

1 parties only.

2 My thought would be that if I'm going to limit
3 it to that, why isn't it sufficient enough for you to just get
4 your own client's records; that would show the transactions
5 between her and the father. I don't know what would be on the
6 father's phone that wouldn't be on the mother's phone, except
7 for to show a difference of deleting a message or something of
8 that nature.

9 MR. CERVI: Your Honor, there is one additional
10 issue. There's text messages between the prior supervisor and
11 the father. We would suggest -- and I have proof already,
12 Judge, the supervisor had mistakenly text messaged my client a
13 message that was meant for Mr. Diarbakerly. In that message
14 she calls my client Miss Miserable. With that, Judge, I think
15 it seriously calls into question the -- it was supposed to be
16 a neutral supervisor.

17 THE COURT: Let me -- let me -- let me -- and
18 that gives me the opportunity to clarify something on the
19 record, as well. One, that is not a supervisor that was
20 selected by the Court, nor ordered by the Court. That was an
21 agreement between the parties, through multiple and consistent
22 pretrials.

23 What Mr. Margulis did -- to move this matter
24 along and to show good faith -- he proposed Jeanne Kratt as a
25 monitored supervisor, to at least do some supervising and to

Ashley Kleinschmidt, NYACP, NYRCR
Official Court Reporter:

1 He said to do some reporting to the Court. That was agreed
2 to -- upon, by the parties and the lawyers. I did an order
3 then memorializing what the parties had consented and agreed
4 to. Of course, as being the Court, I would like to have an
5 independent social worker. That was a selection by
6 Mr. Margulis. It was a selection by his client, and they both
7 agreed to -- well, he agreed to pay for her to be there to
8 observe.

9
10 The characterization in your papers that this
11 was a Court-ordered -- I did not Court order it. I
12 Court-ordered it in the sense that I memorialized an agreement
13 between the parties.

14 MR. CERVI: Understood.

15 THE COURT: That was an understanding between
16 the parties and the lawyers.

17 MR. CERVI: Okay.

18 THE COURT: It was supposed to act as an
19 independent report, to me, to help move this case along. I
20 did not select her. Okay? Therefore, you're here to live
21 with that.

22 MR. CERVI: No question.

23 THE COURT: What you need to do -- I see it as,
24 in testimony, or whenever Ms. Kratt is here testifying --
25 which I assume she would be -- that would be your opportunity
26 to, at least, cross-examine her and show if she had a bias or

Ashley Kleinschmidt, NYACR, NYRCR
Official Court Reporter

not.

I don't feel as though whatever text messaging that went on between her and Mr. Diarbakerly has any -- I don't feel they are important enough to be here in this Court. What she felt about Ms. -- what she thinks about Ms. Riford or whatever, I don't find that to be important enough, as opposed to her as a social worker here reporting to me what she's supervised and observed as a father interacting with his children. Okay?

MR. CERVI: Fair enough, Judge. Thank you.

THE COURT: All right. With respect to the cell phone records, I'm not going to quash the full subpoena, but I will limit that to only conversations between -- and I think what you need to do is identify the exact cell phone numbers that you want to see the records from. I think Verizon can minimize it to that, only; I'm hoping.

I don't know if you want to put on the record -- someone has to get me an -- on the record, stating what it is that I'm limiting here, so you can get it to Verizon. I'm sure you will want to do that, Mr. Margulis.

MR. MARGULIS: Sure.

THE COURT: So I don't know, do we want to put on the record, what are the specific cell phone numbers we're speaking of that Verizon releases information to, only?

MR. CERVI: I have it in my subpoena, Judge.

meaningful relationship with me.

10. It is my belief that, during my periods of access with the children, they are not permitted to smile, nor demonstrate any signs of affection toward your Petitioner.

11. When I attempt to photograph **OLIVIA**, she will refuse to smile, even if she had just been in a smiling pose just moments earlier.

12. The Respondent has denied numerous attempts to facilitate access with the children, even after a temporary Access Order was granted by this court in June 2018.

13. There have been occasions when I have driven to Western New York from Massachusetts, where I reside, only to be turned away upon the Respondent's failure to produce the children for access.

14. The Respondent refuses to facilitate reasonable telephone access with the children. I am either unable to reach the children, or the Respondent refuses to facilitate a return call, should I call at a time later claimed to be inconvenient.

15. The Respondent has continuously interfered with my access with both children. Such interference has included, without limitation, having uninvited family members accompanying me during periods of access, namely Respondent's brother **KEVIN**, who has harassed me, belittled me, and chastised me, in the presence of my children, and for no valid reason.

16. The Respondent has verbally harassed the court-appointed supervisor of my recent access, in the presence of the children.

17. There have been occasions when, during my access with the children, the Respondent has contacted the police, filing false incident reports and making false and fraudulent allegations against

19. The motion seeks a modification, not a "reversal," of the temporary order based on new facts.
20. Temporary Orders regarding access are frequently granted during the pendency of family court matters, including this one. As Respondent points out, there have already been two (2) Temporary Orders of access issued by this Honorable Court in this action.
21. ~~Three of the affidavits relied upon by Respondent, Gross, Brown, and Brooks, all state seeking a modification of an existing order.~~
22. Respondent's Affidavit and the Affirmation of her attorney repeatedly accuse Petitioner of "neglect and abuse" of the children and claim that he is "incapable of taking care of his children, even with supervised access."
23. Respondent includes multiple "examples" of Petitioner's alleged "neglect and abuse" that occurred during his supervised access, including claims that the infant, Mason, was "dehydrated" and "lifeless" during a visit, that Petitioner "forced" the child Olivia to "walk a long distance in the heat, despite [her] asking for breaks to rest," the Petitioner and the Supervisor "refused [Olivia] the right to use her rescue inhaler" despite the child's requests for same, and the Petitioner "speeding excessively" with both the children and the supervisor in the vehicle.
24. Respondent's concerns about this alleged "neglect and abuse" have even caused her to cancel Petitioner's already very limited access with the children and on another occasion caused her to contact the police.
25. It should be noted, the court appointed Supervisor, Jeanne Kratt, was present for all of Petitioner's access since June. To take Respondent's allegations as true is to say that Ms. Kratt **witnessed and allowed** this alleged "abuse and neglect" to occur.

meaningful relationship with me.

10. It is my belief that, during my periods of access with the children, they are not permitted to smile, nor demonstrate any signs of affection toward your Petitioner.

11. When I attempt to photograph **OLIVIA**, she will refuse to smile, even if she had just been in a smiling pose just moments earlier.

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17. There have been occasions when, during my access with the children, the Respondent has contacted the police, filing false incident reports and making false and fraudulent allegations against

STE 1102

STE 910

STE 810

MEZZANINI

Jeanne Kratt, Director of Holistic Services

STE 1000

Roger J. Edel

Jared L. Garlipp

Benjamin S. Carlisle

Adam P. Hatch

Eric J. Vogan

Motion to Impeach Jeanne Kratt

Jeanne Kratt committed perjury by stating in her testimony that she is a social worker who practices independently. It is a NYS requirement to practice social work, especially in an independent capacity. Her lack of licensure was verified by the Office of the Professions.

(Recorded call by Anthony Cervi to NYS Office of the Professions to confirm online verification of lack of licensure)

- Jeanne Kratt demonstrated a clear and blatant BIAS against Katie Riford throughout the entire duration of visitations in which she supervised. Jeanne's bias was heavily demonstrated in her supervisory notes and her texts to Katie Riford. Additionally, a text that was meant for either Peter or his mother was inadvertently sent to Katie by Jeanne, which refers to Katie as "Ms. Miserable".

(all supervisory notes written by Jeanne Kratt and exchanged between attorneys; text communications between Katie and Ms. Kratt, including the specific text inadvertently sent to Katie by Ms. Kratt to be added as exhibits)

- Jeanne Kratt intentionally and falsely used credentials to impede a CPS investigation when credible physical evidence of neglect and abuse of Katie L. Riford's two young children while under Ms. Kratt's supervision was provided and reported to CPS by three separate licensed medical professionals.

(Recorded call by Anthony Cervi to CPS to speak to assigned supervisor of this particular case, Michele Wharity – (716) 439-7748 at the Lockport office) regarding communications between CPS, Jeanne Kratt, Randy Margulis and Jason Cafarella; court transcripts with Ms. Kratt's testimony; and correspondence/court documents with false credentials to be added as exhibits)

******I spoke to a supervisor at CPS in Niagara Falls (Holly) to confirm that CPS is able to share caseworker documentation regarding communications during the case. Since the case has been closed; a copy of Katie's file can be obtained from Albany. Katie has requested a copy of the contents of her case file, but I'm not positive that those specifics would be offered as hard copies to Katie and I'm also not sure how long it takes to fulfill a requested copy of a case file; CPS supervisor and caseworker did not this either.

- Jeanne Kratt FAILED to report her family's personal connection to the Diarbakerly family and the Gow school in East Aurora, NY. Zoe Kratt (daughter of KC Kratt and niece of Jeanne Kratt) was written up for inappropriate behavior (indecent exposure) while attending co-ed summer camp at the Gow School in the (summer of 2007 – exact year needs to be verified). The incident was reported by Katie L. Riford (camp counselor) to David Mendlewski, the Director of the Gow School Summer Program. He was also Director of Campus Life/School Counselor during the regular school year.

(Recorded call by Anthony Cervi to David Mendlewski formerly of the Gow School to obtain official confirmation of this specific event at the Gow school (he should not be required to divulge any specifics to maintain confidentiality other than to confirm with a 'yes' to an incident; a 'yes' to Katie Riford reporting the incident to him; a 'yes' to the last name Kratt only). He should be able to confirm his job title while at Gow, as well. He is now the director of admissions at St. Andrew's-Sewanee School in Sewanee, TN (931-598-5651).

Motion for Order of Protection

To ensure protection and safety of Katie L. Riford and her two young children, Olivia N. Riford-Diarbakerly and Mason M. Riford as this custody case proceeds and further investigation is conducted by this court and outside professionals, including general and specialized care providers and agencies.

To prevent further harm including neglect, physical, emotional and mental abuse, which allegedly occurred during visitations with Peter M. Diarbakerly and his family members, including Regina Diarbakerly and Nicole Diarbakerly of Olivia N. Riford-Diarbakerly and Mason Riford and in the presence of Jeanne M. Kratt, supervisor as evidenced in reports by three separate licensed medical professionals.

(three separate medical reports as exhibits) Katie has copies of these medical reports.

The court must review the evidence of domestic violence, including texts messages, text images and email communications sent by Peter M. Diarbakerly to Katie L. Riford over the course of their nine year, long distance relationship as previously submitted by Katie L. Riford in her original petition filed with the court in this custody case. As NYS statute in family court law **demands consideration of the effect of domestic violence on the child's best interests** in order to make a determination of custody. (N.Y Dom. Rel §240).

(resubmit evidence as an exhibit if possible)

(Calls by Anthony Cervi to Brian A. Burns (special agent FBI) and Kelly Marshall (special agent of Internal Affairs - US Customs and Border Protection) to verify investigation of Peter M. Vito and Associates in relation to the event involving the Riford family).

Custody Case - KLR

Christina L

Fri 1/11/2019 3:52 PM

To: ajcervi@gmail.com <ajcervi@gmail.com>

Cc: Katie Riford <katie.riford@gmail.com>

2 attachments (32 KB)

Motion to Impeach Jeanne Kratt.docx: Motion for Order of Protection.docx

Mr. Cervi,

As you may already be aware, Katie's custody case is currently under review for judicial misconduct. Yesterday, I received a copy of the motion you prepared to remove the AFC, in addition to seeking attorney's fees. It is nice to see you finally taking steps to represent and defend your client's and her children's best interests.

However, your recent motion is just the start, as we wait patiently for a thorough review by the SCOJC of the evidence and materials we have submitted to their office. Attached, please find a motion to impeach Jeanne Kratt and a motion for order of protection. I would like you to expand on what I have already started as key points for these motions.

Your decision to file the motion to remove the AFC after months of prompting you to do so indicates to me that you want to be on the right side of the law with regards to the mishandling of my sister's case by this court and many others. I do appreciate any hard work which you and your office complete in diligently defending my sister and her children. And, it may be a great opportunity to redeem yourself and regain our trust and respect.

Thank you for your time and attention to this matter.
Christina Little



NIAGARA COUNTY
DEPARTMENT OF SOCIAL SERVICES
P.O. BOX 506
LOCKPORT, NEW YORK 14095-0506

NIAGARA FALLS OFFICE
P.O. BOX 865
301 TENTH STREET
NIAGARA FALLS, NY 14302-0865

"We Help Families"

October 24, 2018

Re: Case ID: 27114226
Intake Stage ID: 32214838
Date of Intake: 10/20/2018

Katie Riford
3038 Michael Dr
North Tonawanda, New York 14120-1428

Dear Katie Riford :

This is to inform you that you are an other person named in a report of suspected child abuse or maltreatment received by the New York State Child Abuse and Maltreatment Register (State Central Register) on 10/20/2018. This means that you have been named in the report but have not been alleged to be responsible for causing injury, abuse or maltreatment to the child(ren). This report has been transmitted to NIAGARA County Child Protective Service for commencement of an investigation and evaluation of the report as required by the New York State Child Protective Services Act.

The Law allows the local child protective service 60 days from the time of the receipt of the report to complete a full investigation of the allegations contained within the report as well as an evaluation of the care being provided to your child(ren). You will be notified in writing of the findings of the investigation. Where appropriate, services will be offered to assist you and your family.

If the report is determined to be "unfounded" meaning that there is no credible evidence (i.e., evidence worthy of belief) of abuse or maltreatment, all information which would identify the subject(s) or other persons named in the report will be legally sealed by the State Central Register and the local child protective service. An "unfounded" report is confidential and may only be unsealed and made available under limited circumstances, including: to a local child protective service or State agency investigating a subsequent report of abuse or maltreatment involving the same subject of the report, or child named in the legally sealed, unfounded report, or the child's sibling; or to the subject of the report where the subject requests access to the "unfounded" report. If the report is determined to be "indicated" (i.e. there is some credible evidence of abuse or maltreatment to the child(ren)), the report will remain in the State Central Register and the local social services district's register.

This report is confidential and can only be released to certain authorized persons granted rights to access by State Law. As the subject of the report you have a right to request a copy of all information regarding the report contained in the State Central Register. However, the Commissioner of the New York State Office of Children and Family Services and social services district official must withhold information identifying the person who made the report unless that person has consented in writing to the release of such information. In addition, the Commissioner and social services district official may withhold information identifying a person who cooperated in the investigation of the report if the Commissioner reasonably determines that the release of this information would be detrimental to that person's safety or interest.

After the investigation is completed, if the report is determined to be "indicated" and if you are determined to be a subject of the report, you have the right to request the Commissioner of the New York State Office of Children and Family Services to amend (change) the record of the report if you believe that the report

is inaccurate. This request must be made by you within 90 days of being notified that the report is indicated.

The subject of the report is the person(s) responsible for causing or allowing to be inflicted injury, abuse or maltreatment to the child(ren).

If you wish to receive a copy of the information contained in the State Central Register, please write to:

New York State Office of Children and Family Services
Child Abuse and Maltreatment Register
P.O. Box 4480
Albany, New York 12204-0480

This written request should include your full name, the full name(s) of the child(ren) named in the report, your address and children's address, if different, and the Case ID and Intake Stage ID given in the upper right-hand corner of this letter.


Kelly Custode
Caseworker

278-8689
Telephone number


Stacie D Whitaker
Caseworker's Supervisor



NIAGARA COUNTY
DEPARTMENT OF SOCIAL SERVICES
P.O. BOX 506
LOCKPORT, NEW YORK 14095-0506

NIAGARA FALLS OFFICE
P.O. BOX 865
301 TENTH STREET
NIAGARA FALLS, NY 14302-0865

"We Help Families"

November 7, 2018

Re: Case ID: 27114226
Intake Stage ID: 32239142
Date of Intake: 11/04/2018

Katie Riford
3038 Michael Dr
North Tonawanda, New York 14120-1428

Dear Katie Riford :

This is to inform you that you are an other person named in a report of suspected child abuse or maltreatment received by the New York State Child Abuse and Maltreatment Register (State Central Register) on 11/04/2018. This means that you have been named in the report but have not been alleged to be responsible for causing injury, abuse or maltreatment to the child(ren). This report has been transmitted to NIAGARA County Child Protective Service for commencement of an investigation and evaluation of the report as required by the New York State Child Protective Services Act.

The Law allows the local child protective service 60 days from the time of the receipt of the report to complete a full investigation of the allegations contained within the report as well as an evaluation of the care being provided to your child(ren). You will be notified in writing of the findings of the investigation. Where appropriate, services will be offered to assist you and your family.

If the report is determined to be "unfounded" meaning that there is no credible evidence (i.e., evidence worthy of belief) of abuse or maltreatment, all information which would identify the subject(s) or other persons named in the report will be legally sealed by the State Central Register and the local child protective service. An "unfounded" report is confidential and may only be unsealed and made available under limited circumstances, including: to a local child protective service or State agency investigating a subsequent report of abuse or maltreatment involving the same subject of the report, or child named in the legally sealed, unfounded report, or the child's sibling; or to the subject of the report where the subject requests access to the "unfounded" report. If the report is determined to be "indicated" (i.e. there is some credible evidence of abuse or maltreatment to the child(ren)), the report will remain in the State Central Register and the local social services district's register.

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is inaccurate. This request must be made by you within 90 days of being notified that the report is indicated.

The subject of the report is the person(s) responsible for causing or allowing to be inflicted injury, abuse or maltreatment to the child(ren).

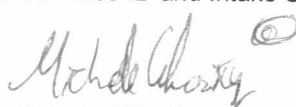
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Child Abuse and Maltreatment Register
P.O. Box 4480
Albany, New York 12204-0480

This written request should include your full name, the full name(s) of the child(ren) named in the report, your address and children's address, if different, and the Case ID and Intake Stage ID given in the upper right-hand corner of this letter.


Kelly Custode
Caseworker

278-8689
Telephone number


Michele Wharity
Caseworker's Supervisor

1 the hospital referred to CPS, made a call to CPS as a mandated
2 reporter? Are you aware of that?

3 A No, I'm not.

4 Q Were you contacted by CPS as -- in regards to any open
5 CPS investigations against Mr. Diarbakerly?

6 A No, I was not.

7 Q You were not? Were you also aware that there was a
8 second CPS investigation against Mr. Diarbakerly?

9 A No.

10 Q And you're saying you haven't been contacted by anyone
11 regarding either?

12 A No.

13 Q Now, on June 30th and July 1st, that was an access
14 period you observed of Mr. Diarbakerly and the children,
15 correct?

16 A Yes.

17 Q And I think you testified that during that access
18 period, it was hot and sunny, right?

19 A Yes.

20 Q Do you recall what the temperatures were that day?

21 A I do not.

22 Q If I told you it was in the 90s, would that sound
23 right to you?

24 A If that's what you told me, I would -- I guess I would
25 consider that.

Ashley Kleinschmidt, NYACR, NYRCR
Official Court Reporter

1 Q Okay. Now, in regards to the child Olivia, does she
2 have any health concerns?

3 A She has asthma.

4 Q Okay. And that was relayed to you by my client before
5 access, correct?

6 A Correct.

7 Q And with regards to her asthma, my client also
8 provided you with a doctor's note regarding restrictions of
9 her activities, right?

10 A Yes.

11 Q All right. And that was before the June 30th visit,
12 correct?

13 A I believe it was on the -- on that day.

14 Q Okay.

15 A She gave me two pieces of paper, one for each child.

16 Q All right. And the essence of it was that the -- the
17 child should not be exposed to heat for lengthy periods of
18 time; is that accurate?

19 **MR. CAFARELLA:** Judge, I'm going to object to
20 what the letter said. It's an out-of-court statement by a
21 doctor. It's hearsay.

22 **THE COURT:** Sustained. And we have to wrap this
23 up, Mr. Cervi. I'm close to 25 to 4:00, and I have to hear a
24 family offense still.

25 **MR. CERVI:** All right.

Jeanne Kratt

(Supervisor)

- Jeanne Kratt was hired by Peter's family as supervisor after Judge DeLabio, Jason Cafarella, AFC and both attorneys, Dana Herrington, Esq. (mother's 1st attorney) and Randy Margulis, Esq. (Peter's attorney) discreetly made an agreement behind closed doors and off the record and WITHOUT the mother's knowledge or consent. (court transcripts referencing this event taking place)
 - Jeanne Kratt is listed on the court roster of neutral professionals and primarily works in Erie County. The AFC made the claim to Katie's attorney that he did not previously know Jeanne Kratt, but he placed the call to hire her specifically when she primarily works out of Erie County and did not have an "x" marked under the column family court. (most current court roster attached)
 - Jeanne Kratt does NOT have a license to practice social work in NYS. The absence of licensure was verified through the Office of the Professions. (site search attached)
 - Jeanne Kratt's education is listed as a Master of Social Work from the State University at Buffalo in a court roster dated 2015. This information could not be verified due to privacy restrictions. Her supervisory notes do NOT reflect master level education and/or domestic violence and conflict resolution experience; although she claims to have both. (court transcripts and court rosters attached)
 - Jeanne Kratt demonstrated a clear and blatant BIAS against Katie Riford throughout the entire duration of visitations in which she supervised. Jeanne's bias was heavily demonstrated in her supervisory notes and her texts to Katie Riford. Additionally, a text that was meant for either Peter or his mother was inadvertently sent to Katie by Jeanne, which refers to Katie as "Ms. Miserable". (supervisory notes, text communications and specific text attached)
 - Jeanne Kratt admitted in court testimony that she was prepped by Randy Margulis, Esq. and paid to prepare for trial by Peter's family. (court transcript attached).
 - Jeanne Kratt not only committed perjury on the stand by stating that she is an independent social worker, but also intentionally and falsely used credentials to impede
-

a CPS investigation into abuse allegations of the two children who were under her supervision. (court transcript and correspondence/court documents with false credentials attached)

- Jeanne Kratt not only provided inconsistent and contradictory statements in her testimony, but also made boldface lies and false claims in her supervisory notes and communications with CPS. She never once substantiated her claims with any evidence or proof. One example of her many false claims was her accusation of assault by Katie Riford's mother who has severe limitations in strength and agility and who has been deemed totally disabled by New York State, the Social Security Administration and several licensed medical professionals due to interrelated, complex and debilitating autoimmune disorders. (court transcripts and supervisory notes attached)
 - Jeanne Kratt is and has been a family friend of Regina Diarbakerly (mother of Peter M. Diarbakerly) prior to the start of this custody case.
 - The Kratt and Diabakerly families know each other from the Gow School in East Aurora, NY. (Both families have children who attended the Gow School)
 - Zoe Kratt (daughter of KC Kratt and niece of Jeanne Kratt) was written up for inappropriate behavior (indecent exposure) while attending co-ed summer camp at the Gow School in the summer of 2009. The incident was reported by Katie L. Riford (camp counselor) to David Mendlewski, the Director of the Gow School Summer Program. He was also Director of Campus Life/School Counselor during the regular school year.
 - The eight-year old child in this custody case reported to her mother that she saw Regina sharing a bowl of soup with Jeanne while at a restaurant during one of the supervised visitations. This tip prompted a deeper investigation into the true nature of the Jeanne/Regina connection.
-

1 be tantamount to severing her relationship with her father.
2 That would not be in her best interests and would
3 result -- will likely result in a substantial risk of imminent
4 serious harm to the child.

5 THE COURT: Okay.

6 MR. CAFARELLA: Thank you, Judge.

7 THE COURT: Thank you. And then you're going to
8 order -- we're going to have a -- a Lincoln hearing at the end
9 of all this?

10 MR. CAFARELLA: For Olivia, only. Yes, Judge.

11 THE COURT: Okay. Raise your right hand.

12 JEANNE KRATT, called herein as a witness, being
13 duly sworn, testified as follows:

14 THE COURT: Thank you. Have a seat. Just for
15 the record, say your name. Spell it out, and then just
16 where -- I would just put an address on of where your business
17 is.

18 THE WITNESS: Okay. Jeanne Kratt, J-E-A-N-N-E,
19 K-R-A-T-T, address is 43 Court Street, Mezzanine Level,
20 Buffalo, New York 14202.

21 THE COURT: You may ask, Mr. Margulis.

22 MR. MARGULIS: Thank you.

23 DIRECT EXAMINATION BY MR. MARGULIS:

24 Q Ms. Kratt, good afternoon.

25 A Good afternoon.

Ashley Kleinschmidt, NYACR, NYRCR
Official Court Reporter

1 Q Would you please state for the Court what your
2 occupation is?

3 A I'm a social worker.

4 Q And what is your specific title?

5 A When I work in the Courts I do supervised visits, home
6 studies, and mediations for custody/visitation. In the past
7 I've done housing mediations, anything over in City Court, but
8 mainly I'm in Family Court.

9 Q And can you describe for the Court, please, what your
10 educational experience consists of?

11 A I have my Master's Degree in Social Work. I have many
12 hours of training in domestic violence, parent coordination,
13 divorce mediation, custody/visitation mediation, neighborhood
14 disputes, conflict resolution.

15 Q And by the way, where did you obtain your MSW?

16 A At the University of Buffalo.

17 Q And would you please describe your -- the extent of
18 your work experience -- related work experience?

19 A Yes. I've been in the Courts for 20 years doing
20 mediations, parent coordination, supervised visits, and home
21 studies for various Judges and attorneys, mainly in Erie
22 County Family Court, but I have also been in Niagara County
23 Court.

24 Q Specifically with respect to your experience in the
25 area of supervised visitations, can you tell us,

1 approximately, how many cases you've been involved with over
2 the past 10 years with relation to supervised visitation
3 issues?

4 A I would say, approximately, 150.

5 Q And with respect to your training, other than your
6 education and your master's degree from UB, have you attended
7 any educational type settings with respect to your occupation,
8 specifically with respect, I guess, to the supervised
9 visitation work that you do?

10 A I would have to say the conflict resolution
11 is -- conflict resolution and parent coordination, not
12 specifically for supervised visits. I'm not aware of anything
13 that teaches specific to supervised visits.

14 Q Can you tell me, exactly, how are you employed? Are
15 you a state employee? Are you self-employed?

16 A Just self-employed.

17 Q During your involvement in this case have you been
18 paid or have you charged a fee?

19 A I have been paid based on charges that I have given to
20 the father.

21 Q And what is the charge or the fee you charge for
22 services in this case?

23 A \$75 an hour.

24 Q And would that include payment for your time in Court
25 today?

Ashley Kleinschmidt, NYACR, NYRCR
Official Court Reporter

1 A That's additional.

2 Q Can you tell me how it came about that you became
3 involved in this case?

4 A I believe I received a phone call from Mr. Cafarella
5 for a supervised visit, to see if I would be interested and if
6 I had room in my schedule.

7 Q After you agreed to participate in this matter, can
8 you tell me what -- what were the first steps, or the early
9 steps that you took in the process?

10 A The first thing I do when I'm assigned a case is to
11 contact both parties, see if they have any initial questions,
12 tell them what the procedure is for my supervised visit, see
13 if there's a Court order defining the guidelines, and meeting
14 with the residential parent and the child or children.

15 Q You mentioned guidelines. Are there any specific
16 guidelines that you're required to adhere to with respect to
17 your involvement in this case that you're aware of?

18 A No, not that I'm aware of.

19 Q So when you started out -- oh, by the way, were you
20 familiar with either of these parties before you became
21 involved?

22 A No.

23 Q You didn't know either one of them?

24 A No.

25 Q Are you a mandatory reporter?

1 A Yes, I am.

2 Q Can you tell me, what does that mean to you? As a
3 mandatory reporter, what, if anything, are you required to do,
4 and under what circumstances?

5 A If I see harm being done to the child or -- or I see a
6 bruise or a cut on a child, I would have to report it.

7 Q And specifically -- now, you said there are no formal
8 guidelines that dictate any protocol with regard to
9 supervising visitation?

10 A Right. If there were, they're set up by the Court
11 ahead of time in any case that I've done, or I reach out to
12 the Attorney for the Children to see if there's any
13 guidelines, because sometimes I -- I don't get paperwork for
14 cases.

15 Q So with respect to this case, can you just tell me,
16 what do you understand your role and your function to be in
17 this particular case?

18 A To supervise dad with the children, and to make sure
19 that they are safe and taken care of. And on this particular
20 case, to make sure that Mason was returned for breastfeeding,
21 and then given back to dad for additional access once he was
22 breastfed and he has taken a nap -- he had taken a nap.

23 Q Approximately -- or if you know, specifically, how
24 many periods of visitation between these two parties did you
25 supervise?

1 A I believe I had eight weekends, so 16 visits.

2 Q During those 16 occasions did you find the need to
3 contact CPS for any reason?

4 A No, not at all.

5 Q So when you first were contacted by Mr. Cafarella and
6 you agreed to participate in this case, did there come a time
7 when you met the parties, initially?

8 A Not before the visit. I had -- I had a visit
9 scheduled with mom and the children the Friday before the
10 visit, but Court ran over on Friday, so I could not meet her
11 and the children, so I met them Saturday morning at 43 Court
12 Street, before the first visit.

13 Q So are you suggesting that you -- so at the first
14 visit that you supervised, it took place on a Saturday?

15 A Yes.

16 Q And your testimony is, prior to that occasion, you had
17 not met either of the parties, or you had not met Ms. Riford?

18 A I didn't meet either party. I spoke with them on the
19 phone, but I did not meet them in person.

20 Q So did you meet them both in person for the first time
21 on that Saturday morning?

22 A I did, yes.

23 Q And you said you were supposed to meet them the day
24 before. That got cancelled because Court ran over?

25 A Yes, because I had a mediation in Court on Friday, and

1 I -- I just never know when I'm going to get out of Court, so
2 I just didn't have time to meet with mom and the children on
3 that Friday.

4 Q Since that time have there been any occasions where
5 you have met with one of the parties without the other party
6 present --

7 A No.

8 Q -- for any purposes?

9 A No.

10 Q So at the first meeting -- strike that.

11 At the first visitation period, prior to
12 the commencement of the actual visitation, was there any
13 discussion that you had with either of the parties?

14 A I always ask the parties if they have any questions
15 about my role. I certainly want the -- in this case, I wanted
16 mom to be comfortable with me, because she's handing her
17 children off to a perfect stranger, and I understand that, so
18 I wanted to meet with Olivia and Mason and mom to see if she
19 had any questions, just explain my role, that I'm supposed to
20 keep the children safe, and if at any time she wanted to text
21 me, she could. I would text her to say that the kids were
22 fine. I don't do that throughout my entire visits with the
23 children. Normally, it's just that first visit I always tell
24 the parents -- the parent who is giving me their children, if
25 you want to know how the kids are, if I don't reach out to

Fwd: Supervised Visitation Issues/Biased Psych. Report

Katie Riford <katie.riford@gmail.com>

Wed 12/26/2018, 12:52 PM

To: Christina Riford-Little <ccriford@hotmail.com>

 1 attachments (129 KB)

SUPERVISEDVISIT.docx;

----- Forwarded message -----

From: **Katie Riford** <katie.riford@gmail.com>

Date: Mon, Jul 9, 2018 at 3:59 PM

Subject: Supervised Visitation Issues/Biased Psych. Report

To: Dana Herrington <dherrington@wnyfamilylaw.com>

Dana,

I am very concerned for the children's health and well-being after the first supervised visitation. I am keeping a log of the visitations, which I have attached to this email. There were numerous concerns from BOTH days. I thought supervised visitation with a court appointed supervisor would make things better for the children, but it has not.

I do not feel comfortable sending the children off again with Peter, his family, and the supervisor. Peter is not meeting the needs of the children, yet the supervisor reports back to me that "everything went great." Olivia came to me with the concerns, and I, as her mother, am morally obligated to make sure that these visitations are in her and her brother's "best interest." A mother should not be left feeling sick to her stomach wondering if her children are ok or are barely hanging on (emotionally and physically) while with Peter and his family.

I am not sure what options are available at this point - a therapeutic visitation center with a medical professional present is what comes to mind for the same amount of weekends OR discontinuing visitations until this can be addressed at the next court appearance.

Also - I would like to know what the plan of action for the extremely biased psychological report is. I have never alienated Peter from the children, and have many texts that go years back begging him to be more involved, sending him pictures of Olivia, sending gifts and artwork to his home, notifying him of school events to attend, etc. Furthermore, I can provide several accounts from mutual friends/acquaintances that I confided in over the years and who have witnessed firsthand, how Peter failed to be involved in Olivia's life. The psychologist already had her mind made up before I even walked through the doors and I could tell within a couple questions in and by the tone of her voice that she blamed me and saw me as the

"bad guy.". She completely ignored the abuse I tried talking to her about. She victim-shamed every single issue I brought up. For example, when I told her that Peter only came a few times a year, she responded with, "How would you know that?" in a sarcastic manner. When I told her he threatened me, she asked me, "Well, why didn't you just let him do it?" etc. These are questions you NEVER ask a victim of Domestic Violence! I guarantee Randy instructed Peter what to bring, what to say, etc. and I entered her office not knowing what to expect and without knowing I had to bring any documentation to support what I was telling her. Luckily, I was able to show a few things off of my phone, but obviously that didn't matter to her. I also am confident that the psychologist has zero experience with Domestic Violence, trauma, and Cluster B/Narcissistic Personality Disorder (Peter has this). Because of the victim-shaming questions and responses, I shut down. To be wrongfully accused of parental alienation, has made me sick to my stomach and has affected me greatly.

I am in the process of working with a psychologist for the trauma I have endured during the abusive relationship I was in. So, I am not sure what the options are here going forward - if the psychologists Olivia and I are working with can state/testify that we both experienced trauma as a result of Peter and his family, does that discredit the court ordered psychological report? Can we ask for another evaluation to be done? This is of great concern to me, so I'm looking to figure out where to go from here. Parental alienation is a very serious allegation and since I was wrongfully accused of it, I am looking to clear my name of it and not have it wrongfully used against me (which it already has, by the children's attorney).

Thank you,
Katie Riford

Thursday 6/21/2018 - I received a phone call from Jeannie Kratt discussing the details of the upcoming supervised visitations. One of the topics discussed was how she would give the children and I the opportunity to meet with her *before* the first visitation on June 30/July 1. This in-person meeting would allow Olivia to see who would be accompanying her on the visitations and try to make her feel more comfortable with Jeannie. This would also provide me with a little comfort knowing who was going to be spending every other weekend with the children. Jeannie stated the meeting would take place on Friday, June 29th at the Walden Galleria Mall, following another family's supervised visitation. After getting off of the phone, I told Olivia I had a conversation with Jeannie and that she would be able to meet her before the visitation. This made Olivia feel better, as she was having anxiety about having the visitation with someone she did not know.

Thursday 6/28 - I received a text message from Jeannie to check in about the upcoming supervised visitation that would take place that upcoming weekend. She provided me with the locations and start times for both Saturday and Sunday. Due to the upcoming heat wave with very high temperatures and humidity forecasted, I immediately let Jeannie know that I was concerned about the high heat and the children's health/well-being. I let her know that Olivia has asthma that is greatly affected by the heat and humidity, which cause her symptoms to flare up. I also had concerns with Mason, due to him being a baby with no experience in the heat and how sensitive babies are to the heat in general. I let Jeannie know that I had talked to Peter during past visitations about these concerns, so it should not have been a

surprise to him. I told Jeannie I would even provide a doctor's letter stating the limitations for the children in the heat. Jeannie said she was aware of the upcoming heat wave and would talk to Peter about having a "back up plan". I thanked her and moved on the next topic.

When I asked Jeannie if we were still planning on meeting with the children the following day, I was told that she could meet "after 3 and before 6," and that she would have to see her court schedule to let me know. She also wanted to know about Mason's feeding schedule, to which I told her that he eats on demand, approximately every 2 hours and that I didn't have exact times, but could let her know the last time he was fed upon drop off each morning. This was the end of the conversation for the day.

Friday June 29 - I received a text message from Jeannie, which stated that she "thinks Peter has a back up plan just in case." At 5:03 PM, she also told me that she would have to meet with the kids and I right before the visit the following day. After Olivia spent the entire day thinking she was going to meet Jeannie, and after I made alterations to our schedule to meet with Jeannie sometime between 3-6, she let me know that late in the evening that the plans were now cancelled, with no apology or explanation given. She then told me she would meet me at her office downtown at 11:10 AM, the day of the visitation, assuming that I could get to that location 20 minutes earlier than previously arranged.

Saturday June 30 - I arrived at Jeannie's office downtown at 11:10 AM, however she did not arrive until 11:20 AM, as she had just finished another supervised

visitation beforehand. I talked to her about some last minute questions I had, such as bathroom accompaniment/diaper changes and what the protocol is for the baby if he is unable to stop crying. She told me that she would accompany Olivia to the bathroom and that Mason's diaper changes would happen in front of her. If Mason cried for a duration of time, I was told that she would call me if he could not be consoled within 10 minutes of crying, so that I could come and comfort him. After answering my questions, I said my goodbyes to the children and left her office building, silently praying that both children would be looked after sufficiently by the supervisor and that any issues would be immediately brought to my attention, either by a telephone call or text.

Saturday, June 30, 2018

Supervised Visit with Jeannie #1

Location: Naval Park/Canalside

We arrived at Jeannie's office downtown at 11:10 AM, we wait in car until I received a phone call from Jeannie at 11:20 AM that she arrived back to her office after another supervised visitation that morning, and that she was going to run into her office, and then meet us outside of the door. Go over some last minute questions I have regarding the children/visitation. Despite providing Jeannie with a doctor's letter describing Olivia's limitations in the heat due to asthma, I am told that she contacted the children's attorney, Jason Cafarella, and that he stated that there were no location limitations listed in the Temporary Order. Considering Jason is unaware of Olivia's medical condition and Peter has never been to a single doctor's appointment, I do not understand how these two individuals are able to turn their heads from a child's medical needs. Peter has made it obvious during past visitations (and during our relationship) that he will do everything to undermine my parenting and do the opposite of what I have asked, despite it putting the children's health/well-being at risk. I am reassured that Jeannie talked to Peter about the weekend's intense heat and that the day's location at Canalside should not be "too bad" because it is located by the water. I was also reassured that if Mason should cry for a duration of 10 minutes without being able to be consoled, I would be notified to come comfort him. Jeannie informed me that she will be accompanying Olivia to the bathroom and that Mason's diaper changes will happen in front of her. I provide

Jeannie with Olivia's prescribed inhaler/spacer, the stroller, and a change of clothes/diapers/wipes for the baby, and say my goodbyes to Olivia and Mason.

At 12:16 PM, I receive a text saying, "All good here Katie" from Jeannie. At 1:01 PM, Jeannie notifies me that Mason is ready for feeding/nap time and given the location of where I can pick him up. I get there at 1:28 PM and send a text letting her know I have arrived. When I see Mason, he was asleep in the stroller. When I picked him up, I immediately observed that his eyelashes were crusted over with dry tears, indicating that he had been crying a lot and for a long duration of time. He most likely cried himself to sleep, in exhaustion from crying during most of the visitation. When he realizes he is back with me, he smiles. He is able to relax in the car and falls asleep again until I take him to an undisclosed location to be fed. I must also note that when I picked up Mason at this time, Olivia notified me that she wet her pants. She wanted to come home and attempted to get in the car when I was putting Mason in his car seat. I told her I could not take her home. I asked Olivia if she told anyone about wetting her pants. She said she told the supervisor and Peter's mother, both of whom told her, "Its only a little. Its ok." Olivia tells me her underwear is wet and she is uncomfortable. Despite this, she continues on with the visitation while I take Mason. It pains me greatly to know that I have to leave Olivia behind when she wants to come home.

At 4:03 PM, I return Mason back to Canalside for the final 2 hours of the visitation. Olivia looks exhausted at this point, but is happy to have her brother join the visitation again, so she is not alone. I tell Olivia I will pick her and Mason up from Jeannie's office at 6:00 PM and give the children a kiss goodbye.

At 6:00 PM, I notice Peter's vehicle on the side of Jeannie's office. He already dropped off the children with Jeannie, but will not leave. I pull my car in the front of the building to pick up the children. I ask Jeannie how the day went and she said, "Everything was great."

On the drive back home, Olivia does not seem like herself and instead, is upset. I ask her if everything is ok, and then she starts to cry, telling me things that happened to her during the visitation.

Concerns of today's 6/30 visitation:

1. Olivia wet her pants, but was told, "Its ok" and was made to walk around for the day in soiled, wet underwear.
2. Peter's mother, Regina shoved into Olivia on purpose. There was no apology to follow or questioning if Olivia was ok, which would have happened if it were an accident. When I asked Olivia to demonstrate on my body how it happened, it was done forcefully and purposely. I then asked Olivia where Jeannie was during this, to see if she may have observed anything, however, Olivia stated that Jeannie was taking personal pictures on her cell phone at Canalside during that time.
3. Jeannie did not accompany Olivia to the bathroom, like she has told me she would. She allowed Olivia to go into the bathroom alone with Peter's mother, Regina who has been emotionally/psychologically abusive to both Olivia and I in the past. Regina used that unsupervised bathroom visit as an

opportunity to bribe Olivia and tell her she could get any American Girl doll and accessories that she wanted.

4. Olivia tells me that Mason was crying most of the visitation. She also states that Regina does not hold Mason during the entire visitation, which confuses Olivia and has her asking me why that is. Olivia also notices that Regina puts sunscreen on her, but won't apply any on her brother.
5. Immediately upon seeing Mason, Peter takes off his bib and states, "You don't need this." The bib is placed on Mason for a reason. He is teething and drools excessively. Without a bib, he soaks through his clothing and the dampness of the saliva causes a rash on his skin if left to sit in his wet clothes.
6. I should also note another concern that I have – During Olivia's scheduled phone call with Peter on Friday, June 29th, Peter does not mention anything to Olivia about the next day's visitation. Olivia brought it up, and Peter states, "What about it?" Olivia asks if Danielle would be accompanying him again and Peter states, "I don't know yet. I haven't made up my mind." Confused, Olivia asked him, "Why are you keeping secrets from me?" At that point, you could hear the hostility in Peter's voice when he responded with, "I'm not keeping any secrets, Olivia." However, Saturday morning, when we asked the supervisor who would be accompanying him, she immediately informed Olivia and I that it would be Peter's mother, Regina. Peter tries to remain as secretive as possible, despite it being a supervised visit.

Sunday, July 1, 2018

Supervised Visit with Jeannie #2

Location: Breakfast at Kostas/The Buffalo Zoo

I met Jeannie by Kostas Restaurant located on Hertel Ave in Buffalo at 9:00 AM. When Jeannie approached us, I was told that she talked to Peter about the intense heat of the day and that she told Peter to limit the zoo to 2 hours, as the heat would be stronger inland than yesterday at Canalside. While I was still nervous about the outdoor activities, I felt slightly better that there is a limitation on the duration spent outdoors. At this time, I begin discussing my concerns with Jeannie about yesterday's visitation (#1-5 from yesterday's report on page 7). When I brought each concern to her attention, one by one, she stood there, in silence, with no response or reaction to anything I am saying. I feel like I am talking to a wall. When I bring up the concern of how Regina shoved into Olivia and that she was too distracted taking personal cell phone pictures to notice, Jeannie's demeanor instantly changed. She became very defensive and finally said something – "Are you asking Olivia a bunch of questions?" I let her know that Olivia came back to me very upset and came out with everything on her own. Clearly Jeannie did not think my 8 year daughter is as intuitive and articulate as she is and was given quite the surprise when Olivia confided in me all of the above (#1-6 from page 7) concerns.

After this, I said my goodbyes to Olivia and Mason, who then went to Kostas for breakfast. I left the area and received a text at 11:22 PM from Jeannie to inform me that Mason was ready for a feeding/nap. I informed her at 11:29 that I was there in the area already, since it had been 3 hours (already past his usual 2 hours) since his last feeding and knew he would be beyond ready for a feeding, especially in the heat. At 11:33 AM, I was told that Mason was given a diaper change and at 11:34 AM, I told her I was waiting outside of the Buffalo Zoo entrance. I waited an additional 15 minutes for Mason and Olivia to come out of the zoo. It was so hot outside that my stomach began cramping up and I started dry heaving. "If the heat had that effect on my body, what are the children feeling like?" is the thought that immediately entered my mind. At the entrance, my Mom and I waited and could see inside of the zoo. We watched Peter walk by the entrance, pushing Mason in the stroller, with no supervisor in sight! Olivia, Regina, and Jeannie were nowhere to be found. When I saw Olivia pushing Mason over to me, I instantly saw a very lifeless baby lying in the stroller. He was not moving any parts of his body and looked traumatized. I rushed over to pick him up, his hair was soaked in sweat, and his outfit was drenched in sweat. He was not acting himself and looked horrible. I began questioning Jeannie and she calmly stated, "Sweat is the body's natural reaction to heat." An adult processes heat in a much different manner than a baby and child, so for her to tell me that was completely ignorant. Once I looked over Mason, I then looked at Olivia, who looked completely miserable. She stood there quiet; sweat puddling on top of her head, almost like she was in a state of shock. I can sense she was uncomfortable and the fact that Jeannie hovers over her makes matters worse. I



+1 (716) 359-6141

Good morning Katie, I want you to know I am enforcing my third party policy due to recent events surrounding supervised visits and other work I do for the courts. There are to be no third parties at the pick up and drop offs. I am letting you know because historically your mother has been present. I am not saying she cannot be in your vehicle, but she does need to stay inside your vehicle while the pick up and drop off takes place. Anyone not adhering to this will be asked that they arrive without any third party inside their vehicle. The only exception to this would be if a third-party is allowed at the Supervised Visits and it is actually spelled out in the court papers. Thank you for understanding.





+1 (716) 359-6141

Can you kindly show me where that is stated in the court order? I just reviewed it and there is nothing stated about third-party. Thank you.

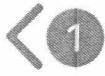
It says in the court ordered that Pieter can have somebody with him it doesn't say that you can. It is my policy normally to have as few people as possible to any pick up drop off and home studies that I do.

Actually it does not

I just reviewed it and it only states that the Father is granted access.

I don't need confrontation from you. I am just asking that your Mother to stay in the vehicle. I





+1 (716) 359-6141

I just reviewed it and it only states that the Father is granted access.

I don't need confrontation from you. I am just asking that your Mother to stay in the vehicle. I think that is acceptable in the court would back me up on that.

I'm not causing any confrontation. You are telling me false information and misleading and violating my rights.

I expect your Mother to stay inside your vehicle. Thank you

Due to safety reasons and no court order stating otherwise, my mother will be present with





+1 (716) 359-6141

Due to safety reasons and no court order stating otherwise, my mother will be present with me at all times.

It is my policy. I am requesting this from all clients, not just you.

Yesterday 11:30 AM

Will be about 10 minutes late,
Stuck in traffic due to 1 lane on highway

I am here parked in front of
corner of Union and Walden

We are at Canalside Katie. I will let you know when to come get Mason and an exact location.

Yesterday 1:32 PM





+1 (716) 359-6141

Pick up is back at Miltons at
5:30

I'm here

Side of building

Yes, I found Miss miserable.
Thank you I told her 815
tomorrow morning here at the
same location. If that changes
let me know.

Yesterday 8:50 PM

5311 main St. Williamsville ny
tomorrow at Panera's on Main
Street. thanks

Today 8:22 AM

I'm parked at the back of
Panera.

Delivered





+1 (716) 359-6141

Sun, Jul 15, 8:09 AM

What's the plans for today?

To get the children from you, allow them to have fun and quality time with their Father and Grandmother, keep them safe, feed them and return Mason for nap and breastfeeding. See you momentarily.

Are you planning on coming out to discuss the locations with me? I'm not sure why today is different than any previous visitation in regard to locations.

From Jason -AFC:

"There is absolutely no requirement for you to tell her where you are going. She does





+1 (716) 359-6141

Are you planning on coming out to discuss the locations with me? I'm not sure why today is different than any previous visitation in regard to locations.

From Jason -AFC:

"There is absolutely no requirement for you to tell her where you are going. She does not have to know. As long as the baby is fed. But that doesn't mean she gets to know where you are going. "

We will have a nice breakfast and keep the children safe and return Mason whenever you are requesting.

I will be right out. Where are you located?

