATION IN SUPPORT OF HANNA MARS. 15 MOTION TO RECUSE JUDICIAL OFFICER FOR CAUSE;" 16 Respondent. IN THE ALTERNATIVE, 17 VERIFIED ANSWER OF JUDGE ANDREA FLINT 18 19 20

The present case is a highly contentious family law case filed by petitioner Kostiantyn Mars on September 22, 2022. Since the time the case was filed, the Court has presided over several contested hearings at which evidence was presented and orders issued, including hearings pertaining to issues of domestic violence, child custody, support, and marital assets.

On August 9, 2023, petitioner Kostiantyn Mars filed 1) Challenge to Recuse Judicial Officer for Cause; 2) Notice of Motion and Motion to Recuse Judicial Officer for Cause; and 3) Declaration in Support of Motion to Recuse Judicial Officer for Cause (hereinafter, collectively,

-1-





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

MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

22FL003144

Date of Hearing: 09/05/2023

Hearing Start Time: 1:30 PM

Hearing Type: Request for Order: Other

Comments:

Heard By:

Flint, Andrea E

Courtroom Reporter: - No Court Reporter

Location: Department 79

Courtroom Clerk: Roxana Guevara

Parties Present:

Future Hearings:

Mars, Hanna

Respondent Petitioner

Mars, Kostiantyn Roberts, Nancy Lee

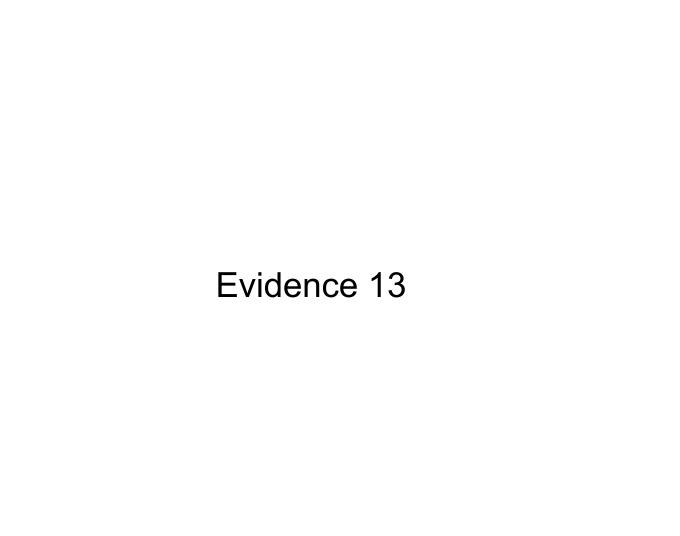
Attorney Limited Scope Attorney

Petitioner is present via Teams

Respondent is present via Teams, with attorney, Nancy Roberts

Court acknowledges service of recusal documents.

Continued to 9-7-23 at 1:30 pm in Department 79 for Status





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

MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

Hearing Start Time: 1:30 PM

22FL003144

Hearing Type: Request for Order: Other/no

fee

Date of Hearing: 09/07/2023

Comments:

Heard By:

Flint, Andrea E

Location: Department 79

Courtroom Reporter: - No Court Reporter

Courtroom Clerk: Roxana Guevara

Parties Present:

Future Hearings:

Mars, Hanna Mars, Kostiantyn Respondent Petitioner

Roberts, Nancy Lee

Limited Scope Attorney

Petitioner is present via Teams Respondent is present via Teams, with attorney, Nancy Roberts

Both parties are sworn.

Petitioner states that he served documents to the court today. Court does NOT acknowledge service of Petitioner's documents. Court finds service is not valid.

Discussions held re: Respondent's request for Sanctions

COURT ORDERS:

Court DENIES Respondent's request for Sanctions

Discussions held re: modification of custody & visitation

COURT ORDERS:

Due to no change in circumstance, Court DENIES Petitioner's request.

Discussions held re: vexatious litigant

Court states that Respondent request is not properly before the court and is denied.

Hearing on 9-13-23 shall remain as set.

Order to be prepared and submitted by E-FILE by attorney, Ms. Roberts

Evidence 14



Constantine Mars <constantine.mars@gmail.com>

State on record: Petitioner is seeking a new court due to bias

1 message

Constantine Mars <constantine.mars@gmail.com>
To: Department 79 <department79@scscourt.org>
Cc: nancy roberts <nlrobertslaw@sbcglobal.net>

Thu, Sep 7, 2023 at 1:56 PM

Dear Clerk,

Please enter my request (made during hearing today) in the docket and minute order: I state on the record that I am seeking a new court due to bias.

Motion to recuse was served to the Judge in person this morning.

Thank you

Best regards,

CONSTANTINE MARS

Cell: +1 (408) 518-0088

Email: constantine.mars@gmail.com San Jose, CA, United States



State on record: Petitioner is seeking a new court due to bias

Constantine Mars < constantine.mars@gmail.com>

Tue, Sep 12 at 8:00 AM

To: Department 79 <department 79@scscourt.org>

Cc: nancy roberts <nlrobertslaw@sbcglobal.net>, Self Help <selfhelp@scscourt.org>

Dear Clerk,

Please confirm the reason why my request to recuse the judge that was made on record during the hearing 09/07/2023 was not included in the minutes order from 09/07/2023? (please see forwarded email below)

Please state reasons why my email with request to include my request for judge recusal in docket and minute order that was received by you on 09/07/2023, was ignored. (please see forwarded email addressed to you on 09/07/2023 below)

Please also provide any other available transcripts from hearing 09/07/2023 that contain the judge's lies about "not being served motion to recuse" that were made in the courtroom on record during hearing 09/07/2023.

CC @Self Help
[Quoted text hidden]

Evidence 15



MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

Hearing Start Time: 1:30 PM

22FL003144

Hearing Type: Request for Order: Other

w/fee

Date of Hearing: 09/13/2023

Comments:

Line 4

Heard By:

Flint, Andrea E

Location: Department 79

Courtroom Reporter:

No Court Reporter

Courtroom Clerk: True Parker

Court Interpreter:

Court Investigator: Future Hearings:

Parties Present:

Mars, Hanna

Respondent

Petitioner

Mars, Kostiantyn Roberts, Nancy Lee

Attorney

Limited Scope

Attorney

Exhibits:

All above listed parties appear via MS Teams.

Petitioner and respondent are sworn.

Petitioner requests a continuance.

The Court finds good cause and grants the request for a continuance past the September 28, 2023.

The Court does not find good cause and denies petitioner's request to continue the hearing into December 2023.

The matter is continued to 11-13-2023 at 9:00 am in department 79.

Time Estimate: 2 hours

The Court denies petitioner's request for specific statements made by petitioner be captured on today's minute order.

Evidence 16



MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

Hearing Start Time: 9:00 AM

Hearing Type: Request for Order: Domestic

22FL003144

Violence

Date of Hearing: 10/31/2022

Comments:

Heard By:

Flint, Andrea E

Location: Department 79

Courtroom Reporter:

- No Court Reporter

Courtroom Clerk: Chris Collins

Court Interpreter:

Court Investigator:

Parties Present:

Future Hearings:

January 24, 2023 8:30 AM Conference: Settlement

Dinneen, Steven Allen

Attorney

Mars, Hanna

Respondent

Flint, Andrea E Department 79

Mars, Kostiantyn Roberts, Nancy Lee

Petitioner Limited Scope

January 30, 2023 9:00 AM Court Trial: Long Cause

Attorney

Flint, Andrea E

Department 79

Exhibits:

- Respondent assisted by certified Russian interpreter.

Matters set for one-day hearing on DVRO. Based on agreement of the parties, matter limited to one day.

Parties should prepare to proceed by offer of proof.

Trial set on 1-30-23 at 9:00 a.m. Dept 79

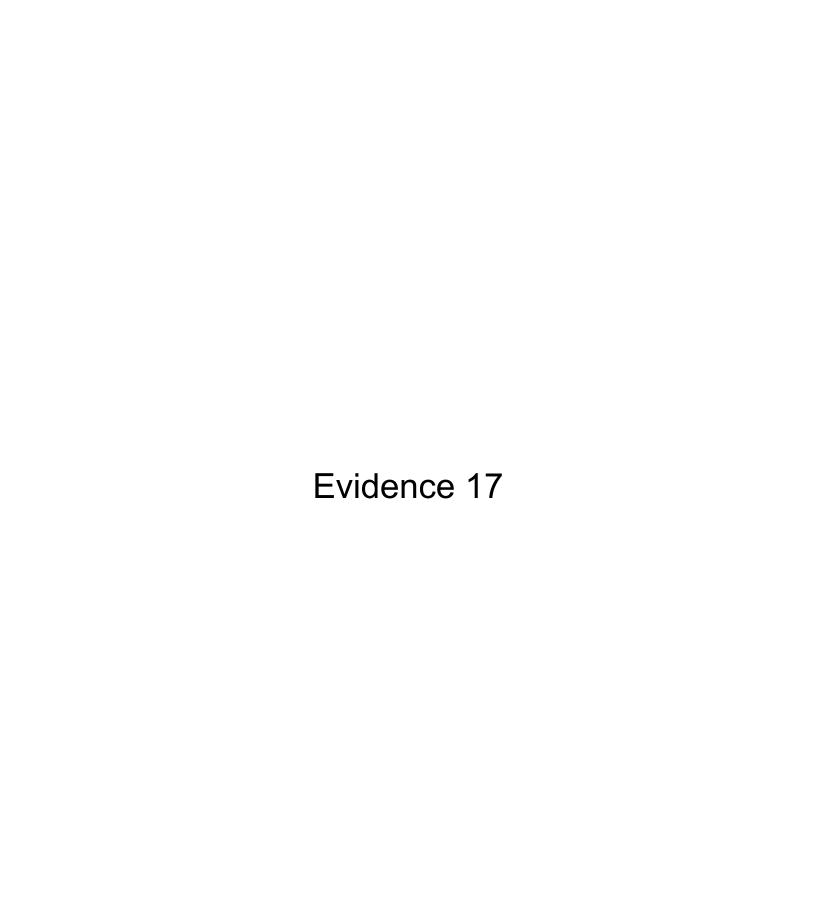
MSC set on 1-24-23 at 8:30 a.m. Dept 79

The Court orders the DV matter and this FL matter to be consolidated with the FL case as the lead.

The Court orders that parties participate in a private screening with Father to pay.

The Court orders that parties participate and cooperate in a private screening.

Father ordered to pay full cost of the screening.





Constantine Mars < constantinemars 1@gmail.com>

Declined: Complete with DocuSign: Emergency Screening Rx.pdf

1 message

Kostiantyn Mars via DocuSign <dse_NA4@docusign.net> Reply-To: Kostiantyn Mars <constantine.mars@gmail.com> To: Constantine Mars <constantinemars1@gmail.com> Thu, Apr 6, 2023 at 3:25 PM

DocuSign^{*}

Nancy Roberts declined to sign.

REVIEW DOCUMENT

Kostiantyn Mars

constantine.mars@gmail.com

Nancy Roberts declined Emergency Screening Rx.pdf. As a result, the documents cannot be completed.

Do Not Share This Email

This email contains a secure link to DocuSign. Please do not share this email, link, or access code with others.

Alternate Signing Method

Visit DocuSign.com, click 'Access Documents', and enter the security code: F33A3D55788C4B6291AB4EDD89B0F6977

About DocuSign

Sign documents electronically in just minutes. It's safe, secure, and legally binding. Whether you're in an office, at home, on-the-go -- or even across the globe -- DocuSign provides a professional trusted solution for Digital Transaction Management™.

Evidence 18

Mary D. Rolison. PhD, LCSW 1625 The Alameda Ste#304, San Jose, Ca. 95126

Phone: 408 513-5107

e- mail: drmaryrolison@gmail.com

To: Santa Clara County Superior Court

REQUEST AND ORDER PURSUANT TO AN EMERGENCY SCREENING

In re the matter of:

Hanna Mars

Petitioner

And

Kostiantyn Mars Respondent

CASE No: 22-FL-003144

Dept: 79

Judge Andrea Flint

Date of Report: 2/9/23

Mother: Hanna Mars Father: Kostiantyn Mars

Child: Maksym Mars - age 7 yrs 2 mths (DOB: 11/23/15).

Introduction: The screening process was ordered to be undertaken at the court hearing addressing issues associated with a request for a Temporary Restraining Order requested by mother. The hearing of November 4, 2022 was conducted by the Honorable Superior Court Judge Andrea Flint. The process was begun on 12/12/22 with Mary D Rolison, PhD, LCSW assigned by attorney agreement to conduct the screening process. The recommendations were distributed to the attorneys and parties on 1/25/23. The screening issues concern the child's well-being with regards to parenting timeshare and concerns for the child's exposure to parental conflict and parental mental health.

12/15/22: Attorney conference call: 45 minutes - Presentation of the emergency screening issues by the attorneys, Ryan Romero / Steve Dineen office for father and Nancy Roberts attorney for mother.

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12/15/22: Document review - DV assessment review - Restraining order review

Interviews:

12/22/22: zoom video call with Father – 65 minutes 12/22/22: zoom video call with Mother - 60 minutes

Emerg scrning: Mars/Mars Case #22-F1-003144 Dept. Date: 2/9/23

1/05/23: Office visit Observation with child and mother:

1/05/23: Office visit Observation with child and father:

1/05/23: Office interview with child

1/11/23: Home visit to father's residence

1/11/23: Home visit to mother's residence -child present

1/11/23: Interview/observation with child at mothers home

1//18/23: Summary review of e mails /documentation supervised visitation reports

1/20/23: T/C Alena Chepakovich - friend of family

1/220/23: T/C Process server Tien

1/20/23: Fax Vargas elementary school

1/20/23: Document review / write recommendations/ coordinate case file

2/9/23: meet and confer with attorneys

Please note: CPS report summarizing involvement of the family regarding any allegations of child abuse and neglect were unable to be obtained due to time restraint and no access allowed to the CPS record. There is currently no belief that there is an open child abuse investigation by either parent. During the course of the screening parties each report no findings of abuse or neglect by CPS worker.

A domestic violence assessment was reviewed regarding each parent.

Summary: A confidential summary offering a rationale for the recommendations is offered as an addendum following the recommendation pages.

The time dedicated to conduct the emergency screening process including travel, interviews, documentation review recommendations and summary – has been 18 hours. (There is an anticipation of a court hearing which may entail two – three additional hours.)

The writer respectfully submits the following recommendations for the Court's consideration:

RECOMMENDED TEMPORARY ORDERS

- Legal Custody: The mother and father shall maintain temporary joint legal
 custody of the child unless there is a finding of domestic violence perpetrated by the
 father. If there is an ensuing finding of domestic violence perpetrated by the father
 which meets criteria of warranting a 3044 finding, then sole legal custody shall to be
 assigned to the mother, per best interest of the child. The child's primary residence
 shall be assigned to the mother for purposes of school placement eligibility.
- Physical custody: The mother shall maintain temporary sole physical custody of the child.
- Civil Restraining Orders: The parents acknowledge that the issue of the civil
 restraining order has been resolved and agreed to be dropped prior to the date of this
 agreement stipulation of 2/9/23.

- 4. Conflicting Orders: In the event any items in this order conflict with any valid Criminal /Civil Restraining Order, the most restrictive order (or no contact order) shall have enforcement precedence subject to the provisions of Penal Code Section 136.2 and Family Code Section 6383 (h)(2).
- 5. Access to Records: Notwithstanding any other Court Orders intended to protect the address of the mother or father if he or she is legally deemed a domestic violence victim, each parent shall have access to medical and school records pertaining to the children and shall be permitted to independently consult with any and all professionals involved with the child. Each parent shall be responsible for contacting the schools and medical providers to receive information. Both parents shall have the right to supply information to all providers.
- 6. **Timeshare:** Father shall be assigned non-professional supervised visitation each Friday afternoon to begin at the end of the school day or 2:30pm and end at 6pm pending further review and outcome of psychiatric assessment and medication evaluation. The father shall be assigned non-professional supervised visitation time of the first, third and fifth Saturdays of the month or it may be assigned to Sunday with a week's notice to the mother. The timeshare for father shall for a period of five hours if the father is in the presence of a mutually agreed upon non-professional visitation supervisor. The mother shall be assigned all time that is not designated to the father. The timeshare shall be reviewed to address the appropriateness of a step up custodial timeshare plan for the father after the father provides documentation of a completed psychiatric examination and medication evaluation as described in recommendation # 10 and #11). A follow up review hearing shall be scheduled to address modification of the timeshare and results of the psychiatric assessment.
- 7. Non-professional Supervised Visitation: The Father shall have visitation supervised by a neutral third party/or parties selected and agreed upon by both parents. The supervised visits shall take place on Friday afternoon any time between school release and 5pm and may include the first, third, and fifth Saturdays of the month for up to five hours per visit at times mutually agreeable to the providers. In the event the chosen supervising parties is/are no longer able or willing to supervise the visits, or the parents are unable to agree on a non-professional supervisor, the Father who is being supervised shall select and contact a professional supervised visitation agency chosen from a list supplied by Family Court Services within 5 days of receiving notification that the non-professional supervisor is not willing or able to supervise the visits of that parent. Father shall be responsible for the payment of the supervised visitation sessions.
- 8. Non-professional visitation supervision: The parties shall meet all the requirements of the provider. The Father shall provide the visitation supervisor with a copy of this Court order. The selected provider and Family Court staff and the emergency screener shall have the right to exchange information. The selected agency shall have the authorization to provide written information to Family Court and to the emergency

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- screener. The parents shall sign all necessary releases to permit this exchange of information.
- 9. Exchanges: The exchange of the child shall be peaceful and shall occur at school if school is in session. If school is not in session then the exchange shall occur in line of sight at the base of the stairway leading to mother's apartment or curbside should mother change residence. A third party may transport the child and assist in the exchange of the child. The parties shall not verbally interact directly with each other but may engage with their son to acknowledge Max in greeting and/or saying goodby to him. Neither party shall engage in any intimidation such as glaring, negative looks or sounds, statements or mannerism that may be perceived as imposing toward the other party.
- 10. Mental Health Evaluation for Father. Father shall participate in a mental health evaluation with any Board Certified Psychiatrist (medical doctor who specializes in the treatment of mental health issues or psychiatric intern) selected by mutual agreement between mother and father or mutual agreement of their attorneys. Father may use existing mental health coverage for this purpose. Specific issues to be assessed shall be the following: assess the presence and diagnosis of a mental disorder, the need for psychiatric medications, the presence of cognitive distortions or delusions and provide a viable treatment plan to address the father's mental health if the assessments finds a need for treatment. The father shall select the mental health evaluator that meets the criteria as noted above within two weeks from the filing of this order.
- 11. Mental Health Assessment/ Medication assessment: Father shall sign the necessary consents to permit the exchange of information between the mental health evaluator and Family Court and the emergency screener if the screener is requested to be included in the disclosure of the results. The Family Court Screener shall be authorized to release information to the mental health evaluator. The mental health evaluator may contact the screener Mary Rolison at: phone #408 513-5107 for background information as part of the mental health assessment. The mental health evaluator shall submit a summary of the results of the assessment to Family Court within 21 days of the completed appointment regimen. The father shall follow the treatment recommendations resulting from the assessment upon completion of the assessment.
- 12. Co-parent communication: Each party shall sign up for a mutual on-line website that will address the intercommunication of issues regarding the child and their schedule, daily functioning, appointments, and concerns. It is suggested that the parties sign up for services through Talking Parents or a mutually agreed upon website that can be used to support healthy communication between the parties and is recognized as a viable source to verify the integrity of communication claims.
- 13. Co-Parenting/Parallel Parenting Counseling: The parents shall commence a co-parenting/parallel counseling with a licensed or licensed supervised, mental health

professional trained to work with separated parents, domestic violence and substance abuse within 30 days of the filing of this order. Sessions shall occur at least once a month and shall be no fewer than 6 months duration. The parents shall present a copy of this order to the selected class counselor or therapist. The therapeutic goals shall be to learn behavioral changes that the parents need to make in order to reduce the exposure of the child to their conflict, to improve cooperation and communication with the other parent, learn negotiating and conflict resolution skills in order to improve decision making regarding the child, to increase trust, and to learn problem-solving skills with the other parent. The parents shall provide the counselor with a copy of this order at the outset of treatment. The parent may have separate or staggered sessions with the coparenting counselor at the discretion n or either party or the counselor.

- 14. Individual counseling for mother: The mother shall engage in individual mental health counseling at a minimum of two times per month with a licensed clinical therapist of her choice who has experience with high conflict divorce and life management skills. The counseling shall continue pending further orders of the court or for the duration of 3 months.
- 15. Timeshare and Extracurricular Activities: If the child is currently engaged in organized sports, lessens, or public activities then the expectation is that the timeshare arrangements shall be made for the child to continue to participate. The father and mother may each attend the child's activities unless there is a restraining order in place. Neither party shall engage the other party. If a parent is attempting to have the child engage in an activity which occurs during the custodial time of the other parent, then both parents shall need to agree to sign up the child for the activity and cooperate with transporting the child to and from the activity.
- 16. Medical and educational provider: Both parents shall have the right to receive information from and supply information to all of the child's medical, educational, and providers. The information provided shall be solely pertinent to the child and his well-being regarding school and/or health related issues. Both parents shall be consulted and are required to agree in writing prior to the child having non-routine medical procedures administered.
- 17. Education: The parties are requested to maintain the family and child's privacy and not involve school personnel in the civil court proceedings except in reference to timeshare and custody regarding access to the child arriving and exiting school and other school related activities where parental involvement or custodial exchanges are expected.
- 18. Phone contact/text messages: The child may initiate phone calls to either parent at his own discretion. The noncustodial parent shall be allowed a weekly phone call to the child not to exceed 15 minutes on Thursdays after school and before 7pm.

- 19. Transportation: The custodial parent shall ensure that the child is transported in a safe and lawful manner at all times while in their care. This includes, but is not limited to: having a valid driver's license, valid vehicle registration, valid vehicle insurance, use of legal child restraints, and a properly functioning vehicle; not driving under the influence of drugs and/or alcohol; and full compliance with all driving laws.
- 20. Travel with the Child: The custodial parent may travel with the child to other counties and other states, but the travelling parent shall notice the non-custodial parent of the travel itinerary prior to travel. The custodial parent shall not be allowed to travel to another country with the child unless there is an agreement or if a court order has been issued or a signed and notarized agreement has been signed by both parents indicating consent to the travel and a designated departure and return itinerary is offered to the non-traveling parent. Neither parent shall be unreasonable in rationale for their decision to withhold their permission.

CHILD ABDUCTION PREVENTION ORDERS

- 21. The parents shall contact the consulate of the Ukraine to request that no passport or visa be issued for Maxsym Mars (DOB: 11/23/15)
- 22. Both parents shall surrender the passports/visas of the child/ren to a neutral person selected by them/to the Court/to minor's counsel by (insert date) at (insert time). Neither parent shall apply for replacement passports or visas for the child/ren in the absence of a mutual written, notarized agreement between the parents or order of the Court
- 23. The parents shall notify the relevant foreign consulate or embassy, and/or the Office of Children's Issues of the Department of State (202-501-4444, 1-888-407-4747), of passport and visa restrictions, and provide the Court with proof of that notification.
- 24. In the event that the child is awarded a United States Passport then the Mother shall contact the Office of Children's Issues of the Department of State [202-501-444, 1-888-407-4747, within 24 hours of the filing of this order to register the child with the Children's Passport Issuance Alert Program. She shall provide proof of registration to FCS and to the Court within 30 days of this order being filed.
- 25. In the event a parent wishes to travel to another country, the traveling parent shall obtain an order from the other country containing terms identical to the custody and visitation order issued in the United States as a prerequisite to allowing the child to travel to that country.
- 26. The parent who has possession of these documents of the child shall turn over the following documents to his or her attorney within 24 hours of the filing of this order: child's birth certificate; child's social security card; child's U.S. and other passports child.

Conduct orders:

27. Corporal Punishment: Neither parent shall permit the child to be subjected to corporal punishment of any kind including, but not limited to spanking, hitting or striking with any instrument, hitting or striking, or any activity that could cause

- injury, bruising, or significant pain, or any physical behavior that could be construed as intimidation or the threat of violence to the children.
- 28. Interrogation: Neither parent shall permit the child to be subjected to interrogation while in their care related to hostile or invasive questioning about what happened while in the care of the other parent or questions related to disputed child custody or visitation issues.
- 29. Threats: Neither parent shall permit the child to be exposed to any threats related to custody or visitation including but not limited to, threats of loss contact with either parent or their families.
- 30. Exposure to Domestic Violence: Neither parent shall permit the child to be exposed to any incidents of domestic violence or extreme or hostile conflict including, but not limited to, derogatory comments about the other parent or the relatives or friends of the other parent, profanity, name-calling or accusations, fighting or excessive or hostile arguing or emotional abuse, or threats of self-harm.
- 31. **Alienation**: The parents shall not permit the child to be exposed to inappropriate information or comments intended to alienate them from either parent or relationship with both parents.
- 32. Mutual Respect: Both parents shall generally refer to the other parent with respect at all times. Neither parent shall denigrate or demean the character or behavior of the other parent in the presence of the child, on social media sites, or indirectly through third parties. This includes but is not limited to speaking ill of the other parent in front of the child, making sarcastic remarks about the other parent in the child's presence, sharing negative stories or character-damaging gossip about the other parent, or venting to a third party while the child is under the same roof. The parents shall speak in a positive, respectful manner to and about the other parent and their family members, and encourage any third parties to do the same, for the well-being of the child.
- 33. Recording options at exchanges: Mother shall have the right to video/audio tape telephone calls and the exchange of the child with the other parent.
- 34. **Notification of Medical Emergency**: In the event the child receives emergency medical treatment, the parent who arranges for such treatment shall notify the other parents as soon as it is practically possible of the treatment.
- 35. Notification of Address and Telephone Number: The parents shall keep each other informed of their addresses and telephone numbers, unless a protective order is in place. Each party shall inform the other of any change thereof within 48 hours, to be used solely to arrange visitation or in the event of an emergency.

- 36. Notice of Intent to Move: If either parent is intending on moving out of the county, that parent shall provide a minimum of 45 day notice of intent to change residence from the current county and offer the information of the new address to the other parent.
- 37. Violation: The parties are aware that a violation of this order may constitute a violation of California Penal Code §278 and/or §278.5 consistent with the exception provided by Section 278.7.
- 38. **Abduction:** If there has been abduction, the opposite parent may contact the District Attorney's Child Abduction Unit at (408) 792-2523. (Failure to visit is not an appropriate referral.)
- 39. Law enforcement is instructed to enforce this order.
- 40. All previous orders that are not in violation of this order shall remain in full force and effect.
- 41. The parties will contact Family Court Services (#408 534-5600) and sign up for parent orientation / mediation services within four weeks of this order being filed and accept the first available appointments.
- 42. **Review Hearing**: The Court will set a Review Hearing for this case to take place in approximately 60 90 days to be arranged by counsels in conjunction with the Court Clerk in this matter. Specific date to be presented and acknowledged as being received by each party to each other in writing.

I declare under penalty of perjury that I have completed the domestic violence training, including applicable updates, required by California Rule of Court 1257.7.

Dated: 2/9/23 Mary Day, Rollison, PhD, LCSW

THE UNDERSIGNED LITIGANT PARENTS AGREE TO THE ABOVE WRITTEN STATEMENT AND PLANS IN REGARD TO THEIR MINOR CHILDREN

FATHER:	KOSTIANTYN	MARS	118	DATE:	4/18/2023
_			f		
Attorney fo	r the father:			Date:	

MOTHER:		DATE:
Attorney for the mother	r:	Date:
Order of the Court an Court has jurisdiction [X] California is the	Id each party is order I over the minor child child/children's home assumed jurisdiction	e state. or is the home state of the child/children.
The manner in which	notice and opportuni	ty to be heard were given was:
hearing. [] Service by mail.	ces has informed the al residence is: s of America.	remotely present and had knowledge of the parties in writing that they have a right to a
Any violation of this or custody and visitation San Jose, California	rights of each party a	ril or criminal penalties of both. The child are as set forth in this order/judgment.
Judge of the Su	nerior Court	

Evidence 19



MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

22FL003144

Date of Hearing: 06/29/2023

Hearing Start Time: 10:30 AM

Hearing Type: Hearing: Other

Comments: Line 1-2

Heard By:

Flint, Andrea E

Location: Department 79

Courtroom Reporter:

No Court Reporter

Courtroom Clerk: True Parker

Court Interpreter: Court Investigator:

Future Hearings:

Parties Present:

Mars, Hanna Mars, Kostiantyn Roberts, Nancy Lee

Respondent Petitioner

Attorney **Limited Scope**

Attorney

Exhibits:

Petitioner and respondent are sworn.

All above listed parties appear via MS Teams.

Hearing held re: dispute over documents (custody recommendation of Dr. Mary Rolison) submitted to the Court by petitioner.

The Court hears from the parties.

Dr. Mary Rolison is present and sworn and is directly examined as to the recommendations in her report.

The Court finds that petitioner submitted falsified documents (fraudulent copy of Dr. Mary Rolison's recommendations) to the Court.

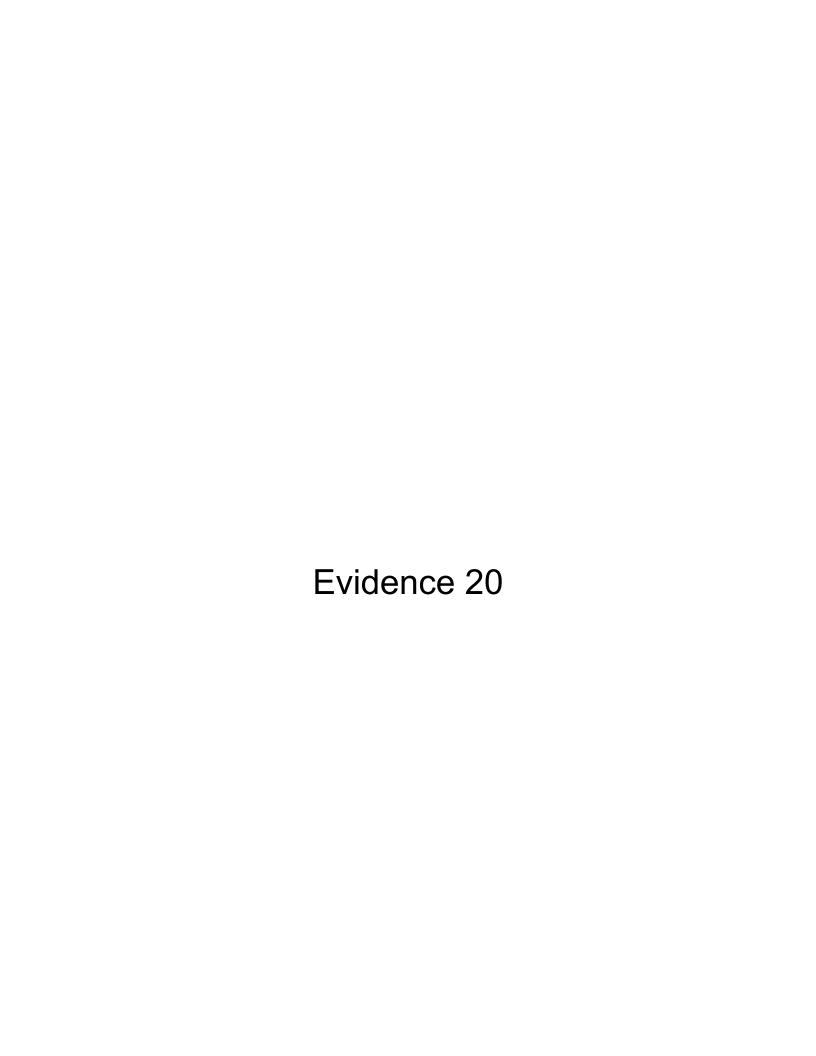
Based on the falsified documents submitted by the petitioner, the Court denies petitioner's request to modify custody/visitation.

The Court makes the following orders:

- Mother shall have sole legal and sole physical custody of the minor child.
- Father shall have professionally supervised visits with the minor child.
- Petitioner is ordered to provide all legal documents pertaining to the minor child requested by attorney Nancy Roberts directly to attorney Nancy Roberts. Attorney Nancy Roberts will be tasked with keeping these documents. Ms. Roberts is permitted to show to mother documents at her office, if requested by mother.
- All previous orders not in conflict with these orders remain in full force and effect.

No further hearing set.

Attorney Nancy Roberts to prepare and submit the order after hearing.





MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

22FL003144

Date of Hearing: 07/31/2023

Hearing Start Time: 9:00 AM

Hearing Type: Court Trial: Long Cause

Comments: Line 2

Heard By:

Flint, Andrea E

Location: Department 79

Courtroom Reporter: No Court Reporter

Courtroom Clerk: True Parker

Court Interpreter:

Court Investigator: **Future Hearings:**

Parties Present:

Mars, Hanna Mars, Kostiantyn Roberts, Nancy Lee Respondent Petitioner Attorney

Limited Scope Attorney

Exhibits:

All above listed parties appear via MS Teams.

Court certified Russian interpreter, Laura Mirzoyan, is personally present.

Petitioner requests a continuance due to medical emergency for his mother; petitioner is directed to provide proof of medical emergency for his mother by 1:30 pm today. If no proof is provided, the hearing shall proceed.

Matter is passed to the afternoon calendar at 1:30 pm.

Matter is recalled at 1:33 pm.

All above listed parties appear via MS Teams.

Respondent is assisted by Court certified Russian interpreter, Laura Mirzoyani; interpreter is personally present.

Petitioner and respondent are sworn.

No proof of medical emergency provided by petitioner.

Petitioner's request for a continuance is denied.

Hearing held re: date of separation.

The Court finds that the date of separation is September 15, 2022.

Hearing held re: vehicles.

The VW Tiguan vehicle is confirmed to respondent as her sole and separate property, without off-set. The Hyundai Tuscon vehicle is confirmed to petitioner as his sole and separate property, without off-set. Respondent is ordered to cooperate with petitioner; petitioner is responsible for providing all required documents to the DMV.

The Peugot vehicle (in Ukrain) is confirmed to respondent as her sole and separate property, without off-set.

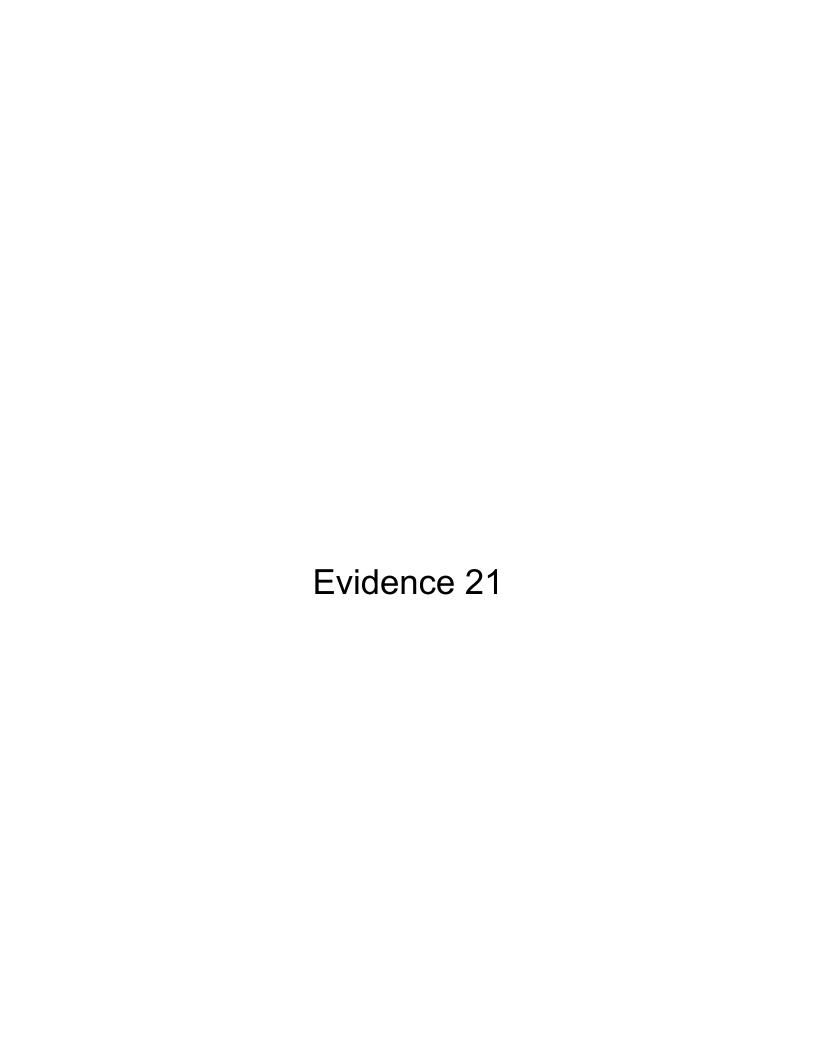
Hearing held re: Robinhood stock account.

The Court orders 50% of the Robinhood stock to respondent; to occur within 30 days of today.

Printed: 7/31/2023

07/31/2023 Court Trial: Long Cause - 22FL003144

Page 1 of 2





MINUTE ORDER

Kostiantyn Mars vs Hanna Mars

22FL003144

Date of Hearing: 08/01/2023

Hearing Start Time: 1:30 PM

Hearing Type: OSC: Contempt

Comments: Line 5-6

Heard By:

Flint, Andrea E

Location: Department 79

Courtroom Reporter: Nina Grimler

Courtroom Clerk: True Parker

Court Interpreter: Court Investigator:

Parties Present:

Future Hearings:

Mars, Hanna Mars, Kostiantyn Roberts, Nancy Lee

Respondent Petitioner Attorney **Limited Scope**

Attorney

Exhibits:

All above listed parties appear via MS Teams.

Case is called re: petitioner's motion to disqualify opposing counsel and petitioner's request for OSC re: Contempt.

The Court hears from the parties.

Hearing held re: petitioner's request for OSC re: Contempt.

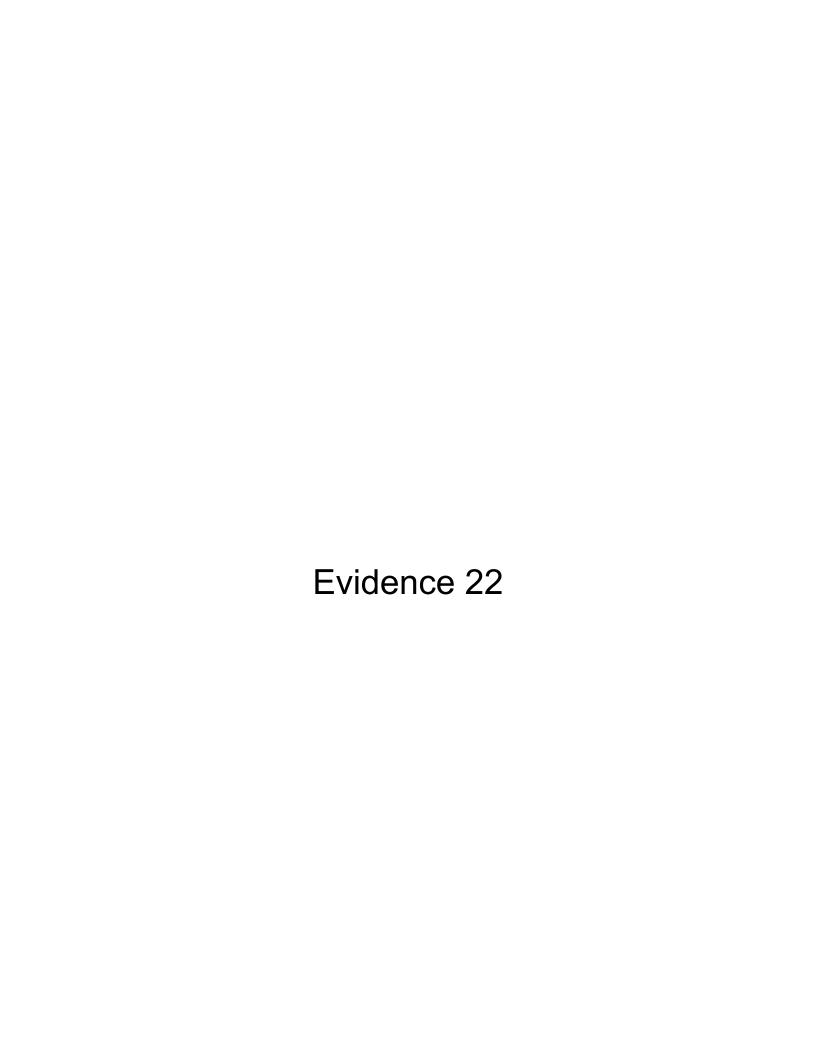
The Court does discharge the contempt; OSC re: contempt is dismissed without prejudice, reasons as stated on the record.

Petitioner's request for sanctions is denied.

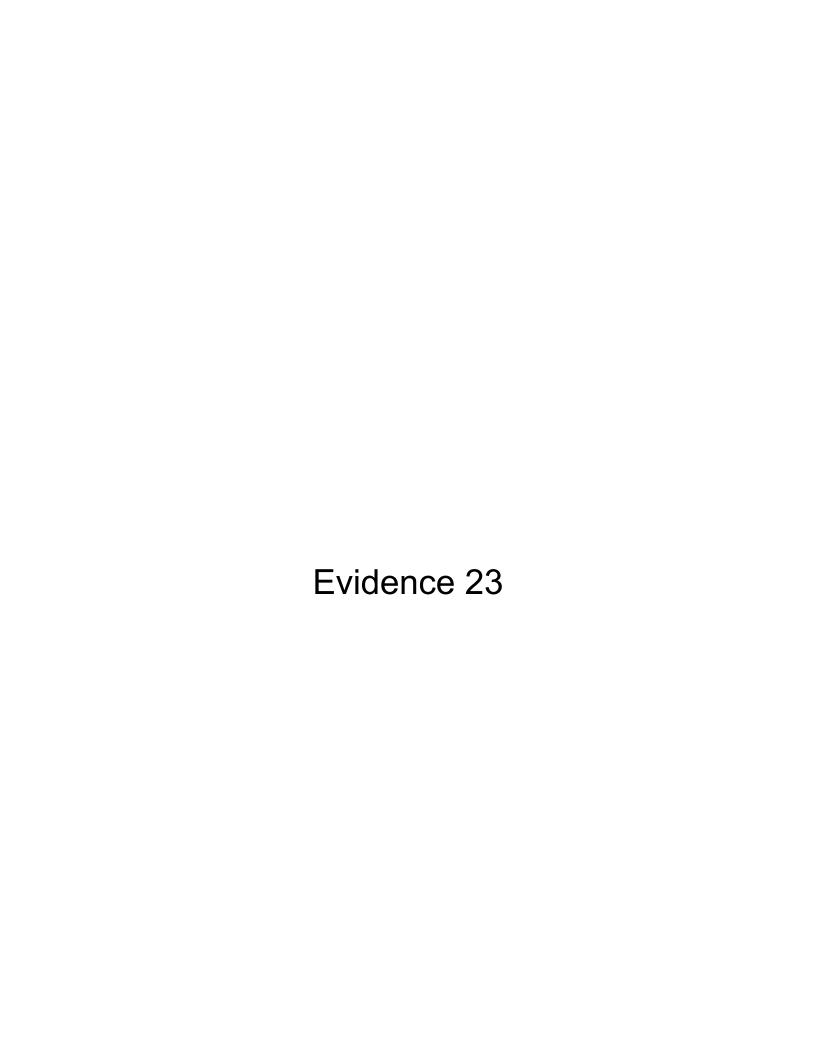
Hearing held re: petitioner's motion to disqualify opposing counsel.

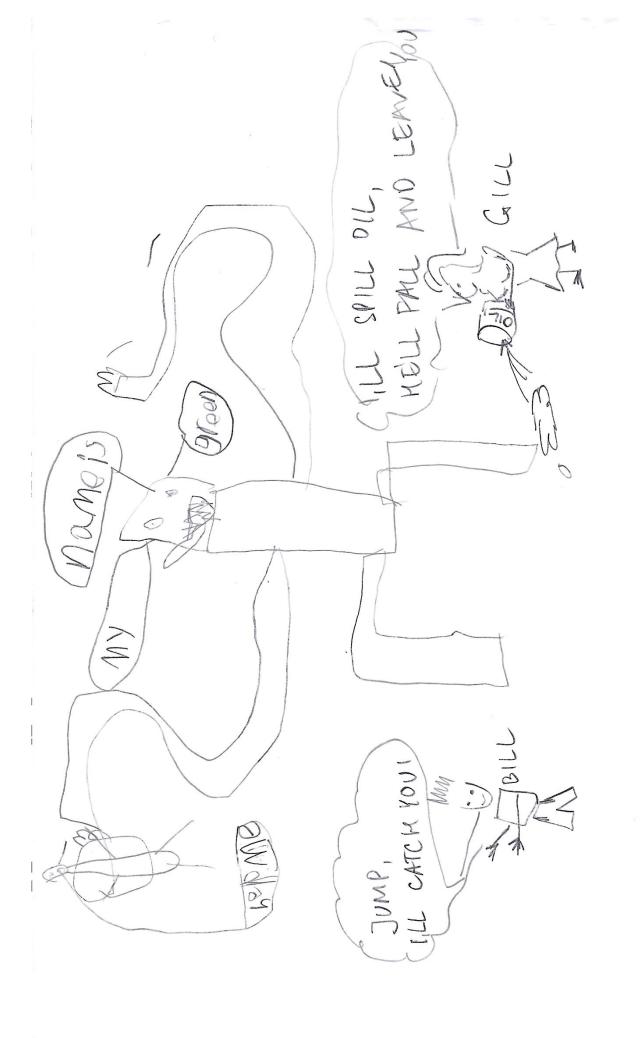
Petitioner's motion to disqualify opposing counsel is denied.

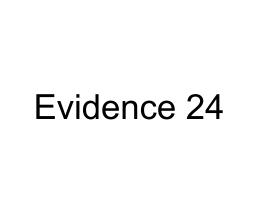
Attorney Nancy Robert to prepare the order; attorney Nancy Robert's request to direct submit the order is denied.

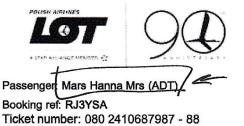












POLSKIE LINIE LOTNICZE LOT S.A.

ul. 17 STYCZNIA 43 02-146 WARSZAWA

Issuing office:

LOT.COM, WARSAW, POLAND Telephone: +1 212 789 0970

Date: 16Oct2019

ELECTRONIC TICKET RECEIPT

At check-in, please show a picture identification and the document you gave for reference at reservation time.

From	То	Flight	Departure	Arrival	
LOS ANGELES LOS ANGELES INTL Terminal: B	WARSAW FREDERIC CHOPIN	LO22	16:20 24Dec2019	12:50 25Dec2019	
Class: W Seat: 24A Baggage (4): 1PC Fare basis: WLATAN3C	Operated by: LOT POLISH AIRLINES Marketed by: LOT POLISH AIRLINES Booking status (1): OK	ţ	FROM	NVB (2): 24Dec2019 NVA (3): 24Dec2019 Duration: 11:30	
WARSAW FREDERIC CHOPIN	KYIV BORYSPIL INTL Terminal: D	LO753	14:40 25Dec2019	17:10 25Dec2019	
Class: W Seat: 27A Baggage (4): 1PC Fare basis: WLATAN3C	Operated by: LOT POLISH AIRLINES Marketed by: LOT POLISH AIRLINES Booking status (1): OK			NVB (2): 25Dec2019 NVA (3): 25Dec2019 Duration: 01:30	
KYIV ZHULIANY INTL	WARSAW FREDERIC CHOPIN	LO750	08:40 01Feb2020	09:15 01Feb2020	
Class: L Seat: Baggage (4): 1PC Fare basis: LLPRO178	Operated by: LOT POLISH AIRLINES Marketed by: LOT POLISH AIRLINES Booking status (1): OK			NVB (2): 01Feb2020 NVA (3): 01Feb2020 Duration: 01:35	
WARSAW FREDERIC CHOPIN	LOS ANGELES LOS ANGELES INTL Terminal: B	LO21	11:00 01Feb2020	14:25 01Feb2020	
Class: L	Operated by: LOT POLISH AIRLINES	\ 1			
		76			
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				1 mong	H



POLSKIE LINIE LOTNICZE LOT S.A.

ul. KOMITETU OBRONY ROBOTNIKÓW 43 02-146 WARSZAWA

Passenger: Mars Hanna Mrs (ADT)

Booking ref: RJ3YSA

Ticket number: 080 2411559431

Issuing office:

CALL CENTER, WARSAW, WARSAW

Telephone: +48 225777755

Date: 14Mar2020

ELECTRONIC TICKET RECEIPT

At check-in, please show a picture identification and the document you gave for reference at reservation time.

From	То	Flight	Departure	Arrival
KYIV BORYSPIL INTL Terminal: D	WARSAW FREDERIC CHOPIN	LO752	14:50 15Jun2020	15:25 15Jun2020
Class: W Baggage (4): 1PC Fare basis: WLATAN3C	Operated by: LOT POLISH AIRLINES Marketed by: LOT POLISH AIRLINES Booking status (1): OK			NVA (3): 20Apr2021 Duration: 01:35
WARSAW FREDERIC CHOPIN	LOS ANGELES LOS ANGELES INTL Terminal: B	LO23	16:45 ,15Jun2020	20:00 15Jun2020
Class: W	Operated by: LOT POLISH AIRLINES Marketed by: LOT POLISH AIRLINES		NEW DA	AE W 6 MONTHS
Baggage (4): 1PC Fare basis: WLATAN3C	Booking status (1): OK			NVA (3): 20Apr2021 Duration: 12:15

(1) OK = Confirmed (2) NVB = Not valid before (3) NVA = Not valid after (4) Each passenger can check in a specific amount of baggage at no extra cost as indicated above in the column baggage.

Baggage Policy

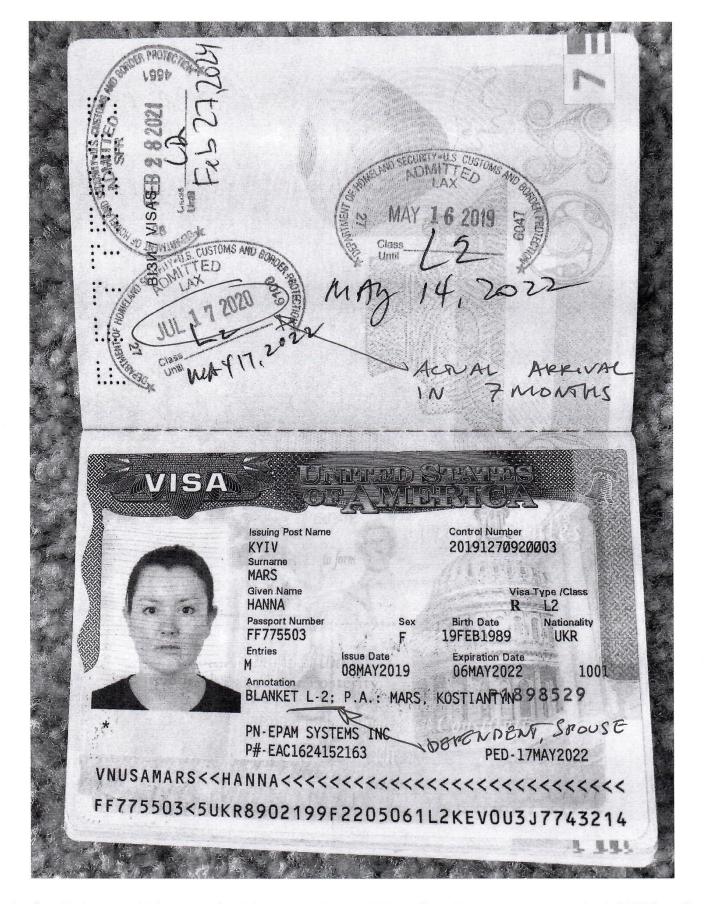
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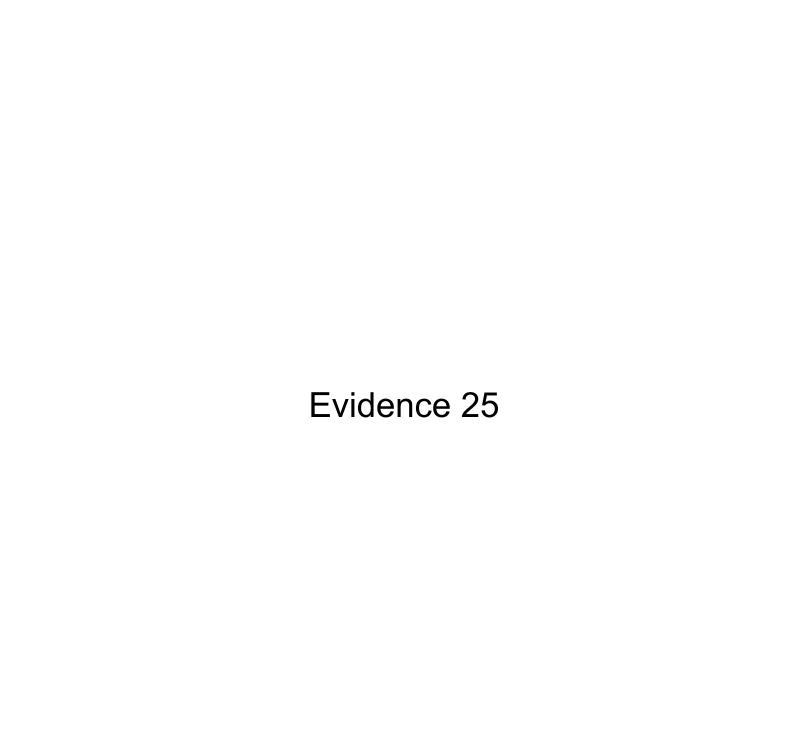
1st Checked Bag:

Free of Charge

PRE PAID BAG UPTO23KG AND158CM OR GOLF EQUIPMENT OR

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CONSTANTINE_MARS

Posts

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constantine_mars San Francisco, California













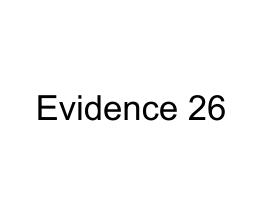
24 likes

constantine_mars Max officially survived The First Day of The First Grade **★ ★** ■

#firstgrade #backtoschool #school #sunnyvale #sf #california #usa

View all 3 comments

August 17, 2022





Constantine Mars < constantinemars 1@gmail.com

Regarding case # 22FL003144 Mars emergency screening RX after meet and confer agreement 2/9/23

nancy roberts <nirobertslaw@sbcglobal.net>

Wed, Apr 19, 2023 at 1:35 PN

To: Constantine Mars <constantinemars1@gmail.com>, Department 79 <department79@scscourt.org> Co: Mary Rolison <drmaryrolison@gmail.com>, Anna Mars <annamars2017@gmail.com>

To clarify: the post-emergency screening hearing will be necessary. Mr. Mars is confusing my request for Dr. Rolison's testimony at the post-emergency screening hearing with the ex parte hearing that he set. I am still awaiting another witnesses availability in order to get back to Dr. Rolison and the court as to dates.

A continuation of the ex parte hearing that Mr. Mars set for Friday, April 21st must be continued as (1) my office was not timely served, and (2) Ms. Mars has surgery on Thursday and cannot appear. I have several times provided Mr. Mars with dates on which I am not available.

Due to the increase in Mr. Mars' delusional behavior and the fact that the February 9, 2023 stipulation still contains inaccuracies that were rectified and agreed upon by counsel prior to Mr. Mars' former attorney's withdrawal, the post-emergency screening hearing will be necessary. Mr. Mars was never presented with a stipulation that allowed unfettered travel with the minor child and that provision remained the same throughout the modification of the stipulation. Again, this is part of Mr. Mars' delusional disorder. Mr. Mars submitted a fraudulent copy of Dr. Rolison's recommendation to the court with his ex parte motion. Ms. Mars has not yet moved to another less expensive apartment in the same area in which she currently resides and it is Mr. Mars who will not provide his residential address. Mr. Mars is not visiting the minor child because his chosen professional visitation supervisor refused to work any longer with Mr. Mars due to his failure to follow rules and Mr. Mars has failed to obtain a new professional supervisor. Mr. Mars does not have a court order to communicate with the minor child outside of supervised visits, but nonetheless sent highly inappropriate text messages to the minor.

In summary, the April 21, 2023 hearing must be continued and we will be scheduling a postemergency screening hearing at which Dr. Rolison will testify.

Nancy Roberts

Nancy L. Roberts, Esq. 155 E. Campbell Ave., #255, Campbell, CA 95008 Telephone: (408) 871-0775 http://www.nancy-roberts-law.com/

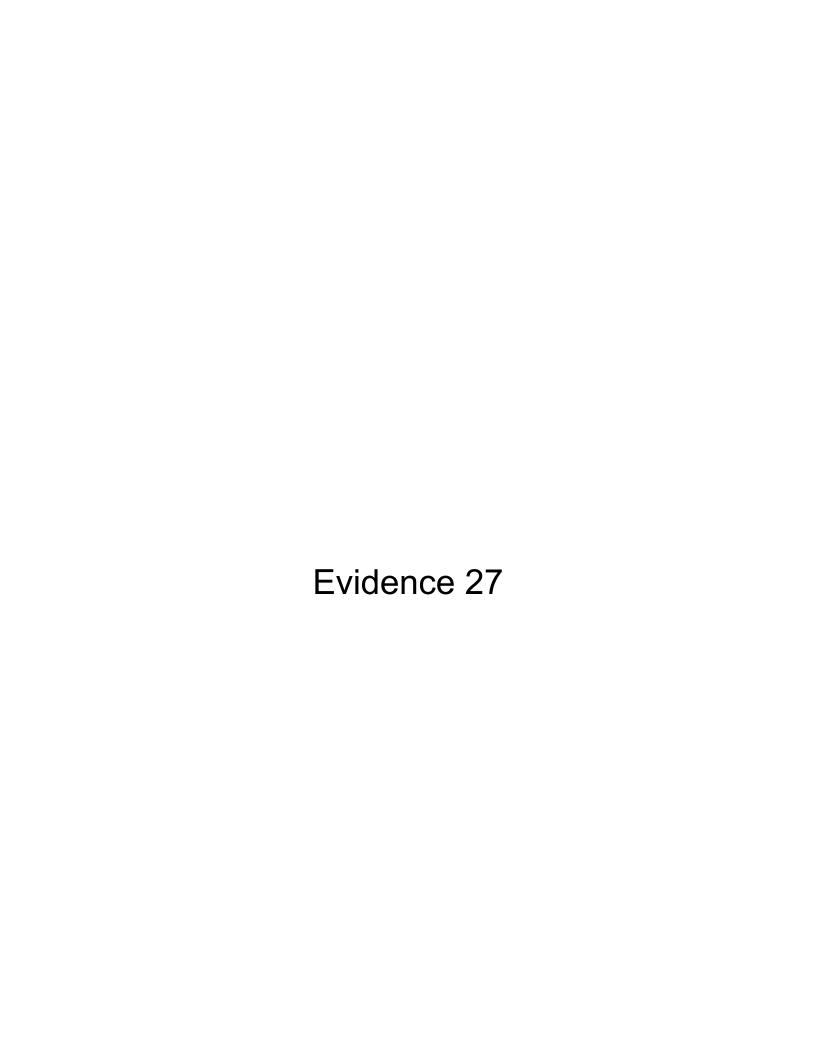
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---- Forwarded Message -----

From: Constantine Mars <constantinemars1@gmail.com>

To: Mary Rolison drmaryrolison@gmail.com

Cc: nancy roberts <nlrobertslaw@sbcglobal.net>; "department79@scscourt.org" <department79@scscourt.org> Sent: Tuesday, April 18, 2023 at 04:51:19 PM PDT





W 12020, 10.00 1 191

Constantine Mars <constantinemars1@gmail.com>

Kostiantyn Mars Supervised Visits

nancy roberts <nlrobertslaw@sbcglobal.net>
To: Lorraine Ruiz <ruiz515115@aol.com>

Mon, May 8, 2023 at 4:29 PM

Cc: Constantine Mars <constantinemars1@gmail.com>

Dear Ms. Ruiz.

I reviewed the note you sent to the court. I know that you are new to this case and I have no idea what Mr. Mars has stated to you. However, I am writing to verify that indeed the emergency screening recommendations of Dr. Rolison do recommend a mental health evaluation of Mr. Mars by a qualified psychiatrist. Mr. Mars has delusions regarding his wife's kidnapping and killing of Maksym in the Ukraine and in the past has continually discussed these delusions with Maksym during supervised visits which is why, in part, the former supervisor terminated visits with Mr. Mars. Mr. Mars compulsively discusses this kidnapping with Maksym, has inappropriately told him his grandparents will kidnap him, and has told Maksym that he will be killed in the Ukraine. This is why Ms. Mars was very concerned about your policy if this behavior continued during Mr. Mars visits with you supervising. It appears that Mr. Mars cannot regulate his behavior and has also spent visitation time with Maksym in the past telling Maksym that he will "have a new mother," hence Maksym's other comments to his father about his marriage and having other children. All of this is well documented in the prior supervised visitation reports.

I can also assure you that Maksym heard over and over again about the "termination" of the visit when the former supervisor would tell Mr. Mars that the visit was terminated or terminating early due to his behavior. Ms. Mars does not use that term and her English is limited.

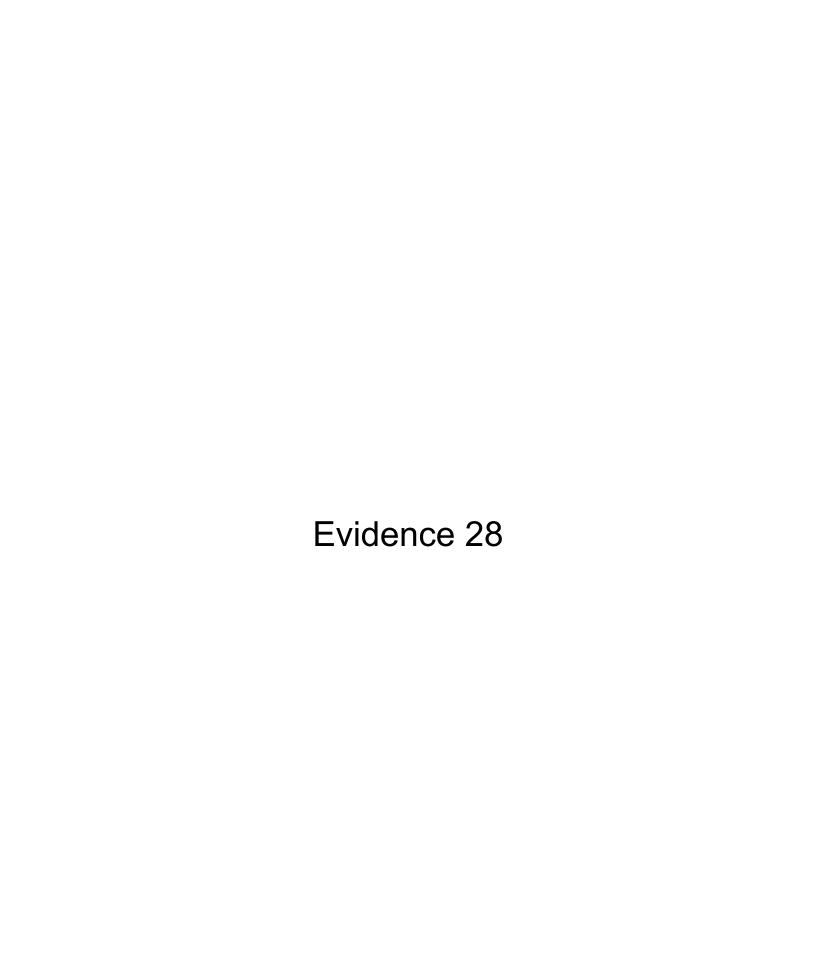
Ms. Mars has also informed me that either her English was not good enough for you to understand, or you did not hear her, but she said at the last visit that Maksym had a stomach ache the night before and that was why he could not have a coke at that visit.

I would be happy to share any number of the past visitation reports showing the reason why Ms. Mars is concerned and why Maksym resorts to telling his father that he may not "talk about his mother." I am sure in time that you will see for yourself.

Nancy Roberts Attorney for Anna Mars

Nancy L. Roberts, Esq. 155 E. Campbell Ave., #255, Campbell, CA 95008 Telephone: (408) 871-0775 http://www.nancy-roberts-law.com/

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PROFESSIONAL SUPERVISED VISITATION REPORT MAY 4, 2022

Case Number: 22FL003144

Provider: LORRAINE RUIZ, PROFESSIONAL SUPERVISED VISITATION/EXCHANGE

Custodial Party (MOM): HANNA MARS

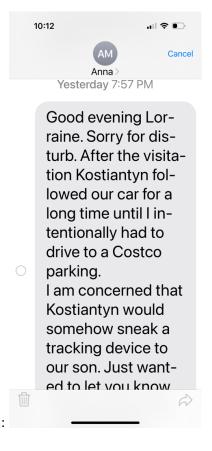
Non-Custodial Party (DAD): KOSTIANTYN MARS

Judge: HONORABLE ANDREA E. FLINT

Lorraine Ruiz Provider Professional Supervised Visitation: The public policy of the State of California is to protect the best interests of children whose parents have a custody or visitation matter within family courts. Professional supervised visitation can be difficult and uncomfortable at times. Often times there are hurt and angry feelings toward the other parent, and it seems impossible to have a positive attitude about professional supervised visitation. In compliance with Family Code 3200.5, both Parties participated in an Intake/Orientation with Lorraine Ruiz, provider of Lorraine Ruiz Professional Supervised Visitation/Exchange. Parties were informed of the terms and conditions of supervised visitation prior to signing a written contract. In compliance with STIPULATION AND ORDER dated 1/25/2023, NCP(DAD) shall have professionally supervised visitation with the minor child up to three times per week for two hours each. TEMPORARY ORDERS Ex Parte scheduled 4/21/20223 rescheduled to 5/10/2023. During Intake/Orientation, Mom mentioned several times that she is learning English. Mother, Father and child are all limited English Learners. During Mom's Intake Mom told me that the previous Supervisors wrote a report and canceled Dad's visitations due to Dad's outbursts. Mom asked me "what happen if Dad say things about me?" Supervisor: "If Dad violates the Court Order, I will terminate the Visitation." As a Master teacher of English Language Development for Santa Clara County, I find it highly unusual that a child in First Grade would use the expression "We terminate Visitation." Safety Concerns: During the initial Intake and Orientation, both parents shared their safety concerns, per contract and Rules of Court, both parties were advised of maintenance and disclosure of records, including confidentiality policies.

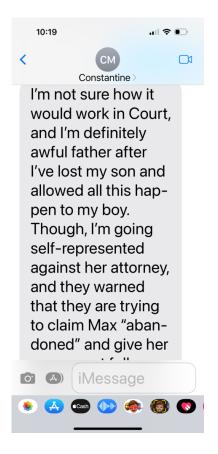
CONCERNS MOM-CP: Mom said Dr. Rollins said Dad has a mental illness. Mom shared with Supervisor: "Dad said to Max: "First remember Mom abuse you go to teacher tell teacher to file Restraining Order against Mom. "Your Mom don't want to see you" Your Mom want to go to Ukraine to kill you."

TEXT MOM: 7:57PM 5/3/2023



CONCERNS DAD-NCP: Dad is concerned that Mom wants to take Max away from Dad.

TEXT DAD: 10:19PM 5/3/2023



THURSDAY 5/3/23 SUPERVISED VISITATION 3:30-4:30PM

PROCEDURES: Good morning,

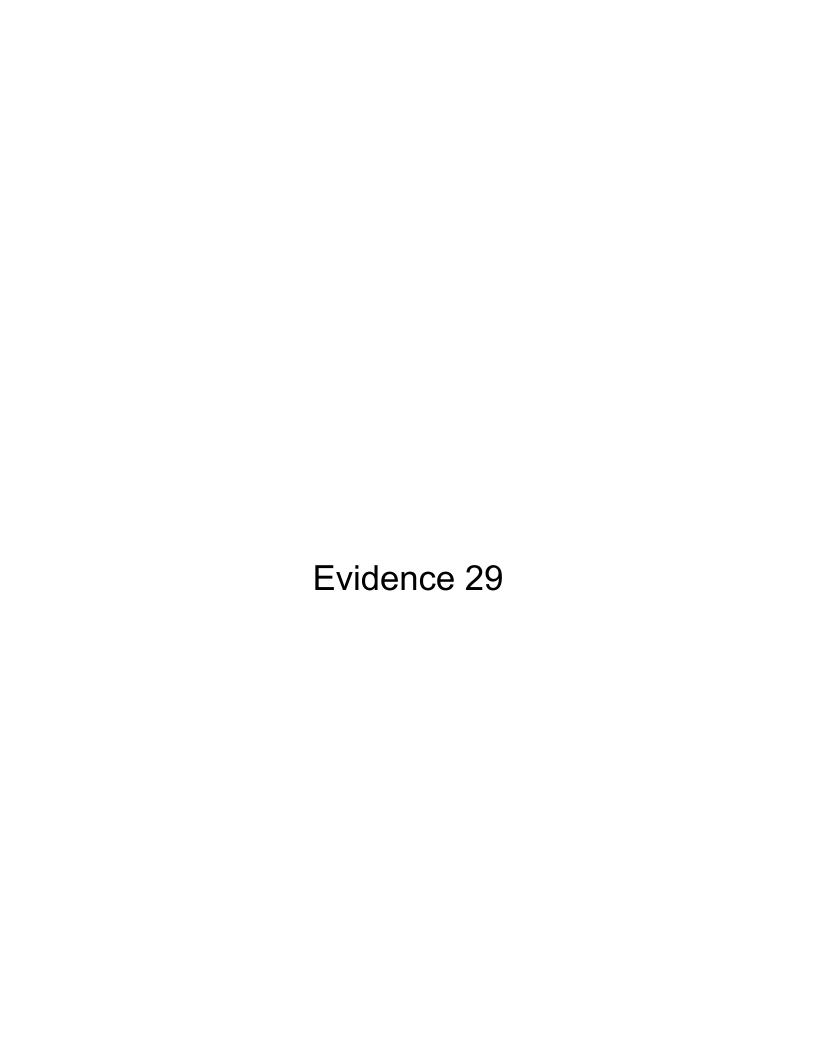
Gentle Reminder: Professional Supervised Visitation Thursday 5/4 Maywood Park 3:30-4:30pm. Dad will arrive by 3:30 pm text Supervisor and wait in vehicle for Supervisors call. Mom to arrive by 3:15 and park at Maywood Park parking lot 3330 Pruneridge Ave. Santa Clara. Mom will Text supervisor at drop off and pick up. Mom will wait in vehicle until Supervisor notifies Mom. Supervisor will meet Mom and child. Once Mom drives off, Supervisor will call Dad to advise him that Supervisor and child are walking to meet Dad. Dad may exit his vehicle and start walking through path where Park and School meet. At 4:30pm Supervisor and child will walk Dad to his car to say goodbye. Once Dad leaves, Supervisor will call Mom and walk with child to Maywood Park Parking Lot. Mom will pick up child no later than 4:45pm.

CP (MOM) FACILITATES DAD'S PARENTING TIME: Mom arrives on time with child. Child was dressed in weather appropriate clothing. Mom sent child with Backpack and bottle of water. Mom requested that child does not drink coca cola because he is only allowed one coke per week. Mom gave him Coca Cola last night and child had difficulty sleeping.



DAD-NCP Supervisor calls Dad informing Dad that child is with Supervisor and Mom has just driven out of parking lot. Dad: I will be there at 3:30 for Court Order." Child to Supervisor: "I happy to see Dad. What time is Dad come? Dad late, we terminate visit. When Dad come? We terminate Visit. Dad arrives child runs up to Dad. Dad: "I miss you, I love you." Child: "Why you don't see me?" Dad: "I want to see you." Child: "Where I live?" Dad: "I don't know where you live, you live with Mommy." Child: "You don't say Mommy, I terminate visit. You kidnap me." Dad: "How I kidnap you, I don't know where you live." Child: "We terminate visit." Child: I don't want you to get divorce and have more children and forget me." Dad: Even if I get married and have more children, I never ever forget you, I love you, you my son. I have Coke and crepe for you" "Supervisor: "Mom requested that Max drink water only, he is allowed one Coke per week, he had one last night and had a hard time sleeping." Child: I sleep at 5:00 and wake up and not sleep more." Dad: "I bring soccer ball, do you want to play soccer?" Child: "I want play tag." Child starts running, Dad chases child and tags him. Child and Dad laugh a lot during tag. Child notices a man on the roof of the school and stops running. Child: "Why that man on roof?" Dad: "Maybe he repair roof." Child: "How he climb on roof?" Dad: "He climb on other side." Child tags Dad and starts to run again. Child and Dad laugh and run. They both walk back to the table for water and snacks. Child: I have 150 fans of Roblox (Roblox is an online game that allows users to program games and play games created by other users.) Dad: "How you know 150 people? Do you play Minecraft too? Child: I don't know every people, I play with my friends. Dad: What do you make? Do you make Lamborghini cars? Child: "No, I make tanks so I shoot everyone and kill. I like tanks so I kill people and shoot at trees." Child: "Can I drink Coke?" Dad: "No, your Mother says no." Child: You talk about my mom we terminate visit." Supervisor: "We have three minutes left." Child: "When I see you?" Dad: "I see you next week. Give me hug." Child hugs Dad. Dad: "I love you. Child asks if he can take another can of Coke home and another crepe. Dad: I buy them all for you. Dad walks back to Eisenhower School. Supervisor calls Mom. Child and Supervisor walk back to Maywood Park Parking Lot. Mom hugs child and both say goodbye to Supervisor. Later on, that evening Mom sends a Text message to Supervisor regarding Dad following them.





Sterling Nakamura MD 2500 Hospital Drive Bld #3 Mountain View, CA 94040

Kostiantyn Mars

Patient ID: 123681174 DOB: 04/20/1987 Sex: M Account No.:

Encounter ID: 273679994 Encounter Date: 02/02/2023

Encounter Type: Office Visit

SUBJECTIVE:

Chief Complaint: Start: 11:02 pm

Stop: 11:55 pm

Face to face video Conference held with patient at home.

Verbal consent obtained in session.

Greater than 50% of the time was spent on counseling.

CC: stress

History Of Present

HISTORY OF PRESENT ILLNESS:

Illness:

The patient is a 35 yo Ukranian Male with no psychiatric history

Patient recently separated and dealing with custody issues with son. He was not sleeping well for awhile but

this is improving.

Some transient low mood following separation but recovered.

Sleep; 7-8 hours interest; "pretty good" guilt; some guilt

energy; priorly low when not sleeping but improving

concentration; ok appetite; ok

psychomotor agitation; ok

Anxiety; ok

Symptoms of Panic; no Symptoms of mania; no Symptoms of psychosis; no

Stressor: separation from wife, custody issues, grandmother in hospice

PAST MEDICAL HISTORY: h.o. elevated cholesterol

SEIZURE HISTORY: no

EATING DISORDER HISTORY: no SLEEP APNEA HISTORY: no

ASTHMA: no

PAST PSYCHIATRIC HISTORY:

Prior psychiatrist; no Prior diagnosis; no

Prior psychiatric hospitalizations; no History of suicide attempts; no History of suicidal ideation; no

SUBSTANCE ABUSE HISTORY:

Current alcohol use; socially on holidays. 2-3 drinks a month

Sterling Nakamura MD 2500 Hospital Drive Bld #3 Mountain View, CA 94040

Kostiantyn Mars

Patient ID: 123681174

DOB: 04/20/1987

Sex: M Account No.:

Encounter ID: 273679994

Encounter Date: 02/02/2023

Encounter Type: Office Visit

Past alcohol history; no History of AA tx; no

drugs; no tobacco; no

caffeine; 1 cup coffee a day

SOCIAL HX:

Lives San Jose alone in a 1 bedroom.

Children: 7 yo son Work: software engineer Wife has temporary full custody

FH: None

2 1022

MEDICATION MANAGEMENT:

Risks and Benefits of medications discussed.

PSYCHOTHERAPY: Supportive therapy provided in session.

ROS: 7 point review of systems negative.

Current Medications:

MEDS:

Atorvastatin

substance abuse hx:

MENTAL STATUS EXAM:

GEN: A&O x 3 EC: good TP: linear

TC: no Suicidal ideation, no homicidal ideation, no AVH

Mood: euthymic
Affect: mood congruent
Insight: good

Insight: good
Judgment: good
Abstraction: good

PAST PSYCH MED TRIALS:

Valium -used for 2 weeks by PMD for sleep SE- none

ALLERGIES: NKDA

PATIENT INFO

Sterling Nakamura MD 2500 Hospital Drive Bld #3 Mountain View, CA 94040

Kostiantyn Mars

Patient ID: 123681174 DOB: 04/20/1987 Sex: M Account No.:

Encounter ID: 273679994 Encounter Date: 02/02/2023

Encounter Type: Office Visit

Emergency contact: Serhii (friend) 510-680-6124

INS: Cigna

PMD: Matthew Felix PA, 408-791-1210 Instant UC

Therapist: none

Referred from: Matthew Felix PA, 408-791-1210 Instant UC

ASSESSMENT:

Diagnosis:

ICD-10 Codes:

1)F4320; Adjustment disorder, unspecified

PLAN:

Procedures:

1) 90792; Psychiatric Evaluation

Care Plan: ASSESSMENT: Adjustment do

ASSESSMENT: Adjustment do f43.20. some transient emotional symptoms within 3 months of the stressor of

separation. This has resolved with distance from the stressor. No apparent psychiatric illness by this

evaluation.

CARE COORDINATION: pmd following labs, updates faxed to office #

DIAGNOSIS:

AXIS I: Adjustment do

AXIS II: none AXIS III: see PMH AXIS IV: moderate

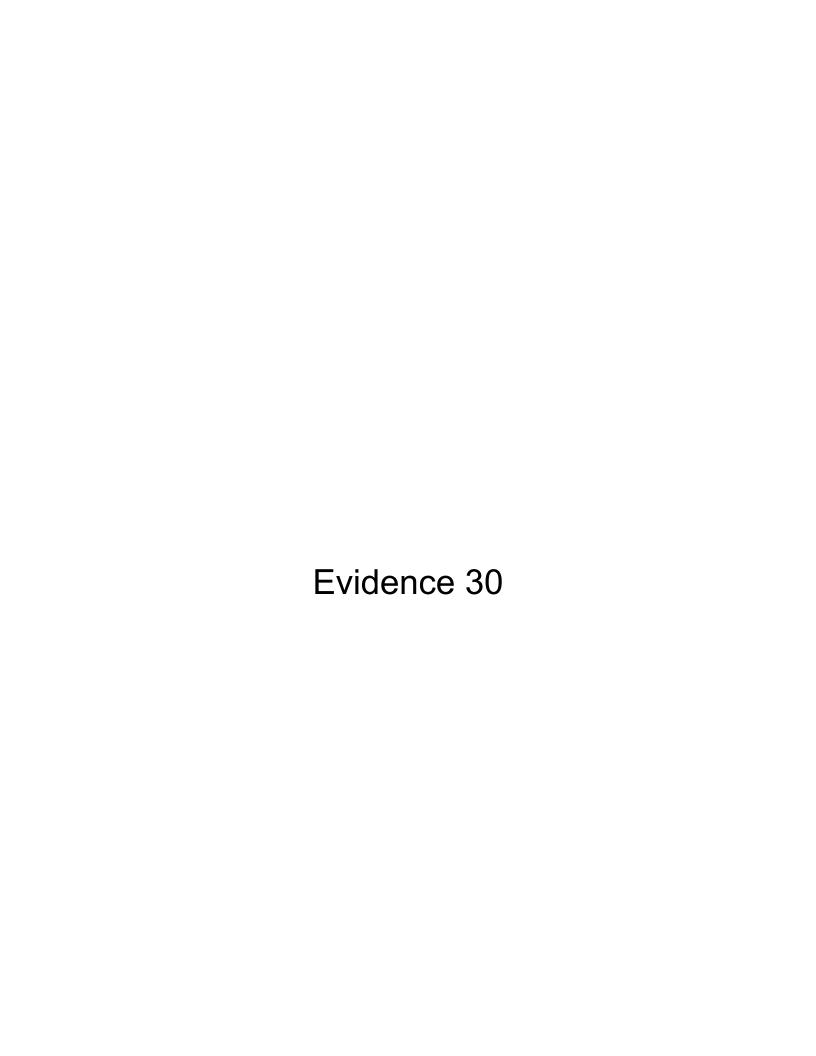
AXIS V: 90

PLAN:

- PROBLEM LIST: custody issues
- no psychiatric medications required
- no therapy required at this time.
- no cognitive distortions evident
- no followup treatment required but can be scheduled if needed.

[Electronically Signed] - Date: 2/2/2023 12:04:02 PM

[Provider]: Sterling Nakamura, MD



Alena Chepakovich 1055 Escalon Ave, Apt 306 Sunnyvale, CA, 94085 Phone: 778-628-0289 Email: lenok1618@gmail.com

Affidavit

My name is Alena Chepakovich and I have been residing at 1055 Escalon Ave, Apt 306, Sunnyvale, CA, 94085 since February 2021. I have been neighbors with and have known Kostiantyn Mars and Hanna Mars for approximately one year. I met them several times at friends' parties and family gatherings and I can state that they were friendly to each other and attentive to their son, Max.

I remember that Hanna complained multiple times about her current living situation as they lived together with Kostiantyn's grandmother who is 94 years old, although Kostiantyn took full care of her while working and providing for the family. On two occasions with me and other people present, Hanna expressed her strong dissatisfaction with Kostiantyn's grandmother situation while revealing unnecessary details about the old women's condition that were quite disrespectful and inappropriate in a discussion in a group of people some of whom she met for the first time. On one occasion Hanna was also enquiring about a possibility of placing Kostiantyn's grandmother to a senior living facility. It was obvious that she did not want to live together with Kostiantyn's grandmother.

Hanna also mentioned that she wanted to go back to Ukraine, which (considering the ongoing war there) is dangerous for both her and her son. In my opinion, Hanna is quite depressed and stressed out about her current situation and I feel that she might want to seek professional psychologist help.

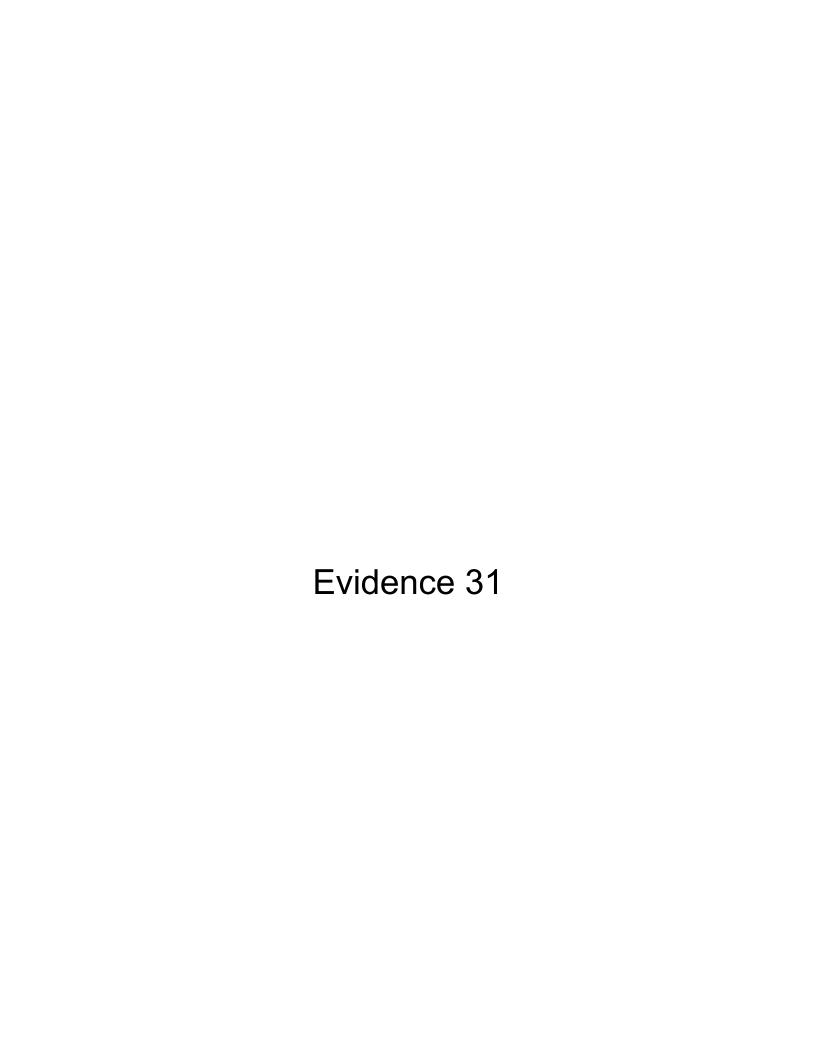
I feel that this whole situation with the family splitting up could have been easily avoided if both parties tried to be more considerate towards the needs of each other. They have a wonderful son Max, who deserves to have both loving parents. I think that for the sake of their son the parties should reconcile and find an arrangement suitable for everybody.

I hereby declare that whatever has been stated above is correct and true to my knowledge.

Alena Chepakovich

E. Tenorcoleur

September 27, 2022



Aliaksei Dziashko 205 N Bayview Ave, apt 6 Sunnyvale, CA, 94086 aliaksei dziashko@epam.com +16503913099

To whom it may concern,

Kostiantyn Mars works with EPAM Systems as a Lead Software Engineer and reports to me since May 2021.

As an employee, Kostiantyn Mars always demonstrated great performance on projects, being proactive and highly organized, focused on business goals, being a great communicator, respectful and supportive of colleagues. In my team, he manages a unit of 5 people, and all subordinates had provided positive feedback about working with Kostiantyn.

I've always put a premium on building good relationships and developing team spirit among my team members and Kostiantyn Mars never failed to deliver. He also helped us to start new initiatives for building the engineering community and helping colleagues to grow professionally and establish good in-person networking. Kostiantyn was supportive and creative while working on this initiative and inspired our colleagues to contribute even more, become speakers and co-organizers, and establish better relationships not only as professionals, but also as people.

Kostiantyn is a delight to work with and I wouldn't hesitate to recommend him as a great engineer and team player.

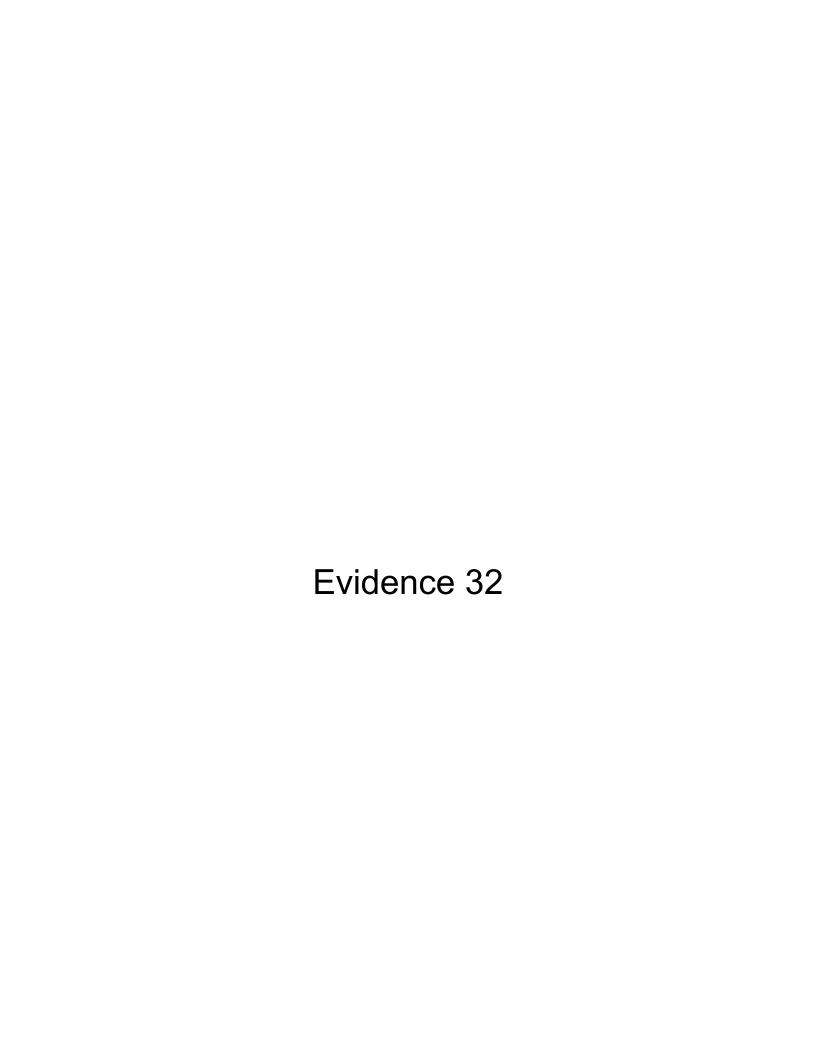
09/28/2022

Respectfully,

Aliaksei Dziashko

Engineering Manager

EPAM Systems, inc.



Alexander Pirozhenko 970 Corte Madera ave, apt 606 Sunnyvale CA, 94085 Cell: (631) 408-5644

September 30, 2022

To whom it may concern:

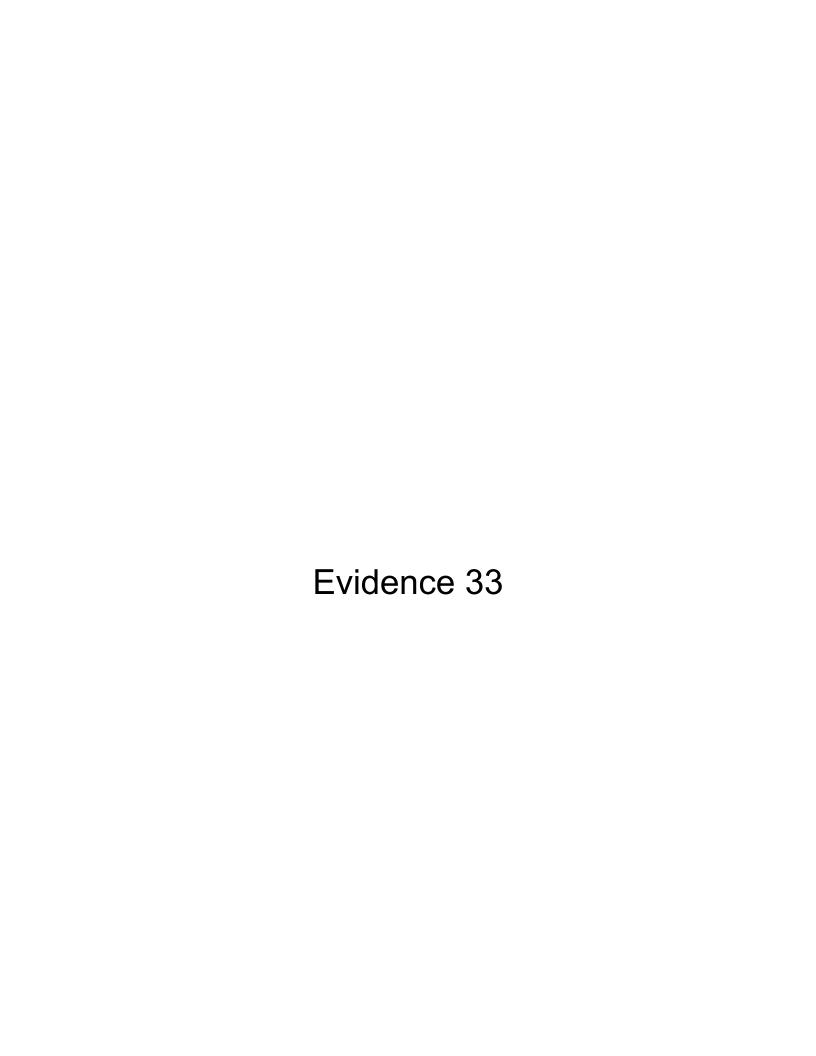
It is an honor to write this statement in support of Mr. Mars gaining custody over his son, Maxim

As a neighbor, I've known Mr. and Mrs. Mars for two years. In that time, our families have quickly become friends, and we have spent time together on numerous occasions. Mr. Mars has always struck me as an intelligent, thoughtful person of good character. I firmly believe that he is a great father figure for his son, Max.

As a friend of the family, I've witnessed a strong bond between Mr. Mars and his son, the kind that fathers and sons should form. We've participated in multiple activities together, and every time I saw Mr. Mars being supportive and encouraging towards Max. Being a professional software engineer and a tech enthusiast, Mr. Mars has invested a lot of effort to spark and develop Max's interest in science and technology. In all our interactions the two of them have always acted as loving and caring father and child.

It is my hope that you take note of this statement of recommendation for Mr. Mars to have custody of his son. I have all reasons to believe that Mr. Mars is a good person, and that him remaining a father figure to his son would benefit Max greatly.

Alexander Pirozhenko



CONSTANTINE_MARS **Posts**

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constantine_mars San Francisco, California













> Liked by **avilk** and **41 others**

constantine_mars Martians are now officially green ✓



#greencard #america #americandream #sf #california #usa

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August 25, 2022

















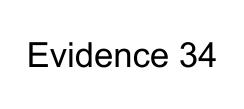
Liked by edubovik90 and 61 others

constantine_mars One week before that ... eKids are amazing, and Max would love to come to this event again and again, thanks to great organizers!... He would come again if not that happen ...

#myboy

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III

My Messages

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(KM) Kostiantyn Mars

Thank you

Hello Hanna, please let me know if you signed a lease and have a new address.

S Payments

Calendar Calendar

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Please share new address where you relocate our son.

Thank you

Hope you're doing well.

Dear Hanna,

(км) Kostiantyn Mars

Contact Us

Hanna Mars

Dear Kostintyn,

Thank you, hope you are doing good too.

I spoke with my attorney, I can share my location only after signing the new agreement, and after that you will also have to share your location with me. Kostiantyn Mars viewed this subject.4/17/2023 3:26 PM

4/27/2023 9.57 PM

Dear Hanna, please share address where you took Max

Kostiantyn Mars viewed this subject.4/3/2023 11:40 AM

4/13/2023 1:41 PW

Hanna Mars viewed this subject.4/13/2023 1 42 PM

4/17/2023 3:05 PM

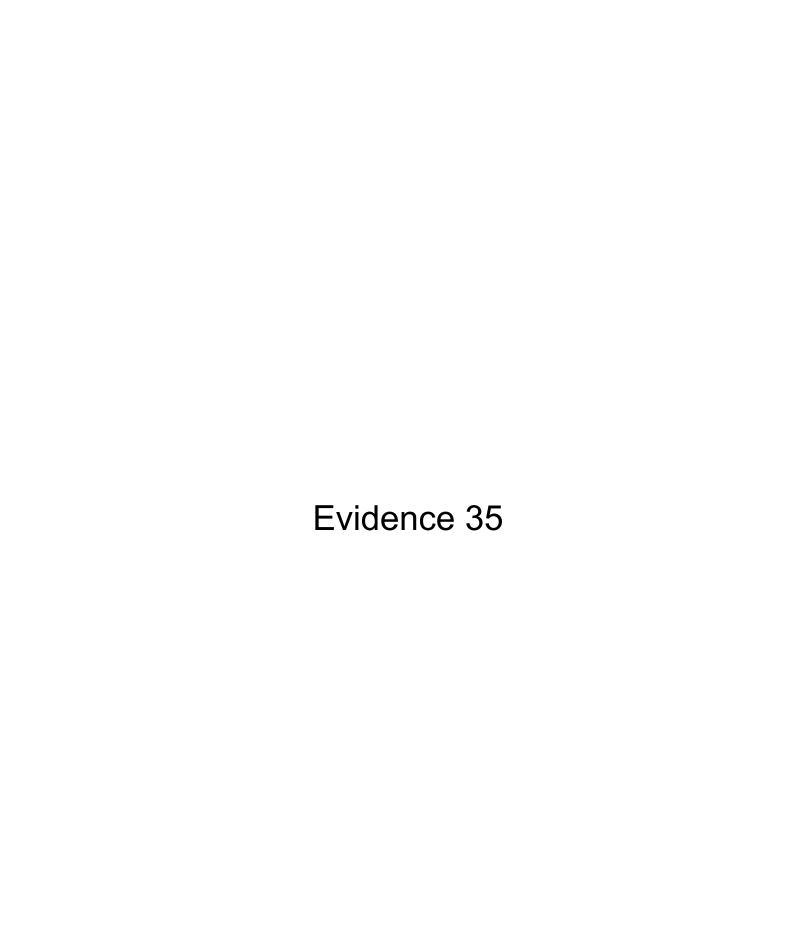
Hanna Mars viewed this subject. 4/17/2023 3:08 PW

4/17/2023 3:15 PM

🍨 Suggestions

(KM) Kostiantyn Mars

Hanna Mars viewed this subject.4/27/2023 9:23 PM





HM Hanna Mars

3/15/2023 12:50 PM

Hi Kostiantyn. Yes, Thursday 5:00pm works for us

Kostiantyn Mars viewed this subject.3/15/2023 12:50 PM

KM Kostiantyn Mars

3/15/2023 12:50 PM

Thank you

Hanna Mars viewed this subject.3/15/2023 12:52 PM

HM Hanna Mars

3/16/2023 5:31 PM

Hi Kostiantyn. You didn't call today at 5:00 pm as we agreed. Now 5:30pm so we go outside with Max to the playground.

Kostiantyn Mars viewed this subject.3/16/2023 5:32 PM

(км) Kostiantyn Mars

4/13/2023 1:42 PM

Hello Hanna, please let me know if I can talk to Max today at 5pm Thank you

Hanna Mars viewed this subject.4/13/2023 3:17 PM

НМ

Hanna Mars

4/13/2023 3:23 PM

Hello Kostiantyn. I'm really worried about what you're saying to Max. Your inappropriate remarks hurt Max, please think about it. You can call Max after signing the agreement. Until then, you have only professionally supervised visits.

