

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

JANET JENKINS, FOR HERSELF AND  
AS NEXT FRIEND OF ISABELLA  
MILLER-JENKINS, A/K/A ISABELLA  
MILLER

Plaintiffs,

v.

KENNETH L. MILLER, LISA ANN  
MILLER F/K/A LISA MILLER-  
JENKINS, TIMOTHY D. MILLER,  
ANDREW YODER, INDIVIDUALLY  
AND AS AN AGENT FOR CHRISTIAN  
AID MINISTRIES, INC., CHRISTIAN  
AID MINISTRIES, INC., RESPONSE  
UNLIMITED, INC., PHILIP  
ZODHIATES, VICTORIA HYDEN,  
F/K/A VICTORIA ZODHIATES  
INDIVIDUALLY AND AS AN AGENT  
FOR BOTH RESPONSE UNLIMITED,  
INC., AND LIBERTY UNIVERSITY  
AND ITS RELATED MINISTRY  
THOMAS ROAD BAPTIST CHURCH,  
INC., LIBERTY UNIVERSITY, AND ITS  
RELATED MINISTRY THOMAS ROAD  
BAPTIST CHURCH, INC., LINDA M.  
WALL, INDIVIDUALLY AND AS  
AGENT FOR THOMAS ROAD BAPTIST  
CHURCH, INC., AND DOUGLAS  
WRIGHT,

Defendants.

Civil Action

Docket No. 2:12-CV-00184-WKS

AFFIDAVIT OF SARAH R. STAR, ESQ., IN SUPPORT OF RESPONSE TO  
MOTION TO DISMISS BY LIBERTY UNIVERSITY, INC., THOMAS ROAD BAPTIST  
CHURCH, AND VICTORIA HYDEN

I, Sarah R. Star, Esq., being duly sworn, do hereby depose and say:

1. Plaintiffs' Exhibit A is a true and correct copy of Liberty University Quick Facts, which I printed from the Liberty University website at [www.liberty.edu](http://www.liberty.edu).
2. Plaintiffs' Exhibit B is a true and correct copy of a Message from the Chancellor, which I printed from the Liberty University website at [www.liberty.edu](http://www.liberty.edu).
3. Plaintiffs' Exhibit C is a true and correct copy of the Liberty University women's hockey team schedule, which I printed from the Liberty University website at [www.liberty.edu](http://www.liberty.edu).
4. Plaintiffs' Exhibit D is a true and correct copy of the profile of the General Counsel for Liberty University, David M. Corry, which I printed from the Liberty University website at [www.liberty.edu](http://www.liberty.edu).
5. Plaintiffs' Exhibit E is a true and correct copy of the Rutland Family Court docket sheet in *Miller-Jenkins v. Miller-Jenkins*.
6. Plaintiffs' Exhibit F is a true and correct copy of the motion for appearance pro hac vice of Rena Lindevaldsen in *Miller-Jenkins v. Miller-Jenkins*.
7. Plaintiffs' Exhibit G is a true and correct copy of a series of emails sent by Rena Lindevaldsen to me in 2009.
8. Plaintiffs' Exhibit H is a true and correct copy of a press release from Liberty Counsel, which I printed from [www.lc.org](http://www.lc.org).
9. Plaintiffs' Exhibit I is a true and correct copy of a map of Liberty University, which I printed.
10. Plaintiffs' Exhibit J is a true and correct copy of the website for the Liberty Center for Law and Policy, which I printed from [www.libertyclp.org](http://www.libertyclp.org).

11. Plaintiffs' Exhibit K is a true and correct copy of a stipulation entered in *United States v. Kenneth L. Miller*, Criminal No. 2:11-CR-161.

12. Plaintiffs' Exhibit L is a true and correct copy of a message board post by "debbiethurman" on January 27, 2009, which I printed.

13. Plaintiffs' Exhibit M is a true and correct copy of an affidavit of Janet Jenkins.

14. Plaintiffs' Exhibit N is a true and correct copy of the Summons and Complaint for Civil Union Dissolution filed by Lisa Miller-Jenkins against Janet Miller-Jenkins, which I printed.

15. Plaintiffs' Exhibit O is a true and correct copy of the criminal complaint and supporting documents in *United States v. Timothy David Miller*, Criminal No. 2:11-MJ-28-1.

16. Plaintiffs' Exhibit P is a true and correct copy of a webpage for Response Unlimited, offering for sale the Vermont Country Store Masterfile Enhanced, which I printed from [www.responseunlimited.com](http://www.responseunlimited.com).

17. Plaintiffs' Exhibit Q is a true and correct copy of a faxed copy of an order issued by the Virginia Juvenile and Domestic Relations District Court of Frederick County, in *In re Isabella Miller-Jenkins*.

18. Plaintiffs' Exhibit R is a true and correct excerpt from Government Exhibit 21 from the trial in *United States v. Kenneth L. Miller*.

19. Plaintiffs' Exhibit S is a true and correct excerpt from Government Exhibit 26b from the trial in *United States v. Kenneth L. Miller*.

20. Plaintiffs' Exhibit T is a true and correct copy of a statement published on <http://millercase.org> on February 1, 2012.

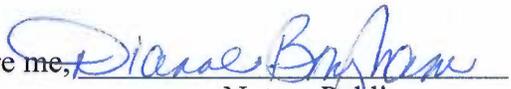
DATED at Middlebury, Vermont this 13<sup>th</sup> day of February, 2013.



Sarah R. Star, Esq.  
Attorney for Plaintiffs

STATE OF VERMONT  
ADDISON COUNTY, SS.

At Middlebury, Vermont this 13<sup>th</sup> day of February, 2013, personally appeared Sarah R. Star and she acknowledged that the information contained in the foregoing Affidavit is true and correct to the best of her knowledge and belief.

Before me,   
Notary Public

Commission Expires: 2/10/15

591589

# *Exhibit A*



## Liberty University Quick Facts

<b>Institutional Type</b>	The University is a religiously-oriented, private, co-educational, comprehensive institution
<b>Motto</b>	"Knowledge Aflame"
<b>Location</b>	Lynchburg, Virginia
<b>Founded</b>	1971
<b>Campus</b>	<ul style="list-style-type: none"><li>▶ 6,819 acres</li><li>▶ Over 4 million sq. feet of building space</li><li>▶ 258 buildings and structures</li><li>▶ 215 classrooms</li></ul>
<b>Enrollment</b>	<ul style="list-style-type: none"><li>▶ Residential enrollment: 12,600</li><li>▶ Online enrollment: over 80,000</li><li>▶ Total enrollment: exceeds 92,600</li></ul>
<b>Academic Programs</b>	<ul style="list-style-type: none"><li>▶ 273 unique programs of study (some available both resident and online)<ul style="list-style-type: none"><li>▶ 204 resident programs<ul style="list-style-type: none"><li>▶ 150 undergraduate</li><li>▶ 53 graduate</li><li>▶ 1 post master's</li></ul></li><li>▶ 124 online programs<ul style="list-style-type: none"><li>▶ 46 undergraduate</li><li>▶ 69 graduate</li><li>▶ 3 post master's</li><li>▶ 6 doctorate</li></ul></li></ul></li><li>▶ Liberty University School of Law</li><li>▶ Liberty Baptist Theological Seminary</li></ul>
<b>Student Profile</b>	<ul style="list-style-type: none"><li>▶ Residential: 48% Male, 52% Female</li><li>▶ Online: 39% Male, 61% Female</li><li>▶ Combined: 41% Male, 59% Female</li><li>▶ 55.9% of Resident students live on campus; 44.1% commute</li><li>▶ The student body represents all 50 states (and Washington, D.C.) and over 95 countries</li><li>▶ Resident students volunteer 586,262 hours each year in the community and on campus</li></ul>
<b>Faculty Profile</b>	<ul style="list-style-type: none"><li>▶ Student/Professor Ratio<ul style="list-style-type: none"><li>▶ 25:1 Resident Undergraduate</li><li>▶ 17:1 Online</li></ul></li></ul>

- ▶ more than 2,000 full and part-time faculty
- ▶ 70% Full-time faculty hold terminal degrees

**Athletics**

- ▶ 20 NCAA Division I Athletic programs
- ▶ 31 Club Sports
- ▶ 20 Intramural Sports

**Technology**

- ▶ 95% wireless coverage campus wide
- ▶ 100% wireless coverage of student areas on campus
- ▶ 99% Technology-enabled classrooms
- ▶ Over 450 computers in 16 classroom labs and over 350 computers in various open computing spaces across campus

**Library**

- ▶ 224,402 Electronic books and media items
- ▶ 75,244 Electronic full-text journals
- ▶ 340,904 Print and media items

**Tuition/Room &  
Board/Fees**

\$27,218 approximate annual undergraduate resident cost including tuition, mandatory fees and housing

# ***Exhibit B***



### Message From the Chancellor

Liberty University is the largest private non-profit university in the nation, the largest university in Virginia, and the largest Christian university in the world. Liberty was founded in 1971 by my father, Dr. Ed. ... with a vision to train Champions for Christ as a world class university. An accredited institution, Liberty now offers 315 unique programs of study. Liberty's 6,819-acre campus boasts millions of square feet of technologically advanced academic, residential and recreational space, the vast majority of which was constructed in the last 15 years. Liberty hosts some of the world's best-known Christian speakers from all walks of life every semester and our vibrant spiritual life programs are based on a solid doctrinal statement that truly sets us apart from other schools. Our code of conduct teaches discipline and promotes a lifestyle of biblical morality but is well balanced to allow students the freedom to enjoy their college experience. While academics and faith are our top priorities, Liberty also fields 20 NCAA Division I athletic teams, 31 club sport teams and provides a host of student activities, intramural sports and recreational opportunities. Everything we do is designed to develop Christ-centered men and women with the values, knowledge and skills essential to impact tomorrow's world.



Chancellor Jerry Falwell, Jr.

- Chancellor Jerry Falwell, Jr.

### A Closer Look

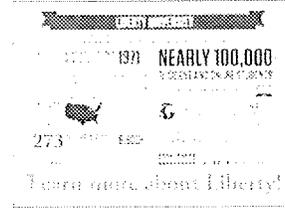
Liberty University's greatest asset is its students -- and their school spirit, enthusiasm, strong character and motivation. Behind these successful students are parents who are valued for their supportive role. Whether you're a prospective student or parent, you might be curious about Liberty -- and you're looking in the right spot. Our website is designed to answer your questions, but the best way to find out if Liberty is a perfect fit for you is to schedule a visit.



Students and faculty members

- ▶ Training Champions since 1971
- ▶ Liberty University Quick Facts
- ▶ Liberty University Distinctives
- ▶ Doctrinal Statement
- ▶ Executive Leadership
- ▶ Undergraduate Student Blogs
- ▶ Social Media Networks
- ▶ Campus Improvements

### Infoposter



### The Campus



Liberty's expensive campus on Liberty Mountain, in Lynchburg, VA.

- ▶ Visitors Center
- ▶ Maps of Campus
- ▶ Liberty and Lynchburg
- ▶ Recreational Facilities

### Video



# *Exhibit C*



## Women's D1 Hockey

### 2012-2013 Schedule

Season 2012-2013 ▾

Date	Time	Opponent*	Results
Aug 25, 2012	5:00 PM	Hamilton Hawks LaHaye Ice Center	W (5-2)
Oct 6, 2012	7:00 PM	Raleigh LaHaye Ice Center	W (3-2)
Oct 7, 2012	2:45 PM	Raleigh LaHaye Ice Center	W (2-1)
Oct 11, 2012	8:15 PM	vs. University of Vermont Burlington, VT	W (3-2)
Oct 12, 2012	8:00 PM	vs. University of Vermont Burlington, VT	W (5-0)
Oct 14, 2012	10:00 AM	vs. Northeastern University Boston, MA	W (4-3)
Oct 26, 2012	9:30 PM	vs. Michigan State East Lansing, MI	W (1-0)
Oct 27, 2012	1:45 PM	vs. Michigan State East Lansing, MI	W (4-2)
Nov 3, 2012	5:15 PM	vs. Stevenson University Owings Mills, MD	W (4-1)
Nov 9, 2012	10:00 PM	University of Massachusetts LaHaye Ice Center	W (5-4)
Nov 10, 2012	3:00 PM	University of Massachusetts LaHaye Ice Center	W (5-3)
Nov 16, 2012	8:00 PM	vs. University of Minnesota Madison, WI	L (4-1)
Nov 17, 2012	12:45 PM	vs. University of Minnesota Madison, WI	W (3-2)
Nov 19, 2012	8:45 PM	vs. University of Wisconsin Madison, WI	W (7-1)
Nov 20, 2012	5:00 PM	vs. University of Wisconsin Madison, WI	W (8-0)
Nov 29, 2012	7:30 PM	University of Colorado LaHaye Ice Center	W (2-1)
Nov 30, 2012	6:00 PM	University of Colorado LaHaye Ice Center	W (3-0)
Dec 1, 2012	5:15 PM	University of Colorado LaHaye Ice Center	W (3-0)
Jan 11, 2013	9:20 PM	vs. Miami University Oxford, OH	W (5-0)
Jan 12, 2013	7:15 PM	vs. Miami University Oxford, OH	W (1-0)
Jan 18, 2013	8:00 PM	vs. Robert Morris College Chicago, IL	W (3-0)
Jan 19, 2013	8:00 PM	vs. Robert Morris College Chicago, IL	L (1-0)
Jan 27, 2013	2:15 PM	Reston Raiders LaHaye Ice Center	W (6-1)

Date	Time	Opponent	Results
Feb 1, 2013	8:30 AM	<b>Colorado State</b> LaHaye Ice Center	W (6-0)
Feb 1, 2013	6:00 PM	<b>Colorado State</b> LaHaye Ice Center	W (3-0)
Feb 2, 2013	7:45 PM	<b>Colorado State</b> LaHaye Ice Center	W (8-1)
Feb 9, 2013	3:00 PM	<b>Raleigh</b> LaHaye Ice Center	<a href="#">Live Video</a>
Feb 10, 2013	2:15 PM	<b>Raleigh</b> LaHaye Ice Center	<a href="#">Live Video</a>
Feb 16, 2013	1:00 PM	vs. Chatham University Pittsburgh, PA	
Feb 17, 2013	7:00 PM	vs. Chatham University Pittsburgh, PA	
Mar 6, 2013	T.B.D.	vs. ACHA Nationals Asburn, VA	
Mar 7, 2013	T.B.D.	vs. ACHA Nationals Asburn, VA	
Mar 8, 2013	T.B.D.	vs. ACHA Nationals Asburn, VA	

\* - Denotes Conference Game  
 All Times are Eastern Time Zone and are subject to change  
 Bold indicates home games

# ***Exhibit D***



## General Counsel

### David M. Corry

The General Counsel reports to the President and is the Chief Legal Officer of Liberty in charge of all legal matters pertaining to the university and its subsidiaries. The General Counsel has primary responsibility for overseeing all legal matters across a broad range of legal disciplines and geographic boundaries, including corporate law, securities compliance, transactional documents, licensing agreements, intellectual property, litigation, strategic litigation, employment law, contract management, privacy, construction, international law, administrative law, regulatory compliance, and other legal matters as needed. The General Counsel represents the university in all legal matters and advises the university, its committees, its officers and the President on legal matters as required; directs and oversees the provision of all legal services to the university.



# *Exhibit E*

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 01

Vermont Superior Court

Rutland Family Division

Docket No. 454-11-03 Rddm		Miller-Jenkins vs. Miller-Jenkins	
No.	Role	Litigant Name	Attorney Name Telephone
p#1	plf	Miller-Jenkins, Lisa	Smith, Norman C. 288-9088
p#2	def	Miller-Jenkins, Janet	Star, Sarah 385-1023
p#3	min	Miller-Jenkins, Isabella	
p#4	ccp	Staver, Mathew	W:800-671-1776
p#5	ccp	Lindevaldsen, Rena	W:434-592-7000
p#6	ccd	Loewy, Karen	W:617-426-1350
p#7	ccd	Bonauto, Mary	W:617-426-1350
p#8	ccd	Levi, Jennifer	W:617-426-1350
p#9	ccd	Chalidze, Lisa Esq.	W:537-3062
p#10	ccp	Crampton, Stephen	W:434-592-7000
p#11	ccp	Kreep, Gary RMV	W:760-788-6624
p#12	ccp	Paino, Allison RMV	W:760-788-6624
p#13	ccp	Corry, David	W:434-592-7000
p#14	gal	Devine, Tara	W:802-775-5580
p#15	ccd	Chalidze, Lisa Esq.	Chalidze, Lisa 802-537-3062

Case Type: Civil Union dissolution Last judge: William D. Cohen  
Case Track: Not set Recused: None  
Case Status: Disposed-Case Closed Ripe date:  
Next Hearing:

## Programs:

Coping With Divorce

11/24/03 Party 1-2 Ordered.

Pro Se Education

11/24/03 Party 1-2 Ordered.

=====  
Motion/Petitions/Requests for Relief:  
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1	R/to establish child support	order	MG-SJG	12/10/06
2	R/to establish parental rights & resp.	order	WDC	06/15/07
3	R/to establish parent-child contact	order	WDC	06/15/07
4	R/for Property Division	order	WDC	06/15/07
5	M/to Allow Testimony by Telephone	moot	WDC	07/20/04
6	M/to withdraw as attorney	granted	WDC	03/11/04
7	M/to withdraw as attorney	granted	WDC	05/10/04
8	M/for Contempt	order	WDC	12/08/06
9	M/to Continue	denied	WDC	05/19/04
10	M/to Withdraw Waiver to Challenge of Paren	order	WDC	11/17/04
11	R/for Findings	order	WDC	12/06/04
12	M/to Reconsideration of Temporary Order	denied	WDC	07/20/04
13	M/for Genetic Testing	denied	WDC	07/20/04
14	M/Emergency Motion for Contempt/Enforce	order	WDC	07/19/04
15	M/for Reconsideration and Alter and Amend	denied	WDC	09/02/04
16	M/Second Motion for Contempt	order	WDC	09/02/04
17	M/for Immediate Hearing	granted	WDC	08/03/04
18	R/to Testify by Telephone	moot	WDC	08/31/04
19	M/for Reconsideration August 24 Hearing	denied	WDC	08/26/04
20	R/for Extension to file Briefs	granted	WDC	09/02/04
21	M/for Leave to File Supplemental Brief	granted	WDC	09/16/04
22	M/to Supplement Briefing	granted	WDC	09/24/04
23	M/for Sanctions	order	WDC	12/08/06
24	M/for Appearance Pro Hac Vice	granted	WDC	10/08/04
25	M/to Testify by Telephone	order	WDC	10/08/04
26	M/stay enforcement of contempt	denied	WDC	10/08/04
27	M/to Continue	granted	WDC	10/14/04
28	F/Complaint for Judgment to be Entered on	order	WDC	12/21/04
29	M/to Admit Attorney Karen Loewy Pro Hac Vi	granted	WDC	11/23/04

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 02

30	M/to Admit Attorney Mary Bonauto Pro Hac V	granted	WDC	11/23/04
31	M/to Admit Jennifer Levi Pro Hac Vice	granted	WDC	11/23/04
32	M/for Permission to Appeal	order	WDC	01/05/05
33	M/for Permission to Appeal	granted	WDC	01/26/05
34	M/Re: Final Hearing	denied	WDC	06/27/05
35	M/Appeal by Telephone 6/21/05	granted	WDC	06/20/05
36	M/Re: Discovery	order	WDC	02/14/07
37	M/to Withdraw as Attorney	granted	WDC	02/14/07
38	M/for Lead Counsel to Attend by Phone	granted	WDC	02/13/07
39	M/to Amend Complaint	denied	WDC	03/28/07
40	M/Emergency Motion for Discovery Order	order	WDC	03/28/07
41	M/Amended 2nd Motion to Appear Pro Hac Vic	granted	WDC	03/28/07
42	R/for Pre-Union Name	order	WDC	07/05/07
43	M/in Limine Re: Opinion Testimony of Hayda	order	WDC	07/05/07
44	M/for Supplemental Sanctions for Contempt	order	WDC	09/28/07
45	M/for Evidentiary Hearing on Sanctions	order	WDC	09/28/07
46	M/for a Protective Order	order	WDC	09/28/07
47	M/to Participate by Phone	granted	WDC	08/01/07
48	M/to Modify or Annul Visitation Schedule	order	WDC	12/31/07
49	M/for Other Enforcement Issues	order	WDC	12/31/07
50	M/for Contempt Other than Child Support	order	WDC	02/10/09
51	M/to Modify Parental Rights & Resp.	order	WDC	02/10/09
52	M/Emergency Motion to Annul Visitation	order	WDC	02/10/09
53	M/Emergency Motion for Change of Custody	order	WDC	02/10/09
54	M/to Participate by Phone	denied	WDC	12/27/07
55	M/Emergency Motion for Contempt/Enforcemen	order	WDC	04/30/08
56	M/to Modify Parental Rights & Resp.	denied	WDC	04/30/08
57	M/for a Protective Order	moot	WDC	04/30/08
58	M/to Participate by Phone	granted	WDC	04/25/08
59	M/to Participate by Phone	moot	WDC	04/30/08
60	M/to Strike Affidavit	denied	WDC	04/30/08
61	M/Emergency Motion for Contempt	order	WDC	02/10/09
62	M/Emergency Motion for Enforcement	order	WDC	02/10/09
63	M/for Transfer of Both Sole Legal & Physic	withdraw	WDC	10/16/08
64	M/to Strike Defendant's Affidavit	order	WDC	02/10/09
65	M/for a Protective Order	order	WDC	10/08/08
66	M/to Continue Hearing	denied	WDC	10/17/08
67	M/to Quash Notice of Deposition	denied	WDC	10/21/08
68	M/for Admission Pro Hac Vice of Joseph Pri	granted	WDC	01/28/09
69	M/to Quash Notice of Deposition	moot	WDC	01/28/09
70	M/Cross Motion to Compel Production of Doc	moot	WDC	01/28/09
71	M/Emergency Motion to Enforce Visitation	order	WDC	02/10/09
72	M/for Contempt Other than Child Support	order	WDC	02/10/09
73	R/for Sanctions	order	WDC	02/10/09
74	M/to Participate by Phone or For Continuan	granted	WDC	01/28/09
75	M/Renewal/Refiling of Motion to Transfer C	order	WDC	02/10/09
76	M/for Clarification Regarding Sanctions	order	WDC	11/20/09
77	M/Modify	order	WDC	05/08/09
78	M/Emergency Motion for Enforcement	order	WDC	04/08/09
79	R/for Make Up Parent Child Contact Time	order	WDC	05/08/09
80	R/Renewal of Request for Sanctions	order	WDC	11/20/09
81	M/to Participate by Phone	granted	WDC	04/23/09
82	M/to Participate by Phone	granted	WDC	05/06/09
83	M/for Appearance Pro Hac Vice	granted	WDC	05/07/09
84	M/to Modify Parental Rights & Resp.	order	WDC	11/20/09
85	M/to Appoint Guardian ad Litem	granted	WDC	06/19/09
86	M/for Psychological Exam of Both Parties	moot	WDC	11/20/09
87	M/to Continue Hearing	denied	WDC	08/20/09
88	C/to Modify Child Support	granted	WDC	04/09/10
89	R/for Status Conference	order	WDC	12/10/09
90	M/to Stay Pending Appeal	denied	WDC	12/22/09
91	R/to Participate by Phone	granted	WDC	12/22/09
92	M/for Rule 11 Sanctions	withdraw	WDC	12/22/09
93	M/Emergency Motion for Contempt	order	WDC	02/23/10
94	M/Emergency Motion for Sanctions	order	WDC	02/23/10
95	M/Emergency Motion for Enforcement	order	WDC	01/29/10

96 R/to Participate by Phone	granted	WDC	01/12/10
97 M/to Withdraw as Attorney	denied	WDC	01/22/10
98 R/to Participate by Phone	granted	WDC	02/22/10
99 M/to Withdraw as Attorney	denied	WDC	03/08/10
100M/to Withdraw as Attorney	granted	WDC	08/20/10

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11/24/03 New party: plf, Lisa Miller-Jenkins - Atty. Pro Se.  
 New party: def, Janet Miller-Jenkins.  
 New party: min, Isabella Miller-Jenkins.  
 Complaint filed by Plaintiff Miller-Jenkins against Defendant Miller-Jenkins.  
 New filing. Minors: 1 IV-D: no.  
 Plaintiff Miller-Jenkins, Defendant Miller-Jenkins Ordered Coping With Divorce.  
 Plaintiff Miller-Jenkins, Defendant Miller-Jenkins Ordered Pro Se Education.

12/12/03 Case Managers Conference set for 01/14/04 at 11:00 AM.

01/08/04 Appearance entered by Theodore A. Parisi Jr. on behalf of Defendant Miller-Jenkins.

01/12/04 Appearance entered by Linda Aylesworth Reis on behalf of Plaintiff Miller-Jenkins.

01/14/04 Case Managers Conference scheduled for 01/14/04 continued.  
 attorneys called and requested continuance since Atty Reis just entered appearance and temp hrg is needed.

01/16/04 Service complete on party(s) 2: Personal Service by Sheriff/Constable. Documents served: Summons and complaint.  
 Counterclaim filed by Defendant Miller-Jenkins against Plaintiff Miller-Jenkins.

01/29/04 Hearing to Establish Temporary Order set for 02/25/04 at 08:30 AM.

02/23/04 MPR 5) Motion to Allow Testimony by Telephone filed by Plaintiff Miller-Jenkins. Motion to Allow Testimony by Telephone given to judge.

02/24/04 MPR 5) Motion to Allow Testimony by Telephone given to Judge William D. Cohen.  
 Response re MPR 5 filed by party 2.  
 Attys. Reis and Parisi were on phone re there is not enough time for temporary hearing tomorrow (just 1/2 hour); Linda client is coming from Virginia and she would rather reset matter for 1/2 day at a later date; Atty. Parisi will check with his client if objection to postponing matter.  
 Ted Parisi called back and stated the March date was okay with his client.  
 Hearing to Establish Temporary Order scheduled for 02/25/04 rescheduled.  
 Hearing to Establish Temporary Order set for 03/15/04 at 01:30 PM.  
 spoke to Atty. Reis re pending motion for testimony by phone as there is an objection filed; she advises she will get back re the pending motion.

03/11/04 MPR 6) Motion to withdraw as attorney filed by Plaintiff Miller-Jenkins. Motion to withdraw as attorney given to judge.  
 Response re MPR 6 filed by party 2.  
 MPR 6) Motion to withdraw as attorney given to Judge William D. Cohen.  
 Entry order re MPR 6) Motion to withdraw as attorney. M/Reaction Form. granted William D. Cohen. Granted upon the condition that the case set for March 15, 2004 will not be continued.  
 Attorney Linda Aylesworth Reis withdraws.

03/12/04 Appearance entered by Deborah Lashman on behalf of Plaintiff Miller-Jenkins.

03/15/04 Hearing to Establish Temporary Order held. WDC/VTAPE.  
 Entry Order: Testimony taken from the Plaintiff. Her testimony was completed. Case to be reset for a continuation of this case. 1/2 day is needed.

03/29/04 Hearing to Establish Temporary Order set for 05/26/04 at 09:00 AM.

05/03/04 MPR 7) Motion to withdraw as attorney filed by Plaintiff Miller-Jenkins. Motion to withdraw as attorney waiting for Memo in

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 04

Opposition. Documents filed: Notice of Pro Se Appearance.

05/04/04 Response re MPR 7 filed by party 2.

05/10/04 Entry order re MPR 7) Motion to withdraw as attorney. M/Reaction Form. granted William D. Cohen.  
Attorney Deborah Lashman withdraws.

05/14/04 MPR 8) Motion for Contempt filed by Plaintiff Miller-Jenkins. Motion for Contempt waiting for Memo in Opposition.

05/17/04 MPR 8) Motion for Contempt given to Judge William D. Cohen.  
MPR 9) Motion to Continue filed by Plaintiff Miller-Jenkins. Motion to Continue waiting for Memo in Opposition.

05/19/04 sent copy of motion to continue to deft.  
Response re MPR 9 filed by party 2.  
MPR 9) Motion to Continue given to Judge William D. Cohen.  
Entry order re MPR 9) Motion to Continue. M/Reaction Form. denied William D. Cohen.  
Entry order re MPR 8) Motion for Contempt. M/Reaction Form. to be set for hearing William D. Cohen. TO BE HEARD AT FINAL HEARING.

05/21/04 Defendant's Supplemental Response to Plaintiff's Motion dated 5/11/04 filed.

05/26/04 Appearance entered by Judy G. Barone on behalf of Plaintiff Miller-Jenkins.  
MPR 10) Motion to Withdraw Waiver to Challenge of Paren filed by Plaintiff Miller-Jenkins. Motion to Withdraw Waiver to Challenge of Paren given to judge.  
MPR 10) Motion to Withdraw Waiver to Challenge of Paren given to Judge William D. Cohen.  
Hearing to Establish Temporary Order held. WDC/VTAPE.  
Entry Order: hearing held; court grants defendant parent child contact and Atty. Parisi to submit order.

05/28/04 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Temporary Order Re: Parental Rights.  
1 document filed by Attorney Judy G. Barone for party 1: Plaintiff's Request for Findings.  
MPR 11) Request for Findings filed by Plaintiff Miller-Jenkins.  
Request for Findings given to judge.

06/02/04 Response re MPR 11 filed by party 2.

06/08/04 Response re MPR 10 filed by party 2.

06/09/04 MPR 12) Motion to Reconsideration of Temporary Order filed by Plaintiff Miller-Jenkins. Motion to Reconsideration of Temporary Order waiting for Memo in Opposition.  
MPR 13) Motion for Genetic Testing filed by Plaintiff Miller-Jenkins. Motion for Genetic Testing waiting for Memo in Opposition.  
MPR 10) Motion to Withdraw Waiver to Challenge of Paren given to Judge William D. Cohen.

06/15/04 Response re MPR 12-13 filed by party 2.

06/16/04 MPR's 12-13: 12) Motion to Reconsideration of Temporary Order; 13) Motion for Genetic Testing given to Judge William D. Cohen.  
Entry order re MPR's 2-3: 2) Request to establish parental rights & resp; 3) Request to establish parent-child contact. Contested Hearing. temporary order issued William D. Cohen.

06/18/04 sent copies of temporary order to parties; faxed copy of temporary order to plaintiff.

06/25/04 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: AOS of Temporary Order Re: PR&R dat.6/17.

07/02/04 Plaintiff's Objection to Presumption of Parentage filed.  
Defendant files return of service re service of temporary order re: PR&R to Lisa Miller-Jenkins.

07/07/04 MPR 14) Motion Emergency Motion for Contempt/Enforce filed by Defendant Miller-Jenkins. Motion Emergency Motion for Contempt/Enforce given to judge.

07/08/04 MPR 14) Motion Emergency Motion for Contempt/Enforce given to Judge William D. Cohen.

07/09/04 Atty. Barones files letter stating pltf. has filed a petition to establish parentage and for declaratory relief in Winchester, VA.

07/19/04 Entry order re MPR 14) Motion Emergency Motion for Contempt/Enforce. M/Reaction Form. order issued William D. Cohen. see order issued by

court on July 19.

07/20/04 Entry order re MPR 12) Motion to Reconsideration of Temporary Order. M/Reaction Form. denied William D. Cohen.  
Entry order re MPR 13) Motion for Genetic Testing. M/Reaction Form. denied William D. Cohen.  
Entry order re MPR 5) Motion to Allow Testimony by Telephone. M/Reaction Form. rendered moot. William D. Cohen. this motion was already ruled upon.

07/26/04 MPR 15) Motion for Reconsideration and Alter and Amend filed by Plaintiff Miller-Jenkins. Motion for Reconsideration and Alter and Amend waiting for Memo in Opposition.

07/27/04 sent copies of entry orders dated 7/20 to parties.

08/02/04 Motion Hearing set for 08/24/04 at 09:00 AM.

08/03/04 MPR 16) Motion Second Motion for Contempt filed by Defendant Miller-Jenkins. Motion Second Motion for Contempt given to judge.  
MPR 17) Motion for Immediate Hearing filed by Defendant Miller-Jenkins. Motion for Immediate Hearing given to judge.  
MPR's 16-17: 16) Motion Second Motion for Contempt; 17) Motion for Immediate Hearing given to Judge William D. Cohen.  
Entry order re MPR 17) Motion for Immediate Hearing. M/Reaction Form. granted William D. Cohen.

08/04/04 Motion Hearing set for 08/17/04 at 09:00 AM. PLEASE BE ADVISED THE HEARING SET FOR AUGUST 24, 2004 AT 9:00 A.M. HAS BEEN CANCELLED AS THE MATTER IS NOW SET FOR AUGUST 17 AT 9:00 A.M. AS THE COURT GRANTED REQUEST FOR IMMEDIATE HEARING AND MORE HEARING TIME IS AVAILABLE ON THE 17TH.  
Atty. Parisi's office called and inquired about hearing date on motion for immediate hearing; advised when hrg. was set.  
Atty. Parisi called to advise that he would like to keep the August 24 hearing date as it is as he is calling Deb Lashman as a witness and she is not available to be subpoenaed for the 17th; advised the hearing would be left as it was and contempt would be heard on the 17th.  
Motion Hearing scheduled for 08/17/04 rescheduled.  
Motion Hearing set for 08/17/04 at 09:00 AM.

08/17/04 MPR 18) Request to Testify by Telephone filed by Plaintiff Miller-Jenkins. Request to Testify by Telephone waiting for Memo in Opposition.  
Response re MPR 18 filed by party 2.  
Motion Hearing held. WDC/VTAPE.  
Entry Order: Testimony completed. Case under advisement on defendant's request for contempt.  
Entry order re MPR 16) Motion Second Motion for Contempt. Contested Hearing. taken under advisement William D. Cohen. Notice given on record.

08/18/04 Telephone conference set for 08/19/04 at 03:00 PM.  
Sent certified copies to Atty. Joe Price, of the entire file. Atty. Price to send check for reimbursement cost of making certified copies of the file by 8/27/04 in the amount of \$750.00.

08/19/04 MPR 19) Motion for Reconsideration August 24 Hearing filed by Plaintiff Miller-Jenkins. Motion for Reconsideration August 24 Hearing given to judge.  
MPR 19) Motion for Reconsideration August 24 Hearing given to Judge William D. Cohen.  
Telephone conference held. WDC/VTAPE.  
Entry Order: Phone conference held with the Virginia Court re: parentage action. Conference held on the record with the parties present.

08/24/04 Motion Hearing held. WDC/VTAPE.  
Entry Order: Case taken under advisement. The parties to have 2 weeks to submit memoranda of law for 3 issues 1. Waiver 2. Choice of law and 3. Parentage rights.  
Entry order re MPR 10) Motion to Withdraw Waiver to Challenge of Paren. Contested Hearing. taken under advisement William D. Cohen. Notice given on record.  
Response re MPR 15,18-19 filed by party 2.

08/26/04 Entry order re MPR 11) Request for Findings. M/Reaction Form. Other William D. Cohen. Findings to be issued with the court's decision on the waiver issue.  
Entry order re MPR 19) Motion for Reconsideration August 24 Hearing. M/Reaction Form. denied William D. Cohen.

08/27/04 MPR's 15,18: 15) Motion for Reconsideration and Alter and Amend; 18) Request to Testify by Telephone given to Judge William D. Cohen.

08/31/04 Entry order re MPR 18) Request to Testify by Telephone. M/Reaction Form. rendered moot. William D. Cohen.

09/01/04 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Original Subpoena and Return of Service.  
Order issues re attorney for child to be appointed; copies faxed to parties.

09/02/04 MPR 20) Request for Extension to file Briefs filed by Defendant Miller-Jenkins. Request for Extension to file Briefs given to judge.  
MPR 20) Request for Extension to file Briefs given to Judge William D. Cohen.  
Entry order re MPR 16) Motion Second Motion for Contempt. Contested Hearing. order issued William D. Cohen.  
copies of Order issued 9/2 sent to parties.  
Response re MPR 20 filed by party 1.  
Entry order re MPR 20) Request for Extension to file Briefs. M/Reaction Form. granted William D. Cohen.  
sent entry regarding request no. 20 to parties.  
Entry order re MPR 15) Motion for Reconsideration and Alter and Amend. M/Reaction Form. denied William D. Cohen.

09/07/04 sent copies of entry regarding motion 15 and 18 to parties.

09/09/04 Appearance entered by David L. Cleary on behalf of Minor child Miller-Jenkins.

09/13/04 2 documents filed for party : Transcript of phone conversation; between Judge Prosser on August 19, 2004.

09/14/04 3 documents filed by Attorney Judy G. Barone for party 1: Pltf's Reply to Court's Request for; Briefing and Request to Annul Temporary; Relief Order.

09/15/04 Status Conference set for 10/04/04 at 01:15 PM. PLEASE BE ADVISED THIS HEARING WILL TAKE PLACE AT RUTLAND SUPERIOR COURT, 83 CENTER STREET, RUTLAND, VERMONT.  
3 documents filed by Attorney Theodore A. Parisi Jr. for party 2: Opposition to Pltf's Motion to Withdraw; Waiver to Challenge Presumption of; Parentage.  
MPR 21) Motion for Leave to File Supplemental Brief filed by Defendant Miller-Jenkins. Motion for Leave to File Supplemental Brief given to judge.  
MPR 21) Motion for Leave to File Supplemental Brief given to Judge William D. Cohen.

09/16/04 Entry order re MPR 21) Motion for Leave to File Supplemental Brief. M/Reaction Form. granted William D. Cohen. compliance by 7 days.

09/22/04 MPR 22) Motion to Supplement Briefing filed by Plaintiff Miller-Jenkins. Motion to Supplement Briefing given to judge.  
MPR 22) Motion to Supplement Briefing given to Judge William D. Cohen.

09/24/04 Capitol Process Services, Inc. files affidavit of process service re service of order filed 9/2/04 on Lisa Miller- Jenkins.  
MPR 23) Motion for Sanctions filed by Defendant Miller-Jenkins. Motion for Sanctions given to judge.  
MPR 23) Motion for Sanctions given to Judge William D. Cohen.  
Entry order re MPR 23) Motion for Sanctions. M/Reaction Form. to be set for hearing William D. Cohen.  
Entry order re MPR 22) Motion to Supplement Briefing. M/Reaction Form. granted William D. Cohen. Compliance by october 8, 2004.

09/29/04 sent parties copy of entry regarding motion no. 21-23.

09/30/04 Motion Hearing set for 10/15/04 at 01:30 PM. PLEASE BE ADVISED THE HEARING WILL TAKE PLACE AT RUTLAND SUPERIOR COURT, 83 CENTER STREET, RUTLAND, VERMONT.

10/01/04 Response re MPR 23 filed by party 1.  
2 documents filed for party : Motion to Admit Attorney Mathew Staver; Pro Hac Vice.

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 07

- 2 documents filed for party : Motion to Admit Atty. Rena Lindevaldsen; Pro Hac vice.  
 Notice of Appeal from party 1.
- 10/04/04 sent original Notice of Appeal and check #7051 in the amount of \$225.00 for the filing fee to the Supreme Court, along with certified copies of the docket entries and a hearing list. Will forward contents of the trial court file pertaining to appeal asap. Hearing pending and issues to be taken up at status today.  
 Status Conference held. WDC/TAPE.  
 MPR 24) Motion for Appearance Pro Hac Vice filed by Plaintiff Miller-Jenkins. Motion for Appearance Pro Hac Vice given to judge. Entry Order: The Plaintiff by Florida unadmitted counsel has filed a notice of appeal of the contempt to Vermont Supreme court. conf. w/ attorney re: jurisdiction. Atty. Cleary in case and sanction hrg. on October 15, 2004. Attorney Cleary need not be present at 10/15/04 hearing.
- 10/05/04 MPR 24) Motion for Appearance Pro Hac Vice given to Judge William D. Cohen.
- 10/06/04 rec'd letter from Supreme court assign- ing docket no.  
 Defendant's Opposition to Motion to Admit Attorney Rena Lindevaldsen Pro Hac vice and Defendant's Opposition to Motion to Admit Attorney Mathew Staver Pro Hac Vice filed.  
 Response re MPR 24 filed by party 2.  
 Atty. Parisi's office called re setting up a telephone conference re issue of appeal; he will hook up all parties if necessary for conference.  
 Status Conference set for 10/08/04 at 08:30 AM.  
 notified both sides of conference and Atty. Parisi notified Atty. Cleary.
- 10/07/04 MPR 25) Motion to Testify by Telephone filed by Plaintiff Miller-Jenkins. Motion to Testify by Telephone given to judge.  
 MPR 25) Motion to Testify by Telephone given to Judge William D. Cohen.  
 MPR 26) Motion stay enforcement of contempt filed by Plaintiff Miller-Jenkins. Motion stay enforcement of contempt given to judge.  
 3 documents filed by Attorney Judy G. Barone for party 1: reply in support of motion to admit; attorney Rena Lindevaldsen and Mathew; Staver pro hac vice.
- 10/08/04 Status Conference held. WDC/VTAPE.  
 Entry Order: Attorney Parisi has filed a motion to dismiss appeal with Vermont Supreme Court. 10/15/04 being still on and Plaintiff's motion to stay denied. Pro hac vice request granted.  
 New party: ccp, Mathew Staver.  
 New party: ccp, Rena Lindevaldsen.  
 Entry order re MPR 25) Motion to Testify by Telephone. M/Reaction Form. order issued William D. Cohen. If the phone system can be modified to allow phone conference and the plaintiff to certify that she is alone during testimony, then request will be granted.  
 Entry order re MPR 26) Motion stay enforcement of contempt.  
 Contested Hearing. denied William D. Cohen.  
 Entry order re MPR 24) Motion for Appearance Pro Hac Vice. Contested Hearing. granted William D. Cohen.  
 plaintiff files Memorandum of Law in further support of Plaintiff's Motion to Withdraw Waiver and Certificate of Service.
- 10/13/04 MPR 27) Motion to Continue filed by Defendant Miller-Jenkins. Motion to Continue given to judge.
- 10/14/04 MPR 27) Motion to Continue given to Judge William D. Cohen.  
 Entry order re MPR 27) Motion to Continue. M/Reaction Form. granted William D. Cohen.  
 Motion Hearing scheduled for 10/15/04 continued.  
 notified parties by phone that hearing has been continued.
- 10/15/04 1 document filed by Attorney Judy G. Barone for party 1: Disc.Cert re Pltf's Interr.&Req.Produce.
- 11/02/04 MPR 28) Petition Complaint for Judgment to be Entered on filed by Plaintiff Miller-Jenkins. Petition Complaint for Judgment to be Entered on given to judge.

MPR 28) Petition Complaint for Judgment to be Entered on given to Judge William D. Cohen.

11/09/04 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Disc.Cert re Deft's Interr.&Req.Produce.

11/15/04 1 document filed for party : Motion to Admit Attorney Pro Hac Vice.  
1 document filed for party : Motion to Admit Attorney Pro Hac Vice.  
1 document filed for party : Motion to Admit Attorney Pro Hac Vice.

11/17/04 Entry order re MPR 10) Motion to Withdraw Waiver to Challenge of Paren. Contested Hearing. order issued William D. Cohen.  
sent copies of Ruling on Plaintiff's Motion to Withdraw Waiver to Challenge Presumption of Parentage to parties.

11/19/04 Response re MPR 28 filed by party 2.  
MPR 29) Motion to Admit Attorney Karen Loewy Pro Hac Vi filed by Defendant Miller-Jenkins. Motion to Admit Attorney Karen Loewy Pro Hac Vi given to judge.  
MPR 30) Motion to Admit Attorney Mary Bonauto Pro Hac V filed by Defendant Miller-Jenkins. Motion to Admit Attorney Mary Bonauto Pro Hac V given to judge.  
MPR 31) Motion to Admit Jennifer Levi Pro Hac Vice filed by Defendant Miller-Jenkins. Motion to Admit Jennifer Levi Pro Hac Vice given to judge.

11/22/04 MPR's 29-31: 29) Motion to Admit Attorney Karen Loewy Pro Hac Vi; 30) Motion to Admit Attorney Mary Bonauto Pro Hac V; 31) Motion to Admit Jennifer Levi Pro Hac Vice given to Judge William D. Cohen.

11/23/04 Entry order re MPR's 29-31: 29) Motion to Admit Attorney Karen Loewy Pro Hac Vi; 30) Motion to Admit Attorney Mary Bonauto Pro Hac V; 31) Motion to Admit Jennifer Levi Pro Hac Vice. M/Reaction Form. granted William D. Cohen.  
New party: ccd, Karen Loewy.  
New party: ccd, Mary Bonauto.  
New party: ccd, Jennifer Levi.

11/24/04 sent copies of entry regarding motions 29,30,31 to parties.  
MPR 32) Motion for Permission to Appeal filed by Co-counsel for Plaintiff Lindevaldsen. Motion for Permission to Appeal given to judge.  
MPR 32) Motion for Permission to Appeal given to Judge William D. Cohen.

12/06/04 Entry order re MPR 11) Request for Findings. Contested Hearing. order issued William D. Cohen.

12/07/04 sent copies of Findings of Fact, Temporary Parental Rights to parties.

12/21/04 Entry order re MPR 28) Petition Complaint for Judgment to be Entered on. M/Reaction Form. order issued William D. Cohen. See ruling on Plaintiff's Request for Entry of Judgment Based on Virginia Court Order.

12/22/04 sent copies of Ruling on Plaintiff's Request for Entry of Judgment Based on Virginia Court Order to parties.

01/05/05 Entry order re MPR 32) Motion for Permission to Appeal. M/Reaction Form. order issued William D. Cohen.  
sent copies of Ruling on Plaintiff's Motion for Permission to Appeal to parties.

01/06/05 MPR 32) Motion for Permission to Appeal filed by Co-counsel for Plaintiff Lindevaldsen. Motion for Permission to Appeal given to judge.

01/07/05 MPR 33) Motion for Permission to Appeal given to Judge William D. Cohen.

01/20/05 fax rec'd from supreme court re motion for interlocutory appeal.

01/26/05 Entry order re MPR 33) Motion for Permission to Appeal. M/Reaction Form. granted William D. Cohen. see Ruling on Plaintiff's Motion for Permission to Appeal.  
sent copies of Order issued 1/26/05 to parties.  
faxed copy of court's decision dated 1/26/05 to Supreme Court.

01/27/05 Spoke with Supreme Court and informed need to send the whole file. File being organized and should be sent.

02/01/05 Sent file to Supreme Court.

02/04/05 3 documents filed for party 5: Notice of Appeal; Check in the amount of \$225.00; Copy of the Transcript Order form.

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 09

1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Dis.Cert re RESPONSE to Pltf Interog.

02/08/05 Sent Faxed copy of Appeal, check in the amount of \$225.00, copy of transcript request to Supreme Court. Entire Trial Court File previously sent up.

03/08/05 1 document filed by Attorney Judy G. Barone for party 1: Notice of Appeal.

03/10/05 Sent Notice of Appeal of 11/17/04 order - (document #11 previously sent to Supreme Court) and check #7451 in the amount of \$225.00 to Supreme Court. Copy of Appeal and transcript request supplied by Atty. Barone forwarded to Atty. Lindevaldsen. Contents of trial court file with a document list previously forwarded to the Supreme Court.

03/14/05 letter rec'd from supreme Court re docket no. assigned.

04/01/05 Entry Order rec'd from Supreme Court Docket Nos. 2004-443, 2005-030 and 2005- 105.

04/07/05 letter rec'd from Atty. Parisi re setting matter for status conference.

04/08/05 Status Conference set for 04/14/05 at 02:00 PM. PLEASE BE ADVISED THE HEARING WILL BE HELD AT RUTLAND SUPERIOR COURT, 83 CENTER STREET, RUTLAND, VERMONT.

04/14/05 Status Conference held. WDC/TAPE.  
Entry Order: There is a question about what is not stayed. Atty. Parisi to request clarification from Vermont Supreme Court.

05/03/05 rec'd filing from Supreme Court stating appeal completed by court; enclosing certified copy of entry order and file you to set up your own standard notes. Choose "Docket Specific Codes" in the "System Admin. Screens" menu. Then search under CODE for "samnote". Each line must be 40 characters or less in length.

05/18/05 MPR 34) Motion Re: Final Hearing filed by Defendant Miller-Jenkins. Motion Re: Final Hearing given to judge.

05/19/05 MPR 34) Motion Re: Final Hearing given to Judge William D. Cohen.

06/06/05 Motion Hearing set for 06/21/05 at 01:00 PM. PLEASE BE ADVISED THE HEARING WILL BE HELD AT RUTLAND SUPERIOR COURT, 83 CENTER STREET, RUTLAND, VERMONT.

06/17/05 MPR 35) Motion Appear by Telephone 6/21/05 filed by Co-counsel for Plaintiff Lindevaldsen. Motion Appear by Telephone 6/21/05 given to judge.

06/20/05 Entry order re MPR 35) Motion Appear by Telephone 6/21/05. M/Reaction Form. granted William D. Cohen.

06/21/05 Motion Hearing held. WDC/TAPE.  
Entry Order: hearing held; court to issue order.

06/27/05 Entry order re MPR 34) Motion Re: Final Hearing. Contested Hearing. denied William D. Cohen. see Entry Order dated 6/27/05.  
sent copies of entry order to parties.

10/07/05 Case status changed to Active-ripe-discovery incomplete.

08/07/05 Entry Received from Supreme Court re Decision Affirmed and Remanded.

08/09/06 letter rec'd from Atty. Parisi re ready to go forward with a final hearing.

08/31/06 Status Conference set for 09/19/06 at 08:30 AM.

09/19/06 Status Conference held. WDC/TAPE.  
Entry Order: The case needs to be set for 3 hearings. This will be a child support hearing, a hearing on the contempt and lastly a hearing on the dissolving the civil union. Ms. Barone still is arguing jurisdiction.

09/28/06 Motion Hearing set for 11/17/06 at 01:30 PM. PLEASE BE ADVISED THE HEARING WILL BE ON WHAT, IF ANY, SANCTION SHOULD BE IMPOSED.

10/23/06 Hearing to establish child support set for 12/04/06 at 10:00 AM.

11/13/06 letter rec'd from Atty. Parisi re if hearing should be on sanctions.

11/14/06 Entry Order rec'd from Supreme Court re motion is denied.  
1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Request to Consider Sanctions.

11/16/06 Rena Lindevaldsen, Esq. files Memorandum in Opposition to Imposition of Sanctions.  
1 document filed by Attorney Judy G. Barone for party 1: Notice of Scheduling impossibility.

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 10

- 11/17/06 Defendant's Supplemental Memorandum of Law in Support of Motion for Sanctions filed.  
Motion Hearing held. WDC/DIGITAL.  
Entry Order: Court awards compensatory award of \$4,725 (to date) with ongoing award of \$75 per day; legal fee reimbursement of \$2,992.50; and expenses for travel of \$1449.00. Atty. Parisi to prepare order. Set showcase hearing for Atty. Barone to show cause why she should not be sanctioned for her failure to appear at 11/17 hearing. Case is set with magistrate on child support for 12/4. Set final hearing thereafter.
- 11/29/06 Status Conference set for 01/09/07 at 08:30 AM.  
1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Order Re: Motion for Sanctions.
- 12/04/06 Hearing to establish child support held. MC-SJG/TAPE.  
Present at hearing: Defendant Janet Miller-Jenkins; Attorney for Plaintiff Lisa Miller-Jenkins; Attorney for Defendant Janet Miller-Jenkins.  
1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Income & Expense Affidavit.  
support order to be filed by Atty Parisi.
- 12/06/06 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: proposed child support order.
- 12/08/06 Entry order re MPR's 8,23: 8) Motion for Contempt; 23) Motion for Sanctions. Default at Hearing. order issued William D. Cohen. see Order Re: Motion for Sanctions.  
sent parties copies of Order Re: Motion for Sanctions.
- 12/10/06 Child support entry order. Contested Hearing. order issued Shelley J. Gartner. Sole Custody of Party 3:children. Obligee is party 1; obligor is party 2.
- 12/22/06 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: AOS of Child Support Order.
- 01/09/07 Status Conference held. WDC/TAPE.  
Entry Order: case needs to be set for final hearing; set for week of trial April 2.
- 01/31/07 Domestic Hearing set for 04/02/07 at 09:00 AM. PLEASE BE ADVISED THE COURT HAS ALLOTTED ONE WEEK FOR THIS HEARING.  
Domestic Hearing set for 04/03/07 at 09:00 AM. PLEASE BE ADVISED THE HEARING WILL BE HELD UNTIL 2:30 P.M.  
Domestic Hearing set for 04/04/07 at 09:00 AM.  
Domestic Hearing set for 04/05/07 at 09:00 AM.  
Domestic Hearing set for 04/06/07 at 09:00 AM.
- 02/02/07 MPR 36) Motion Re: Discovery filed by Defendant Miller-Jenkins.  
Motion Re: Discovery given to judge.
- 02/06/07 MPR 37) Motion to Withdraw as Attorney filed by Plaintiff Miller-Jenkins. Motion to Withdraw as Attorney given to judge.
- 02/07/07 MPR's 36-37: 36) Motion Re: Discovery; 37) Motion to Withdraw as Attorney given to Judge William D. Cohen.
- 02/08/07 Response re MPR 37 filed by party 2.  
Motion Hearing set for 02/14/07 at 08:30 AM.
- 02/13/07 MPR 38) Motion for Lead Counsel to Attend by Phone filed by Plaintiff Miller-Jenkins. Motion for Lead Counsel to Attend by Phone given to judge.  
MPR 38) Motion for Lead Counsel to Attend by Phone given to Judge William D. Cohen.  
Entry order re MPR 38) Motion for Lead Counsel to Attend by Phone. M/Reaction Form. granted William D. Cohen.
- 02/14/07 Motion Hearing held. WDC/TAPE.  
Entry order re MPR 37) Motion to Withdraw as Attorney. Stipulated at Hearing. granted William D. Cohen. Notice given on record.  
Attorney Judy G. Barone withdraws.  
Entry Order: request to withdraw is granted. Attorney Lindevaldsen to remain in case and has 30 days to obtain lead counsel. both parties to be available for deposition and are to cooperate on the time and place.  
Entry order re MPR 36) Motion Re: Discovery. Contested Hearing. order issued William D. Cohen. Notice given on record.

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 11

- 02/26/07 1 document filed by Attorney Theodore A. Parisi Jr. for party 2:  
Notice to Take Deposition Upon Oral Exam.
- 03/05/07 New address for party 5 filed.  
New address for party 4 filed.  
letter rec'd from William Suter, Clerk, Supreme court of US re writ  
of certiorari being filed.
- 03/07/07 MPR 39) Motion to Amend Complaint filed by Co-counsel for Plaintiff  
Lindevaldsen. Motion to Amend Complaint given to judge.  
1 document filed for party 5: Reply and Affirmative Defenses to Claim.
- 03/14/07 New party: ccd, Lisa Chalidze Esq.
- 03/15/07 MPR 40) Motion Emergency Motion for Discovery Order filed by  
Co-counsel for Defendant Chalidze. Motion Emergency Motion for  
Discovery Order given to judge.  
Response re MPR 39 filed by party 9.
- 03/16/07 2 documents filed for party 9: Opposition to Motion for Admission  
Pro; Hac Vice.
- 03/20/07 Plaintiff's Response to Emergency Motion for Discovery Order filed by  
Norman C. Smith and Alternative Motion in Limine with Request for  
Protection filed.
- 03/21/07 Judge Cohen Grants Second Motion for Appearance Pro Hac Vice.  
Appearance entered by Norman C. Smith on behalf of Plaintiff  
Miller-Jenkins.  
New party: ccp, Stephen Crampton.  
New party: ccp, Gary Kreep.  
New party: ccp, Allison Paino.  
sent parties copies of court granting second motion for appearance  
pro hac vice.  
MPR 41) Motion Amended 2nd Motion to Appear Pro Hac Vic filed by  
Plaintiff Miller-Jenkins. Motion Amended 2nd Motion to Appear Pro Hac  
Vic given to judge.
- 03/22/07 1 document filed by Attorney Theodore A. Parisi Jr. for party 2:  
Disc.Cert re Suppl. Response to Interrog.
- 03/23/07 1 document filed by Attorney Norman C. Smith for party 1: Disc.Cert  
re Amended Notices Taking Depo.
- 03/26/07 Lisa Chalidze files Defendant's Reply Memorandum in Support of  
Emergency Motion for discovery Order and Alternative Motion in  
Limine.  
Response re MPR 41 filed by party 9.  
Status Conference set for 03/28/07 at 10:00 AM.  
Atty. Smith; Atty. Parisi; Atty. Chalidze and Atty. Cleary notified  
by phone of status hearing and attorneys will confer with  
out-of-state counsel they are involved with on date and time.
- 03/28/07 Entry order re MPR 39) Motion to Amend Complaint. M/Reaction Form.  
denied William D. Cohen. See Ruling on Plaintiff's Motion to Amend  
Complaint issued 3/28/07.  
Status Conference held. WDC/TAPE.  
Entry Order: All motions for pro hac vice admission are granted. The  
court to issue discovery order. Rules for the trial were explained to  
all counsel. Attorney Cleary not required to be present during the  
trial. If needed, he will be notified.  
Entry order re MPR 41) Motion Amended 2nd Motion to Appear Pro Hac  
Vic. Contested Hearing. granted William D. Cohen. Notice given on  
record.  
Entry order re MPR 40) Motion Emergency Motion for Discovery Order.  
Contested Hearing. order issued William D. Cohen. see entry order  
re: discovery issued March 28, 2007. Party 11, Gary Kreep, removed.  
Party 12, Allison Paino, removed.  
New party: ccp, David Corry.  
faxed and sent original orders re discovery and ruling on amending  
complaint to all parties.
- 04/02/07 MPR 42) Request for Pre-Union Name filed by Co-counsel for Defendant  
Chalidze. Request for Pre-Union Name given to judge.  
MPR 43) Motion in Limine Re: Opinion Testimony of Hayda filed by  
Co-counsel for Defendant Chalidze. Motion in Limine Re: Opinion  
Testimony of Hayda given to judge.  
1 document filed for party 13: Trial Memo.

1 document filed by Attorney Norman C. Smith for party 1: Disc.Cert re Amended Notice of Depos.  
Domestic Hearing held. WDC/TAPE.  
04/03/07 Domestic Hearing held. WDC/TAPE.  
04/04/07 1 document filed by Attorney Theodore A. Parisi Jr. for party 2:  
Disc.Cert re Amended Notice of Depos.  
Domestic Hearing held. WDC/TAPE.  
04/05/07 Domestic Hearing held. WDC/TAPE.  
Entry Order: parties have two weeks to submit proposed findings.  
04/06/07 Domestic Hearing scheduled for 04/06/07 cancelled.  
04/20/07 1 document filed for party 9: Proposed Findings of Fact&Conclusions.  
05/01/07 Case status changed to Active-Under Advisement.  
1 document filed for party 13: Notice of Filing Proposed Order.  
Entry order re MPR's 2-4: 2) Request to establish parental rights & resp; 3) Request to establish parent-child contact; 4) Request for Property Division. Contested Hearing. taken under advisement William D. Cohen. Notice given on record.  
05/04/07 United States Supreme Court files letter stating petition for a writ of certiorari is denied.  
05/07/07 1 document filed by Attorney Norman C. Smith for party 1: Notice of Visitation.  
1 document filed by Attorney Theodore A. Parisi Jr. for party 2:  
Proposed Final Order Dissolving Civil Un.  
05/11/07 MPR 44) Motion for Supplemental Sanctions for Contempt filed by Co-counsel for Defendant Chalidze. Motion for Supplemental Sanctions for Contempt given to judge.  
MPR 44) Motion for Supplemental Sanctions for Contempt given to Judge William D. Cohen.  
05/14/07 Corrected Affidavit of Janet Jenkins in Support of Defendant's Motion for Supplemental Sanctions for Continued Contempt of Visitation Order filed.  
05/16/07 1 document filed for party 9: Certificate of Service for Affidavit.  
05/22/07 Response re MPR 44 filed by party 1.  
06/05/07 2 documents filed by Attorney Norman C. Smith for party 1: Affidavit of Lisa Miller; Affidavit of Rena Lindevaldsen.  
06/06/07 MPR 45) Motion for Evidentiary Hearing on Sanctions filed by Co-counsel for Defendant Chalidze. Motion for Evidentiary Hearing on Sanctions given to judge.  
MPR 45) Motion for Evidentiary Hearing on Sanctions given to Judge William D. Cohen.  
06/11/07 3 documents filed by Attorney Norman C. Smith for party 1: Second Notice Concerning Visitation; affidavit of Sylvia Haydash; Affidavit of Lisa Miller.  
06/12/07 Norman Smith, Esq. files page 4 all the Miller affidavit.  
06/13/07 2 documents filed for party 9: Cert.of Service re Reply to 2nd Notice; Concerning Visitation".  
06/15/07 Entry order re MPR's 2-4: 2) Request to establish parental rights & resp; 3) Request to establish parent-child contact; 4) Request for Property Division. Contested Hearing. order issued William D. Cohen. see Findings of Fact, Conclusions of Law and Order.  
copies of order were mailed to parties.  
Case status changed to Active-ready for final hearing.  
MPR 46) Motion for a Protective Order filed by Plaintiff Miller-Jenkins. Motion for a Protective Order given to judge.  
Entry order re MPR's 42-43: 42) Request for Pre-Union Name; 43) Motion in Limine Re: Opinion Testimony of Hayda. Contested Hearing. order issued William D. Cohen.  
Entry order re MPR's 42-43: 42) Request for Pre-Union Name; 43) Motion in Limine Re: Opinion Testimony of Hayda. Contested Hearing. order issued William D. Cohen.  
07/03/07 Defendant's Opposition to Plaintiff's Motion for Protective Order filed.  
Response re MPR 46 filed by party 9.  
07/05/07 Motion Hearing set for 08/03/07 at 02:00 PM. PLEASE BE ADVISED THIS HEARING IS HELD ON ALL PENDING MOTIONS FOR CONTEMPT.  
Motion Hearing scheduled for 08/03/07 corrected.

Entry order re MPR's 42-43: 42) Request for Pre-Union Name; 43) Motion in Limine Re: Opinion Testimony of Hayda. Contested Hearing. order issued William D. Cohen. see findings and order issued 6/15/07.  
 Motion Hearing set for 08/03/07 at 02:00 PM. PLEASE BE ADVISED THIS HEARING WILL BE ON ALL PENDING MOTIONS FOR CONTEMPT.

07/11/07 1 document filed by Attorney Norman C. Smith for party 1: Notice of Appeal.  
 Notice of Appeal from party 1.  
 Motion Hearing set for 08/03/07 at 02:00 PM.

07/12/07 Sent Notice of Appeal, check #9294, certified copy of docket entries, and hearing list. Contents of file (box) to be given to Justice Reiber to bring back to Supreme Court. Justice Reiber will be at Rutland Family Court to appear at GAL recognition luncheon.

07/13/07 2 documents filed for party : Cover letter for Appeal of Final Order; Supreme Court Docket # 2007-271.

07/31/07 MPR 47) Motion to Participate by Phone filed by Defendant Miller-Jenkins. Motion to Participate by Phone given to judge.  
 MPR 47) Motion to Participate by Phone given to Judge Thomas J. Devine.

08/01/07 Entry order re MPR 47) Motion to Participate by Phone. M/Reaction Form. granted William D. Cohen. as to relevant testifying only.  
 sent parties copies of entry regarding motion no. 47.

08/02/07 Entry Order issued re videorecording; copies faxed to parties.

08/03/07 Motion Hearing held. WDC/DIGITAL.  
 Present at hearing: Plaintiff Lisa Miller-Jenkins; Defendant Janet Miller-Jenkins; Co-counsel for Defendant Lisa Chalidze Esq; Co-counsel for Plaintiff Stephen Crampton.  
 Hearing held in Courtroom 2, third floor, on digital audio.  
 Motion Hearing held. WDC/TAPE.  
 Entry Order: the parties agreed to an order as to its sanction for noncompliance and contempt prior to final order. Atty. Parisi to prepare order, the party to submit an order w/in 2 weeks regarding contact.

Entry order re MPR's 44-46: 44) Motion for Supplemental Sanctions for Contempt; 45) Motion for Evidentiary Hearing on Sanctions; 46) Motion for a Protective Order. Stipulated at Hearing. attys ordered to submit proposed order William D. Cohen. Notice given on record.

08/21/07 1 document filed for party 9: Proposed Order.

08/23/07 Plaintiff's Response in Opposition to Defendant's Proposed Order filed.

09/10/07 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Proposed Order.

09/20/07 MPR 48) Motion to Modify or Annul Visitation Schedule filed by Plaintiff Miller-Jenkins. Motion to Modify or Annul Visitation Schedule given to judge. Documents filed: Plaintiff's Memorandum; Affidavit of Pastor Douglas Wright; Affidavit of Gwen Corley; Affidavit of Lisa Miller; Child Care Information System.  
 MPR 48) Motion to Modify or Annul Visitation Schedule given to Judge William D. Cohen.

09/21/07 letter rec'd from David Cleary re responding to recent submissions of Attorney Smith.

09/28/07 Entry order re MPR 48) Motion to Modify or Annul Visitation Schedule. M/Reaction Form. to be set for hearing William D. Cohen. status conf. to be set in order to determine the amount of time needed for a hearing.  
 Entry order re MPR's 44-46: 44) Motion for Supplemental Sanctions for Contempt; 45) Motion for Evidentiary Hearing on Sanctions; 46) Motion for a Protective Order. Stipulated at Hearing. order issued William D. Cohen.  
 sent parties copies of Stip and Order issued and Entry Order issued 9/28/07.

10/03/07 Status Conference set for 10/10/07 at 08:30 AM.

10/05/07 letter rec'd from Atty. Smith re correct ing P. O. Box number is 24 not 245.  
 Response re MPR 48 filed by party 2.

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 14

10/10/07 Status Conference held. WDC/TAPE.  
Present at hearing: Defendant Janet Miller-Jenkins; Co-counsel for Defendant Lisa Chalidze Esq; Attorney for Plaintiff Lisa Miller-Jenkins; Attorney for Defendant Janet Miller-Jenkins. Atty. Cramton by phone.  
Entry Order: the case needs to be set for a 1/2 day contested hearing.

10/29/07 Notice of Appeal from party 1.

10/30/07 sent Notice of Appeal (for Entry Order of 9/28/07) w/ check # 9648 along with certified copies of docket entries, hearing list, contents of file pertaining to appeal with a document list - all sent to Supreme Court.

10/31/07 rec'd fax from Supreme Court re assigning docket number.

11/05/07 Motion Hearing set for 12/31/07 at 09:00 AM.

11/16/07 MPR 49) Motion for Other Enforcement Issues filed by Defendant Miller-Jenkins. Motion for Other Enforcement Issues given to judge.  
MPR 50) Motion for Contempt Other than Child Support filed by Defendant Miller-Jenkins. Motion for Contempt Other than Child Support given to judge.  
MPR 51) Motion to Modify Parental Rights & Resp. filed by Defendant Miller-Jenkins. Motion to Modify Parental Rights & Resp. given to judge.  
MPR's 49-51: 49) Motion for Other Enforcement Issues; 50) Motion for Contempt Other than Child Support; 51) Motion to Modify Parental Rights & Resp. given to Judge William D. Cohen.

11/21/07 MPR 52) Motion Emergency Motion to Annul Visitation filed by Plaintiff Miller-Jenkins. Motion Emergency Motion to Annul Visitation given to judge.  
Response re MPR 52 filed by party 9.  
MPR 53) Motion Emergency Motion for Change of Custody filed by Co-counsel for Defendant Chalidze. Motion Emergency Motion for Change of Custody given to judge.

12/07/07 Motion Hearing set for 12/31/07 at 09:00 AM. PLEASE BE ADVISED THIS IS AN AMENDED NOTICE OF HEARING. THE COURT WILL BE HEARING ALL PENDING MOTIONS FOR THE DAY ON DECEMBER 31, 2007 AT 9:00 A.M.

12/24/07 MPR 54) Motion to Participate by Phone filed by Plaintiff Miller-Jenkins. Motion to Participate by Phone given to judge.  
Response re MPR 53 filed by party 1.

12/27/07 MPR 54) Motion to Participate by Phone given to Judge William D. Cohen.  
Entry order re MPR 54) Motion to Participate by Phone. M/Reaction Form. denied William D. Cohen. notice had been sent to all parties on November 5, 2007. This is the first request to participate by telephone. Phone participation would make it difficult to conduct this contested hearing. Thus, the request is denied.

12/31/07 Motion Hearing held. WDC/TAPE.  
Motion Hearing held. WDC/TAPE.  
Entry Order: matter to be set for status conference in March.  
Entry order re MPR's 48-49: 48) Motion to Modify or Annul Visitation Schedule; 49) Motion for Other Enforcement Issues. Stipulated w/o Hearing. order issued William D. Cohen.  
1 document filed by Attorney Norman C. Smith for parties 1-2: AOS of Modification of Visitation.  
Response re MPR 51 filed by party 1.

01/04/08 Status Conference set for 03/11/08 at 08:30 AM.

01/24/08 1 document filed for party : Entry Order - appeal dismissed.

01/28/08 Entry Order from Supreme Court filed re appeal is dismissed.

02/19/08 3 documents filed for party : Appeal of 9/28/07 dismissed and contents; of file pertaining to this appeal; returned from Supreme Court.  
emailed Supreme court re: Plf Atty request for copy of Plf Ex. 19 - timeshare document.

03/11/08 Status Conference held. WDC/TAPE.  
no parties present for status - only attorneys participated.  
Entry Order: The parties agreed to continue with the parent time as set forth. There have been some missed times due to the weather. The case may need a new allocation of time in July of 2008.

03/17/08 Entry Order rec'd from Supreme Court stating "affirmed".

04/01/08 MPR 55) Motion Emergency Motion for Contempt/Enforcemen filed by Defendant Miller-Jenkins. Motion Emergency Motion for Contempt/Enforcemen given to judge.  
MPR 56) Motion to Modify Parental Rights & Resp. filed by Defendant Miller-Jenkins. Motion to Modify Parental Rights & Resp. given to judge.  
MPR's 55-56: 55) Motion Emergency Motion for Contempt/Enforcemen; 56) Motion to Modify Parental Rights & Resp. given to Judge William D. Cohen.

04/02/08 Entry order re MPR 55) Motion Emergency Motion for Contempt/Enforcemen. M/Reaction Form. to be set for hearing William D. Cohen. A 1 hour hearing to be set on the re- quest for an order of contempt. If the Plaintiff found in contempt, then a hearing to be set to determine if a change in custody is needed based upon a change in circumstance and is in the child's best interest.

04/08/08 Motion Hearing set for 04/29/08 at 02:30 PM.

04/21/08 1 document filed by Attorney Norman C. Smith for party 1: Disc.Cert re Notice of Depo of Janet Jen.

04/23/08 defendant files affidavit of service for personal service on plaintiff of emergency motion for contempt/enforce and motion for transfer of both sole leg al and physical responsibility to deft.

04/24/08 MPR 57) Motion for a Protective Order filed by Defendant Miller-Jenkins. Motion for a Protective Order given to judge.  
MPR 57) Motion for a Protective Order given to Judge William D. Cohen.  
MPR 58) Motion to Participate by Phone filed by Plaintiff Miller-Jenkins. Motion to Participate by Phone given to judge.  
MPR 58) Motion to Participate by Phone given to Judge William D. Cohen.

04/25/08 Entry order re MPR 58) Motion to Participate by Phone. M/Reaction Form. granted William D. Cohen.  
Entry order re MPR 57) Motion for a Protective Order. M/Reaction Form. to be set for hearing William D. Cohen. to be argued at the upcoming hearing.  
Motion Hearing set for 04/29/08 at 02:30 PM.  
sent parties copies of entry regarding motions 57,58.  
MPR 59) Motion to Participate by Phone filed by Defendant Miller-Jenkins. Motion to Participate by Phone given to judge.  
MPR 59) Motion to Participate by Phone given to Judge William D. Cohen.

04/28/08 Response re MPR 55,57 filed by party 1.  
Response re MPR 55-56 filed by party 1.  
MPR 60) Motion to Strike Affidavit filed by Plaintiff Miller-Jenkins.  
Motion to Strike Affidavit given to judge.  
1 document filed by Attorney Norman C. Smith for party 1: second Amended Notice of Depo duces Tecu.  
Response re MPR 58 filed by party 9.  
1 document filed for party 10: Original Affidavit of Lisa Miller.  
Ted Parisi files response to Plaintiff's Response in Opposition to Defendant's Emergency Motion for Contempt and Enforc ement and Motion for Transfer of Both Legal and Physical Responsibility and Motion to Strike Affidavit.

04/29/08 Motion Hearing held. WDC/DIGITAL.

04/30/08 Entry Order: Motion for contempt taken under advisement.

04/30/08 Entry order re MPR 55) Motion Emergency Motion for Contempt/Enforcemen. Contested Hearing. order issued William D. Cohen. See Decision Defendant's Motion for contempt.  
Entry order re MPR 56) Motion to Modify Parental Rights & Resp. Contested Hearing. denied William D. Cohen. see Decision Defendant's Motion for contempt.  
Entry order re MPR 57) Motion for a Protective Order. Contested Hearing. rendered moot. William D. Cohen. see Decision Defendant's Motion for Contempt.  
Entry order re MPR 60) Motion to Strike Affidavit. Contested Hearing. denied William D. Cohen. See Decision Defendant's Motion

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 16

for Contempt.  
 Entry order re MPR 59) Motion to Participate by Phone. M/Reaction Form. rendered moot.

05/01/08 sent parties copies of Decision defendant's Motion for Contempt.

06/10/08 copy of letter from Supreme Court in Washington,DC to Supreme Court in Montpelier re application for an extension of time.

06/19/08 MPR 61) Motion Emergency Motion for Contempt filed by Defendant Miller-Jenkins. Motion Emergency Motion for Contempt given to judge.  
 MPR 62) Motion Emergency Motion for Enforcement filed by Defendant Miller-Jenkins. Motion Emergency Motion for Enforcement given to judge.  
 MPR 63) Motion for Transfer of Both Sole Legal & Physic filed by Defendant Miller-Jenkins. Motion for Transfer of Both Sole Legal & Physic given to judge.

06/20/08 MPR's 61-63: 61) Motion Emergency Motion for Contempt; 62) Motion Emergency Motion for Enforcement; 63) Motion for Transfer of Both Sole Legal & Physic given to Judge William D. Cohen.

06/27/08 Entry order re MPR's 61-63: 61) Motion Emergency Motion for Contempt; 62) Motion Emergency Motion for Enforcement; 63) Motion for Transfer of Both Sole Legal & Physic. M/Reaction Form. to be set for hearing William D. Cohen. status conference only. Phone calls are allowed.

07/02/08 Status Conference set for 07/29/08 at 08:30 AM.

07/29/08 Status Conference held. WDC/TAPE.  
 Attorneys to conference with Attorney Cleary re: possible substitution of counsel for child. Set for 1 day hrg. on motions enforce/contempt.

08/12/08 Motion Hearing set for 10/27/08 at 09:00 AM.

08/20/08 Response re MPR 50-53 filed by party 1.  
 MPR 64) Motion to Strike Defendant's Affidavit filed by Plaintiff Miller-Jenkins. Motion to Strike Defendant's Affidavit given to judge.

08/26/08 MPR 64) Motion to Strike Defendant's Affidavit given to Judge William D. Cohen.  
 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Supplemental Affidavit of Janet Jenkins.

09/05/08 Entry order re MPR 64) Motion to Strike Defendant's Affidavit. M/Reaction Form. to be set for hearing William D. Cohen. to be heard at time of hearing.  
 Motion Hearing set for 10/27/08 at 09:00 AM.

09/23/08 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Disc.Cert re Notice of Taking Deposition.

10/07/08 MPR 65) Motion for a Protective Order filed by Plaintiff Miller-Jenkins. Motion for a Protective Order given to judge.  
 MPR 65) Motion for a Protective Order given to Judge William D. Cohen.  
 Response re MPR 65 filed by party 2.

10/08/08 Entry order re MPR 65) Motion for a Protective Order. M/Reaction Form. order issued William D. Cohen. the plaintiff to be deposed in Virginia and the Defendant to be deposed in Vermont.  
 faxed copies of entry regarding motion no. 65 to parties.

10/10/08 2 documents filed by Attorney Theodore A. Parisi Jr. for party 2: Dis.Cert re Amended Notice to Take Depo; Disc.Cert re Notice of Taking Depo.

10/13/08 MPR 66) Motion to Continue Hearing filed by Plaintiff Miller-Jenkins, Co-counsel for Plaintiff Crampton. Motion to Continue Hearing given to judge.  
 MPR 66) Motion to Continue Hearing given to Judge William D. Cohen.

10/16/08 Response re MPR 66 filed by party 2.  
 Entry order re MPR 63) Motion for Transfer of Both Sole Legal & Physic. Withdrawn. withdrawn.

10/17/08 Entry order re MPR 66) Motion to Continue Hearing. M/Reaction Form. denied William D. Cohen.  
 sent parties copies of entry regarding motion no. 66.  
 0 document filed for party 10:.  
 MPR 67) Motion to Quash Notice of Deposition filed by Plaintiff Miller-Jenkins, Co-counsel for Plaintiff Crampton. Motion to Quash Notice of Deposition given to judge. Documents filed: Amended Notice

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 17

to Take Deposition.

10/20/08 Response re MPR 67 filed by party 9.  
MPR 68) Motion for Admission Pro Hac Vice of Joseph Pri filed by Co-counsel for Defendant Chalidze. Motion for Admission Pro Hac Vice of Joseph Pri given to judge.

10/21/08 Plaintiff's Reply in Support of Motion to Quash Notice of Deposition. hearing time needs to be amended to 10:00 am as judge has an appointment.  
Motion Hearing scheduled for 10/27/08 rescheduled.  
Motion Hearing scheduled for 10/27/08 rescheduled.  
Motion Hearing set for 10/27/08 at 10:00 AM. PLEASE BE ADVISED THIS IS AN AMENDED NOTICE OF HEARING. IT WAS ORIGINALLY SET FOR 9:00 A.M. BUT HAS BEEN RESET TO START AT 10:00 A.M. WE ARE SORRY FOR ANY INCONVENIENCE THIS MAY HAVE CAUSED.  
Entry order re MPR 67) Motion to Quash Notice of Deposition. M/Reaction Form. denied William D. Cohen. deposition must go forward in the Commonwealth of Virginia at a location chosen by the Defendant. This deposition to occur prior to October 27th hearing in Rutland, Vermont.  
faxed entry regarding motion no. 67 to parties.

10/23/08 MPR 69) Motion to Quash Notice of Deposition filed by Defendant Miller-Jenkins. Motion to Quash Notice of Deposition given to judge. Response re MPR 69 filed by party 10.  
MPR 70) Motion Cross Motion to Compel Production of Doc filed by Plaintiff Miller-Jenkins. Motion Cross Motion to Compel Production of Doc given to judge.

10/27/08 Entry Order: Ruling for contempt made on the record. New counsel to be appointed for the child. New Contact order in place. Attorney Parisi to prepare order.

10/29/08 1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Order Re: Contempt & Parent-Child Cont.

11/24/08 1 document filed by Attorney Norman C. Smith for party 1: Notice of Appeal.

11/25/08 Notice of Appeal, check #5912 for filing fee, certified copies of docket entries, hearing list, exhibits and exhibit list, and contents of trial court file pertaining to appeal with a document list sent to Supreme Court.  
1 document filed by Attorney Theodore A. Parisi Jr. for party 2: Stip for Substitution of Counsel.  
Attorney Theodore A. Parisi Jr. withdraws.  
Attorney withdraws.  
Appearance entered by Sarah Star on behalf of Defendant Miller-Jenkins.  
MPR 71) Motion Emergency Motion to Enforce Visitation filed by Defendant Miller-Jenkins. Motion Emergency Motion to Enforce Visitation given to judge.  
MPR 72) Motion for Contempt Other than Child Support filed by Defendant Miller-Jenkins. Motion for Contempt Other than Child Support given to judge.  
MPR 73) Request for Sanctions filed by Defendant Miller-Jenkins. Request for Sanctions given to judge.

11/26/08 MPR's 71-73: 71) Motion Emergency Motion to Enforce Visitation; 72) Motion for Contempt Other than Child Support; 73) Request for Sanctions given to Judge William D. Cohen.  
Telephone conference set for 11/26/08 at 11:00 AM.  
Telephone conference held. WDC/VIDEO.  
2 documents filed for party : Cover letter. Supreme Docket No. is; 2008-481 for new appeal filed.  
Entry Order: status to be set week of December 8.  
Appearance entered by Michelle A. Kenny on behalf of Minor child Miller-Jenkins.

12/02/08 Status Conference set for 12/12/08 at 01:30 PM.

12/08/08 1 document filed by Attorney Michelle A. Kenny for party 3: Substitution of Counsel.

12/12/08 Status Conference held. WDC/TAPE.  
Entry Order: status held; all pending motions to be set for an all

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 18

day hearing January 2009.

12/16/08 Motion Hearing set for 01/28/09 at 09:00 AM. PLEASE BE ADVISED THE COURT WILL HEAR ALL PENDING MOTIONS.

Motion Hearing set for 01/28/09 at 09:00 AM.

01/26/09 MPR 74) Motion to Participate by Phone or For Continuan filed by Plaintiff Miller-Jenkins. Motion to Participate by Phone or For Continuan given to judge.

01/27/09 MPR 75) Motion Renewal/Refiling of Motion to Transfer C filed by Defendant Miller-Jenkins. Motion Renewal/Refiling of Motion to Transfer C given to judge.

01/28/09 Motion Hearing held. WDC/VTAPE.  
Motion Hearing held. WDC/VTAPE.  
Entry Order: Findings made on the record and the Plaintiff's Motion to Stop visitation was denied. Court found a real substantial and unanticipated change in circumstances on the Defendant's motion but that change in custody could not be in child's best interest.  
Attorney Star to prepare order.  
Entry order re MPR 75) Motion Renewal/Refiling of Motion to Transfer C. M/Reaction Form. to be set for hearing William D. Cohen. to be argued on the merits.  
Entry order re MPR 73) Request for Sanctions. M/Reaction Form. to be set for hearing William D. Cohen.  
Entry order re MPR 69) Motion to Quash Notice of Deposition. M/Reaction Form. rendered moot. William D. Cohen.  
Entry order re MPR 70) Motion Cross Motion to Compel Production of Doc. M/Reaction Form. rendered moot. William D. Cohen.  
Entry order re MPR 68) Motion for Admission Pro Hac Vice of Joseph Pri. M/Reaction Form. granted William D. Cohen.  
Entry order re MPR 74) Motion to Participate by Phone or For Continuan. M/Reaction Form. granted William D. Cohen. Notice given on record.

02/10/09 MPR 76) Motion for Clarification Regarding Sanctions filed by Defendant Miller-Jenkins. Motion for Clarification Regarding Sanctions given to judge.  
Entry order re MPR's 50-53,61-62,64: 50) Motion for Contempt Other than Child Support; 51) Motion to Modify Parental Rights & Resp; 52) Motion Emergency Motion to Annul Visitation; 53) Motion Emergency Motion for Change of Custody; 61) Motion Emergency Motion for Contempt; 62) Motion Emergency Motion for Enforcement; 64) Motion to Strike Defendant's Affidavit. Contested Hearing. order issued William D. Cohen.  
Entry order re MPR's 71-73,75: 71) Motion Emergency Motion to Enforce Visitation; 72) Motion for Contempt Other than Child Support; 73) Request for Sanctions; 75) Motion Renewal/Refiling of Motion to Transfer C. Contested Hearing. order issued William D. Cohen.

02/11/09 sent parties copies of Order re PCC.

02/12/09 Plaintiff files objections to Proposed Order.  
Response re MPR 76 filed by party 1.  
MPR 77) Motion Modify filed by Plaintiff Miller-Jenkins. Motion Modify given to judge.

02/13/09 MPR's 76-77: 76) Motion for Clarification Regarding Sanctions; 77) Motion Modify given to Judge William D. Cohen.  
Entry order re MPR 76) Motion for Clarification Regarding Sanctions. M/Reaction Form. Other William D. Cohen. no costs at this time. The court will reserve on this issue.  
sent parties copies of entry regarding motion no. 76.  
letter rec'd from Supreme Court of the United States re Petition for Writ of Certiorari is denied.

02/19/09 Attorney Star called for certified copy of Parent/Child Contact Order issued on 2/10/09. Sent out today.

03/09/09 MPR 78) Motion Emergency Motion for Enforcement filed by Defendant Miller-Jenkins. Motion Emergency Motion for Enforcement given to judge.  
Response re MPR 78 filed by party 1.

03/10/09 Telephone conference set for 03/12/09 at 08:30 AM.  
originals filed re opposition to defendant's emergency motion for

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 19

enforcement and an evidentiary hearing.

03/12/09 Telephone conference held. WDC/TAPE.  
partys have 1 week to agree to a make up visit / if not able to agree matter will be set.  
Entry Order: The parties to attempt to reset the missed visit. They have one week to work out the make up time. If not, Ms. Star to notify the court and a hearing to be set.

03/27/09 2 documents filed for party : Entry Order re Dismissing Appeal per her; request.  
1 document filed by Attorney Sarah Star for party 2: Order re Make UP PCC Time.

04/06/09 1 document filed for party : Dismissal Order.

04/08/09 Entry order re MPR 78) Motion Emergency Motion for Enforcement. Stipulated w/o Hearing. order issued William D. Cohen.  
Order Regarding Make-Up Parent Child Contact Time faxed to parties.

04/09/09 sent copies of Original Order re Make-Up Parent Child Contact Time to parties.

04/10/09 MPR 79) Request for Make Up Parent Child Contact Time filed by Defendant Miller-Jenkins. Request for Make Up Parent Child Contact Time given to judge.  
MPR 80) Request Renewal of Request for Sanctions filed by Defendant Miller-Jenkins. Request Renewal of Request for Sanctions given to judge.  
MPR's 79-80: 79) Request for Make Up Parent Child Contact Time; 80) Request Renewal of Request for Sanctions given to Judge William D. Cohen.

04/14/09 Status Conference set for 04/24/09 at 09:00 AM.

04/17/09 MPR 81) Motion to Participate by Phone filed by Plaintiff Miller-Jenkins. Motion to Participate by Phone given to judge.

04/20/09 MPR 81) Motion to Participate by Phone given to Judge William D. Cohen.

04/22/09 Response re MPR 79-80 filed by party 1.

04/23/09 defendant files response to plaintiff's 4/22/09 filing.  
Affidavit of Rena Lindevaldsen submitted to Clarify and Correct Defendant's Latest Filing filed.  
Entry order re MPR 81) Motion to Participate by Phone. M/Reaction Form. granted William D. Cohen.

04/24/09 Video Tape ID: 1872 Time: 09:13 AM.  
Status Conference held. WDC/VIDEO.  
Present at hearing: Co-counsel for Plaintiff Rena Lindevaldsen; Attorney for Defendant Janet Miller-Jenkins; Attorney for Minor child Isabella Miller-Jenkins. R. Lindevaldsen appeared by phone.  
Matter to be set for 1/2 day hrg. on a Friday before Memorial Day if possible.  
Motion Hearing set for 05/08/09 at 01:00 PM.

05/01/09 MPR 82) Motion to Participate by Phone filed by Plaintiff Miller-Jenkins. Motion to Participate by Phone given to judge.

05/04/09 MPR 82) Motion to Participate by Phone given to Judge William D. Cohen.  
Plaintiff's Original Response to Deft's Request for Make-Up Parent Child Contact Time and Renewal of Request for Sanction and Original Affidavit of Rena Lindevaldsen submitted to clarify and correct defendant's latest filing filed.

05/06/09 Entry order re MPR 82) Motion to Participate by Phone. M/Reaction Form. granted William D. Cohen.

05/07/09 MPR 83) Motion for Appearance Pro Hac Vice filed by Plaintiff Miller-Jenkins. Motion for Appearance Pro Hac Vice given to judge.  
Entry order re MPR 83) Motion for Appearance Pro Hac Vice.  
M/Reaction Form. granted William D. Cohen.

05/08/09 Motion Hearing held. WDC/TAPE.  
Present at hearing: Plaintiff Lisa Miller-Jenkins; Defendant Janet Miller-Jenkins; Attorney for Plaintiff Lisa Miller-Jenkins; Attorney for Defendant Janet Miller-Jenkins; Attorney for Minor child Isabella Miller-Jenkins. Atty. Horatio Mihet, Esq. appeared for plaintiff Plf was present by phone.  
Order issued re: make up visits copies given to parties after hrg.

Certified copy of order given to def along with Certified copy of 4/8/09 order.

Entry order re MPR 79) Request for Make Up Parent Child Contact Time. Stipulated at Hearing. order issued William D. Cohen.

1 document filed by Attorney Norman C. Smith for party 2: AOS of Order Re: Make up Visits.

Entry order re MPR 77) Motion Modify. Stipulated at Hearing. order issued William D. Cohen.

05/28/09 MPR 84) Motion to Modify Parental Rights & Resp. filed by Defendant Miller-Jenkins. Motion to Modify Parental Rights & Resp. waiting for Memo in Opposition.

06/04/09 MPR 85) Motion to Appoint Guardian ad Litem filed by Minor child Miller-Jenkins. Motion to Appoint Guardian ad Litem given to judge.

06/05/09 MPR 85) Motion to Appoint Guardian ad Litem given to Judge William D. Cohen.

06/10/09 Defendant files Supplemental Memo in Support of Defendant's Motion to Modify Parental Rights and Responsibilities.

06/19/09 Entry order re MPR's 76,80,84: 76) Motion for Clarification Regarding Sanctions; 80) Request Renewal of Request for Sanctions; 84) Motion to Modify Parental Rights & Resp. M/Reaction Form. to be set for hearing William D. Cohen.

Entry order re MPR 85) Motion to Appoint Guardian ad Litem. M/Reaction Form. granted William D. Cohen.

07/01/09 spoke to Judge Cohen who advises that the motion to modify (mpr. no 77) was closed out at the last hearing and the pending motions that need to be heard are mpr 76,80 and 84.

spoke to Atty. Starr who was inquiring on status of her motion to modify; advised that it had to be set for hrg. for 1 day; she advises that she did not feel it would need that much time as there has not been a response to her motion as of this date and her case would probably need 1 hour.

07/02/09 Sent parties copies of entry regarding motions 76,80,84 and 85.

07/08/09 Motion Hearing set for 08/21/09 at 01:00 PM.

07/15/09 Status Conference set for 07/24/09 at 01:00 PM.

07/24/09 Status Conference held. WDC/TAPE.

Entry Order: case to be set for a full day contested hearing on August 21, 2009.

07/29/09 Motion Hearing scheduled for 08/21/09 rescheduled.

Motion Hearing set for 08/21/09 at 09:00 AM. PLEASE BE ADVISED THIS IS AN AMENDED NOTICE OF HEARING. IT WAS ORIGINALLY SET FOR 1:00 P.M. BUT HAS NOT BEEN SET FOR 9:00 A.M. FOR AN ALL DAY HEARING.

Motion Hearing scheduled for 08/21/09 rescheduled.

Motion Hearing set for 08/21/09 at 09:00 AM.

08/06/09 New party: gal, Tara Devine.

08/19/09 1 document filed for party : Permission to Videotape upcoming hrg.

Response re MPR 84 filed by party 1.

MPR 86) Motion for Psychological Exam of Both Parties filed by Plaintiff Miller-Jenkins. Motion for Psychological Exam of Both Parties given to judge.

MPR 87) Motion to Continue Hearing filed by Plaintiff Miller-Jenkins. Motion to Continue Hearing given to judge.

MPR's 86-87: 86) Motion for Psychological Exam of Both Parties; 87) Motion to Continue Hearing given to Judge William D. Cohen.

Response re MPR 86-87 filed by party 2.

08/20/09 Entry order re MPR 86) Motion for Psychological Exam of Both Parties. M/Reaction Form. Other William D. Cohen. to be argued on August 21, 2009.

Entry order re MPR 87) Motion to Continue Hearing. M/Reaction Form. denied William D. Cohen. the case to go forward on the merits. notified parties by phone of court's decision on entry regarding motion 86 and 87.

08/21/09 Motion Hearing held. WDC/TAPE.

Ms. Star to prepare order with a bill of costs set for status on a friday sept 4th partys have 10 days to file proposed findings and conclusions partys may call in for status.

New party: ccd, Lisa Chalidze Esq. - Atty. Lisa Chalidze.

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 21

- 08/31/09 1 document filed by Attorney Norman C. Smith for party 1: Proposed Findings of Fact & Conclusions.
- 09/03/09 Status Conference set for 09/04/09 at 09:00 AM.  
Spoke with Bonnie Gentry from Mr. Crampton's office regarding the time for the Status Conference on Sept. 4th. The time is set for 9:00 am and the attorney s to appear by phone. Left message on Ms. Star's machine re: time and that she would need to give us her phone number so we could link up the attorneys at the correct time. Liberty Counsel will be calling in at 9:00 am. Ms. Bonnie Gentry's number from Liberty Counsel is 434-592-4880 if needed.
- 09/04/09 2 documents filed by Attorney Sarah Star for party 2: Proposed Findings of Fact; Winchester VA Family Court's Order re Co. Video Tape ID: 1910 Time: 09:10 AM.  
Status Conference held. WDC/VIDEO.  
Set three day visit have clients mother pick up child have Ms. Miller pick up at Grandparents in VA pick up occur Fri 9:00 am her home by Ms. Jenkin's mother then Ms. Miller pick up at grandmother's home Sunday at 3 pm for September visit J weekend of 25th Sept. Ms. Star prepare an order include 48 hours notice (if visit not going forward).
- 09/08/09 1 document filed by Attorney Sarah Star for party 2: Interim order Re Parent Child Contact.  
Entry order re MPR 84) Motion to Modify Parental Rights & Resp. Contested Hearing. taken under advisement William D. Cohen. Notice given on record.
- 09/11/09 1 document filed for party 5: Interim Order re Parent Child Contact.  
Interim Order Regarding Parent-child contact issued; copies sent to parties.
- 10/07/09 letter rec'd from Sarah Star re no visitation occurred.
- 11/20/09 Entry order re MPR's 76,80,84: 76) Motion for Clarification Regarding Sanctions; 80) Request Renewal of Request for Sanctions; 84) Motion to Modify Parental Rights & Resp. Contested Hearing. order issued William D. Cohen.  
Entry order re MPR 86) Motion for Psychological Exam of Both Parties. M/Reaction Form. rendered moot.  
Dispute 1-2 disposed: Judgment, findings & conclusion. Case closed.  
MPR 88) Motion Filed by Court to Modify Child Support. Court's Motion to Modify Child Support to be set for hearing.  
decision faxed to pltf and def't's atty and to Atty Kenny and copies sent to all parties.
- 11/23/09 Status Conference scheduled for 04/24/09 case closed.  
Motion Hearing scheduled for 10/27/08 case closed.  
Motion Hearing scheduled for 04/29/08 case closed.
- 12/09/09 MPR 89) Request for Status Conference filed by Defendant Miller-Jenkins. Request for Status Conference given to judge.
- 12/10/09 MPR 89) Request for Status Conference given to Judge William D. Cohen.  
Status Conference set for 12/18/09 at 01:00 PM.  
Entry order re MPR 89) Request for Status Conference. M/Reaction Form. order issued William D. Cohen.
- 12/16/09 1 document filed by Attorney Norman C. Smith for party 1: Notice of Appeal.  
MPR 90) Motion to Stay Pending Appeal filed by Plaintiff Miller-Jenkins. Motion to Stay Pending Appeal given to judge.  
MPR 91) Request to Participate by Phone filed by Co-counsel for Plaintiff Lindevaldsen. Request to Participate by Phone given to judge.
- 12/17/09 Notice of Appeal, check #11983 in the amount of \$250.00, docketing statement, certified copy of docket entries and hearing list sent to Supreme Court. Contents of trial court file pertaining to appeal to be sent at later date as soon as possible.  
1 document filed by Attorney Michelle A. Kenny for party 3: Notice of Appeal.
- 12/18/09 Status Conference held. WDC/TAPE.  
Motion Hearing set for 12/22/09 at 10:00 AM. Hearing to be held at Rutland Superior Court, 83 Center Street, Rutland, VT. Their

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 22

telephone number is 775-4394.

12/21/09 Response re MPR 90 filed by party 2.  
MPR 92) Motion for Rule 11 Sanctions filed by Defendant Miller-Jenkins. Motion for Rule 11 Sanctions given to judge.  
Response re MPR 90 filed by party 3.

12/22/09 Motion Hearing held. WDC/TAPE.  
Entry order re MPR 90) Motion to Stay Pending Appeal. Contested Hearing. denied William D. Cohen. see decision issued.  
Entry order re MPR 91) Request to Participate by Phone. M/Reaction Form. granted William D. Cohen.  
Entry order re MPR 92) Motion for Rule 11 Sanctions. Withdrawn. withdrawn William D. Cohen. Notice given on record. without prejudice.  
sent parties copies of Decision Re: Motion for Stay.

01/04/10 MPR 93) Motion Emergency Motion for Contempt filed by Defendant Miller-Jenkins. Motion Emergency Motion for Contempt given to judge.  
MPR 94) Motion Emergency Motion for Sanctions filed by Defendant Miller-Jenkins. Motion Emergency Motion for Sanctions given to judge.  
MPR 95) Motion Emergency Motion for Enforcement filed by Defendant Miller-Jenkins. Motion Emergency Motion for Enforcement given to judge.  
MPR's 93-95: 93) Motion Emergency Motion for Contempt; 94) Motion Emergency Motion for Sanctions; 95) Motion Emergency Motion for Enforcement given to Judge William D. Cohen.

01/05/10 Motion Hearing set for 01/22/10 at 01:30 PM.

01/07/10 MPR 96) Request to Participate by Phone filed by Co-counsel for Plaintiff Lindevaldsen. Request to Participate by Phone given to judge.  
MPR 96) Request to Participate by Phone given to Judge Nancy S. Corsones.

01/12/10 Entry order re MPR 96) Request to Participate by Phone. M/Reaction Form. granted William D. Cohen.

01/13/10 sent parties copies of entry regarding motion no. 96.

01/20/10 MPR 97) Motion to Withdraw as Attorney filed by Plaintiff Miller-Jenkins, Co-counsel for Plaintiff Staver, Co-counsel for Plaintiff Lindevaldsen, Co-counsel for Plaintiff Crampton. Motion to Withdraw as Attorney given to judge.  
Entry order re MPR 97) Motion to Withdraw as Attorney. M/Reaction Form. to be set for hearing William D. Cohen. to be argued on January 22, 2010.  
Motion Hearing set for 01/22/10 at 01:30 PM.  
Response re MPR 97 filed by party 2.

01/21/10 Plaintiff files Affidavits in Response to Defendant's January 20, 2010.  
Defendant files Response to Plaintiff's Opposition to Motion for Contempt.

01/22/10 Motion Hearing held. WDC/DIGITAL.  
Motion Hearing held. WDC/DIGITAL.  
Entry Order: ruling made on the record. Case to be set in 30 days. Findings made on the record of intentional noncompliance. Request to withdraw was denied.  
Entry order re MPR 97) Motion to Withdraw as Attorney. Contested Hearing. denied William D. Cohen. Notice given on record.

01/25/10 1 document filed by Attorney Sarah Star for party 2: Findings and Order Regarding Sanctions.  
Motion Hearing set for 02/23/10 at 01:00 PM.

01/29/10 Entry order re MPR 95) Motion Emergency Motion for Enforcement. Contested Hearing. order issued William D. Cohen.  
Findings and Order Regarding Sanctions issued and sent to parties; sent copy of order regarding sanctions and emergency motion for contempt sent to plaintiff by certified restricted mail.

02/02/10 3 documents filed by Attorney Sarah Star for party 2: Cert of Service re certifying documents; which were served on Lisa Miller via; registered certified mail.

02/11/10 Letter rec'd from Atty. Star requesting clerk mail enclosed documents as she is not received a return receipt from her 2-1-10 mailing.

11/20/2012 11:31 7865888

RUT CRIMINAL DIV

PAGE 23

02/22/10 MPR 98) Request to Participate by Phone filed by Co-counsel for Plaintiff Crampton. Request to Participate by Phone given to judge. Entry order re MPR 98) Request to Participate by Phone. M/Reaction Form. granted William D. Cohen.

02/23/10 Motion Hearing held. WDC/DIGITAL. arrest warrant amount of 50,000. Entry Order: Rulings made on the record with a finding of contempt. Arrest warrant issued with bail set at \$50000. Entry Order: ruling made on the record with a finding of contempt. Arrest warrant issued with bail set at 50.00. Entry order re MPR's 93-94: 93) Motion Emergency Motion for Contempt; 94) Motion Emergency Motion for Sanctions. Default at Hearing. order issued William D. Cohen. arrest warrant issued.

03/03/10 MPR 99) Motion to Withdraw as Attorney filed by Minor child Miller-Jenkins. Motion to Withdraw as Attorney given to judge.

03/04/10 MPR 99) Motion to Withdraw as Attorney given to Judge William D. Cohen.

03/05/10 Entry order re MPR 99) Motion to Withdraw as Attorney. M/Reaction Form. denied William D. Cohen. denied currently. Due to the circumstances with this case the court believes that having an attorney available for the child is in the child's best interest.

03/10/10 sent parties copies of entry regarding motion no. 99.

04/09/10 Entry order re MPR 88) Motion Filed by Court to Modify Child Support. M/Reaction Form. granted William D. Cohen. current child support order of 12/10/06 is stayed due to change of custody order. This to be heard at a later date if the circumstances of the case change. Case closed.

08/10/10 MPR 100) Motion to Withdraw as Attorney filed by Minor child Miller-Jenkins. Motion to Withdraw as Attorney given to judge.

08/11/10 MPR 100) Motion to Withdraw as Attorney given to Judge William D. Cohen.

08/20/10 Entry order re MPR 100) Motion to Withdraw as Attorney. M/Reaction Form. granted William D. Cohen. Attorney Michelle A. Kenny withdraws. Case closed.

08/23/10 sent parties copies of entry regarding motion no. 100.

11/01/10 1 document filed for party ; Entry Order re affirmed.

# ***Exhibit F***

IN THE SUPREME COURT OF THE  
STATE OF VERMONT

LISA MILLER-JENKINS,	)	
Individually,	)	Supreme Court Docket No. 2009-473
	)	
Plaintiff,	)	Appealed from:
	)	
v.	)	Rutland Family Court
	)	
JANET MILLER-JENKINS,	)	Docket No. 454-11-03 Rddm
Individually,	)	
	)	
Defendant.	)	
_____	)	

**PLAINTIFF’S MOTION FOR APPEARANCE OF  
ATTORNEY LINDEVALDSEN PRO HAC VICE**

NOW COMES Plaintiff’s present local counsel, NORMAN C. SMITH, a member of the Vermont Bar, and pursuant to Vermont Rule of Civil Procedure 79.1(e), and Vermont Rule of Appellate Procedure 45.1(e), moves the Court to admit pro hac vice Rena M. Lindevaldsen for purposes of presenting oral argument before this Court on June 23, 2010, and in support thereof, states:

1. Attorney Rena Lindevaldsen has been actively involved in this case both before the Rutland Family Court and this Court since 2004. In September 2004, she previously presented oral argument before this Court in this case.

4. Attorney Lindevaldsen is an attorney in good standing in Florida, New York, and Virginia and has filed a pro hac vice licensing statement with the Court Administrator and paid the required fee. Attached hereto as Exhibit “A” is a copy of same.

WHEREFORE, Plaintiff requests that this court permit Rena Lindevaldsen to appear pro hac vice associated with present local counsel, Norman C. Smith.

Dated this 2<sup>nd</sup> day of June, 2010.



Norman C. Smith, Esq.

Vermont License No. 1182

76 Lincoln St

P.O. Box 24

Essex Junction VT 05453-0024

(802) 288-9088 - Telephone

(802) 879-9640 - Telefacsimile

*Vermont Pro Hac Vice License*

I hereby certify that  
Rena M. Lindevaldsen  
*Pro Hac Vice* License # 404

is an attorney duly licensed in Docket No. 2009-473 and has paid the  
fee required by the Licensing of Attorneys Rules, § 13.



*Robert Freeman*

Court Administrator

EXHIBIT A

# ***Exhibit G***

**Sarah Star**

---

**From:** Lindevaldsen, Rena M. <rlindevaldsen@liberty.edu>  
**Sent:** Wednesday, January 28, 2009 6:26 PM  
**To:** srs@sarahstarlaw.com  
**Cc:** Crampton, Steve  
**Subject:** Visitation

Sarah,

Given that Steve is attempting to travel back home from the Vermont hearing, he's asked me to send an e-mail confirming with you a conversation that took place between Janet and Lisa where they made arrangements for the March visit. It is my understanding that the two of them have agreed that the visit will take place from Sunday at 5pm until Wednesday afternoon (I'll be honest, I can't recall the time for pick up and can't reach either Steve or Lisa on the phone right now). Lisa will be responsible to drop Isabella off and pick her up in Vermont for that visitation. If you could confirm that, it would be great.

Separately, it appears the two of them spoke about the summer visitation and Janet was willing to discuss rearranging the visitation times to permit Isabella to visit some relatives (including one that is gravely ill) on a few, already scheduled trips during this summer. As Janet and Lisa spoke, it is my understanding that they discussed the possibility of perhaps having more, but shorter visits rather than one five-week visit. I'm sure we'll be asked to confirm those arrangements once the two of them work it out.

Finally, Lisa asked me to mention Ms. Kenny's suggestion that both Lisa and Janet acquire the capabilities for webcam calls to permit Lisa to speak with Isabella while she's with Janet and for Janet to do the same when Isabella is with Lisa. Perhaps we could discuss making arrangements for that to happen (I don't know much about that technology, perhaps you do).

Thanks.

Rena M. Lindevaldsen  
Assistant Professor of Law  
Liberty University School of Law  
1971 University Blvd.  
Lynchburg, VA 24502  
434-592-3402

**Sarah Star**

---

**From:** Lindevaldsen, Rena M. <rlindevaldsen@liberty.edu>  
**Sent:** Thursday, April 16, 2009 1:39 PM  
**To:** srs@sarahstarlaw.com  
**Subject:** Response

Sarah,

We are finishing the response to your Request for Make-up Parent Child Contact and hope to have it to you later today if not first thing in the morning.

In the meantime, I was wondering whether Michelle spoke to you about trying to accommodate the fact that Isabella should not have to miss school for visitation. If she were to be out the week before school lets out she will miss the opportunity to take 2 accelerated reader tests as well as miss study sessions at school for her quarterly math and written tests. Isabella has straight As right now. I had asked Michelle last Friday to communicate with you Lisa's proposal that Janet have the week of visitation here in VA, in Lynchburg. Lisa would be willing to pay for a hotel here in Lynchburg so that Janet could have a week of visitation, be able to take her to school, pick her up from school, meet Isabella's friends in choir, etc. Lynchburg has a lot to offer and they could go hiking, play in the parks, and spend time together.

Let me know if that is a possibility.

Rena M. Lindevaldsen  
Assistant Professor of Law  
Liberty University School of Law  
1971 University Blvd.  
Lynchburg, VA 24502  
434-592-3402

**Sarah Star**

---

**From:** Lindevaldsen, Rena M. <rlindevaldsen@liberty.edu>  
**Sent:** Wednesday, May 06, 2009 12:17 PM  
**To:** Sarah Star  
**Cc:** Michelle Kenny  
**Subject:** Friday's hearing

Sarah,

I've noticed that on the Notice of Hearing it lists several motions, including a motion to modify. While in the past we've seen the clerk simply list all outstanding motions that the court did not intend to cover at the hearing, do you believe there is a motion to modify that is on the calendar for this Friday and if so, what motion?

Rena M. Lindevaldsen  
Assistant Professor of Law  
Liberty University School of Law  
1971 University Blvd.  
Lynchburg, VA 24502  
434-592-3402

# *Exhibit H*



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**Press Release**

August 25, 2009

**ACLU's Request to Jail Lisa Miller Fails in Virginia Court**

[www.LC.org](http://www.LC.org)

Winchester, VA – Earlier today, Liberty Counsel appeared in court to defend Lisa Miller from a complaint filed by the ACLU of Virginia on behalf of Janet Jenkins. The ACLU asked the judge to order Lisa to jail for not delivering her own daughter, Isabella, to Vermont for unsupervised visitation with Janet. The ACLU also requested Lisa to pay attorneys fees and costs. No jail time was ordered and the court rejected the ACLU's request for money.

Although the court ruled that Lisa had violated a Vermont judge's visitation order, no fines were assessed against her. The court ordered that Lisa pay \$100 per day for pending visitation orders issued in Vermont, but there are no pending visitation orders at this time. The ACLU vigorously argued against Liberty Counsel's requested change of venue to Bedford County, where Lisa lives and Isabella attends school. However, the court ruled that future disputes in this case will be heard in Bedford County.

This fall the Virginia Court of Appeals will hear oral argument on the issue of whether Virginia must enforce Vermont's orders in this case. The appeals court previously ruled that Virginia must recognize Vermont's orders but has not ruled on the enforcement issue. Liberty Counsel has maintained that Virginia courts cannot enforce child custody orders arising out of Vermont same-sex civil unions.

Last year a Vermont judge gave Janet Jenkins visitation rights with Lisa's daughter. Last week Liberty Counsel appeared in Vermont to answer a complaint by Janet, asking the judge to change custody from Lisa to Janet. Janet is a practicing lesbian, who is neither Isabella's biological nor her adoptive mother.

Unrefuted testimony has shown that for the last five years, Janet has neither attempted to phone nor write Isabella. She has never sent Isabella a card of any kind for any occasion. Janet has refused to attend Isabella's Christmas plays because she does not want to be around a Christian environment. She has also said that it is not in Isabella's best interest to be raised in a Christian home. The Vermont judge is withholding a ruling on Janet's request for custody of Isabella pending the outcome of today's hearing in Virginia.

Mathew D. Staver, Founder of Liberty Counsel and Dean of Liberty University School of Law, commented: "I am very pleased that Isabella will have her mother with her tonight where she belongs, rather than in the jail cell the ACLU originally intended. We look forward to the court of appeals, for the first time later this year, addressing the enforcement of this Vermont same-sex civil union order. Virginia's Constitution and public policy clearly do not recognize orders arising from same-sex civil unions. Virginia law affirms the common sense definition of marriage between one man and one woman."

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# *Exhibit I*



# *Exhibit J*

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[Public Pressure Causes Boy Scouts to Postpone Vote on Policy Change](#)

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[Liberty Law Professor, Dr. Judith Reisman, To Speak on Safe Internet Panel in Russia](#)

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122 C Street NW, Suite 640, Washington, D.C., 20001 | Fax: 202-289-7474

# *Exhibit K*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 2:11-CR-161  
 )  
 KENNETH L. MILLER )

**STIPULATION**

The United States of America, by and through its attorney, Tristram J. Coffin, United States Attorney for the District of Vermont, and Kenneth L. Miller, and his counsel, Joshua M. Autry, Esq. hereby stipulate and agree if called as a witness, Debbie Thurman, would testify as follows:

1. I have lived in Madison Heights, Virginia, for more than five years. I was a member of Thomas Road Baptist Church in 2008, and have been since that time.

2. In the Fall of 2008, I began communicating with Lisa Miller, who had moved to Lynchburg, Virginia. I met her at some point around the end of the year. We became friendly. I had followed the story of her custody dispute before I met her, and I become more involved in the matter after we met. Lisa Miller attended Thomas Road Baptist Church in 2009.

3. In approximately March 2009, I helped with the formation of a website called protectisabella.com, which provided information about Lisa Miller's case and some of the legal issues associated with that litigation. I worked with Lisa Miller's lawyer, Rena Lindevaldsen, of Liberty Counsel, on the website's content. The protectisabella website was updated twice in 2009, in April and again in May. The first page of Exhibit 58a is a true and correct copy of the content of the home page of the website as of September 2009. The second page of Exhibit 58a is



a true and correct copy of page on the website titled Fact Sheet. The website was taken off the internet in January 2010.

4. At around the same time as I helped with the formation of the protectisabella website, Ms. Lindevaldsen made me co-administer of a Facebook page she created called onlyonemommy. I helped with that page from approximately March 2009 until the Facebook page was removed in January 2010. The onlyonemommy page contained a variety of information about Lisa's Miller custody case, including regular updates on litigation developments. The page was open to all Facebook users until January 2010, shortly before the page was removed, when the page was closed to all but members. As part of Facebook, messages could be sent to members of the Facebook page, which could be received by email by the members. I have recently had an opportunity to review material from the onlyoneommy page supplied by Facebook. I recognize this material as accurately capturing what was posted on the page in 2009 in terms of updates and comments. Based on my review, I recall that on more than one occasion in late August 2009 the page documented Lisa Miller's understanding that the Vermont judge, Judge Cohen, was likely to transfer primary custody of Isabella to Janet Jenkins. I also posted updates about Judge Cohen's status conference on September 4, 2009, during the first week of September 2009. I reported that, though Judge Cohen had not ruled on the change in primary custody, he ordered an unsupervised visitation with Isabella for Janet Jenkins on the weekend of September 25, 2009.

5. I followed the progress of Lisa Miller's case in the media, including on a website called Lifesitenews.com. Exhibit 59 is a true and correct copy of an article about the status of Lisa Miller's case published on Lifesitenews on September 1, 2009.

6. I talked with Lisa Miller frequently about her case in 2009. She never mentioned to me

either Philip Zodiates or Kenneth Miller, neither of whom I know. She never talked with me about any interest in or association with the Mennonite church.

7. My last contact with Lisa Miller was in the week before September 20, 2009. I communicated with her by email and by phone, though I have no recollection of the content of our phone conversation. She did not share with me prior to September 21, 2009, any information about a plan to leave the United States. I have had no contact with Lisa Miller since September 19, 2009.

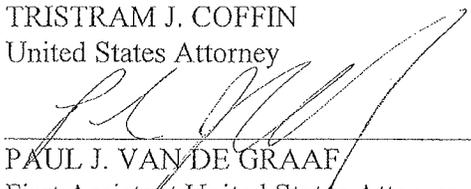
Dated at Burlington, in the District of Vermont, this 8 day of August, 2012.

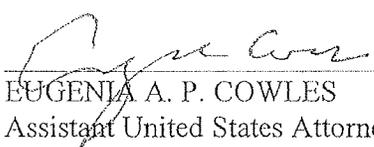
Respectfully submitted,

UNITED STATES OF AMERICA

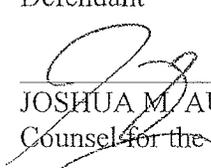
TRISTRAM J. COFFIN  
United States Attorney

By:

  
\_\_\_\_\_  
PAUL J. VAN DE GRAAF  
First Assistant United States Attorney

  
\_\_\_\_\_  
EUGENIA A. P. COWLES  
Assistant United States Attorney

\_\_\_\_\_  
KENNETH L. MILLER  
Defendant

  
\_\_\_\_\_  
JOSHUA M. AUTRY, ESQ.  
Counsel for the Defendant

  
\_\_\_\_\_  
BROOKS MCARTHUR, ESQ.  
Counsel for the Defendant

# ***Exhibit L***



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### Lisa Miller Talks About her Fears for her Daughter

by [debbiethurman](#) on Tue Jan 27, 2009 6:56 pm

As I write this, Lisa Miller and the friends who are her traveling companions may be arriving in Vermont for tomorrow's custody hearing that will determine whether or not Janet Jenkins, her lesbian former civil union partner, will be awarded full custody of 6-year-old Isabella, Miller's biological child. Lisa Miller is her mother by all rights, and certainly the only logical choice for raising this child, who barely knows Jenkins and is afraid of her.

Lisa sent the following urgent prayer request out to her loyal prayer partners last night. In it, she speaks of her specific concerns for her daughter in no uncertain terms. The group stopped over in Pennsylvania for the night and continued on this morning.

Dear Prayer Warriors:  
January 26, 2009

Keeping us in your prayers over the next several days is more vital than ever. Tonight, we travel through the night to beat the storm that is coming our way. We leave at 8:00 p.m. and will arrive in Vermont around 8:00-9:00 a.m. tomorrow morning. Please keep us in your prayer as Mrs. Moon, Renee and I travel. The hearing is still on Wednesday, January 28 at 8:30 a.m. It will be an all day hearing.

Please keep that hearing in your prayers. Janet is "confident" that she will gain full custody and has

# *Exhibit M*

**AFFIDAVIT OF JANET JENKINS**

I, Janet Jenkins, of Fair Haven, in the County of Rutland in the State of Vermont do hereby swear and affirm that the following is true and accurate.

1. I live in Fair Haven, Vermont where I own a home and run a day care in my home.  
  
When I was married in a civil union to Lisa Miller, we jointly owned the home that I now reside in, and co-owned and operated our day-care business. Because I am self-employed, it would be an extreme hardship to have to travel to Virginia for litigation. I would have to close my business, which is my only source of income. Lisa Miller tried for many years to get family court litigation moved from Vermont to Virginia even though she filed in Vermont Court first. These attempts failed and Judge Cohen presided over our case in Rutland, Vermont ever since. Isabella's attorneys and Guardian ad Litem were also in Vermont.
2. When our civil union was dissolved in 2007, our property was divided equitably and a Final Order regarding parental rights and responsibilities for our daughter, Isabella Ruth Miller-Jenkins was issued.
3. Lisa was living in Winchester, VA at the time the union was dissolved, and in 2008 moved to Lynchburg where she lived for some time with Scott Ehrhorn who is a professor at Liberty University and his family, who attend TRBC. I know this because my child support went to their address.
4. Lisa Miller did not abide by the family court order during the time she was living in Virginia, and after many warnings, on November 20, 2009, the Rutland Family Court decided to grant me full legal and physical rights and responsibilities for Isabella, subject to visitation with Lisa Miller.

5. Per the Court's order, Lisa Miller was to bring Isabella to my parents' house on January 1, 2010. She did not do so. When she did not show up, I first called the police where my parents live, in Falls Church, VA. I was put in contact with a detective there, but I do not remember his name. He took my information, but eventually informed me that this would be a Vermont case, since the jurisdiction for prosecuting parental kidnapping would be where I reside and where the child is supposed to reside – in Vermont.
6. With the help of my attorney, I contacted the Fair Haven police, and the case regarding the disappearance of my daughter was assigned to Detective Boutin of the Castleton/Fair Haven police. I met with Detective Boutin and provided him with materials and an affidavit. I was also in touch with the National Center for Missing and Exploited Children, who told me that even though it was a Vermont case, Isabella would need to be entered into the Missing Child Database from the county where she was last seen, in Bedford, VA. My attorney was in touch with the Bedford County Sheriff's department about getting Isabella on the registry, but my understanding was that the investigation was being handled in Vermont because that is where jurisdiction would be.
7. Several days later, I learned from my attorney that one of the police officers (I am not sure which one) told her that Lisa had apparently taken Isabella to El Salvador and that I should contact the FBI in Albany, New York because it might be a Federal Case as well as a Vermont State case. I never received any confirmation that Isabella was out of the country, and we were getting tips that she was still in Virginia until June

2010 when a caller provided information that Lisa was being hidden by a man named Zodiates in Nicaragua.

8. Also, in early 2010, the Fair Haven police indicated that they wanted to see if the Rutland Court would issue a contempt warrant for Lisa Miller before filing a criminal case, so we took steps to make this happen as well and a bench warrant was issued. My attorneys also helped me register the Vermont order transferring custody in Virginia and move for contempt there, so we could get a pick-up order for Isabella in Virginia, if she turned out to be there. The Virginia Court denied this request for reasons that are not entirely clear to me, but it seemed that the judge was not interested in helping me find my daughter.
9. I have kept in touch with Detective Boutin periodically about the case. It has always been my understanding, from the time I reported this crime, that the crime of custodial interference against Lisa Miller and those who helped her would be prosecuted in Vermont because that was the proper jurisdiction, not Virginia.
10. While I was making these efforts from home in Vermont, I also received tips about statements that Lisa's friends from church (Thomas Road Baptist Church) were making on the internet and on television about Isabella's kidnapping. I was familiar with these friends because I have read their postings on Only One Mommy, a Facebook site maintained by Rena Lindevaldsen and Debbie Thurman. I have also seen them at court hearings, in the hallways, engaged in what appeared to be prayer meetings, and noted that Lisa always attended hearing accompanied by an entourage.
11. In January 2010, I printed out a blog post by Debbie Thurman that endorsed the kidnapping and brought it to the police. I also watched a segment online from ABC

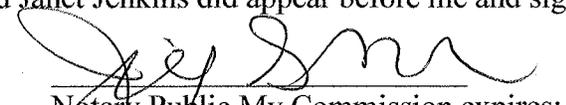
news where a Tipton Killingsworth endorsed also Isabella’s kidnapping, and Linda Wall compared herself to Harriet Tubman. Under his image on the program it, I recall that it said “Tipton Killingsworth: Pastor of Outreach and Assimilation, Thomas Road Baptist Church.” Later, I was forwarded online postings that Mr. Killingsworth had made suggesting that he knew of Lisa and Isabella’s whereabouts and stating that Lisa was Isabella’s refuge from the Vermont Law. According to the postings I saw, and from checking the Liberty University Directory, Killingsworth had begun working at Liberty University, which I understood from the website to be a “related ministry” of TRBC.

- 12. I passed along the tips that I received to law enforcement in Vermont, not Virginia.
- 13. To this day, I do not have confirmation of where my daughter is, and the people that helped Lisa Miller kidnap Isabella, including Kenneth Miller will not provide any information that would help me find her and bring her home to Vermont.

DATED AT 2/11/13 Fair Haven, Vermont this 11 day of February, 2013

  
\_\_\_\_\_  
Janet Jenkins

On February 11, 2013, the above named Janet Jenkins did appear before me and sign this affidavit under oath.

  
\_\_\_\_\_  
Notary Public My Commission expires:  
**MY COMMISSION EXPIRES  
FEBRUARY 10, 2015**

# ***Exhibit N***

Form 836 CU

Vermont Family Court	County Rutland	Docket Number 454-11-03 Romm
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**SUMMONS, COMPLAINT FOR CIVIL UNION DISSOLUTION  
NOTICE OF APPEARANCE AND AFFIDAVIT OF CHILD CUSTODY**

Plaintiff's Name Lisa Miller-Jenkins	Defendant's Name Janet Miller-Jenkins
Street Address 101 Covington LN	Street Address V. 17 Caernarvon St.
Town/City Winchester	Town/City Fair Haven
State VA	State VT
Zip Code 22601	Zip Code 05743

**SUMMONS**

**To the above-named Defendant:**

You are hereby summoned and required to serve upon the Plaintiff at the address listed above an Answer to the attached Complaint that has been served upon you.

You must also file a copy of your Answer with the Court at the following address:

Name and Address of the Court Family Court of Rutland 83 Centre St Rutland VT 05701
--

**FILED  
NOV 24 2003  
RUTLAND FAMILY COURT**

**You must answer this summons within (20) days of the date of service.**

If you fail to answer the Complaint within twenty days, a **Default Judgment** may be entered against you and the Court may grant the relief demanded by the plaintiff in the Complaint.

Under most circumstances, your answer must state as a counterclaim any related claim which you may have against the plaintiff, or you will thereafter be barred from making such claim in any other action.

Court Clerk	Date
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**COMPLAINT FOR CIVIL UNION DISSOLUTION**

1. (a) Plaintiff resides in 

Town/City Winchester	County	State Virginia
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(b) Plaintiff has resided in Vermont continuously until the present day since 

Date
------

2. (a) Defendant resides in 

Town/City Fair Haven	County	State Vermont
-------------------------	--------	------------------

(b)  Defendant has resided in Vermont continuously until the present day since 

Date August 5, 2002
------------------------

3. Plaintiff and Defendant received a Certificate of civil union on 

Date December 19, 2000
---------------------------

 at

Town/City Stowe	State Vermont
--------------------	------------------

4. The following are the biological or adoptive children of said civil union:

Name of Child Isabella Miller-Jenkins	Date of Birth 4-16-02	Name of Child	Date of Birth
Name of Child	Date of Birth	Name of Child	Date of Birth
Name of Child	Date of Birth	Name of Child	Date of Birth

5. The parties own the following property singly or jointly:

Home on 17 Caernarvon St, Fair Haven, Vt.  
1995 Pontiac Transport VAN  
1985 Truck  
Time Share - w/Deed

6. The following actions for divorce, annulment, civil union dissolution, abuse prevention or separate support have been brought by either party against the other:  None, or:

(  A certified copy of the complaint and docket entries in the previous action is attached.)

7. Defendant has/will have lived separate and apart from the plaintiff for six consecutive months and the resumption of the civil union relationship is not reasonably probable. The parties separated on Date Sept 13 2009

8.  Plaintiff  Defendant is or has been a recipient of public assistance from the VT Department of Social Welfare.

**PLAINTIFF REQUESTS THE FOLLOWING RELIEF:**

- 1. Dissolution of civil union.
- 2. That the Court award  the plaintiff  the defendant legal rights and responsibilities for the minor children.
- 3. That the Court award  the plaintiff  the defendant physical rights and responsibilities for the minor children.
- 4. That the Court award  the plaintiff  the defendant suitable parent/child contact (supervised)
- 5. That the Court award payment of suitable child support money.
- 6. That the Court award  the plaintiff  the defendant suitable maintenance supplement.
- 7. That the Court award  the plaintiff  the defendant suitable maintenance.
- 8. That the Court award  the plaintiff  the defendant a suitable portion of the property of the civil union.
- 9. That the Court award the plaintiff costs and attorney's fees.
- 10. Such other relief as is just and equitable.

NOTICE OF APPEARANCE

I, the Plaintiff in this case, enter my pro se appearance; I will represent myself. Unless I or an attorney notify you otherwise, no attorney will represent me in this case.

All court papers may be mailed to me by first class mail at the address listed above. I understand that it is my responsibility to notify the Court of any change in my mailing address. I understand that if I send anything to the Court, I must send copies to Defendant or Defendant's attorney.

I can be reached by telephone at the following numbers.

Telephone Number (day) 540-665-9529

Telephone Number (evening) 540-665-9529

AFFIDAVIT OF CHILD CUSTODY

I. With regard to each child named in the above complaint, the child: (use an additional page if you need more space)

A. now lives: at [X] my address [ ] the address listed below:

B. has lived in the places listed below within the last five years:

Fair Haven VT; Hamilton Va; Berryville VA w/ both parties in case

C. has lived with the following people during the past five years (give current address):

II A. Have you participated as a party, witness, or in any other capacity in any litigation concerning the custody of the child(ren) named above, in Vermont or in any other state? [ ] yes\*\* [X] no

B. Do you have information of any custody proceeding concerning the child(ren) named above pending in a court in Vermont or in any other state? [ ] yes\*\* [X] no

C. Do you know of any person not a party to these proceedings who has physical custody of the child(ren) named above or claims to have custody or visitation rights with respect to the child(ren)? [ ] yes\*\* [X] no

(\*\* If you answered "yes", please explain on another page)

Notice: During this proceeding, you must inform the court if you learn of any other custody proceeding concerning the child(ren).

Date 11/8/03

Signature of Plaintiff [Handwritten Signature]

Subscribed and sworn to before me:

Date Nov. 10th 2003 Signature of Notary Public C. Renee Cummings Expiration Date Jan. 31, 2005

Form 838

<b>Vermont Family Court</b>	County <u>  Rutland  </u>	Docket Number <u>  454-1-0320mm  </u>
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**NOTICE OF APPEARANCE, ANSWER TO THE DIVORCE COMPLAINT  
AND COUNTERCLAIM**

Name of Plaintiff <u>  Lisa Miller-Jenkins  </u>	Name of Defendant <u>  Janet Miller-Jenkins  </u>
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**NOTICE OF APPEARANCE**

I, the Defendant in this case, enter my **pro se** appearance; I will represent myself. Unless I or an attorney notify you otherwise, no attorney will represent me in this case.

All court papers may be mailed to me by first class mail at the address listed below. I understand that it is my responsibility to notify the Court of any change in my mailing address. I understand that if I send anything to the Court, I must send copies to Plaintiff or Plaintiff's Attorney.

My Street Address		
Town/City	State	Zip Code
Telephone Number (day)		

My Mailing Address (if different from street address)		
Town/City	State	Zip Code
Telephone Number (evening)		

**ANSWER TO THE COMPLAINT**

I, the Defendant in this case, answer the Plaintiff's Complaint as follows (Please circle "Admit" or "Deny"; if you "deny," write in what you believe to be true.):

1. ADMIT or DENY \_\_\_\_\_
2. ADMIT or DENY \_\_\_\_\_
3. ADMIT or DENY \_\_\_\_\_
4. ADMIT or DENY \_\_\_\_\_
5. ADMIT or DENY \_\_\_\_\_
6. ADMIT or DENY \_\_\_\_\_
7. ADMIT or DENY \_\_\_\_\_
8. ADMIT or DENY \_\_\_\_\_

The Defendant asks the Court to grant Defendant fair and just relief.

**COUNTERCLAIM**

The Defendant incorporates the allegations of the plaintiff's complaint and requests the following relief:

- \_\_\_ 1. Divorce from the bonds of matrimony.
- \_\_\_ 2. That the Court award \_\_\_ the plaintiff \_\_\_ the defendant legal rights and responsibilities for the minor children.
- \_\_\_ 3. That the Court award \_\_\_ the plaintiff \_\_\_ the defendant physical rights and responsibilities for the minor children.
- \_\_\_ 4. That the Court award \_\_\_ the plaintiff \_\_\_ the defendant suitable parent/child contact.
- \_\_\_ 5. That the Court award payment of suitable child support money.
- \_\_\_ 6. That the Court award \_\_\_ the plaintiff \_\_\_ the defendant suitable maintenance supplement.
- \_\_\_ 7. That the Court award \_\_\_ the plaintiff \_\_\_ the defendant suitable spousal maintenance.
- \_\_\_ 8. That the Court award the defendant a suitable portion of the property of the marriage.
- \_\_\_ 9. That the Court award the defendant costs and attorney's fees.
- \_\_\_ 10. Such other relief as is just and equitable.

Date

Signature of Defendant

Subscribed and sworn to before me:

Date	Signature of Notary Public	Expiration Date

# ***Exhibit 0***



**AFFIDAVIT**

I, Dana L. Kaegel, being duly sworn, depose and state as follows:

A. Introduction and Agent Background

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have been a Special Agent since October of 2008. I am currently assigned to the Burlington, Vermont Resident Agency.

2. The facts in this affidavit come from my personal observations, my training and experience, information obtained by other law enforcement officials and witnesses, and court documentation. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Timothy David Miller has violated 18 U.S.C. §§ 1204, 2; aiding in international parental kidnapping of minor Isabella Ruth Miller-Jenkins (IMJ) by Lisa Miller and other unknown persons. This crime involved removing a child from the United States on or about September 22, 2009, and retaining a child who has been in the United States, outside of the United States from September 2009 to the present, with the intent to obstruct the lawful exercise of parental rights by Janet Jenkins. I have reason to believe that Timothy Miller violated 18 U.S.C. §§ 1204, 2 in that:

a. Timothy Miller had knowledge of the parental rights litigation in the United States involving Lisa Miller and regarding IMJ.

b. Timothy Miller provided assistance for Lisa Miller and IMJ's travel outside of the United States.

c. Timothy Miller provided a place of shelter to Lisa Miller and IMJ outside of the United States.

4. Much of the information provided in this affidavit and pursuant to this investigation has been derived from Search Warrants executed on various online accounts, such as e-mail and Facebook accounts. Search Warrants were obtained for electronic accounts to enable this investigation to remain covert to facilitate this investigation.

**B. International Parental Kidnapping**

5. On April 27, 2010, a Criminal Complaint and Arrest Warrant for Lisa Miller were issued. The United States Attorney's Office filed a motion to seal the complaint and warrant. On that same date, the United States District Court for the District of Vermont granted the government's motion and issued an order to seal the above documents.

6. The supporting affidavit for the Criminal Complaint and Arrest Warrant for Lisa Miller are attached and incorporated into this affidavit.

7. Pursuant to a Grand Jury subpoena, Mexicana Airlines provided that on September 22, 2009, Lisa A. Miller and IMJ departed Toronto, Ontario and arrived in Mexico City, Mexico on Mexicana Flight 887.

8. Pursuant to a Grand Jury subpoena, TACA Airlines provided that on September 22, 2009, Lisa Miller and IMJ departed Mexico City Juarez International Airport and arrived at El Salvador International Airport on TACA Flight 0231.

9. Pursuant to another Grand Jury subpoena, TACA Airlines provided that on September 23, 2009, Lisa Miller (E-Ticket Number 2027568006474) and Isabella Ruth Miller (E-Ticket Number 2027568006473) departed El Salvador International Airport and arrived at Augusto C. Sandino International Airport, Managua, Nicaragua on TACA Flight 0360.

10. An Immigrations and Customs Enforcement Special Agent has told me that United States border records, which document entries into the United States, do not indicate that Miller or IMJ have returned to the United States since September 22, 2009.

C. General Information Regarding Timothy Miller

11. The existence of a biological relationship between Timothy Miller and Lisa Miller has not been established.

12. On October 29, 2010 and February 1, 2011, Search Warrants were issued by the United States District Court of Vermont by the Honorable John M. Conroy, U.S. Magistrate Judge for the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) e-mail account. SA Dana L. Kaegel executed the Search Warrants on October 29, 2010 and February 1, 2011, respectively.

13. The subscriber name on the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) is Timo Miller. During the course of this investigation, Timothy Miller has been referred to as "Timo" by himself and others.

14. An e-mail dated on or about September 10, 2009 from the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) is written in Spanish and contains the following content, "... Bueno, me llamo Timoteo David Miller pero casi todos me conocen por Timo... Actualmente tenemos cuatro hijos: Melvin David, 8; RuthAnna Marie, 6; LillyAnna Marie, 4; TatiAnna Marie, 22 meses..." A Level 2+ Rating Spanish speaking FBI Special Agent advised that the text above could be translated as the following, "Well, my name is Timoteo David Miller, however most know me as Timo.... We

currently have four children: Melvin David, 8; RuthAnna Marie, 6; LillyAnna Marie, 4; TatiAnna Marie, 22 months...."

15. An inquiry of U.S. database records provided that Timothy Miller holds a valid driver's license in the state of Tennessee. According to database records, Miller is a white male with brown eyes and brown hair and whose date of birth is October 15, 1976. Database records also provide that Timothy Miller's height is 5' 7" and his weight is 185 pounds. An e-mail dated January 8, 2011 from the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) e-mail account contains an e-mail dated January 8, 2011 that provides, "... TIMOTHY DAVID MILLER, 15 OCT 1976[,] JOANNA MARIE MILLER, 29 DEC 1978[,] MELVIN DAVID MILLER, 22 DEC 2000[,] RUTH ANNA MARIE MILLER, 30 MAY 2003[,] LILLYANNA MARIE MILLER, 8 JUNE 2005[,] TATIANNA MARIE MILLER, 13 OCT 2007..." An inquiry of multiple database records indicate an address of 102978 Highway 70 N, Crossville, Tennessee 38571 as being associated with "Timothy David Miller" with a date of birth of October 15, 1976.

16. The [timjomiller@gmail.com](mailto:timjomiller@gmail.com) e-mail account contains photographs of what appear to be family photographs of Timothy Miller, his wife Joanna, and children.

17. An e-mail dated on or about November 21, 2008 from the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) account contains the following text, "Greetings sent your way from Nicaragua. ... Since our move we have had people living with us or visiting. ... A little bit about us: This coming February 18 we will be celebrating our 9th anniversary. We met in Farmington, NM where I was director of Spanish correspondence and Joanna worked at the Gingerich Home (for elderly). I taught school in Waslala in '99 and then went back and we married in Michigan... In October of 2000 we moved to Waslala and were ordained to the ministry in December of 2001. We were given

responsibility of the Jicaral congregation, which we recently passed on to another, because of being sent to Managua...." A printout of the website <http://en.wikipedia.org/wiki/Waslala> on or about March 21, 2011 describes Waslala as "a municipality... of Nicaragua - it is... 161 miles from Managua...."

18. An Internet Protocol (IP) address for the login information for the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) account is 200.62.70.81. According to the website associated with "IP2Location™", IP address 200.62.70.81 resolves to Managua, Nicaragua.

19. During the investigation, Vivophone account number 9865582 was identified as being associated with Timothy Miller. Information provided by Vivophone pursuant to a Grand Jury Subpoena regarding account 9865582 identified during the course of the investigation the account as registered to "Tim Miller" with an address of "Managua, Nicaragua."

20. A review of e-mails indicate that Timothy Miller associated with the Christian Aid Ministries (CAM) organization in Managua, Nicaragua.

21. On or about March 16, 2010, an e-mail from the "Timo & Joanna <[timjomiller@gmail.com](mailto:timjomiller@gmail.com)>" e-mail account was sent to what appear to be several e-mail accounts associated with the CAM organization. The e-mail contains, "Good morning, Bretheren.... Blessings on your day, Timo".

D. Timothy Miller's Knowledge of the Litigation in the United States involving Lisa Miller

22. On February 1, 2011, a Search Warrant was issued by the United States District Court of Vermont by the Honorable John M. Conroy, U.S. Magistrate Judge for the [millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com) e-mail account. SA Dana L. Kaegel executed the Search Warrant on February 1, 2011.

23. "Alvin & Edna Miller" are associated with the millersofwaslala@gmail.com e-mail account. An e-mail dated on or about August 13, 2009 from "'Alvin & Edna Miller' <millersofwaslala@gmail.com>" to "'Timo & Joanna' <timjomiller@gmail.com>", "Dear Ones, ... May the Lord be with you and protect you. ... Love and Prayers, MOM". An e-mail dated on or about December 14, 2009 from "'Timo & Joanna' <timjomiller@gmail.com>" to "'Alvin & Edna Miller' <millersofwaslala@gmail.com>" included the following content, "Dear Dad, Thank you. ... I love you very much, Timo".

24. The millersofwaslala@gmail.com e-mail account contained an e-mail dated approximately September 22, 2009, from "'Alvin & Edna Miller' <millersofwaslala@gmail.com>" to multiple e-mail accounts, one of which includes, "'Timo & Joanna' <timjomiller@gmail.com>". The content of the e-mail included, "... So what is this about Lisa Miller? Do you have any more information? Where will she be going? This sounds a little like Joy Coats how they ruled to give the Grandparents custody. People can be so unfeeling for the children included. I will be praying about this.... MOM". The subject line of the e-mail was "A Few Lines".

25. A reply e-mail from the "'Bilmer' <thescoto7@gmail.com>" account to the "'Alvin & Edna Miller' <millersofwaslala@gmail.com>" is dated on or about September 22, 2009 and contains the following subject line, "Re: A Few Lines". The content of the reply to the previous e-mail included, "What for Lisa Miller??? We haven't heard anything about it."

26. A subsequent reply e-mail from the "'Alvin & Edna Miller' <millersofwaslala@gmail.com>" account to "'Bilmer' <thescoto7@gmail.com>" account dated on or about September 22, 2009 contains the following text, "Google it. Lisa Miller child custody. She is getting picked up int he airport by Timo. Mim".

27. Another subsequent reply e-mail from the "'Bilmer' <[thescoto7@gmail.com](mailto:thescoto7@gmail.com)>" account to "'Alvin & Edna Miller' <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" account dated on or about September 22, 2009 contains the following text, "Is she bringing her daughter with her or is she escaping by herself? Is she planning on staying at Timos?????".

28. Another subsequent reply e-mail from the "'Alvin & Edna Miller' <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" account to the "'Bilmer' <[thescoto7@gmail.com](mailto:thescoto7@gmail.com)>" account dated on or about September 22, 2009 contains the following text, "Yes she is bringing her daughter with her, but we still don't know where she will stay. I think it kinda depends on the situation."

29. Another subsequent reply e-mail dated on or about September 22, 2009 containing the subject line text, "Re: A Few Lines" from "'Timo & Joanna' <[timjomiller@gmail.com](mailto:timjomiller@gmail.com)>". The e-mail appears to be a reply to the e-mail accounts contained within the e-mail from "'Alvin & Edna Miller' <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" dated on or about September 22, 2009. The only content within the e-mail is, "Sorry, folks, the Lisa subject should currently not be a topic of discussion or emailing. It might soon, or it just might be more of a secret. Please advise folks about this. Pray. Definitely, pray. Thanks, Timo".

30. A subsequent reply e-mail dated on or about September 22, 2009 from the "'Sierra Madre Mission' <[mexicomission@hughes.net](mailto:mexicomission@hughes.net)>" to the "'Alvin & Edna Miller' <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" contains the following text, "... What Lisa, and what does it mean? It will be kept top secret!!!... Don't tell Timo I asked!!".

31. A subsequent reply e-mail dated on or about September 22, 2009 from the "'Alvin & Edna Miller' <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" to the "'Sierra Madre Mission' <[mexicomission@hughes.net](mailto:mexicomission@hughes.net)>" account contains the following text, "We don't know where she

will be going or what just that she is coming. I can send you the story from the internet tomorrow if you want it. Love you, Mim".

32. A subsequent reply e-mail dated on or about September 23, 2009 from the "Sierra Madre Mission' <[mexicomission@hughes.net](mailto:mexicomission@hughes.net)>" account to the "Alvin & Edna Miller' <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" account contains the following text, "... Yes, do! Thanks, Leona".

33. An e-mail dated on or about September 23, 2009 from the "Alvin & Edna Miller' <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" account to the "Adonay and Leona' <[mexicomission@hughes.net](mailto:mexicomission@hughes.net)>" account contains what appears to be a copy of the text from an article. The text of the e-mail includes, "Lisa's age is 40 Isabella's age is 6 (she turns 7 in April 2009). They reside in Bedford County, Va., but formerly resided in Frederick County, Va.... Lisa was joined in a civil union with Janet Jenkins (both women were Virginia residents) in December 2000 in Vermont during a brief vacation trip (civil unions had become legal in Vermont in July 2000).... She became pregnant and gave birth to Isabella in April 2002. Janet Jenkins did not adopt the child.... Lisa filed to dissolve the civil union in 2003, and moved with Isabella, who was then 17 months old, to the Winchester area of Virginia. She renounced her former lesbian life. Lisa returned to her Christian faith in 2003. She and Isabella attend Thomas Road Baptist Church in Lynchburg, Va.... Lisa is represented in her child custody/visitation legal dispute with Janet Jenkins by Liberty Counsel, with offices in Florida and Virginia. Their Web site is <http://www.lc.org>."

E. Timothy Miller's Assistance Provided in Lisa Miller's Travel

34. Records provided pursuant to a Grand Jury Subpoena from TACA Airlines regarding Lisa Ann Miller (E-Ticket Number 2027568006474) and Isabella Ruth Miller (E-Ticket Number 2027568006473) provided the following verbatim customer service notes including that, "... Timothy Miller called from Nicaragua: They have to leave Can. tomorrow and... Cant go thro U.S...." According to the records provided, the date of the communication of Timothy Miller with TACA Airlines appears to be on or about September 21, 2009.

35. Records provided by TACA Airlines pursuant to the same Grand Jury Subpoena provided e-mail account "[timjomiller@gmail.com](mailto:timjomiller@gmail.com)". This appears to be an e-mail account that was provided by Timothy Miller to TACA Airlines.

36. Records provided pursuant to a Grand Jury Subpoena from TACA Airlines regarding Lisa Ann Miller (E-Ticket Number 2027568006474) and Isabella Ruth Miller (E-Ticket Number 2027568006473) provided the following verbatim customer service notes including that, "itinerary was approved by Timothy... cardholder is Elaine R Cooper...". Later in the customer service notes, the address annotated for Elaine Cooper appears to be associated with 12124 Griffith Road, Brethren, Michigan 49616.

37. An inquiry of database records provide an address associated with "Elaine Ruth Cooper" to be 12124 Griffith Road, Brethren, Michigan 49619.

38. The records provided by TACA Airlines pursuant to the same Grand Jury Subpoena appear to indicate that the charges associated with Lisa Ann Miller and Isabella Ruth Miller are \$877.92 and \$816.92, respectively. The customer service notes include "1540", which appears to be the last four digits of the credit card that was provided for payment to TACA Airlines.

39. A review of e-mails within the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) e-mail account indicate that Elaine Cooper is the adoptive mother of Joanna Miller.

40. Financial records pursuant to a Grand Jury Subpoena indicate that a National City credit card statement addressed to Elaine R. Cooper and Jesse J. Cooper lists a charge in the amount of \$1,694.84 with a transaction date of September 21, 2009. The charge identified contains "TACA" as a portion of the charge description. The last four digits of the credit card account are "1540".

41. Financial records pursuant to a Grand Jury Subpoena indicate that the same National City credit card had a charge with the transaction date of September 22, 2009 in the amount of \$60.00 for "Golden Rule Travel... KS".

42. Information provided by TACA Airlines pursuant to a Grand Jury Subpoena indicate that the itineraries for Lisa Ann Miller and Isabella Ruth Miller were sent to the [lindarose@goldrule.net](mailto:lindarose@goldrule.net) e-mail account on September 21, 2010.

43. A printout of the website <http://goldenruletravel.com> on approximately March 16, 2011 provides the following Introduction excerpt for "Golden Rule Travel", "We specialize in international adoption, humanitarian, and missionary travel. ... Most of our advertising comes by way of recommendations from satisfied clients. Large missionary and humanitarian organizations; churches; evangelism ministries, NGOs; adoption agencies, forums, and blogs; and adoptive parents highly recommend Golden Rule as the best choice for value and service."

44. A printout of the "Contact Us" page on [http://goldenruletravel.com/contact\\_us.asp](http://goldenruletravel.com/contact_us.asp) on approximately March 18, 2011 lists "Linda Rose Miller" as an Agent of the Hutchinson, Kansas Office.

45. A biological relationship between Linda Rose Miller and Lisa Miller has not been established.

46. Records provided by TACA Airlines pursuant to a Grand Jury subpoena indicate that the flights for Lisa Miller and IMJ were booked continuously through to Managua, Nicaragua.

47. The TACA Airlines records do not appear to show the purchase of return tickets for Lisa Ann Miller and Isabella Ruth Miller.

F. Use of Code Names as References to Lisa Miller and IMJ

48. The [timjomiller@gmail.com](mailto:timjomiller@gmail.com) e-mail account contains multiple references to "Sarah" and "Lydia". Based on the context of the e-mails, it is believed that "Sarah" is Lisa Miller and "Lydia" is IMJ.

49. The [timjomiller@gmail.com](mailto:timjomiller@gmail.com) account contained an e-mail to the "Carl & June <[cajun@coqui.net](mailto:cajun@coqui.net)>" e-mail account dated on or about December 13, 2009. The verbatim excerpts included, "... Sarah has worked for some time with counseling, mentoring, she's kept young people and children in her home who were with some real trama related problems, mental problems, schizophrenic, {as sher mother was}... She has taught from kindergarden to highscool and special edd for more then 20 years...."

50. On August 10, 2010, a Search Warrant was issued by the United States District Court of Vermont by the Honorable John M. Conroy, U.S. Magistrate Judge for the [zeusdesfor@aol.com](mailto:zeusdesfor@aol.com) e-mail account. SA Dana L. Kaegel executed the Search Warrant on August 10, 2010. The [zeusdesfor@aol.com](mailto:zeusdesfor@aol.com) email account is registered to Lisa Miller.

51. The [zeusdesfor@aol.com](mailto:zeusdesfor@aol.com) contained a folder labeled "JOBRESUMES". A subfolder within the "JOBRESUMES" folder contained two files of what appear to be a cover letter and resume for Lisa Miller. The contents of the cover letter include that Lisa Miller holds "... a

Master's degree of Special Education, K-12 cross- categorical and a Virginia Special education teacher certificate...." The cover letter contents includes that Lisa Miller has "... previous experience teaching middle school science...." and "... tutoring and teaching several high school science courses...."

52. A "Newsweek" article on the Internet titled, "Mrs. Kramer Vs. Mrs. Kramer" by Lorraine Ali, dated December 6, 2008, discussed the custody dispute between Lisa Miller and Janet Jenkins over IMJ. The article content included, "... [Miller] was left to live with her mother, whom Miller claims was a paranoid-schizophrenic...."

53. The [timjomiller@gmail.com](mailto:timjomiller@gmail.com) account contained an e-mail dated on or about March 1, 2010 from the [timjomiller@gmail.com](mailto:timjomiller@gmail.com) account to the [cajun@coqui.net](mailto:cajun@coqui.net) account. The e-mail's verbatim excerpts included, "... Another big thing right now is CAM higher ups say she may not even go to CAM any more for the protection of the organization. That's pretty sick. The isolation is driving her and little Lydia crazy. ... Please keep this e-mail to yourselves about Sarah and CAM...."

54. IMJ's date of birth is April 16, 2002.

55. The [timjomiller@gmail.com](mailto:timjomiller@gmail.com) account contained an e-mail to "Alvin and Edna Miller <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>" dated on or about March 25, 2010. The e-mail's verbatim excerpts included, "Mother Dear, ... We were planning to have a special birthday party for Lydia as her birthday is the 16th. ... The more children the better. Sarah every year has gotten a pinata for Lydia, so she has been planning on that... I feel dearly for these 2 dear people. And I can see it would mean a lot to them in this rough first year of there stay in Nica. I would love for Lydia's birthday to be very special and remembered long. She is going through a lot, and her future looms greatly in front of her right now...."

56. The [timjomiller@gmail.com](mailto:timjomiller@gmail.com) e-mail account contained an e-mail dated on or about Monday, April 12, 2010 to "Pablo Yoder <[pabloeuni@gmail.com](mailto:pabloeuni@gmail.com)>" and "Alvin and Edna Miller <[millersofwaslala@gmail.com](mailto:millersofwaslala@gmail.com)>". The verbatim excerpts included, "... We are not sure yet if we will be coming into Waslala Thurs. evening or Friday morn. but we think the BD get together would be best Friday evening because I will need to make the cake and such.... We were thinking maybe just getting together for cake and ice cream and pinata and maybe singing. Lydia LOVES to sing. ... PS... She is grateful for this for her daughters sake...".

G. Christian Aid Ministries (CAM)

57. A printout of the website <http://www.christianaidministries.org/CAMhome.html> lists an address for Christian Aid Ministries as PO Box 360, Berlin, OH 44610.

58. The printout of the website <http://www.charitynavigator.org/> dated March 17, 2011 provides the following description, "Charity Navigator, America's premier independent charity evaluator, works to advance a more efficient and responsive philanthropic marketplace by evaluating the financial health of over 5,500 of America's largest charities."

59. The Charity Navigator website provides the following mission description for Christian Aid Ministries, "Christian Aid Ministries (CAM) was founded in 1981. Our primary purpose is to provide a trustworthy, efficient channel for Amish, Mennonite, and other conservative Anabaptist groups and individuals to minister to physical and spiritual needs around the world. Annually, CAM distributes approximately 15-20 million pounds of food, clothing, medicines, seeds, Bibles and other Christian literature. The main purpose of giving material aid is to encourage God's people and to help bring the Gospel to a lost and dying world. CAM has staff, bases and distribution networks in Romania, Moldova, Ukraine, Haiti, Nicaragua...".

H. Liberty University and its Relationship with Lisa Miller

60. Liberty University is located in Lynchburg, Virginia. An online news article dated March 6, 2011 by Brian Kelley is titled, "Census 2010: Liberty University fuels Lynchburg's growth".

61. The website <http://www.liberty.edu/aboutliberty/> contains a "Message from the Chancellor", Chancellor Jerry Falwell Jr.. The text on the March 18, 2011 printout of the webpage includes, "Liberty University is the largest and fastest growing Christian Evangelical university in the world. Founded in 1971 by my father, the late Dr. Jerry Falwell Sr., Liberty started with his vision to train young Champions for Christ...."

62. Rena M. Lindevaldsen represented Lisa Miller during the litigation of parental rights of IMJ.

63. Bank records show that Lisa Ann Miller received multiple payroll checks from the Lynchburg Christian Academy Payroll Account.

64. The "Faculty/Staff Directory" listed within the Liberty School of Law website lists "Rena M. Lindevaldsen" as an "Associate Professor of Law" and "Associate Director, Liberty Center for Law and Policy".

65. According to the printout of the website for Liberty Counsel, "Liberty Counsel™ is a nonprofit litigation, education and policy organization dedicated to advancing religious freedom, the sanctity of human life and the family. Established in 1989, Liberty Counsel is a nationwide organization with offices in Florida, Virginia, and Washington D.C., and hundreds of affiliate attorneys across the Nation. ... Liberty Counsel provides pro bono legal assistance in the areas of religious liberty, the sanctity of human life and the family. ... The Liberty Center for Law & Policy (LCLP) operates as one component of Liberty Counsel's training, education and public

policy program. With offices in Washington, D.C. and on the campus of Liberty University School of Law in Lynchburg, Virginia, the LCLP trains attorneys, law students, policymakers, legislators, clergy and world leaders in constitutional principles and government policies...."

I. General Information Regarding Philip Zodhiates

66. Sarah Star, an attorney who represents Janet Jenkins, has told me that she received a call on or about June 21, 2010. The caller provided the following information:

a. Philip Zodhiates is a wealthy man and a "Liberty Leader" who has a beach house in Nicaragua. Lisa Miller and Isabella Miller have been staying at the home of Zodhiates.

b. Victoria Hyden is the daughter of Zodhiates. Zodhiates asked Hyden to disseminate a request to get Lisa Miller supplies.

67. The "Faculty/Staff Directory" listed within the Liberty School of Law website lists "Victoria Hyden" as an "Administrative Assistant" within the "Admissions and Financial Aid" section.

68. A website printout dated July 7, 2010 from the Vacationrentals.com website lists Philip Zodhiates as the owner of a vacation rental in Nicaragua. The phone number listed on the webpage is 540-943-6721.

69. Database records indicate that phone number 540-943-6721 as being associated with "Response Unlimited." The address associated with the phone number is 284 Shalom Road, Waynesboro, VA 22980.

70. A link within the website for Response Unlimited contains the following text, "Dear Friend: Response Unlimited soon became the nation's best and most comprehensive source of mailing lists for conservative and Christian mailers and tele-marketers....Cordially, Philip Zodhiates".

71. Star has told me that she determined through Internet research that Zodhiates has six adopted children. Three of the children are from Nicaragua and three children are from Guatemala.

J. Shelter Provided to Lisa Miller by Timothy Miller

72. The [timjomiller@gmail.com](mailto:timjomiller@gmail.com) account contained an e-mail strand beginning on or about November 12, 2009 and concluding on or about November 13, 2009 between "Philip Zodhiates" and "John Collmus". The Subject line throughout the e-mail strand referenced "bag for Nicaragua".

a. An e-mail dated on or about November 12, 2009 from "Philip Zodhiates [<mailto:philipz@responseunlimited.com>]" to "John Collmus" was labeled as "High" within the Importance field. The e-mail's content included, "John: The bags for Nicaragua have not arrived yet, but one is on its way to our home as I write. I will send it with Josiah in the morning. If I find out the other is ready I will have to go to Lynchburg to pick it up tomorrow or have someone else get it Saturday. Would that work? Can you give me your home & cell numbers just in case. ... Thanks so much for doing this. They are just personal belongings of someone who recently moved to Managua doing missions work and a few things they can't buy there readily like peanut butter. So it is nothing you need to declare on the customs forms. Philip 540-943-6721 office...".

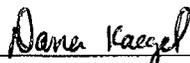
b. An e-mail dated on or about November 13, 2009 from the "John Collmus [<mailto:jcollmus@covenantschool.org>]" to "Philip Zodhiates". The e-mail contains, "I have 2 in my room. Do you think they may open them up, break the tape, or is that not a problem. Who will my contact be? John H. Collmus".

c. "Philip Zodhiates' <[philipz@responseunlimited.com](mailto:philipz@responseunlimited.com)>" responds to "John Collmus' <[jcollmus@covenantsschool.org](mailto:jcollmus@covenantsschool.org)>" in an e-mail dated on or about November 13, 2009. The e-mail contained, "... Yes they will probably examine the bags when you check in, but that is not a problem. I am not sure why they taped them (I did not pack them, one of the elders of the local church did here). Timo Miller will meet you at the airport and hold up a sign with your name. He is a pastor of an Amish-Mennonite church in Managua who is with Christian Aid Ministries (Ohio). ... The suitcases are for a lady that works with them there in Managua named Sarah. ... Thank you for taking these. Sarah will greatly appreciate it, I am sure...."

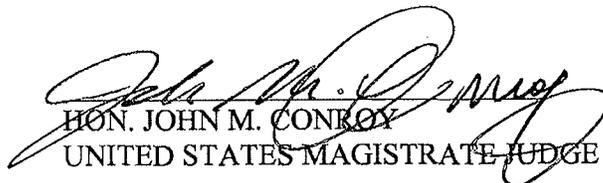
K. Conclusion

73. Based on the foregoing, I request that a Criminal Complaint be issued for Timothy Miller.

Respectfully submitted,

  
\_\_\_\_\_  
Dana Kaegel  
Special Agent, Federal Bureau of  
Investigation

Subscribed and sworn to before me  
on April 15, 2011:

  
HON. JOHN M. CONROY  
UNITED STATES MAGISTRATE JUDGE

AO 91 (Rev. 01/09) Criminal Complaint

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

UNITED STATES DISTRICT COURT

for the  
District of Vermont

2010 APR 27 PM 3:42

United States of America )

v. )

Lisa Miller )

Defendant )

CLERK AZE  
DEPUTY CLERK

Case No. 2:10-mj-74-1

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 09/22/2009 to the present in the county of \_\_\_\_\_ in the \_\_\_\_\_ District of  
Vermont, the defendant violated 18 U.S.C. § 1204, an offense described as follows:

removing a child from the United States, and retaining a child (who has been in the United States) outside the United States with intent to obstruct the lawful exercise of parental rights

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Dana Kaegel  
Complainant's signature

Dana Kaegel, Special Agent, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: 04/27/2010

John M. Conroy  
Judge's signature

City and state: Burlington, Vermont

John M. Conroy, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, Dana L. Kaegel, being duly sworn, depose and state as follows:

A. **Background**

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have been a Special Agent since October of 2008. I am currently assigned to the Burlington, Vermont Resident Agency.

2. I have probable cause to believe that Lisa Miller, also known as Lisa Miller-Jenkins and Lisa A. McConchie, has violated 18 U.S.C. § 1204, by engaging in international parental kidnapping, by removing a child from the United States, on or about September 22, 2009, and retaining a child, who has been in the United States, outside the United States from September 2009 to the present, with intent to obstruct the lawful exercise of parental rights by Janet Jenkins. I make this affidavit in support of a criminal complaint and request for an arrest warrant charging Lisa Miller with violating of 18 U.S.C. § 1204.

3. The statements contained in this affidavit are based upon my investigation and include information provided by other law enforcement officials, court documentation, information provided by Janet Jenkins, and on my experience and training as a Special Agent of the FBI. Because this affidavit is being submitted for the limited purpose of supporting a complaint and obtaining an arrest warrant, I have not included each and every fact known to me concerning this investigation.

B. **Relationship between Miller and Jenkins**

4. Janet Jenkins has told me the following:

a. In or about December 1997, Janet Jenkins met and began a personal relationship with Lisa Miller, who at the time represented that she was a lesbian. Both women lived in Virginia at the time.

b. Prior to December 1997, Miller was married to Kurt McConchie, but Miller divorced him.

c. In or about February 1998, Jenkins and Miller became engaged. The two began researching state laws regarding parental protections for same-sex couples.

d. In or about April 1998, Miller moved into Jenkins' home in Virginia.

e. In December 2000, Miller and Jenkins traveled to Vermont and obtained a civil union pursuant to Vermont law.

f. In or about January 2001, Jenkins and Miller identified an alternative insemination specialist in Virginia for the purpose of pursuing a pregnancy of Miller. Jenkins paid approximately fifty thousand dollars to facilitate the alternative insemination that led to the birth of IMJ on April 16, 2002.

g. Jenkins and Miller planned to move to Vermont prior to IMJ's birth, but because of complications with Miller's pregnancy, Isabella Ruth Miller-Jenkins (IMJ) was born in Virginia.

5. On June 15, 2007, Rutland Vermont Family Court made the following findings of fact, as part of the litigation between Jenkins and Miller concerning custody of IMJ:

a. In August 2002, Miller and Jenkins moved to Fair Haven, Vermont, where they had purchased a home together.

b. During 2002 and 2003, Miller and Jenkins referred to each other as the mothers of IMJ and shared equally in the care of IMJ, except when Jenkins worked outside the home.

6. Jenkins has told me the following:

a. Miller became pregnant again through alternative insemination in May 2003, but had a miscarriage.

b. After the miscarriage, Miller's behavior changed.

c. In or about August 2003, Jenkins told Miller that she wanted a separation due to her concerns over Miller's behavior and refusal to seek help. Jenkins hoped that the separation would encourage Miller to seek help.

d. In September 2003, Miller and IMJ moved to Virginia. During that Fall, Jenkins traveled to Virginia regularly on weekends to visit IMJ.

C. Litigation Prior to 2007

7. Miller filed a complaint for dissolution of the civil union in Rutland Family Court in November 2003.

8. On June 17, 2004, the Rutland Family Court issued a temporary order regarding parental rights and responsibilities. This order awarded Lisa temporary legal and physical responsibility for IMJ and awarded Janet parent-child contact for two weekends in June, one weekend in July, and the third full week of each month, beginning in August 2004. The Family Court also ordered Lisa to permit Janet to have telephone contact with IMJ once daily.

9. On July 1, 2004, Miller filed a "Petition to Establish Parentage and for Declaratory Relief" in the Frederick County Virginia Circuit Court. Miller asserted that she had "sole custody" of IMJ, and asked the court to declare that she was the "sole parent of" IMJ.

10. In July 2004, the Rutland Family Court reaffirmed its "jurisdiction over this case including all parent-child contact issues," stated that it would not "defer to a different State that

would preclude the parties from a remedy,” and made clear that the temporary order for parent-child contact was to be followed. The Court added that “[f]ailure of the custodial parent to allow contact will result in an immediate hearing on the need to change custody.”

11. On September 2, 2004, the Rutland Family Court found Miller in contempt for willful refusal to comply with the temporary visitation order.

12. On September 9, 2004, the Virginia Circuit Court held that it had jurisdiction to determine parentage and parental rights of IMJ, and later ruled that Jenkins had no “claims of parentage or visitation rights over” IMJ.

13. On August 4, 2006, the Vermont Supreme Court affirmed the decision of the Rutland Family Court that it had jurisdiction over the child custody matter and that Jenkins had parent-child contact rights.

14. On November 28, 2006, the Court of Appeals of Virginia vacated the Virginia Circuit Court order denying parental rights to Jenkins, holding that the Virginia courts should defer to the jurisdiction of the Vermont courts.

D. Litigation 2007 through 2010

15. In April 2007, Miller and Jenkins were involved in a trial in Rutland Family Court concerning custody of IMJ. After the trial, the court granted parental rights to Miller and ordered visitation rights for Jenkins with IMJ.

16. In April 2007, the Virginia Court of Appeals reversed a decision by the Virginia Circuit Court declining to enforce the Vermont custody order. This decision was affirmed by the Supreme Court of Virginia on June 6, 2008.

17. During 2008, the Rutland Family Court issued a series of orders finding Miller in contempt for refusing to comply with its visitation orders.

18. At a hearing in Rutland Family Court in January 2009, the Court explicitly warned Miller that failure to comply with ordered visits could lead to a transfer in custody. Miller stated that she would comply with the ordered visits.

20. The Rutland Family Court ordered a contact visit for March 7 -14, 2009, which did not occur. The Rutland Family Court ordered a make-up visit in Vermont for April 9-13, 2009, which did not occur. The Rutland Family Court ordered a visit in Vermont for May 23-29, 2009, which did not occur. The Rutland Family Court ordered a visit in Virginia for June 6-8, 2009, which did not occur. The Rutland Family Court ordered a visit for July 10-August 8, 2009, which did not occur.

21. On August 21, 2009, the Rutland Family Court held a hearing on Jenkins' Motion to Modify Parental Rights and Responsibilities. Miller was not present for the hearing. The Court concluded on November 20, 2009, that Miller willfully interfered with Jenkins' visitation rights. Moreover, the Court ordered that Jenkins would have sole physical and legal custody of IMJ and that the custody transfer occur on January 1, 2010.

E. International Travel by Miller and IMJ

22. Intelligence Officer Melanie Granger, Canadian Border Services Agency has provided me the following information from Canadian Border Records and Mexican Authorities:

a. Miller and a second passenger crossed the Canadian border at the Rainbow Bridge between Buffalo, NY, and Canada on September 22, 2009 in a vehicle bearing New York license plate 20719TX.

b. It is likely that the second passenger's name was not entered into records because the second passenger was a minor.

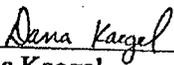
c. On September 22, 2009, Lisa A. Miller and Isabella Ruth Miller arrived in Mexico City, Mexico on Mexicana Flight 887.

23. I have conducted an inquiry of U.S. database records that provided New York license plate 20719TX as registered to Omnibus Taxi. The vehicle registered to the plate is a 2002 Chevrolet Impala.

24. FBI Intelligence Analyst Abigail Pope has told me that United States border records, which document entries into the United States, do not indicate that Miller or IMJ have returned to the United States since September 22, 2009.

25. At a hearing in Rutland Family Court in February 2010, a representative of Liberty Christian Academy testified that IMJ had not been a student there in the 2009 - 2010 school year and that the school had no information about her location. At the same hearing, a friend of Miller's testified that the last time she saw Miller was in early September 2009 and that she had no idea where Miller was.

Dated at Burlington, in the District of Vermont, this 27<sup>th</sup> day of April, 2010.

  
\_\_\_\_\_  
Dana Kaegel  
Special Agent, Federal Bureau of  
Investigation

Sworn to and subscribed before me this 27<sup>th</sup> day of April, 2010.

  
JOHN M. CONROY  
United States Magistrate Judge

# *Exhibit P*



info@responseunlimited.com  
(540) 943-6721

**VERMONT COUNTRY STORE MASTERFILE ENHANCED**

Universe/Base Rate	1,322,016	\$110/M
12 Month Buyers	882,016	+\$12/M
6 Month Buyers	413,522	+\$17/M
3 Month Buyers	223,747	+\$22/M
1 Month Buyers	74,512	+\$27/M
FUNDRAISER RATE		\$75/M
PUBLISHER RATE		\$75/M

Since 1946, The Vermont Country Store has brought yesteryear's hard-to-find products to today's quality conscious consumer. Their catalog and website product categories include Apothecary, Apparel, Food & Candy and For The Home. The Vermont Country Store Masterfile is comprised of Voice of the Mountains, Goods & Wares and VermontCountryStore.com buyers.

**Demographics:**

Age 55+

Majority are college-educated

The majority own their own homes

Average HHI \$67,000

Voice of the Mountains and Goods & Wares titles available as subsets of Masterfile at \$16/M.

A sample mail piece is required for approval.

Payment is due 15 days from delivery.

All cancelled orders are subject to a \$100 cancellation fee, plus \$8/M run charges, and any applicable shipping and material fees.

**SOURCE**

Direct Mail Sold

**AVG UNIT SALE**

\$66

**ADDRESSING**

Cartridge	\$30/F
Diskette	\$75/F
Email	\$60/F
Magtape	\$40/F
PS Labels	\$7.50/M

KEYING: \$3/M

**SELECTIONS**

Geography	\$11/M
Gender	\$11/M
Age	\$11/M
Cash	\$11/M
Catalog Buyers	\$11/M
Ethnicity	\$10/M
Credit Card Buy	\$11/M
Gender	\$11/M
\$50+	\$26/M
\$75+	\$31/M
\$100+	\$36/M
\$150+	\$41/M
Religion	\$10/M
Title	\$16/M
Demographics	\$11/M
Recency	\$8/M
Frequency	\$8/M
Distinct Clients	\$8/M
# of Titles	\$8/M
Internet Buyer	\$11/M
Omit House File	\$50/F
2+ Zips	\$5/M
Run Charge	\$8/M

**MAINTENANCE**

Semi-annually

**MINIMUM**

10,000

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# VERMONT SECRETARY OF STATE

*Jim Condos*

- ARCHIVES
- CORPORATIONS
- ELECTIONS
- OTHER PROGRAMS
- PROFESSIONAL REGULATIONS
- SECRETARY'S DESK

### Corporation Information

Corporation Name	VERMONT COUNTRY STORE, INC. THE
Corporation Status	Active
File No	V-10258-0
Type	Vermont
Incorporation Date	01/09/1961
Corporation Description	STORE
State of Incorporation	VT
Fiscal Month End	04
Registered Agent	PENNY JOHNSON
Address	5650 MAIN STREET
City State Zip	MANCHESTER CTR VT 05255
President	WILLIAM C SHOULDice IV
Vice Pres	CHRIS VICKERS
Secretary	CABOT ORTON
Treasurer	GARDNER ORTON
Director1	MICHAEL SHERMAN
Director2	FRED LAGER/R. JEWETT
Director3	W.CRANSHAW/E.MESSINA
Principal Street Address	5650 MAIN STREET
City State Zip	MANCHESTER CTR VT 05255
Last Annual Report	04/30/2012

Above accurate as of: 02/08/2013

[Information Contact](#)

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[Vermont State Page](#) | [Disclaimer](#)

This Web Page is



# *Exhibit Q*

Frederick County Juvenile & Domestic Relations District Court  
5 North Kent Street  
Winchester, VA 22601  
540-667-5770  
Fax: 540-723-8886



# Fax

**To:** Rebecca K. Glenberg, Esq. **From:** William W. Sharp, Judge

---

**Fax:** 804-649-2733 **Pages:** 7

---

**Phone:** **Date:** 8/28/2009

---

**Re:** Miller v. Jenkins

---

- Urgent  
  For Review  
  Please Comment  
  Please Reply  
  Please Recycle

• **Comments:**

Following is my order from Tuesday's hearing. I apologize for the delay. As this is likely the last I will see of this case, due to appeal and/or transfer, I felt I needed to be sure that I documented that all points raised were covered.

WWS

VIRGINIA: IN THE JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT OF  
FREDERICK COUNTY

JANET JENKINS  
Petitioner

v.

DOCKET NO. JA013947-03F

LISA MILLER  
Respondent

IN RE: ISABELLA MILLER-JENKINS, d.o.b. 04/16/02

ORDER

CAME THIS 25<sup>th</sup> day of August, 2009, the Petitioner (hereinafter, Jenkins), appearing by phone, and by her counsel, Rebecca K. Glenberg, Esq., and also came the Respondent (hereinafter, Miller), in person and with her counsel, Matthew D. Staver, Esq., appearing *pro hac vice*, and Rena M. Lindevaldsen, Esq., to be heard upon the Show Cause Summons issued upon Jenkins' complaint that Miller had violated the Vermont visitation orders previously registered in this Court.

WHEREUPON, the Court heard testimony from the parties and argument and considered the briefs already filed. In consideration whereof, the Court makes the following findings and conclusions:

1. This Court has both the power and the duty to enforce the Vermont orders. Recognition of the Vermont orders pursuant to the Parental Kidnapping Protection Act (the PKPA) also means enforcement of the orders. Without revisiting arguments already addressed by this Court, and the Circuit Court and the Court of Appeals, this Court believes this to be the law, and does not believe that *Baker v. General Motors Corp.*, 522 U.S. 222 (1998) warrants any different conclusion. Miller points to the language

of Justice Scalia's concurring opinion in *Baker v. General Motors Corp.*, 522 U.S. at 235 that "Enforcement measures do not travel with the sister state judgment." This only limits the parties to using enforcement procedures and mechanisms as are provided for in the state where enforcement is sought; it does not allow a state to decide it will not enforce certain judgments because it disagrees with them. In *Baker*, the Court cited with approval: "In numerous cases this Court has held that credit must be given to the judgment of another state although the forum would not be required to entertain the suit on which the judgment was founded." *Milwaukee County v. M.E. White Co.*, 296 U.S. 268, 277 (1935) And it said, "...our decisions support no roving 'public policy exception' to the full faith and credit clause." *Baker* at 233. The Full Faith and Credit Clause "ordered submission . . . even to hostile policies reflected in the judgment of another State." *Estin v. Estin*, 334 U.S. 541, 546 (1948).

2. The recent decision by the Virginia Court of Appeals in *Damon v. York* (Va. Ct. of Appeals, 8/11/2009) does not give this Court any pause to reconsider its previously expressed view that it must enforce the Vermont order, regardless of Virginia public policy. That decision certainly further affirms what this Court has always believed - had the custody/visitation matter between the parties initiated in this Commonwealth, the result would have been quite different. Indeed that is exactly what happened in *Damon*. A same-sex couple had a marriage in Canada, but the determination of custody/visitation rights took place here, and our law applied. Pursuant to the PKPA and Full Faith and Credit,

that judgment should be respected and enforced in every State of our Union.

3. Ms. Miller's counsel also raised the argument that there is currently no custody order in place to enforce in a letter of August 24, 2009, though that argument was not renewed at the hearing except to argue for delay in any decision. To the extent counsel may have intended to argue that Jenkins had no rights to enforce at this time because there was no order to enforce, that does not appear to be the case. There is an underlying determination of custody and visitation; what is lacking is merely an order for any specific dates and times of visitation at this time. It is this Court's conclusion that there is an effective order currently placing custody with Miller, and recognizing that Jenkins have visitation, but there is no specific visitation for Miller to have to comply with until further order is entered.

4. Lisa Miller is in contempt of the orders of the Family Court of Rutland County, Vermont that are registered here for enforcement. She willfully failed to comply with requirements to deliver Isabella for visitation, as ordered, on April 9, May 23 and June 6, and there is no good cause for her failure to obey the orders. As it appears the child truly was ill on March 7, the Court finds the failure to deliver the child for that visit was for good cause. The excuses raised for the other dates do not constitute good cause to disobey a lawful court order. In April, while the written order did not come down until hours before Ms. Miller should have left to deliver the child, she knew what the order was going to say weeks in advance, and made no effort to

plan a job substitute or someone to transport the child for her until after the order was signed. Her deliberate delay cannot then become an excuse for non-compliance. Her claims that subsequent visits interfered with important school functions or testing were presented to, and rejected by, the Vermont Court.

5. There is no longer good cause for these matters to remain in Frederick County. The Virginia litigation over Isabella commenced in Frederick County because Ms. Miller and the child then resided here. Ms. Jenkins has always lived in Vermont throughout these cases. Well over six months ago, Ms. Miller moved to Bedford County, Virginia. This past Fall, this Court rejected a motion to transfer venue to Bedford County because the litigation had commenced here, and the transfer would interfere with trying to expeditiously decide this case, and bring it to a close. However, we are now ten months past that decision - expedition has not been accomplished. A decision has been reached at this level which will either be appealed, keeping the case in Frederick County until remand, or will lead to a subsequent motion to enforce the Show Cause judgment entered today, if the sanctions imposed today do not achieve their purpose. In either case, further pleadings, if needed, at this level, can be brought just as expeditiously in the County where a party resides as they can be here. There is simply no longer any reason for this Court to hold on to this case when no one involved is here.

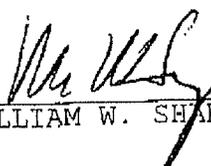
FOR THE FOREGOING REASONS, it is hereby ADJUDGED and ORDERED that Lisa Miller is found guilty of civil contempt for failing to deliver Isabella for visitation; as a coercive sanction, to compel

compliance with the Orders of the Family Court of Rutland, Vermont, Ms. Miller shall pay a civil fine of \$100 for each and every day that she fails to deliver the child to Ms. Jenkins for days the Vermont Court has either now or hereafter ordered the child to be with Ms. Jenkins. Said civil fine shall be payable to Janet Jenkins. Ms. Miller is further advised that, pursuant to Virginia Code §16.1-278.16, if there is continued contempt, sanctions could include a coercive sentence of up to 12 months in jail.

It is further ORDERED that jurisdiction of all matters pertaining to the custody and visitation of Isabella Miller-Jenkins shall be transferred to the Juvenile and Domestic Relations District Court for Bedford County, Virginia. As an appeal may be made of this Order, which would have the effect of staying this order, including the transfer, the Clerk shall only send the matter to Bedford County if ten days passes after entry of this order without an appeal.

The Clerk shall forward copies of this Order to counsel of record. There is good cause existing to dispense with the endorsement of counsel on this Order, pursuant to Rule 8:19 of the Rules of the Supreme Court of Virginia. Any party may file written objections to the form of the Order within ten (10) days of its entry.

ENTERED this 28<sup>th</sup> day of August, 2009.

  
WILLIAM W. SHARP, JUDGE

NOTICE: THIS IS A FINAL ORDER, AND EITHER PARTY HAS THE RIGHT TO APPEAL THIS ORDER, BY GIVING WRITTEN NOTICE OF THEIR APPEAL TO THE CLERK OF THIS COURT WITHIN TEN (10) DAYS OF THE DATE OF THIS ORDER. THE TERMS OF THIS ORDER WILL REMAIN IN EFFECT DURING THE APPEAL, UNLESS AND UNTIL CHANGED BY THE COURT HEARING THE APPEAL.

# ***Exhibit R***



Account Number: 108723165

9/28/09

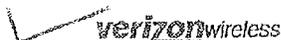
RESPONSE UNLIMITED INC

Wireless Service for - (Continued)

FOR 540-649-1999

Room Activity for 540-649-1999										
Date	Time	Call Type	Service Location	From/Called Number	Location Called	Minutes	Air Charges	Long Distance	Taxes & Fees	Total
9/14	4:58 pm	RM	LEXINGTON VA	540-456-7226	GREENWOOD VA	1:00				\$ .00
9/14	5:00 pm	RM	LEXINGTON VA	540-943-5779	WAYNESBORO VA	2:00				\$ .00
9/14	5:48 pm	RM	LEXINGTON VA	540-943-5779	WAYNESBORO VA	2:00				\$ .00
9/14	8:55 pm	RM	LEXINGTON VA	434-293-8685	CHARLOTSVL VA	3:00				\$ .00
9/14	9:16 pm	RM	LEXINGTON VA	540-241-6673	WAYNESBORO VA	1:00				\$ .00
9/14	9:17 pm	RM	LEXINGTON VA	540-943-5779	WAYNESBORO VA	9:00				\$ .00
9/21	4:23 pm	RM	HAGERSTOWN MD	540-649-1999	VOICEMAIL CL	3:00				\$ .00
9/21	5:05 pm	RM	HAGERSTOWN MD	610-740-9823	INCOMING CL	6:00				\$ .00
9/21	5:35 pm	RM	ALTOONA PA	540-649-4875	INCOMING CL	8:00				\$ .00
9/21	6:44 pm	RM	PITTSBURGH PA	540-649-4875	WAYNESBORO VA	6:00				\$ .00
9/21	7:13 pm	RM	PITTSBURGH PA	540-943-8115	INCOMING CL	5:00				\$ .00
9/21	7:21 pm	RM	PITTSBURGH PA	850-276-8000	PENSACOLA FL	4:00				\$ .00
9/21	9:10 pm	RM	MEADVILLE PA	519-826-8156	SHAKESPERE ON	2:00		\$ .30		\$ .30
9/21	9:12 pm	RM	MEADVILLE PA	519-276-8156	INCOMING CL	4:00				\$ .00
9/21	9:42 pm	RM	CAMBDG SPIG PA	540-649-4875	INCOMING CL	3:00				\$ .00
9/21	10:00 pm	RM	HERIE PA	519-276-8156	INCOMING CL	2:00				\$ .00
9/21	11:14 pm	RM	BUFFALO NY	540-241-9887	INCOMING CL	1:00				\$ .00
9/22	1:21 am	RM	BUFFALO-RO NY	519-276-8156	INCOMING CL	2:00				\$ .00
9/22	7:10 am	RM	BUFFALO-RO NY	519-276-8156	INCOMING CL	2:00				\$ .00
9/22	7:18 am	RM	BUFFALO-RO NY	906-374-0372	NIAGARAFALLS ON	2:00		\$ .30		\$ .30
9/22	7:29 am	RM	BUFFALO-RO NY	540-649-4875	INCOMING CL	6:00				\$ .00
9/22	7:38 am	RM	BUFFALO-RO NY	906-374-0372	NIAGARAFALLS ON	2:00		\$ .30		\$ .30
9/22	8:48 am	RM	BUFFALO-RO NY	540-241-5673	WAYNESBORO VA	3:00				\$ .00
9/22	8:58 am	RM	BUFFALO-RO NY	616-289-0798	NASHVILLE TN	1:00				\$ .00
9/22	8:54 am	RM	BUFFALO-RO NY	864-906-7285	GREENVILLE SC	2:00				\$ .00
9/22	8:59 am	RM	BUFFALO-RO NY	540-649-4875	INCOMING CL	7:00				\$ .00
9/22	11:30 am	RM	BINGHAMPTO NY	540-447-6720	INCOMING CL	6:00				\$ .00
9/22	1:03 pm	RM	LEHIGHTON PA	610-549-3975	INCOMING CL	4:00				\$ .00
9/22	1:20 pm	RM	LEHIGHTON PA	540-943-6721	WAYNESBORO VA	8:00				\$ .00
9/22	1:28 pm	RM	LEHIGHTON PA	407-766-8928	ORLANDO FL	1:00				\$ .00
9/22	1:29 pm	RM	LEHIGHTON PA	434-592-5300	LYNCHBURG VA	1:00				\$ .00
9/22	1:30 pm	RM	LEHIGHTON PA	434-592-5300	LYNCHBURG VA	5:00				\$ .00
9/22	1:44 pm	RM	LEHIGHTON PA		INCOMING CL	2:00				\$ .00
9/22	1:46 pm	RM	LEHIGHTON PA	540-447-6720	INCOMING CL	1:00				\$ .00
9/22	2:16 pm	RM	LEHIGHTON PA	540-649-4875	INCOMING CL	7:00				\$ .00
9/22	2:28 pm	RM	MANDATA PA	610-649-4875	WAYNESBORO VA	2:00				\$ .00
9/22	4:46 pm	RM	HAGERSTOWN MD	540-241-5673	INCOMING CL	3:00				\$ .00
9/24	8:57 am	RM	CHARLTTES VA	540-943-6721	WAYNESBORO VA	1:00				\$ .00
9/24	9:00 am	RM	CHARLOTSVL VA	540-943-6721	WAYNESBORO VA	1:00				\$ .00
<b>Totals</b>						<b>183:00</b>	<b>\$ .00</b>	<b>\$ .90</b>	<b>\$ .00</b>	<b>\$ .90</b>

# *Exhibit S*



Invoice Number Account Number Date Due Page

6125699820 320186287-00001 10/29/09 9 of 12

Detail for Victoria Zodhiates: 540-447-6720

Voice, continued

Date	Time	Number	Rate	Usage Type	Origination	Destination	Min.	Airtime Charges	Long Dist/ Other Chgs	Total
9/20	7:36P	540-649-1999	Off-Peak	N&W	Lynchburg VA	Waynesboro VA	1	---	---	---
9/20	10:10P	540-649-1999	Off-Peak	N&W	Lynchburg VA	Waynesboro VA	16	---	---	---
9/20	11:01P	540-241-5673	Off-Peak	N&W	Lynchburg VA	Waynesboro VA	1	---	---	---
9/20	11:23P	540-241-5673	Off-Peak	N&W	Lynchburg VA	Waynesboro VA	1	---	---	---
9/20	11:28P	434-592-7696	Off-Peak	N&W	Lynchburg VA	Incoming CL	4	---	---	---
9/21	11:32A	434-592-5300	Peak	Plan Allow	Lynchburg VA	Lynchburg VA	2	---	---	---
9/21	12:49P	540-292-8270	Peak	M2M Allow	Lynchburg VA	Incoming CL	3	---	---	---
9/21	2:48P	757-653-4524	Peak	M2M Allow	Lynchburg VA	Incoming CL	3	---	---	---
9/21	2:54P	540-241-9887	Peak	Plan Allow	Lynchburg VA	Incoming CL	3	---	---	---
9/21	2:57P	434-592-7696	Peak	Plan Allow	Lynchburg VA	Incoming CL	6	---	---	---
9/21	5:55P	540-241-9887	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	1	---	---	---
9/21	5:57P	434-582-4345	Peak	Plan Allow	Lynchburg VA	Lynchburg VA	1	---	---	---
9/21	6:00P	540-241-5673	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	6	---	---	---
9/21	6:14P	434-592-7696	Peak	Plan Allow, Call Wait	Lynchburg VA	Incoming CL	4	---	---	---
9/21	6:32P	704-307-8923	Peak	Plan Allow	Lynchburg VA	Charlotte NC	4	---	---	---
9/22	12:39A	434-592-7696	Off-Peak	N&W	Lynchburg VA	Incoming CL	6	---	---	---
9/22	11:31A	540-649-1999	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	6	---	---	---
9/22	1:49P	540-649-1999	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	1	---	---	---
9/22	1:53P	360-471-1899	Peak	Plan Allow	Lynchburg VA	Bremerton WA	1	---	---	---
9/22	3:19P	281-703-1724	Peak	M2M Allow	Lynchburg VA	Incoming CL	4	---	---	---
9/22	3:26P	281-703-1724	Peak	M2M Allow	Lynchburg VA	Incoming CL	2	---	---	---
9/22	7:24P	000-000-0086	Peak	Plan Allow, Call Wait	Lynchburg VA	Voice Mail CL	3	---	---	---
9/22	7:27P	757-969-2744	Peak	M2M Allow	Lynchburg VA	Newport News VA	1	---	---	---
9/22	7:28P	757-969-2744	Peak	M2M Allow	Lynchburg VA	Newport News VA	1	---	---	---
9/22	7:34P	757-969-2744	Peak	M2M Allow	Lynchburg VA	Newport News VA	1	---	---	---
9/22	9:08P	360-471-1899	Off-Peak	N&W	Lynchburg VA	Incoming CL	23	---	---	---
9/22	9:31P	281-703-1724	Off-Peak	M2M Allow	Lynchburg VA	Houston TX	1	---	---	---
9/22	9:32P	281-703-1724	Off-Peak	M2M Allow	Lynchburg VA	Incoming CL	4	---	---	---
9/22	9:45P	281-703-1724	Off-Peak	M2M Allow	Lynchburg VA	Houston TX	5	---	---	---
9/22	11:31P	434-592-7696	Off-Peak	N&W	Lynchburg VA	Incoming CL	20	---	---	---
9/23	10:40A	434-592-7696	Peak	Plan Allow	Lynchburg VA	Incoming CL	2	---	---	---
9/23	2:55P	630-948-1490	Peak	Plan Allow	Lynchburg VA	Incoming CL	1	---	---	---
9/23	4:25P	540-943-5779	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	2	---	---	---
9/23	4:28P	540-943-6721	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	2	---	---	---
9/23	9:53P	419-235-0363	Off-Peak	N&W	Lynchburg VA	Lima OH	2	---	---	---
9/23	9:58P	540-241-5673	Off-Peak	N&W	Lynchburg VA	Incoming CL	3	---	---	---
9/24	11:34P	336-707-8341	Off-Peak	M2M Allow	Lynchburg VA	Greensboro NC	2	---	---	---
9/24	11:41P	336-707-8341	Off-Peak	M2M Allow	Lynchburg VA	Greensboro NC	3	---	---	---
9/24	11:44P	224-688-3307	Off-Peak	M2M Allow	Lynchburg VA	Nothbrook IL	3	---	---	---
9/24	11:48P	434-592-7696	Off-Peak	N&W	Lynchburg VA	Incoming CL	6	---	---	---
9/25	9:47A	704-307-8923	Peak	Plan Allow	Lynchburg VA	Charlotte NC	1	---	---	---
9/25	2:51P	540-241-9887	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	4	---	---	---
9/25	4:25P	540-943-5779	Peak	Plan Allow	Lynchburg VA	Incoming CL	2	---	---	---
9/25	6:51P	540-241-9887	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	2	---	---	---
9/25	7:11P	540-241-9887	Peak	Plan Allow	Lynchburg VA	Waynesboro VA	3	---	---	---

# ***Exhibit T***



# MillerCase.org

- [The Case](#)
- [What We Believe](#)
  
- [Updates](#)
- [Basis For Involvement](#)
- [Background](#)
- [How to Help](#)
- [About Ken](#)
- [About Dirk Willems](#)

## Lisa Miller and the Nicaraguan brethren

Published on Wednesday, 01 February 2012 19:28

The following statement was released by the Nicaraguan Brotherhood on Feb. 2, 2012

**T**Lisa Miller left the US free with full custody of her child and lived in Nicaragua as a free person. She had her own money and took care of herself. After a time of instruction, and of searching the Scriptures, she asked to become part of the church and was received into the brotherhood.

To our knowledge neither Lisa nor any of the Nicaraguan brethren had heard that an arrest warrant had been issued for her until Timo Miller arrest the law started to pursue Lisa, so she decided to go into hiding.

Several years have passed. At the time we did not know what all was going on. We only knew that the poor mother and the precious child needed help, so some of our people kindly extended them a helping hand. But now this case has grown and quite a few congregations have been affected:

- Different churches in Nicaragua have been questioned and pressed to give information of her whereabouts.
- Some have been questioned when going to the US embassy. Others were interrogated in their homes.
- Brethren and neighbors have been watched, interrogated and threatened.
- In some churches Sunday morning services have been watched and videoed.

- A house of one of the brethren was searched without a search warrant.
- Some excommunicated brethren said that they were offered free visas, a trip to the states, study offers and easy ways to become a police officer if they would help find her. The policeman also suggested they rejoin the church but work as spies for them. They asked if the national brethren were loyal to the church.
- Phone lines were tapped. Investigators were connected to a pastor's phone when he was making a call to a brother. When the brother answered the call, all he heard was swearing. Unknown text messages were sent as if they came from a brother's number.
- An excommunicated brother informed that investigators were telling people that Lisa kidnapped someone else's daughter and that her parents are in the US. Seemingly this was done to elicit cooperation because Nicaraguans would tend to side with the biological mother.
- Another family was questioned and the daughter was forced to take off her veiling to take pictures of her.

Timo Miller was released from the charges that were against him. He has not become an official informer in Nicaragua in exchange for freedom. Timo did not turn others in exchange for his freedom. Neither is he cooperating with US authorities as they officially state. There is a possibility he might be questioned again sometime or have to serve as witness to the truth. Timo chooses to forgive the government for the ordeal they have put his family through as well as the untruths they have propagated.

Anabaptist churches in Nicaragua completed this clarification and statement of belief. We choose to forgive and not hold anything against those who unwittingly, or wittingly, were part of the system working against Lisa or us. We do not want to fight for Lisa's rights against her former partner. We understand that Lisa made mistakes in the past and there comes a reaping with it. But in all this Isabella has become an innocent victim of an ungodly agenda. Her wellbeing has not been given much or any consideration. According to the Bible we believe that God has given Lisa sole responsibility to care and protect her own daughter since she has no known father. According to the Bible it is a war between good and evil, a battle between God and Satan. As congregations we stand united in this spiritual warfare against evil.

Lisa Miller has repented of her past life of sin and was born again. She chose to abandon her sin and her deviated lifestyle ([Romans 1:24-27](http://biblia.com/bible/nkjv/Romans%201.24-27) (<http://biblia.com/bible/nkjv/Romans%201.24-27>) with [1 Corinthians 6:9-11](http://biblia.com/bible/nkjv/1%20Corinthians%206.9-11) (<http://biblia.com/bible/nkjv/1%20Corinthians%206.9-11>)). In doing that, she needed to separate herself from her former companion. According to the Bible it was a right decision for her to cut ties from her ex-partner, not only for her daughter's sake, but for the sake of her own holiness. As congregations we praise the Lord with her for a clear deliverance from the homosexual lifestyle. And we rejoice in her faithfulness and the transformation that has occurred in her life.

To us it is sad that someone is trying to pluck this dear nine-year-old daughter from her loving mother's breast. So we leave it in God's hands to protect them.

Without apology we say that we believe in the Bible, the Holy Word of God. And though so many people challenge this faith and try to make it seem old fashioned and behind the times, we simply continue to believe. The Bible has proven itself many times since God brought it into completion and gave it to His people. Jesus is the essence of TRUTH and His Word has revealed it to us. Whoever has the faith to pattern his life according to the New Testament, the rule for the church today, will live a life of peace and joy, in harmony with the author, the creator of all things.

We cannot accept that a lesbian union is a binding one, even though man is trying to say it is. God's Word says that marriage consists of a union between a man and a woman ([Genesis 2:24](http://biblia.com/bible/nkjv/Genesis%202.24) (<http://biblia.com/bible/nkjv/Genesis%202.24>) with Mathew 19:3-6). Who is man to change God, our creator's, eternal laws? Therefore Lisa's ex-partner has no connection with Lisa's daughter.

Because of this very controversial situation, as followers of Jesus Christ, we find ourselves in a very difficult position. We believe that the Bible also teaches us to respect and obey our government and the laws of the land as long as they do not conflict with God's holy laws.

The fact is that suddenly we find ourselves having to choose between obeying God and man made laws. We have chosen to obey God. We are willing to give up our rights, go to jail, or even die, for the cause of helping anyone become free from a sinful live and helping that person to life in obedience to God's Word.

In closing, with great joy in our hearts, we proclaim to anybody that would wish to hear in heaven and in earth, that we love God most of all and we will obey him to the best of our knowledge until the day we die.

We pray that God would have mercy on Lisa Miller and her daughter Isabella, and that He would continue to protect them. We pray that God would have mercy on the ones that are reinterpreting God's laws. We also

continue to pray for all who are still living outside of God's purpose for their lives, and reach out to them in the Love of Jesus Christ.

We all recognize our need of God and His saving grace and love in our lives. God have mercy on us, sinners saved by grace!

Brethren, pray "always with all prayer and supplication in the Spirit, and watching thereunto with all perseverance and supplication for all saints; And for me, that utterance may be given unto me, that I may open my mouth boldly, to make known the mystery of the gospel" (Ephesians 6:18-19 (<http://biblia.com/bible/nkjv/Ephesians%206.18-19>)).

May God bless you!

The Brothers and Sisters in the Nicaraguan Churches

Feb. 2, 2012

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