





4. The Complainant has forced the Defendant to spend enormous amounts of money fighting for his rights as a parent even though the Complainant had agreed the Defendant was the better parent before the child was conceived and had agreed the Defendant would stay home and raise him once the Complainant finished her MBA, and in spite of the fact that the Defendant had given up his career to stay home and care for the child and the Complainant had made verbal and written statements that he was doing an excellent job.

5. The Complainant went on to file for Divorce on grounds she knew to be false on or about June 11, 2003. She did this in spite of her affair with Igor Bakhir, a coworker, and in spite of having made verbal and written statements right up until the time she started the court battle that the Defendant had been a good husband, had been faithful, and had been patient putting up with her bad behavior, that she though if she had been in his place she would have divorced herself.

6. The Complainants repeated filing court cases that she knew were unwarranted and that the Defendant was willing to settle via mediation, had the effect of forcing the Defendant further in debt to pay attorney fees.

7. The Complainant has continued to make false allegations and have her attorney consume time of the Defendants attorney discussing them, thus increasing the Defendants legal fees.

8. The Complainant has also refused to cooperate in concluding the matter in a timely and cost efficient manner. She has admitted to having problems with uncontrollable rage, depression, anxiety, and has expressed concern that she might hurt the child, but has went to great lengths to avoid any productive discussion of them either in or out of court, or taking the required actions to reduce those behavior problems for the benefit of the child.

