

DOCKET NO. MMX-FA22-5014792S : SUPERIOR COURT  
RANDAL HALE, III : JUDICIAL DISTRICT  
 : OF MIDDLESEX  
v. : AT MIDDLETOWN, CONNECTICUT  
MARGARET SULLIVAN : MAY 12, 2022

TRANSCRIPT OF THE PROCEEDINGS

BEFORE THE HONORABLE GERARD A. ADELMAN, JUDGE

A P P E A R A N C E S :

Representing the Plaintiff:

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Representing the Defendant: (ordering party)

MARGARET SULLIVAN (self-represented party)

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1 THE COURT: All right. For the record, this is  
2 Hale versus Hale, Docket Number FA22-5014792. It is  
3 a restraining --

4 MS. SULLIVAN: Excuse me. It should be Hale  
5 versus Sullivan.

6 THE COURT: You're absolutely right.

7 MS. SULLIVAN: Okay.

8 THE COURT: My correction. It is Hale versus  
9 Sullivan. It's a TRO hearing. Counsel, do you want  
10 to identify yourself for the record?

11 ATTY. TUKEY: Thank you, Your Honor. Rob Tukey,  
12 for Randal Hale, who's present.

13 THE COURT: And ma'am?

14 MS. SULLIVAN: Margaret Sullivan, pro se.

15 THE COURT: Thank you. And for the record the  
16 service was not finalized with the respondent, Ms.  
17 Sullivan, but she appears today. Are you waiving  
18 service, ma'am? You wish to go forward today?

19 MS. SULLIVAN: There's -- can I just ask Your  
20 Honor a question because this is going to be a huge  
21 problem?

22 THE COURT: Okay.

23 MS. SULLIVAN: Are you saying there's nothing on  
24 the record that I was served?

25 THE COURT: That's correct.

26 MS. SULLIVAN: Okay. Someone showed up at my  
27 house and dropped off this order. It wasn't a

1 complete one, which I talked to Mr. Tukey about.

2 And one thing I have done for the last month, I  
3 have protected my address from the applicant. I want  
4 to know how the hell someone showed up at my house.  
5 I haven't changed my address, not with my vendors. I  
6 haven't even changed -- filed a, what do you call it,  
7 the change of address with the post office because  
8 I'm terrified of this man.

9 How did these papers show up at my door? Sorry.  
10 I just want that on the record. I apologize but  
11 that's a problem. If you don't have any service and  
12 this was -- a man showed up in my -- at my apartment.  
13 That's --

14 THE COURT: All right. The --

15 MS. SULLIVAN: I'm terrified.

16 THE COURT: The record indicates that the  
17 marshal indicated that he was told that you had  
18 relocated to a different address.

19 MS. SULLIVAN: That's -- and I was told by Mr.  
20 Tukey the service was made.

21 THE COURT: Well, the Court hasn't gotten a  
22 return of it yet.

23 MS. SULLIVAN: Okay.

24 THE COURT: As far as the record, right now the  
25 record --

26 MS. SULLIVAN: Okay.

27 THE COURT: My question is are you willing to go

1 forward?

2 MS. SULLIVAN: I am willing to go forward but  
3 that -- if something doesn't show up, I'm really  
4 terrified. And the only other thing, whoever that  
5 marshal is, I only got the protective order. I  
6 didn't get the application and everything else.  
7 Fortunately -- thankful to Mr. Tukey's paralegal,  
8 they did send the application so I could be prepared.  
9 But that's really kind of terrifying.

10 ATTY. TUKEY: And, Your Honor, I did have a  
11 conversation with Ms. Sullivan. She followed it up.  
12 Was kind enough to follow it up with an email to me  
13 indicating that she would like to move forward today.  
14 So that's what I tried to resolve so we could be here  
15 and ready to go.

16 THE COURT: Very good.

17 MS. SULLIVAN: Your Honor, may I ask one other  
18 question?

19 THE COURT: Yes.

20 MS. SULLIVAN: I do have two grounds for a  
21 motion to dismiss. Do I raise that now or do I wait  
22 until we're all -- like I want to proceed, but I do  
23 want to make a motion to dismiss.

24 THE COURT: If you want to raise a motion before  
25 I have the hearing and take evidence, go right ahead.

26 MS. SULLIVAN: May I?

27 THE COURT: Yes.

1 MS. SULLIVAN: Oh, perfect. Okay. If Your  
2 Honor could look at the restraining -- the  
3 plaintiff's --

4 THE COURT: Well first tell me the basis for --

5 MS. SULLIVAN: Oh, the basis is an improper  
6 affidavit and also improper -- and, Your Honor, I say  
7 this with all due respect, but also an improper  
8 order. That's what we get to do here, right? Play  
9 tennis and go back and forth with the law.

10 THE COURT: Well, it's a little more  
11 sophisticated than that but that's fine. Go right  
12 ahead.

13 MS. SULLIVAN: Okay. So on your -- so motion to  
14 dismiss for improper filing. On, I believe it is the  
15 plaintiff's application for relief from abuse, on  
16 there on his affidavit he says please see attached.  
17 Are you with me on that one?

18 THE COURT: Certainly. Go right ahead.

19 MS. SULLIVAN: It's the affidavit, relief from  
20 abuse. At the end of the -- where he said see  
21 attached, it does say "Do not write on the back of  
22 this form. If you need additional room, use another  
23 Affidavit - Relief From Abuse form. You must sign  
24 and swear to all pages."

25 Looking at his statement, there's no case -- I  
26 mean, Your Honor, like anyone -- like you don't even  
27 know what case this is. I think my name is -- my

1 name is only mentioned in paragraph six and there's  
2 no swearing to it.

3 I'd also add that I don't think Mr. Hale wrote  
4 this himself, that someone wrote it for him. That's  
5 the objection.

6 THE COURT: Is that it?

7 MS. SULLIVAN: Okay. So that's the -- that's  
8 the first point. The second point has to do with the  
9 order itself. Mr. Hale, when he made his -- now this  
10 is looking at the application itself where you have  
11 all the check boxes and under number one he's asking  
12 the Court order for the following conditions. You  
13 know, first three, whatever. But if we look at the  
14 last one, CT19, that the order protect my minor  
15 children. Mr. Hale did not ask for that type of  
16 protection, however Your Honor ordered no contact  
17 with my children right before Mother's Day.

18 And again I'm sorry, Your Honor. Like I'm not  
19 trying to be critical. But Mother's Day, I had to  
20 cancel visits with my son. I mean I haven't seen my  
21 kids in nine hundred and twenty five days since the  
22 ex parte order.

23 THE COURT: All right. Attorney Tukey, do you  
24 wish to respond?

25 ATTY. TUKEY: Thank you, Your Honor. With  
26 regard to the first ground, we do have a signed  
27 application, Your Honor. It is the page that says

1 see attached. It's signed and sworn in front of the  
2 temporary assistant clerk on 4/28/22 and it attaches  
3 the affidavit of my client. And secondly with regard  
4 to the request for protection of the children, Your  
5 Honor has discretion under the statute to extend the  
6 order to the children. So I would ask that the  
7 motion to dismiss be denied.

8 THE COURT: Anything further, Ms. Sullivan?

9 MS. SULLIVAN: I would object to -- again as the  
10 documents -- I mean this is an ex parte order which  
11 is extreme, which is dealing with Fourth Amendment  
12 rights, really civil rights that are being taken  
13 away.

14 And if whoever -- whether it was the  
15 legislatures, the judges, whoever designed this form,  
16 they saw it fit to include that statement that all  
17 pages need to be signed. And frankly, just those two  
18 pages that, again, have no identifying information,  
19 how can that have been a sworn statement for Your  
20 Honor to judge? It's on the papers. If that's not  
21 what's supposed to be there, why do we have these  
22 rules and laws?

23 THE COURT: The Court will deny the motions.  
24 The failure to sign the additional paperwork, while  
25 it does violate the printed instructions, is  
26 really -- it's form over substance in this matter.  
27 And in terms of the children being included in the no



1 contact, the Court does have discretion to that and  
2 can enter those orders even if it was not  
3 specifically requested --

4 MS. SULLIVAN: Thank you, Your Honor. I  
5 appreciate --

6 THE COURT: -- by the applicant.

7 MS. SULLIVAN: Thank you. I appreciate you  
8 hearing me out.

9 THE COURT: Certainly. All right. Turning to  
10 the restraining order itself, do you wish to call  
11 your first witness?

12 ATTY. TUKEY: Thank you, Your Honor. I would  
13 call Randal Hale to the stand.  
14

1                   R A N D A L   H A L E ,   I I I ,  
2   Having been first duly sworn by the clerk, was examined and  
3   testified as follows:

4                   THE CLERK:   And after you take a seat, sir,  
5                   please state your first and last name, spell your  
6                   last name, and give your address for the record.

7                   THE WITNESS:   Randal Hale, R-A-N-D-A-L. Hale,  
8                   H-A-L-E.   408 Plains Road, Haddam, Connecticut,  
9                   06438.

10                  THE COURT:   Whenever you're ready.

11                  ATTY. TUKEY:   Thank you, Your Honor.

12   DIRECT EXAMINATION BY ATTY. TUKEY:

13                  Q   Mr. Hale, I just want to get into some background  
14                  here for the Court.   Okay?   How are you related to Ms.  
15                  Sullivan?

16                  A   She's my ex-wife.

17                  Q   All right.   And when were you divorced?

18                  A   2019.

19                  Q   Okay.   And is there currently litigation pending in  
20                  the divorce case?

21                  A   Yes.   There's an appellate appeal and there's a civil  
22                  lawsuit.

23                  Q   Okay.   So the appeal was taken by Ms. Sullivan?

24                  A   Correct.

25                  Q   And there's also a civil case?

26                  A   Yes.

27                  Q   And who -- who filed that case?

1 A Ms. Sullivan.

2 Q Against you?

3 A Yes.

4 Q Okay. And are there also post judgment motions in  
5 the divorce that are currently pending?

6 A Yes.

7 Q Okay. What is the state of the order of the custody  
8 of the kids?

9 A I have full custody of both children.

10 Q Okay. And what is the visitation schedule?

11 A At the moment my daughter does not want to see her.  
12 So there is no visitation with my daughter. And my son has  
13 supervised virtual visits once a week.

14 Q And that's per orders of the Court?

15 A Yeah. I think it's something similar to what the  
16 Court had in mind.

17 Q Okay. Now I want to turn to the reason that you  
18 filed this -- this action here. It's a restraining order.

19 A Correct.

20 Q Have you had history with Ms. Sullivan interfering  
21 with your business?

22 A Yes.

23 Q Can you explain that to the Court?

24 A She's written letters to the IRS saying we didn't  
25 file our taxes properly. She's gone to the town hall and  
26 said that we did improper things to the home, that my  
27 vehicles aren't being taxed properly.

1 MS. SULLIVAN: Objection, Your Honor. That's  
2 not the question that was asked. It was about the  
3 business, not home and taxes.

4 THE COURT: Sustained. Nonresponsive.

5 BY ATTY. TUKEY:

6 Q Okay. Why don't we talk about what issues she's had  
7 with your business?

8 A I mean she recently called Whelen Engineering, I'm  
9 assuming, posing as a New York Times reporter.

10 Q Okay. What is your business?

11 A It's Hale Propeller.

12 Q Okay. And can you explain that to the Court?

13 A We fix marine propellers.

14 Q All right. And do you have any other businesses?

15 A I have Hale Motorsports also where we do some car  
16 restorations and we have a race team.

17 Q All right. How is Whelen Engineering connected to  
18 your businesses?

19 A We purchased their old GT car.

20 Q What is that?

21 A It's a Corvette race car.

22 Q Okay. And how are they connected?

23 A I'm using the same team to run the car that they  
24 used, same team manager. And then I have a twenty year  
25 relationship with the owner of Whelen Engineering.

26 Q Okay. And is Whelen Engineering, the name Whelen  
27 Engineering on that car?

1 A It was on the car. Yes.

2 Q Okay. And when did it come off the car?

3 A About two weeks ago.

4 Q And why -- why was that?

5 A I had a phone call from my team manager saying there  
6 was an issue with a New York Times reporter calling Whelen  
7 Engineering, saying that I was an abuser and that they were  
8 going to do a story on myself, and they didn't want to be  
9 associated with me anymore.

10 Q Okay. Upon hearing that, what did you do to follow  
11 up with that?

12 A I called Peter, their Motorsports manager and --  
13 first called my team manager who gave me Peter's number and  
14 I gave Peter a call and found out what -- what transpired to  
15 get them to want us to remove the name off the car. And he  
16 told me got a call from a Samantha --

17 MS. SULLIVAN: Objection, Your Honor. Hearsay.

18 THE COURT: Sustained.

19 BY ATTY. TUKEY:

20 Q You don't -- you don't need to tell me right now what  
21 he said --

22 A Okay.

23 Q -- but what did you do?

24 A So I -- I called Peter to find out what was going on.

25 Q Okay. And were you given any information?

26 A Yes.

27 Q And in what form were you given that information?

1 A A text message.

2 ATTY. TUKEY: May I approach, Your Honor?

3 THE COURT: Yes.

4 MS. SULLIVAN: Wait. Oh, it's not a -- oh, I'm  
5 sorry. I thought it was one of those. Sorry, Your  
6 Honor.

7 THE COURT: That's all right.

8 BY ATTY. TUKEY:

9 Q I want to show you a document and ask you if you  
10 recognize this.

11 A Yes. It's a text message.

12 Q Okay. And that's been marked as Applicant's 1 for  
13 identification and is that the text message that you  
14 received from Whelen Engineering?

15 MS. SULLIVAN: Objection, Your Honor. Hearsay.

16 THE COURT: Overruled.

17 MS. SULLIVAN: Your Honor --

18 THE COURT: Ma'am, I've ruled.

19 MS. SULLIVAN: Attorney Albis --

20 THE COURT: Ma'am, when the Court rules, the  
21 Court rules.

22 MS. SULLIVAN: I'm sorry, I'm sorry.

23 THE COURT: If the Court wishes to hear  
24 additional argument, I will request it.

25 MS. SULLIVAN: I apologize.

26 THE COURT: The question did not require a  
27 hearsay answer.

1 MS. SULLIVAN: Okay.

2 BY ATTY. TUKEY:

3 Q You can answer. Is that what you received from  
4 Whelen Engineering?

5 A Yes.

6 Q And who is that from?

7 A From Peter.

8 Q Who is Peter?

9 A A Motorsport's manager for Whelen.

10 Q What's his last name?

11 A Tiezzi.

12 Q Tiezzi?

13 A Yes.

14 Q Okay. And is this what you received in response to  
15 you following up on getting the information from Whelen  
16 about a New York Times reporter --

17 A Yes.

18 Q -- calling? Okay. And did this cause you -- did it  
19 cause you concern about that exchange between you and Peter?

20 A It caused me concern because I --

21 THE COURT: I don't want to know the contents.

22 THE WITNESS: Okay.

23 A Yes. It did.

24 Q It did? And what was your concern?

25 THE COURT: Well, counsel, are you going to  
26 introduce it as a full exhibit?

27 ATTY. TUKEY: Yeah. I will, Your Honor.

1 THE COURT: Any objection?

2 MS. SULLIVAN: The only objection is that it is  
3 hearsay. And as I was about to say, Attorney (sic)  
4 Albis in our previous case, I tried to just submit  
5 text messages between my daughter and I and it was  
6 considered hearsay and they wouldn't allow it because  
7 we don't have Peter here to confirm it.

8 Also, there's -- I mean it's really not clear  
9 who the message is directed to. I mean I just think  
10 without Peter being here?

11 THE COURT: All right. See if you can build a  
12 better foundation.

13 ATTY. TUKEY: Well, we did build a foundation,  
14 Your Honor. I'm not putting it in for the truth of  
15 the matter asserted. I'm putting it in for my  
16 client's state of mind based on what he did upon  
17 learning this information.

18 THE COURT: All right. I'll overrule the  
19 objection. It may be a full exhibit.

20 MS. SULLIVAN: I claim it.

21 THE COURT: It's a full exhibit to explain the  
22 state of mind of the plaintiff, not for the truth of  
23 the material.

24 BY ATTY. TUKEY:

25 Q And I'm going to -- I'm going to just give you a copy  
26 of that exhibit. Okay?

27 A Okay. Thank you.



1 Q After receiving this text message from the race  
2 manager at Whelen Engineering, did you do any research to  
3 look into this message?

4 A I first looked on the New York Times webpage to look  
5 for reporters named Samantha and there was quite a few. So  
6 it wasn't going to be a helpful area.

7 Q Keep your voice up, okay?

8 A Sorry. And then the phone number itself seemed odd  
9 to me. It was an 860 number. I could see if it was a 203  
10 number being a New York reporter, but, you know, a 860  
11 number seemed odd.

12 Q Okay.

13 A So I took that number and did a search through my  
14 emails.

15 Q And why did you do that?

16 A Because the number sounded familiar.

17 Q Okay. And is there any other reason why you did  
18 that?

19 MS. SULLIVAN: Actually objection, Your Honor.  
20 We don't know how he got this number.

21 THE COURT: Overruled.

22 MS. SULLIVAN: If -- just the content of the  
23 email, if it's hearsay, we don't know where that  
24 information came from. He could have made it up.

25 THE COURT: It goes to the weight the Court  
26 gives it. The Court has accepted the exhibit to  
27 allow an understanding of his state of mind and what

1 he did. You're right. I don't know if it's true.  
2 You may continue.

3 ATTY. TUKEY: Thank you, Your Honor.

4 BY ATTY. TUKEY:

5 Q So were there any other reasons why you were  
6 concerned and looked into this number?

7 A The number, it just seemed odd that this was an 860  
8 number to me. That being a New York Times reporter, I  
9 didn't think it would be an 860 number.

10 Q Okay. And you had indicated that the reporter had  
11 talked about you as an abuser?

12 A Correct.

13 Q Did that make you concerned about who may have done  
14 this?

15 A Yes. I mean it's --

16 Q Why?

17 A Because it's not true and my ex-wife has been posting  
18 that anywhere she possibly can, that I'm an abuser.

19 Q Okay. Can you elaborate on that a little bit?

20 A She has posted --

21 Q Explain to the Court why you were worried about that.

22 A Because this is not for -- this is my reputation. I  
23 own two businesses that if people thought I was something  
24 I'm not and I don't portray myself as, that it could effect  
25 my business financially and myself emotionally.

26 Q Okay. And you had said that your ex-wife had posted  
27 or indicated that you were an abuser previously. Can you

1 elaborate on that for the Court?

2 A Yes. Several times on Facebook and on Twitter she  
3 has put -- posted my website of my business on her Facebook  
4 page, saying that I'm an abuser, that I abuse my children.

5 MS. SULLIVAN: Objection, Your Honor. I think  
6 it's a hearsay or lacks -- he's saying this, but we  
7 don't know what he saw.

8 THE COURT: Overruled. You'll deal with it on  
9 cross-examination.

10 MS. SULLIVAN: All right. I claim it.

11 BY ATTY. TUKEY:

12 Q And is that true, that you're an abuser and you abuse  
13 your children?

14 A No. It's not true.

15 Q Okay. So you were talking about doing a search in  
16 your email about the -- with the number. Can you explain to  
17 the Court what you did?

18 A So I -- in Outlook you can search all emails. So I  
19 typed the number into the search bar as it was texted to me  
20 from Peter and one email popped up with that number in it.

21 Q Okay. And can you explain to the Court what email it  
22 was?

23 A It was an email from a few years ago when Ms.  
24 Sullivan still had visitation with the children. She wasn't  
25 allowing my daughter to bring her own phone to her --

26 MS. SULLIVAN: Objection. Beyond the scope of  
27 the question.

1 THE COURT: Overruled. Just get to the point.

2 THE WITNESS: And that number -- Ms. Sullivan  
3 put it in an email saying this is a number that you  
4 can contact your daughter on, this is the phone  
5 she'll have while she's at my apartment.

6 BY ATTY. TUKEY:

7 Q Okay. So you found an email in your search that was  
8 from Ms. Ms. Sullivan?

9 A Yes.

10 ATTY. TUKEY: May I approach, Your Honor?

11 THE COURT: You may.

12 ATTY. TUKEY: Thank you.

13 Q Sir, I'm going to show you what's been marked as  
14 Plaintiff's Exhibit 2 for identification. Could you  
15 identify that for me?

16 MS. SULLIVAN: Actually to save time I can  
17 stipulate to it. The phone number is mine. This is  
18 an email I sent to him. If all we're looking to get  
19 at, the phone is mine.

20 THE COURT: Based on the stipulation, the Court  
21 will enter the exhibit as Plaintiff's Exhibit 2 by  
22 agreement.

23 ATTY. TUKEY: Thank you.

24 Q So you found an email -- and let's show that to the  
25 Court, okay?

26 THE COURT: All right. You may continue.

27 ATTY. TUKEY: Thank you, Your Honor.

1 BY ATTY. TUKEY:

2 Q So you found an email in your archive from Ms.  
3 Sullivan --

4 A Yes.

5 Q -- which had the same phone number that was given to  
6 Whelen Engineering as the number for the reporter?

7 A Correct.

8 Q Okay. And what did that cause you to do?

9 A I called my team manager. I sent the information to  
10 my attorney. And I also called the owner of Whelen  
11 Engineering.

12 Q Okay. And did it cause you to file this restraining  
13 order?

14 A Yes.

15 Q Okay. And why?

16 A Because Ms. Sullivan has a tendency to escalate her  
17 behavior.

18 Q Explain that. What does that mean?

19 MS. SULLIVAN: Yeah. Sorry.

20 A Her -- whenever we get around --

21 Q Explain it in the context of your litigation, if you  
22 could for the Court.

23 A Whenever we get around litigation coming up, her  
24 behavior escalates. Either posting on --

25 MS. SULLIVAN: Objection. I don't know what he  
26 means by my behavior escalates. He hasn't seen me.

27 THE COURT: You can deal with that on cross.

1 MS. SULLIVAN: Okay.

2 BY ATTY. TUKEY:

3 Q You can answer.

4 A Either posting more things on social media. I mean I  
5 find cigarette butts out -- her brand outside my driveway.

6 MS. SULLIVAN: Objection, Your Honor.

7 (Laughing).

8 THE COURT: That's not a basis for an objection.

9 MS. SULLIVAN: Okay. Like -- okay.

10 THE COURT: You can deal with it on --

11 MS. SULLIVAN: Okay.

12 THE COURT: -- cross-examination.

13 Q Okay. Let me ask you before we get into the  
14 cigarette butts, you've indicated that she posts things on  
15 her social media. I'm going to --

16 ATTY. TUKEY: May I approach, Your Honor?

17 THE COURT: You may.

18 ATTY. TUKEY: Thank you.

19 Q I'm going to show you what's been marked as  
20 Plaintiff's 3 for identification.

21 MS. SULLIVAN: And, Your Honor, I have no  
22 objection to this being entered. I'm sorry. Are we  
23 talking about this one?

24 ATTY. TUKEY: Yup.

25 MS. SULLIVAN: Yup. No objection.

26 THE COURT: All right. It may be a full exhibit  
27 without --

1           ATTY. TUKEY: Thank you.

2           THE COURT: -- objection.

3 BY ATTY. TUKEY:

4           Q    You can take a look at it for a moment if you want.  
5 I'll ask you some questions.

6           THE COURT: Do you have another copy for the  
7 Court?

8           ATTY. TUKEY: I do, Your Honor.

9           THE COURT: Thank you.

10          ATTY. TUKEY: You're welcome.

11          Q    Okay. When the Court's done reading it, I can ask  
12 you some more questions.

13          THE COURT: All right. You may continue.

14          ATTY. TUKEY: Thank you, Your Honor.

15          Q    I'm going to direct you, sir, to the third page and  
16 ask you if the name of your company appears on this exhibit?

17          A    It does.

18          Q    Okay. And what is that?

19          A    Hale Motorsports and Hale Propeller.

20          Q    Okay. And that's posted on this social media post  
21 that was made by Ms. Sullivan?

22          A    Yes.

23          Q    And where did you get this?

24          A    Through a friend of mine's website -- Facebook  
25 account.

26          Q    Okay. And how recent is this?

27          A    Not that old. Within two weeks, three weeks.

1 Q Okay. And have you seen any other things similar to  
2 this where Ms. Sullivan has put your information on a  
3 derogatory site?

4 A I think both on Facebook and Twitter.

5 Q Okay. And how often have you seen that?

6 A I mean it happens fairly frequently.

7 Q Okay. How long has that been going on?

8 A Since the start of the divorce.

9 Q And when was that?

10 A 2018.

11 Q All right. And it still continues?

12 A Yes.

13 Q So we know it's happened more than once?

14 A Yes.

15 Q And it's happened as recently as April 22<sup>nd</sup> where  
16 somebody posing as a reporter has called Whelen Engineering?

17 A Yes.

18 Q And --

19 MS. SULLIVAN: Objection. We still -- Peter's  
20 not here. We don't know that anyone called.

21 THE COURT: Ma'am --

22 MS. SULLIVAN: Okay. All right.

23 THE COURT: -- you simply say objection. If the  
24 Court needs further information, I'll ask you to  
25 expand. We don't allow what we call speaking  
26 objections.

27 MS. SULLIVAN: I'm sorry.



1 THE COURT: You may continue. Overruled.

2 ATTY. TUKEY: Thank you.

3 BY ATTY. TUKEY:

4 Q You can answer that.

5 A Yes. It's continuous.

6 Q Okay. And --

7 MS. SULLIVAN: I claim it.

8 Q And what are your concerns here?

9 A That it's going to effect my business, my livelihood.  
10 And I just don't -- I feel very uneasy that what Ms.  
11 Sullivan does and she keeps escalating and she's obsessed  
12 with -- seems to be with myself.

13 Q Okay. Has she ever said anything directly to you  
14 about what she would do to your business?

15 A She said she wanted to ruin me.

16 Q When did she say that?

17 MS. SULLIVAN: Objection. Hearsay.

18 THE COURT: Overruled. You're here, ma'am.

19 THE WITNESS: I mean it was during the divorce.

20 Q Has she said that more than once?

21 A Yes.

22 Q Okay. Is it your concern that if she's allowed to  
23 keep doing this, contacting people about your business, that  
24 it could negatively effect you and your business?

25 A It already has.

26 Q How?

27 A I mean just being told I have to take a name of a

1 race car.

2 Q Explain that because the Judge doesn't -- doesn't  
3 know. You have to explain that.

4 A I mean the race cars had Whelen Engineering which is,  
5 in a way, I'm representing them to the public and I was  
6 asked to take it off the car.

7 Q By whom?

8 A By Whelen Engineering.

9 Q Okay. Why?

10 A Because of the negative effects it has on their  
11 business. I don't blame them for it because in society the  
12 way everything's laid out, if it's out there, it seems to be  
13 true but it's not.

14 Q All right. But what is it related to? What act  
15 caused your name to have to come off that car?

16 A The reporter calling Whelen Engineering and getting a  
17 phone call saying --

18 MS. SULLIVAN: Objection. We haven't --

19 THE COURT: Overruled.

20 BY ATTY. TUKEY:

21 Q Okay.

22 A Told to remove the name off the car --

23 MS. SULLIVAN: I claim it.

24 A -- which we subsequently have removed everything off  
25 the car.

26 Q Okay. So right now your car is not affiliated with  
27 Whelen Engineering at this point?

1 A No. There's nothing on it that has Whelen.

2 Q Because you've respected their wishes in asking -- in  
3 removing that?

4 A Yeah. I even -- I made a personal phone call to  
5 Sonny Whelen who's the owner who I've been friends with for  
6 twenty years and explained what I feel was going on and we  
7 had a discussion and we thought in the best interest of  
8 Whelen, we'll take the name -- I respected his wishes to  
9 take it off.

10 Q Okay.

11 MS. SULLIVAN: Objection. We don't know what  
12 Sonny Whelen's wishes are. I did it again. I'm  
13 sorry.

14 THE COURT: Sustained.

15 ATTY. TUKEY: Not the whole answer though.

16 THE COURT: I meant about Mr. Whelen's wishes  
17 may be stricken.

18 ATTY. TUKEY: Thank you.

19 BY ATTY. TUKEY:

20 Q It's your understanding that Mr. Whelen wanted the  
21 name off the car?

22 A Yes.

23 MS. SULLIVAN: Objection. We don't know what  
24 Mr. --

25 THE COURT: It's his -- the question was his  
26 understanding. So I'll allow that. Overruled.

27 Q You can answer.

1 A Yes. That's --

2 Q Okay. And that's based on a conversation you had  
3 with Sonny Whelen?

4 A Correct.

5 Q Okay. You had mentioned that there were cigarette  
6 butts outside on your -- of your driveway. Can you explain  
7 to the Court what you found?

8 A Several times I found cigarette butts in my driveway  
9 and one day I found a cigarette pack on a stonewall at the  
10 bottom of my driveway.

11 Q Okay. And can you explain what your driveway looks  
12 like so the Court can put that in context?

13 A It's a very long driveway, a quarter mile long. A  
14 long winding driveway. I can't see the end of my driveway  
15 from my -- from my home.

16 Q Okay. And why -- why does it cause you concern that  
17 you found cigarette butts and a package of cigarettes at the  
18 end of your driveway?

19 A It was my ex-wife's brand and it was also -- that was  
20 a big contentious during our marriage and our subsequent  
21 divorce, that she always threw her cigarette butts on the  
22 ground by the home.

23 Q Okay.

24 A And it was all over the driveway.

25 Q And when did you find that?

26 A I find them since the divorce started till  
27 frequent -- to like two weeks ago.

1 Q Okay. And you believe that that's Ms. Sullivan  
2 smoking the cigarettes and leaving them there for you to  
3 find?

4 A That's what I believe.

5 Q Does that cause you concern?

6 A Yes.

7 Q Okay. Do you know if she's been outside of your  
8 house any other times?

9 A She's been spotted on the road, parked on the road.

10 Q Okay. Explain where the road is in relation to your  
11 driveway and your house.

12 A Like I say, I have a long driveway. So where she was  
13 spotted was probably about an eighth of a mile down the  
14 road, parked on the side of the road.

15 MS. SULLIVAN: Objection. Hearsay. We don't  
16 know -- sorry.

17 THE COURT: That's all right. It's his  
18 testimony. We'll take it for what it's worth and you  
19 can cross-examine him.

20 BY ATTY. TUKEY:

21 Q Why does that concern you?

22 A I don't know what she's capable of doing. I don't  
23 trust her in any way and I don't -- like my kids are out  
24 there and my daughter doesn't want to see her.

25 Q And when -- when was she spotted out there?

26 A As recently as April 23<sup>rd</sup>.

27 Q The day after the phone call --

1 A Correct.

2 Q -- that Whelen received regarding you?

3 A Yes.

4 Q What are you asking the Court to do today?

5 A Protect myself from Ms. Sullivan.

6 Q How?

7 A I don't want her calling any of my -- my customers or  
8 business associates. I don't want her coming near me or my  
9 home.

10 Q Do you want her to stop posting on her social media  
11 links to you and your company?

12 A Yes.

13 Q And why?

14 A None of it's true and it's effecting my business.

15 Q Is there any correlation between the activity in  
16 either the civil case that she's filed against you or the  
17 divorce case, between activity in those cases and actions  
18 that you believe are on behalf of Ms. Sullivan?

19 A Yes. Every time we get -- as a hearing comes close,  
20 the date of a hearing comes, she escalates on her social  
21 media. It seems to be her behavior escalates around times  
22 of hearings and filings of information.

23 Q And was there a recent filing with the court  
24 regarding post judgment motions in your divorce?

25 A I think there's -- they're so voluminous it's hard to  
26 keep track of them all. I think it's a motion for contempt,  
27 if I remember correctly.

1 Q Okay. And Judge Moukawsher has that motion?

2 A Yes.

3 Q And that was recently just filed, correct?

4 A Correct.

5 Q And the contempt was filed by whom?

6 A Ms. Sullivan.

7 Q Okay. And did you respond?

8 A Yes.

9 Q Through the court?

10 A Yes.

11 ATTY. TUKEY: Just one second, Your Honor, if I  
12 may?

13 THE COURT: Sure.

14 BY ATTY. TUKEY:

15 Q The number that you found in your search, is that the  
16 same number that you received from Mr. Tiezzi?

17 A It is.

18 MS. SULLIVAN: Objection. We don't know what  
19 Mr. Tiezzi gave him.

20 THE COURT: I'll allow it.

21 MS. SULLIVAN: I claim it.

22 Q And --

23 THE COURT: Under the -- under the current  
24 Practice Book rules you don't have to claim an  
25 objection to preserve it.

26 MS. SULLIVAN: Oh, I'm sorry. But Paige  
27 Quilliam did it during my whole trial. I'm sorry.

1 THE COURT: Okay.

2 MS. SULLIVAN: If I do it, forgive me.

3 THE COURT: No problem. You may continue,  
4 Attorney Tukey.

5 ATTY. TUKEY: Thank you, Your Honor.

6 BY ATTY. TUKEY:

7 Q Have you received any other communications from Ms.  
8 Sullivan threatening you or making you feel uncomfortable  
9 that she might do something derogatory against you?

10 A I mean she's made -- she wrote letters to the IRS  
11 about my business. I mean there's been -- this case has  
12 been going on for so long it's hard to remember all of the  
13 details.

14 Q Okay. Just try to give the Court -- put that in  
15 context for the Court because it's important that the Court  
16 knows what's happening. Okay? So what other things has she  
17 done? She went to the town hall?

18 A She went to the town hall, said I didn't have permits  
19 for things we've done to the home.

20 Q And that's the home you're in now?

21 A Correct.

22 Q And she no longer lives there?

23 A No.

24 Q And doesn't have a property interest in that house?

25 A No. She doesn't.

26 Q And when did she do that? When did she go to the  
27 town hall saying that there weren't permits?



1 A A year and a half ago, I guess.

2 Q Okay.

3 A And she wrote a letter to them also.

4 Q To the town hall?

5 A Yes.

6 Q Okay. Anything else you can remember?

7 A She went to the town assessor's and said that we had  
8 cars that weren't properly being taxed in the town.

9 Q Okay. And does that negatively effect you?

10 A Yes.

11 Q How?

12 A Just the aggravation, first of all. I mean the --  
13 suggesting we're doing something improper is effecting us  
14 and then having to go down to the town hall and explain  
15 ourselves, go through the whole case with them.

16 Q Do you do business in your town?

17 A Yes.

18 Q Okay. Does that effect your business reputation?

19 A Yes.

20 Q And your personal reputation as well?

21 A Yes.

22 Q Do you feel unsafe?

23 A Yes.

24 Q Why is that?

25 A I don't trust what she's capable of doing.

26 Q And you feel she's stalking you?

27 A Yes.

1 Q How is she stalking you?

2 A I mean both electronically and physically, I feel she  
3 stalks us.

4 Q Okay. You feel she's threatening you?

5 A I don't trust what she actually is capable of doing.  
6 I wouldn't put anything past her.

7 Q Is that threatening to you?

8 A Yes.

9 ATTY. TUKEY: I have no further questions, Your  
10 Honor.

11 THE COURT: Thank you. Cross-examine?

12 MS. SULLIVAN: Oh yes, Your Honor. Okay.

13 Actually -- do I need to stand, Your Honor, or do you  
14 mind if I sit?

15 THE COURT: You can sit as long as you've asked.  
16 Sure.

17 MS. SULLIVAN: I'm sorry? Yeah. Thank you.

18 CROSS-EXAMINATION BY MS. SULLIVAN:

19 Q All right. Well, so let's start with -- I guess  
20 what -- I think the most important things are the items that  
21 you just said. So as far as activity close to hearings, you  
22 stated that I sent a letter to the IRS. Isn't it true that  
23 that letter was me saying -- the first line said I would  
24 like to have my tax returns evaluated because -- essentially  
25 I was turning myself into the IRS. Do you remember that?

26 A I remember the letter stating the name of my company,  
27 my name.

1 Q For the tax returns that I was referring to, weren't  
2 we filing them as married?

3 A Correct.

4 Q So your name, your business, wasn't that a part of my  
5 tax return?

6 A It was.

7 Q While we were married. So isn't it true that in -- I  
8 might have to go back. You may not remember. But I've  
9 asked you repeatedly for your 2016, which is while we were  
10 still married, 2016 K-1s because they've never been sent  
11 into the IRS to complete our return?

12 A All my taxes are filed properly.

13 Q But I'm talking about our tax returns.

14 A My accountants take care of the taxes and they've  
15 been filed properly.

16 Q Isn't it true that in 2016 my sister Eileen, who's a  
17 tax accountant, filed our tax return?

18 A She filed the personal tax return. Yes.

19 Q And the personal tax return, because your business is  
20 an LLC, are you required to file a K-1 with your personal  
21 tax return?

22 A Yes.

23 Q Since we were filing jointly, would that tax return  
24 be important for me to comply with the law?

25 ATTY. TUKEY: Objection. Speculation, Your  
26 Honor.

27 THE COURT: Overruled. I'll allow it.

1 BY MS. SULLIVAN:

2 Q Okay. Next, you were talking about --

3 THE COURT: Do you want him to answer the  
4 question?

5 MS. SULLIVAN: Oh, I'm so sorry. Yes.

6 Q So go ahead.

7 A I'm not sure what the -- what the requirement is.

8 Q The question was don't you -- in order to be --  
9 wasn't it true that my sister was filing our tax returns at  
10 that time?

11 A I answered yes.

12 Q Okay. And if the tax return is incomplete -- I'm  
13 just asking you if. If it's incomplete, wouldn't that be a  
14 criminal liability for not filing properly?

15 ATTY. TUKEY: Objection. Asked and answered.  
16 He did answer. He said I'm not sure what the  
17 requirements are.

18 THE COURT: Well, I'll sustain the objection on  
19 different grounds. You're asking him to give you a  
20 legal analysis of the IRS code and he's not competent  
21 to do that.

22 MS. SULLIVAN: That's fine. I can move on.  
23 Sorry, Your Honor.

24 THE COURT: No need to apologize.

25 Q All right. Next, you -- I'm just dealing with the  
26 last five items you addressed. The town hall permits. Is  
27 it safe to say that those were filed somewhere around June

1 of 2019, shortly after we were divorced?

2 A What was filed?

3 Q The town -- I'm sorry. You were complaining that I  
4 had gone to town hall about permits that you needed for the  
5 home; is that correct? When did that happen approximately?

6 A That you complained to the town hall?

7 Q Yes.

8 A I'm not sure what your question is.

9 Q When did -- with your -- when were you notified by  
10 the town hall that there was an issue regarding permits for  
11 your home?

12 A I think somewhere in 2019.

13 Q Okay. You said that I had no interest in the home.

14 A Correct.

15 Q So it was beyond -- I just want to make sure I  
16 understood what your -- your position was. That I shouldn't  
17 have been in the home, is that correct, and had no business  
18 dealing with it?

19 A Correct.

20 Q Okay. Were there issues that you were required to  
21 fix?

22 A No.

23 Q You didn't have to get a roof permit?

24 A I'm in full compliance with the town hall.

25 Q Now you are. I'm asking at the time when you --

26 A I didn't change --

27 Q -- when I filed -- when I filed the permit --

1 complaint, when the complaint was filed, did the town  
2 require you to make amendments to the property?

3 A After explaining your position to the town hall and  
4 my position, I was required to do nothing.

5 Q I should have gotten the report.

6 ATTY. TUKEY: Objection.

7 MS. SULLIVAN: I know.

8 BY MS. SULLIVAN:

9 Q So you did not get a permit for the roof?

10 A Everything in my house is in compliance with the town  
11 hall.

12 Q You didn't have to do changes to your front porch  
13 which really -- you didn't have two exits. You didn't have  
14 to fix the front porch?

15 A I think I've answered your question.

16 Q Did you have -- did the town require you to fix the  
17 porch?

18 A The town required me to do nothing.

19 Q Okay. Town assessor's office. Isn't it true that  
20 many of your vehicles are registered through your business?

21 A Some of my vehicles are registered through my  
22 business. Yes.

23 Q Is your mother's -- because she's a partner. So is  
24 your mother's Mazda CX5 registered personally to her at her  
25 home or is it registered to the business?

26 A It's owned by the company, so it's registered to the  
27 company.

1 Q Okay. Your motorhome that you use for your racing  
2 which we owned, do you still own that vehicle, the Renegade  
3 motorhome that we used to jointly own?

4 A Yes.

5 Q Okay. Is that vehicle registered to you personally  
6 or is it registered to the business?

7 A It's registered to a business.

8 Q Which business?

9 A It's registered to a company called Dena (phonetic)  
10 Worldwide.

11 Q Can you repeat that again?

12 A It's registered to a business called Dena Worldwide,  
13 LLC.

14 Q And who owns that company?

15 A Myself.

16 Q And when did that business -- when was that business  
17 established?

18 A I think 2019.

19 Q Let me ask you. On April 27<sup>th</sup> of 2021 you filed a  
20 financial affidavit and was that business listed on it?

21 ATTY. TUKEY: Objection. Relevance, Your Honor.

22 THE COURT: Sustained. Yeah. We're dealing  
23 with a restraining order.

24 MS. SULLIVAN: This -- okay.

25 THE COURT: This is 2022. So events in --  
26 specific about 2019 are not relevant.

27 MS. SULLIVAN: Okay.

1 BY MS. SULLIVAN:

2 Q You had mentioned, in the Town of Haddam, that you  
3 have a business in town. What business is that?

4 A It's called Candlewood, LLC.

5 Q You also mentioned -- I think the last point that  
6 Attorney Tukey was addressing was that you claimed that I  
7 have electronically stalked you. Did you offer any tangible  
8 evidence to prove that, either like some type of  
9 surveillance report or whatnot?

10 A I think we have -- we put in Facebook posts.

11 Q All right. So just the one Facebook post that you  
12 entered? I just want to be clear what's entered.

13 ATTY. TUKEY: I can stipulate that we entered  
14 three exhibits, Your Honor. I'm not sure what -- I  
15 know this is cross, but it sounds like argument.

16 Q I know. I'm just trying to say you're concerned  
17 about me electronically stalking you, yet there was only one  
18 Facebook post and no Twitter posts. I'm just wondering why  
19 you didn't include other -- why didn't you -- why did you  
20 only include one and not -- you said that there's plenty.

21 ATTY. TUKEY: Objection, Your Honor, to the form  
22 of the question.

23 THE COURT: I'll allow the question.

24 THE WITNESS: Just one is one too many.

25 Q Okay. Now a really curious thing. Cigarette butts  
26 on the stonewall. What brand of cigarettes do I smoke?

27 A Marlboro Lights.



1 BY MS. SULLIVAN:

2 Q No, but okay.

3 ATTY. TUKEY: Objection.

4 THE COURT: I'll sustain the objection.

5 Q Okay. I'm not even going to deal with that. You  
6 said someone spotted me on Plains Road on April 23<sup>rd</sup>. Who  
7 spotted me?

8 A My mother.

9 Q And do you know if your -- this might be hearsay, but  
10 I don't know. I won't object to it. Do you know what  
11 vehicle I was in?

12 A Your dark gray GMC Arcadia.

13 Q Are you aware that my GMC was in the shop that  
14 weekend? (Laughing) Sorry. I'm sorry.

15 A I'm not sure how I'd be aware of that.

16 Q Okay. Okay. I'd like to actually -- would you agree  
17 that you've engaged in stalking behaviors of me?

18 ATTY. TUKEY: Objection, Your Honor. Relevance.

19 THE COURT: I'm sorry. I didn't -- say the  
20 question again.

21 Q Isn't it true that you have stalked me?

22 THE COURT: I'll sustain the objection.

23 Q Okay.

24 A No.

25 ATTY. TUKEY: No. There's no question.

26 Q It means you don't answer.

27 A Sorry.

1 MS. SULLIVAN: I'm sorry, Your Honor. I just --  
2 I'm trying to find --

3 THE COURT: That's all right.

4 MS. SULLIVAN: -- the complaint. I'm really  
5 unorganized.

6 THE COURT: That's all right.

7 BY MS. SULLIVAN:

8 Q You indicated that I repeatedly -- part of your claim  
9 is that you've repeatedly threatened to destroy me and my  
10 business. Did you offer the Court today any documentation  
11 to that effect?

12 A I think the Facebook posts where you're putting my  
13 website and my name on there is enough to --

14 Q So there's one Facebook post; is that true? Just the  
15 one Facebook post?

16 A That's all I've entered. Yes.

17 Q Okay. In paragraph three of your affidavit it says  
18 you've asked my ex-wife to only communicate with me about  
19 the children via electronic mail. When did you make that  
20 request?

21 A I think it's part of our -- the custody agreement,  
22 the final judgment to Judge Albis.

23 Q Okay. So it was just -- it was part of the  
24 agreement. It's not that you have asked. It was included  
25 in the agreement. Has that been followed with the exception  
26 of the phone calls when the kids were with me? With the  
27 exception of kids calling you, has that been followed?

1           ATTY. TUKEY: I'm going to object to the form.  
2           I don't understand what's been followed. If we could  
3           just have a cleaner question?

4           THE COURT: Yeah. Why don't you rephrase just  
5           to make it clearer?

6 BY MS. SULLIVAN:

7           Q    Okay. I just want to understand. It seems like  
8           you're making accusation when you say that you've only --  
9           that you've asked that my ex-wife to only communicate with  
10          me about the children via electronic mail. Hasn't that been  
11          followed?

12          A    I don't -- I think you try to -- you called my cell  
13          phone before.

14          Q    That's why I was saying with the exception of calls  
15          to the kids.

16          A    I think it was outside the scope of calling the kids,  
17          but --

18          Q    I didn't hear you. Did you say yes, I'm calling you,  
19          or no?

20          A    You've called my cell phone outside the scope of  
21          calling the kids.

22          Q    Did you enter those records into evidence today?

23          A    No.

24          Q    Why not?

25                ATTY. TUKEY: Objection, Your Honor.

26                THE COURT: I'll allow the question. Overruled.

27                THE WITNESS: I follow the advice of my

1 attorneys.

2 BY MS. SULLIVAN:

3 Q It also says -- actually, so I'm going to refer to  
4 it. In your application you submitted an order -- I'm  
5 moving on to number -- let's see here. Hang on. Oh, we're  
6 still on number three. The court order, our divorce, on  
7 January 14<sup>th</sup>, 2019 that she not communicate. You're  
8 referring to a court order.

9 MS. SULLIVAN: Your Honor, is there any way that  
10 you can look at the family case to look at these  
11 orders?

12 THE COURT: Sure.

13 MS. SULLIVAN: Okay. I have them here. I'm  
14 sorry, Your Honor. The dates on these are going to  
15 be -- in that docket because I know our docket's  
16 long. It's going to be --

17 THE COURT: Do you know the docket number?

18 MS. SULLIVAN: FA18-6021801. There should be  
19 motions that were filed on around January 14<sup>th</sup>, this  
20 is the order --

21 THE COURT: No. I'm looking at the separation  
22 agreement.

23 MS. SULLIVAN: Oh, no. Not the separation  
24 agreement. I'm referring you to a docket.

25 THE COURT: All right.

26 MS. SULLIVAN: Mr. Hale entered a court -- part  
27 of his application, he included a court order saying

1           that there was an order in place that I not contact  
2           his business and whatnot.

3           THE COURT: All right. Do you know where it is?

4           MS. SULLIVAN: January 14<sup>th</sup>, 2019. So it's  
5           near -- it's the top -- relatively close before. I  
6           actually want to start with, there's a motion filed  
7           by the plaintiff on January 2<sup>nd</sup> which was the motion  
8           for order pendente lite to get the protective order  
9           or that we sign a confidentiality --

10          THE COURT: Motions filed prior to the judgment  
11          are incorporated into the judgment. So --

12          MS. SULLIVAN: Doesn't a --

13          THE COURT: -- anything filed prior to the  
14          judgment is not relevant to this case. Is that  
15          language in the judgment?

16          MS. SULLIVAN: Well, Mr. Hale provided a copy of  
17          the court order from January 14<sup>th</sup> signed by Honorable  
18          Diana. So if it's not relevant, it shouldn't be  
19          considered as -- if that was considered as part of  
20          your granting the ex parte order, I would say it --  
21          again I'd request the motion be dismissed and we can  
22          save a lot of time.

23          THE COURT: It depends on whether the order is  
24          included in the --

25          MS. SULLIVAN: Well, Honorable Diana entered two  
26          orders, both numbered with the same order number.  
27          One is denied and one is a protective order. So I

1 don't see how an order can be on the docket with the  
2 same number signed by the same judge with two  
3 different --

4 THE COURT: Again, anything ordered prior to the  
5 judgment being entered is irrelevant. Any --

6 MS. SULLIVAN: Perfect. Can we --

7 THE COURT: Ma'am, please let me finish  
8 speaking.

9 MS. SULLIVAN: I'm so sorry, so sorry.

10 THE COURT: The court reporter can only record  
11 one person at a time and if you have any interest in  
12 filing an appeal, you'll have an illegible transcript  
13 which the Appellate Court will not consider. So give  
14 me a moment to look into the judgment.

15 The court judgment requires the parties to use  
16 Our Family Wizard for communication. So any  
17 communication other than that that's not an emergency  
18 is a violation of the judgment. Technical, you know,  
19 could be in violation.

20 MS. SULLIVAN: Can I speak with Mr. Tukey for  
21 one second on this?

22 THE COURT: Sure.

23 (PAUSE)

24 MS. SULLIVAN: I'm sorry. So we're just moving  
25 on.

26 THE COURT: Okay.

27

1 BY MS. SULLIVAN:

2 Q Okay. We're only supposed to be using Family Wizard.

3 MS. SULLIVAN: Your Honor, I need a sticker.

4 Hang on. Your Honor, may I show this to the

5 defendant, a document to the defendant?

6 THE COURT: Yes.

7 ATTY. TUKEY: May I see the --

8 MS. SULLIVAN: I know, I know. I'm not moving.

9 ATTY. TUKEY: Your Honor, may I review?

10 THE COURT: Yeah.

11 ATTY. TUKEY: Thank you.

12 MS. SULLIVAN: You go ahead.

13 (PAUSE)

14 ATTY. TUKEY: Showing that to the defendant?

15 MS. SULLIVAN: Yes. Is it entered yet or no?

16 Right. It's not entered yet, right?

17 THE COURT: Right.

18 Q Okay. Mr. Hale, do you recognize this email

19 exchange?

20 A Yes.

21 Q Okay. Is this an email that you wrote to me?

22 A Yes.

23 Q Did I respond?

24 A Yes.

25 MS. SULLIVAN: Your Honor, I'd like to enter

26 this into -- oh, I think I put a 1 on there. I'm

27 supposed to put an A, Defense Exhibit A.

1           ATTY. TUKEY: I'm going to object to relevance,  
2           Your Honor. Foundation.

3           THE COURT: Okay. Can you lay a better  
4           foundation for relevance? So what does it have to do  
5           with the restraining order issues?

6           MS. SULLIVAN: It was --

7           THE COURT: Well, through -- through the  
8           witness.

9           MS. SULLIVAN: Okay. Hang on. Your Honor, I  
10          need to re-object to the -- about Family Wizard. We  
11          have not used Family Wizard for two years, neither of  
12          us.

13          THE COURT: Nobody's -- nobody's claiming a  
14          contempt.

15          MS. SULLIVAN: What's that?

16          THE COURT: This isn't --

17          MS. SULLIVAN: But I need the email to come in  
18          because it does tie to the restraining order.

19          THE COURT: Okay. You need to --

20          MS. SULLIVAN: Oh, can I just ask some questions  
21          about that?

22          THE COURT: Yeah. You need to lay a foundation  
23          to show to the Court why it's relevant.

24          MS. SULLIVAN: Okay.

25          BY MS. SULLIVAN:

26           Q    Mr. Hale, when did -- on what date did you receive  
27           your restraining order -- or the temporary ex parte order?



1 What date did you receive that from the Court?

2 A It was Thursday the 29<sup>th</sup> -- 28<sup>th</sup>.

3 Q 28<sup>th</sup>. And I believe the initial -- the Court has  
4 filed -- the initial marshal who tried to serve on the 28<sup>th</sup>  
5 indicated he couldn't find me, right, because I wasn't at  
6 the location you had -- or the location he was told to go  
7 to? Does that sound about right?

8 ATTY. TUKEY: Objection. Relevance, Your Honor.

9 THE COURT: I'll allow it. The Court notes for  
10 the record that the return --

11 MS. SULLIVAN: The return, the one that says --

12 THE COURT: -- took place on April 28<sup>th</sup>.

13 MS. SULLIVAN: Okay.

14 BY MS. SULLIVAN:

15 Q Did you know where I was?

16 ATTY. TUKEY: Objection. Relevance, Your Honor.

17 MS. SULLIVAN: Your Honor, I think we started  
18 off with how does know where I -- how was I served  
19 and if you don't have a record in there, I'm still  
20 wiling to participate here. Did he know where I was  
21 is what I want to know.

22 ATTY. TUKEY: It's not relevant to the  
23 restraining order or the issue of service because  
24 we're -- it's been waived so Your Honor can hear it.

25 THE COURT: Yeah.

26 MS. SULLIVAN: Okay. One more question.

27 Q Did you send me an email the day after you received

1 the protective order, the ex parte protective order?

2 ATTY. TUKEY: Objection. Relevance.

3 THE COURT: I'll allow that question.

4 THE WITNESS: Yes.

5 BY MS. SULLIVAN:

6 Q Okay. And did you ask me in that email -- or that  
7 you needed my address so our son could send me a Mother's  
8 Day present?

9 ATTY. TUKEY: Objection. Relevance.

10 MS. SULLIVAN: It goes to baiting. If he had a  
11 protective order on August 28<sup>th</sup> that said no contact,  
12 why was he emailing me? To which I responded and,  
13 Your Honor, aside from the fact I --

14 THE COURT: I'll allow the question. Overruled.

15 THE WITNESS: What was the question?

16 Q The question was did you ask for my email address  
17 under the guise of your son wants to send you a Mother's Day  
18 present?

19 A Yes.

20 Q And did you write that the day after you had received  
21 a protective order which kind of by law is kind of quasi  
22 and, you know -- like why were you emailing me? You didn't  
23 want contact.

24 A Randy wanted to send you a gift.

25 Q And in my reply, was my reply in any way threatening  
26 in that email?

27 A No.

1 Q Okay. Did you -- were you concerned about being able  
2 to make proper service without my address?

3 ATTY. TUKEY: Objection. Relevance, Your Honor.  
4 It doesn't go to any of the --

5 MS. SULLIVAN: Well, it goes to his state of  
6 mind. Why is he baiting me?

7 THE COURT: I'll allow it.

8 MS. SULLIVAN: Thank you, Your Honor.

9 BY MS. SULLIVAN:

10 Q So were you trying to -- I mean was there anything in  
11 my response that was threatening or harmful or disastrous in  
12 any way?

13 THE COURT: Well, you haven't got the answer --

14 MS. SULLIVAN: I'm sorry.

15 THE COURT: -- to the first question. The  
16 question was were you trying to find her address.

17 THE WITNESS: So my son could send her a  
18 Mother's Day gift.

19 THE COURT: For any other reason?

20 THE WITNESS: No.

21 Q Why were you trying to communicate with me after you  
22 just got an order that you didn't want to have any contact  
23 with me?

24 ATTY. TUKEY: I'm going to object. It's been  
25 asked and answered a number of times, Your Honor.

26 THE COURT: Yeah. I'll sustain the objection.  
27 You made the point.

1 MS. SULLIVAN: All right. Based on that can we  
2 enter Exhibit 1 -- or A? I think we've talked about  
3 every bit of information that was in the email. I'd  
4 like to enter it into evidence, please.

5 THE COURT: Any objection?

6 ATTY. TUKEY: I'd object as to relevance, Your  
7 Honor.

8 THE COURT: I'll allow it over the objection.  
9 It may be a full exhibit.

10 MS. SULLIVAN: Thank you, Your Honor. Give me  
11 one second. I'm just trying to make sure we got the  
12 court --

13 THE COURT: I want to take a look at the  
14 exhibit. It takes the clerk a minute to process it.  
15 All right. Whenever you're ready.

16 MS. SULLIVAN: Thank you, Your Honor.

17 BY MS. SULLIVAN:

18 Q Moving on. You referred to the contempt motion that  
19 has been filed. You introduced the idea that we have these  
20 contempt motions and your responses that are currently  
21 pending; is that correct?

22 A We have motions pending. Yes.

23 Q Okay. In the contempt motion what have I accused you  
24 of?

25 ATTY. TUKEY: I'm going to object as to  
26 relevance, Your Honor.

27 THE COURT: What's the relevance?

1 MS. SULLIVAN: Well, he introduced it and he --  
2 I'll lay a different foundation. I'm sorry. Let me  
3 just -- I'll back up.

4 BY MS. SULLIVAN:

5 Q Mr. Hale, have you ever hired private investigators  
6 to follow me?

7 ATTY. TUKEY: Objection. Relevance, Your Honor.

8 THE COURT: Sustained.

9 MS. SULLIVAN: He's claiming me to be the  
10 stalker and we have -- we have things entered into  
11 evidence in our other case.

12 THE COURT: But take for example he is stalking  
13 you, there's no restraining order application against  
14 him.

15 MS. SULLIVAN: Not yet.

16 THE COURT: So I will sustain the objection.

17 MS. SULLIVAN: Okay. Thank you, Your Honor.

18 Q Mr. Hale, do you have cameras posted outside your  
19 house for security reasons?

20 A Yes.

21 Q When was the first time you started putting cameras  
22 up?

23 A Probably February of 2019.

24 Q Okay. And when you put those cameras at the time --

25 MS. SULLIVAN: And, Your Honor, I realize this  
26 is pre-divorce but he answered the question.

27 Q When you put those cameras up, wasn't that in

1 violation of a court order we had at the time that neither  
2 party would surveil the other?

3 ATTY. TUKEY: Objection. Relevance, Your Honor.

4 THE COURT: I'll sustain that. Again --

5 MS. SULLIVAN: Okay.

6 THE COURT: -- it's just not relevant.

7 BY MS. SULLIVAN:

8 Q Okay. Mr. Hale, have you ever contacted the police  
9 about me trying to hack -- I'm not sure what the right word  
10 is but hack into one of your iCloud accounts?

11 A Yes.

12 Q Okay. Do you remember the name of the detective that  
13 was handling that case?

14 A No. I don't.

15 MS. SULLIVAN: I'd like to enter into -- may I  
16 show this to the --

17 THE COURT: Of course.

18 MS. SULLIVAN: Okay. This is going to be B,  
19 right?

20 THE COURT: Well, the clerk will mark it.

21 MS. SULLIVAN: Oh, okay. I'm sorry.

22 ATTY. TUKEY: Your Honor, I haven't seen it.

23 MS. SULLIVAN: Oh, I'm sorry.

24 (PAUSE)

25 MS. SULLIVAN: It's okay for me to ask  
26 questions?

27 THE COURT: Uh-huh.

1 BY MS. SULLIVAN:

2 Q Having read that, do you remember that situation,  
3 that phone call to the police trying to get me --

4 THE COURT: Well, the first question is can you  
5 identify what this is.

6 THE WITNESS: Yes.

7 THE COURT: Okay. What is it?

8 THE WITNESS: It looks like an email exchange  
9 between Ms. Sullivan and a Detective Williams.

10 THE COURT: Okay.

11 Q Why did you call the police on that -- for that  
12 event?

13 ATTY. TUKEY: I'm going to object as to  
14 relevance, Your Honor.

15 MS. SULLIVAN: He's calling the police on me.

16 ATTY. TUKEY: No foundation showing when this  
17 was. So right now it's not relevant and I don't  
18 think it will be.

19 THE COURT: You need to lay a better foundation.

20 Q Okay. When was the email? Can you, just at the top,  
21 look at the date? What's the date at the beginning of the  
22 emails?

23 A November 11<sup>th</sup>, 2020.

24 Q Okay. And do you remember the occasion of calling --  
25 I think you said this. Why did you call the police?

26 ATTY. TUKEY: Objection. Relevance, Your Honor.

27 THE COURT: I'll allow it.

1 THE WITNESS: You were trying to get Apple to  
2 reset the iTunes account and the Apple -- whole Apple  
3 account.

4 BY MS. SULLIVAN:

5 Q Okay. And wasn't -- and I think it's in the email  
6 there. What was the email address?

7 A Which email address?

8 Q The email address that I was trying to hack into.

9 THE COURT: So you're offering this as a full  
10 exhibit?

11 MS. SULLIVAN: I would like to offer it as a  
12 full exhibit, if Your Honor -- I know he's going to  
13 object.

14 ATTY. TUKEY: No proper foundation. It's going  
15 to end up being hearsay, Your Honor. I'm going to  
16 object. And to relevance.

17 THE COURT: Well, I'll give her some  
18 flexibility. I'll allow it, although I think you're  
19 probably right.

20 MS. SULLIVAN: Thank you, Your Honor.

21 Q What's the email address?

22 THE COURT: Would you give it to the marshal so  
23 the Court can see it?

24 MS. SULLIVAN: Oh, yes. I apologize.

25 (PAUSE)

26 THE COURT: All right. You may proceed.

27 Q Mr. Hale, what's the email address that you called



1 the police on me for trying to hack?

2 A It was my iTunes account.

3 Q The email address that's listed in the email, what is  
4 the email address that's referred to?

5 ATTY. TUKEY: Objection, Your Honor. The  
6 evidence speaks for itself, the exhibit.

7 THE COURT: Yeah. I agree. I'll sustain the  
8 objection.

9 BY MS. SULLIVAN:

10 Q Let me ask this. Mr. Hale, does -- without  
11 mentioning the email address, does the email address refer  
12 to me?

13 A It was my iTunes account is what you were trying to  
14 reset.

15 MS. SULLIVAN: Your Honor, when you review it  
16 please look at the email address. It's the same as  
17 my email address for this court.

18 ATTY. TUKEY: Objection.

19 MS. SULLIVAN: I know. I'm just begging you to  
20 look at it.

21 THE COURT: Marshal, would you --

22 MS. SULLIVAN: Thank you. All right.

23 THE COURT: -- maintain control of the exhibit?  
24 Thank you.

25 Q Mr. Hale, how many times have you called the police  
26 on me?

27 ATTY. TUKEY: Objection as to form.

1 THE COURT: Sustained.

2 BY MS. SULLIVAN:

3 Q Prior to filing the restraining order did you contact  
4 the police?

5 THE COURT: We need a timeframe.

6 MS. SULLIVAN: Whenever. I don't know when he  
7 decided that he needed the --

8 Q Just prior to this restraining order, did you --

9 THE COURT: No. Let's say the last month or two  
10 months.

11 Q Right. The last two months.

12 A No.

13 Q Why not?

14 A At the time you weren't doing anything that was  
15 threatening.

16 Q I'm a little confused here. So at the time right  
17 before this restraining order I wasn't doing anything  
18 threatening. Is that what you just said?

19 ATTY. TUKEY: I'm going to object as to the  
20 form, Your Honor. I think there's some confusion and  
21 it doesn't track the evidence. We're talking about  
22 two months prior to the restraining order. So I just  
23 don't what there to be confusion.

24 THE COURT: Well, the Court understands.

25 ATTY. TUKEY: Okay.

26 Q Let me try this. The day before you filed the  
27 restraining order with this court did you call the police

1 about me?

2 A Actually yes.

3 Q And what was the result of that call?

4 A They --

5 Q Like when you called, like what was the result of  
6 their -- your interactions with them?

7 A Their recommendation was talk to my attorney and get  
8 a TRO.

9 Q So when you went to them, did they -- did they  
10 determine there was an immediate threat?

11 ATTY. TUKEY: Objection. Relevance, Your Honor.

12 THE COURT: Sustained.

13 BY MS. SULLIVAN:

14 Q So the police or the troopers, whoever you went to,  
15 they did not pursue it and referred you to a private  
16 attorney or referred --

17 ATTY. TUKEY: Objection. Asked and answered,  
18 Your Honor.

19 THE COURT: Sustained.

20 Q All right. Have you ever a filed an ex parte order,  
21 restraining order against me --

22 ATTY. TUKEY: Objection. Relevance.

23 A -- besides this?

24 MS. SULLIVAN: It goes to a pattern of -- your  
25 client's behavior -- the applicant's behavior  
26 history.

27 THE COURT: You can answer the question.

1 THE WITNESS: Yes.

2 BY MS. SULLIVAN:

3 Q And with the exception of the ex parte order where  
4 you got the kids, how many times have you filed ex parte  
5 orders against me?

6 ATTY. TUKEY: I'm going to object as to form. I  
7 don't know what --

8 MS. SULLIVAN: Goes to a pattern of behavior of  
9 applying for frivolous motions.

10 ATTY. TUKEY: I've objected as to the form. I  
11 just don't know the restraining order where he got  
12 the kids. I don't know what that means.

13 THE COURT: Okay.

14 ATTY. TUKEY: I think it's confusing.

15 THE COURT: I'll sustain the objection.

16 MS. SULLIVAN: I'm just asking -- let me  
17 rephrase it.

18 Q In general have you applied for other restraining  
19 orders?

20 ATTY. TUKEY: Objection. Asked and answered.  
21 He said yes.

22 Q Okay. And do you recall the results of those  
23 previous applications?

24 ATTY. TUKEY: Objection. Relevance, Your Honor.

25 MS. SULLIVAN: Well, it goes against frivolous  
26 filings of ex parte motions and he has a pattern of  
27 doing it which is part of this Jennifer's Law and

1 coercive control.

2 THE COURT: Well --

3 MS. SULLIVAN: He has a pattern and if the Court  
4 isn't granting these motions, why are we here again?

5 THE COURT: Because the Court granted this one.

6 MS. SULLIVAN: Well, I understand. But he has a  
7 habit -- he has a pattern of behavior.

8 THE COURT: Well, the fact that he's filed  
9 motions and they've been rejected, did they go to  
10 hearings?

11 MS. SULLIVAN: Let me ask. Can I ask about this  
12 one?

13 THE COURT: Yeah.

14 BY MS. SULLIVAN:

15 Q January 20<sup>th</sup> -- around January 24<sup>th</sup> of 2019, I realize  
16 this is before the divorce but it's important. Right before  
17 we were supposed to go to mediation, did you file an ex  
18 parte motion that was sent to hearing? It wasn't granted ex  
19 parte. That was sent to hearing?

20 THE COURT: Well, hold on a second.

21 MS. SULLIVAN: I'm sorry.

22 THE COURT: Are you referring to an ex parte  
23 motion for custody as opposed to an ex parte --

24 MS. SULLIVAN: It was custody, get me out of the  
25 house. I mean --

26 THE COURT: That's not the same thing as a  
27 restraining order.

1 MS. SULLIVAN: No. It's the same application.  
2 No. It's the same one. Don't go near the dogs,  
3 don't go -- I mean it was the same thing. I'm sorry.  
4 Application for a protective order.

5 ATTY. TUKEY: Just for the record I'm going to  
6 make my objection, Your Honor. I don't think it's  
7 relevant.

8 THE COURT: So the law requires when an ex parte  
9 motion for custody is filed, it's denied --

10 MS. SULLIVAN: It wasn't -- it was an ex parte  
11 motion for -- it was a protective order.

12 THE COURT: It's required to --

13 MS. SULLIVAN: But it wasn't -- well, it was  
14 denied ex parte. He didn't show up for the hearing.

15 THE COURT: No. That's different.

16 MS. SULLIVAN: But that's what I'm saying. He  
17 files these motions and there's been plenty. He has  
18 a pattern of behavior.

19 ATTY. TUKEY: Objection, Your Honor.

20 THE COURT: I'll allow it.

21 MS. SULLIVAN: Thank you, Your Honor. I  
22 appreciate that.

23 BY MS. SULLIVAN:

24 Q So, Mr. Hale, did you apply for an -- well, asked and  
25 answered. On the day of the hearing, which I believe was  
26 January 24<sup>th</sup> or -- whenever the Thursday was in January of  
27 2019, did you show up for that hearing?

1 A No.

2 Q Why not?

3 A My attorney was ill and we decided not to come.

4 Q Okay. But I was still living in a house. And in  
5 that motion did you make similar claims?

6 A Yes.

7 Q That you were afraid. But you didn't show up for the  
8 hearing and we were still in court -- we still lived  
9 together at that time?

10 A Correct.

11 Q Okay. Did you end up in a hospital during that time?

12 A No.

13 Q Were you injured by me during that time physically?

14 A Yes.

15 Q Wow. Explain that one.

16 THE COURT: Well --

17 MS. SULLIVAN: That's not a question.

18 THE COURT: -- I'm not going to get into the  
19 details.

20 MS. SULLIVAN: All right. But he didn't  
21 start --

22 THE COURT: Your representation to the Court was  
23 you were trying to show a pattern of behavior.

24 MS. SULLIVAN: Correct. So that pattern --

25 THE COURT: All right. The details are not  
26 relevant.

27 MS. SULLIVAN: Okay. The details don't matter.

1           Okay. Thank you, Your Honor. I'm sorry for over  
2           talking you. Sorry, lady.

3 BY MS. SULLIVAN:

4           Q    Mr. Hale, shortly -- and again, this goes to the  
5           pattern, is what I'm getting to. After -- I guess that was  
6           in January and I think you've already testified February is  
7           when you put up security cameras. Did you inform me in  
8           February of 2019 that you were putting up security cameras?

9                    THE COURT: Again, if you want to file -- if you  
10           want to show a pattern --

11                   MS. SULLIVAN: I ended up arrested.

12                   THE COURT: I don't need the -- I just need to  
13           know --

14                   MS. SULLIVAN: The question.

15                   THE COURT: -- the question. When was it filed,  
16           what happened?

17           Q    Okay. On or about February 20 -- I'm going to say on  
18           or about February 24<sup>th</sup> did you go to the police and inform  
19           them that I had broken a security camera?

20           A    I talked to the resident state trooper about the  
21           incident. Yes.

22           Q    Okay. Did you file a complaint?

23           A    Yes.

24           Q    Did you swear an affidavit?

25           A    I don't --

26           Q    I'm sorry?

27           A    -- remember. I didn't answer your question yet.



1 Q I'm sorry. Did you file -- like when you went to the  
2 police, did you file an affidavit with them?

3 A I don't remember the exact details but the trooper  
4 took my statement.

5 Q Okay. Fair enough. And in your statement did you  
6 make claims that you were afraid of me?

7 A I don't remember the exact details of it.

8 Q When you went to the trooper did you have any  
9 injuries on your body?

10 THE COURT: Again, I don't need the details. I  
11 just need to know if there was a pattern. So --

12 BY MS. SULLIVAN:

13 Q As a result did I end up arrested?

14 A A protective --

15 MS. SULLIVAN: And yes, I'm introducing that  
16 myself.

17 A -- order went in place after that.

18 Q I'm sorry?

19 A A protective order went into place.

20 Q Well, I was arrested and that's why the protective  
21 order went into place; isn't that correct?

22 A I'm assuming that's how -- there was a protective  
23 order in place.

24 Q You don't remember your attorney telling -- or filing  
25 a -- I'm sorry. Did you end up filing for protective  
26 services with New Horizons, I believe it was?

27 THE COURT: For this hearing it's sufficient to

1 know that you were arrested and a PO was entered.

2 MS. SULLIVAN: No. An PO. I'm sorry. Let me  
3 just -- fine.

4 BY MS. SULLIVAN:

5 Q Was that case nolledd? Do you remember being in court  
6 the day of our signing of the papers where we went into  
7 criminal court downstairs and the case was nolledd? Does  
8 that ring a bell?

9 A I didn't go into criminal court.

10 Q Were you concerned that if --

11 THE COURT: So am I to understand that when you  
12 signed the divorce agreement, the criminal case was  
13 nolledd?

14 MS. SULLIVAN: Yeah. I was -- and this is --

15 THE COURT: It's a yes or no.

16 MS. SULLIVAN: All right. Yes.

17 THE COURT: All right. That's all I need to  
18 know.

19 MS. SULLIVAN: Okay. Well, the timing of  
20 this --

21 THE COURT: Move on.

22 MS. SULLIVAN: Can we look at the dates, Your  
23 Honor? January of 20 -- January of 2019, he's filing  
24 a restraining order. Didn't show up for the hearing.  
25 Then he puts up security cameras. I break one. I  
26 end up being arrested right before mediation. And  
27 the day -- I mean mediation was done. It was kind of

1           like I have to deal with a criminal case and a  
2           divorce and I'm out of the house. My kids lived in a  
3           hotel with me during visitation.

4           The case was nolle. The divorce settled. It's  
5           just -- the -- and nothing -- I broke a camera. He  
6           wasn't injured and -- I mean why it was nolle --

7           THE COURT: Ma'am.

8           MS. SULLIVAN: -- it's like -- I know I'm  
9           testifying. I'm so sorry.

10          THE COURT: It's the most -- it's the most  
11          common event in every courthouse that you settle a  
12          divorce action, if there's a criminal action pending,  
13          that tends to be withdrawn or nolle. I mean it's  
14          just a universal settlement.

15          MS. SULLIVAN: Okay. But now let's move to June  
16          of 2019.

17          BY MS. SULLIVAN:

18          Q     Did you then file a motion to reopen the case and  
19          seek sole custody three months --

20          ATTY. TUKEY: Your Honor --

21          Q     -- after the divorce?

22          THE COURT: Reopen which case?

23          MS. SULLIVAN: Our divorce. Like he wanted  
24          to -- we were divorced in March and June he's filing  
25          for sole custody.

26          ATTY. TUKEY: Your Honor, I'm going to object as  
27          to relevance.

1 THE COURT: It's not relevant.

2 MS. SULLIVAN: Okay. I'm just -- the pattern is  
3 that I'm messing with him.

4 BY MS. SULLIVAN:

5 Q One more thing. You claimed you were concerned about  
6 contact with Whelen Engineering and I'll get to that in one  
7 second. Have you ever called my superintendent?

8 ATTY. TUKEY: Objection. Relevance, Your Honor.

9 THE COURT: Sustained. Again, there's no  
10 application against him.

11 Q All right. Looking at your application for number  
12 five and I just want to refer to your testimony today. You  
13 said that -- let's see here. That you purchased a Corvette  
14 from Hale -- from Whelen Engineering; is that correct?

15 A Correct.

16 Q Okay. In your application under number five you  
17 indicate that -- twice in there that Whelen has pulled their  
18 funding for the vehicle effecting your business. So was  
19 Whelen Engineering funding you?

20 A No.

21 Q Okay. So that statement in your unsigned affidavit  
22 would be incorrect; does that sound right?

23 ATTY. TUKEY: Can he see the affidavit, Your  
24 Honor --

25 THE COURT: Sure.

26 ATTY. TUKEY: -- if we're referring to it? I  
27 have a copy.

1 BY MS. SULLIVAN:

2 Q Number five. If you could just read the whole  
3 paragraph, it'll be great.

4 ATTY. TUKEY: You could read it to yourself.

5 MS. SULLIVAN: Oh, I'm sorry. I apologize.

6 THE WITNESS: Okay.

7 ATTY. TUKEY: Are you ready?

8 THE WITNESS: Uh-huh.

9 ATTY. TUKEY: Okay. Just keep your voice up.

10 THE WITNESS: Yes.

11 Q Okay. For the record would you mind reading the  
12 first sentence of that paragraph?

13 A On Friday, April 22<sup>nd</sup>, 2022, I received a call from  
14 my race team manager stating that one of my sponsors  
15 informed -- informed him --

16 Q Can you read it exactly as it's written, please?

17 A Sponsors informed him they would no longer sponsor  
18 the team.

19 Q All right. Thank you. So -- but they weren't  
20 sponsoring you. You had purchased a vehicle from them?

21 A There was no money involved. No.

22 Q Okay. If you could read the last sentence of that  
23 paragraph just for the record?

24 A Whelen has pulled funding for the vehicle, severely  
25 effecting my business.

26 Q Okay. I know it's asked and answered, but they  
27 weren't funding you. You didn't lose any money?

1           ATTY. TUKEY: Asked and answered, Your Honor.

2           THE COURT: Sustained.

3 BY MS. SULLIVAN:

4           Q All right. I wanted to take a look at the -- I want  
5 to go back to the Facebook pages. So I think you answered  
6 this. I just --

7           MS. SULLIVAN: I'm sorry, Your Honor. I don't  
8 remember, so I apologize if it's been repeated.

9           Q You just presented -- and I think this is in your  
10 statement. Do you still the -- your affidavit? It's -- I  
11 think it says here -- number eight. You're, you know,  
12 making claims that you're an abuser and committed crimes,  
13 links to my business websites. You said that I'm accusing  
14 you of crimes.

15           Around, let's see here, I think it was just recently  
16 on March -- I'm sorry, April 25<sup>th</sup> you received private  
17 medical information per the most recent memorandum of  
18 decision from my medical provider which indicated --  
19 actually, do you remember the letter you received from my  
20 professional medical provider?

21           MS. SULLIVAN: I don't want to introduce -- I'm  
22 not introducing my state of mind or treatment. I'm  
23 just asking him if he received a document. He said  
24 I'm accusing him of crimes. I want to see if he  
25 understands what he did.

26           ATTY. TUKEY: Objection. Relevance, Your Honor.  
27 Foundation.

1 THE COURT: I'm not sure I understand what --

2 MS. SULLIVAN: In his -- he's saying that I've  
3 accused him committing crimes. Wouldn't it be  
4 appropriate for me to illustrate the crime I've  
5 accused him of? I'm going to get to like the nature  
6 of the crime I've accused him of.

7 THE COURT: So you're admitting you accused him  
8 of crimes?

9 MS. SULLIVAN: Yes.

10 THE COURT: Okay.

11 MS. SULLIVAN: I'm stipulating to that. So I'd  
12 like to kind of ask him about his knowledge of the  
13 crime he also committed.

14 THE COURT: I'll give you some time. I don't  
15 want to spend a lot -- I mean if you've already  
16 stipulated that that's true --

17 MS. SULLIVAN: Well, I --

18 THE COURT: -- it's not all that important  
19 why -- how he learned to know it.

20 MS. SULLIVAN: So yes, I can ask?

21 THE COURT: Yeah.

22 MS. SULLIVAN: Okay. I'll keep this really --  
23 it's kind of brief. I believe I have a letter here.  
24 Hang on. Yes. Okay. May I share a document with  
25 the defendant to look at?

26 (PAUSE)

27 MS. SULLIVAN: I really thank Your Honor for

1 your patience with me.

2 THE COURT: No problem. No problem.

3 (PAUSE)

4 MS. SULLIVAN: Yeah?

5 ATTY. TUKEY: I'm not going to -- no. I'm not  
6 going to agree to it.

7 MS. SULLIVAN: Oh, you're not going agree?

8 Well, can I show it to your --

9 ATTY. TUKEY: Yes.

10 THE COURT: Of course.

11 ATTY. TUKEY: Yes.

12 MS. SULLIVAN: Okay.

13 BY MS. SULLIVAN:

14 Q Mr. Hale, could you --

15 MS. SULLIVAN: Oh, does he have it?

16 THE COURT: Yes.

17 Q Okay. Mr. Hale, could you describe the document?

18 A It's an email between yourself, myself, and Vicky  
19 Lanier.

20 Q Okay. And was that one of the emails that I sent you  
21 that you were concerned about because I was threatening you  
22 with a crime?

23 ATTY. TUKEY: Objection. Relevance, Your Honor.

24 MS. SULLIVAN: He said I'm threatening him. I  
25 want to know if this document is -- he didn't submit  
26 many documents. So I'm asking him if he thinks  
27 that's one of the documents that he considers



1 threatening.

2 THE COURT: I'll allow it.

3 MS. SULLIVAN: Thank you, Your Honor.

4 THE WITNESS: It's part of the pattern of your  
5 behavior.

6 MS. SULLIVAN: Okay. Your Honor, I'd like to  
7 enter it into evidence as --

8 ATTY. TUKEY: May I look at it again, Your  
9 Honor?

10 THE COURT: Sure.

11 MS. SULLIVAN: Just for the record, the fact  
12 that Attorney Lanier's name is on there, that's not  
13 the issue of this document.

14 ATTY. TUKEY: I'm going to object, Your Honor.  
15 It's emails from Ms. Sullivan to Mr. Hale. It's not  
16 from Mr. Hale to Ms. Sullivan which would be the  
17 exception to the hearsay rule. This is a self-  
18 serving document from her to him with no response.

19 MS. SULLIVAN: But he just said that he did  
20 think that was one of the documents that was  
21 threatening. So I think he's acknowledged that this  
22 document --

23 THE COURT: I'll allow it based on that.

24 MS. SULLIVAN: Thank you, Your Honor.

25 THE COURT: It may be a full exhibit.

26 (PAUSE)

27 THE COURT: Okay. You may continue.

1 MS. SULLIVAN: Can we get -- does Mr. Hale have  
2 it?

3 BY MS. SULLIVAN:

4 Q Mr. Hale, at the beginning of the document -- in the  
5 first email, I think there's two in there, what -- what am I  
6 asking you to do?

7 ATTY. TUKEY: It speaks for itself, Your Honor.

8 THE COURT: It does. The Court read it.

9 Q Okay. So, Mr. Hale, let me ask you this. In that  
10 email can you point to the threatening language, like the  
11 language that you felt threatened by and share that with --

12 MS. SULLIVAN: I know you've read it, but if he  
13 could just share the language that he was threatened  
14 by?

15 A It's not so much any specific point. It's just that  
16 you -- your pattern of accusing of doing something criminal.

17 Q In the email though, as opposed to accusing you of  
18 doing something criminal, isn't it a request that you not do  
19 something criminal?

20 ATTY. TUKEY: It speaks for itself, Your Honor.

21 THE COURT: Yeah. I'll allow it. You can  
22 answer the question.

23 THE WITNESS: The title just says do not  
24 disclose.

25 Q Okay. And did I provide you -- I was asking you not  
26 to disclose and in the document do I give you a legal basis  
27 for why you can't disclose?

1 A You cite some legal language in here. Yes.

2 Q Okay. And is it possible that I was just trying to  
3 inform you and make a request that you not do something? I  
4 didn't accuse you of a crime; isn't that true?

5 A In this particular email.

6 Q Okay. Subsequent to that email did you, in fact, do  
7 what that email asked you not to?

8 A What were you not asking me to do?

9 Q You don't understand what I was asking you not --  
10 like what was I asking you not to -- the title is do not  
11 disclose. What was I asking you not to disclose?

12 A The test results from Steven Paymer.

13 Q Okay. Anything else?

14 A That's all I see so far.

15 Q Okay. Did you disclose those results from Steven  
16 Paymer after that email?

17 A The only result I get is a text message saying that  
18 you're not compliant.

19 Q Okay. But did you -- so that's -- would you agree  
20 that's information coming from Steve Paymer for the  
21 Soberlink testing, correct?

22 A Correct.

23 Q Okay. And after that -- just for clarification,  
24 what's the date of that email?

25 A February 9<sup>th</sup>, 2022.

26 Q Okay. And subsequent -- so after February 29<sup>th</sup> have  
27 you disclosed information you received from Steven Paymer?

1           ATTY. TUKEY:  Objection, Your Honor.  Relevance  
2           to this --

3           THE COURT:  Yeah.  I'm not sure where I see the  
4           relevance.  You claim that it's privileged  
5           information?

6           MS. SULLIVAN:  Well, I'm claiming -- all I'm  
7           saying is I gave him information -- like he said this  
8           email was threatening.

9           THE COURT:  Answer my question.

10          MS. SULLIVAN:  Oh, I'm sorry.  Could you repeat  
11          it?

12          THE COURT:  Do you think that the test results  
13          from the Soberlink contact is privileged information?

14          MS. SULLIVAN:  Yes.

15          THE COURT:  No.  It's not.

16          MS. SULLIVAN:  Under our agreement, it is  
17          because it's under substance abuse treatment.  It's  
18          not -- and also it's not court ordered, by the way.  
19          There's no -- he has been provided with information  
20          like do not disclose, the no redisclosure  
21          information.

22          THE COURT:  This wasn't court ordered?  This was  
23          done voluntarily?

24          MS. SULLIVAN:  He is -- he's forcing me to do it  
25          to see my kids.  That's another issue.  But he is --  
26          I mean I'm doing it because that's the only way I can  
27          see my son.  So I asked him not to -- so it's --

1 THE COURT: Let's move on.

2 MS. SULLIVAN: Okay.

3 BY MS. SULLIVAN:

4 Q Have you disclosed -- all right. So that's not  
5 threatening. Let's go on to the -- you said as far as  
6 taking -- on Facebook and Twitter, in the last let's just  
7 say two months how many times have I used your name in my  
8 posts?

9 A I'm not sure of the exact number.

10 Q Okay. Would it be fair to say that I typically refer  
11 to you as ex or dad?

12 A Most of the time. Yes.

13 Q Yeah. Have you ever seen me mention the kids' names  
14 aside from their nicknames in the last two months?

15 A I don't remember exactly in the last two months.

16 Q Okay. And again, you didn't bring any of that  
17 evidence in here for today?

18 A Is that a statement or a question?

19 Q Isn't it true that you did not bring any other social  
20 media posting -- I know it's asked and answered, but for  
21 clarification. If your --

22 ATTY. TUKEY: Your Honor --

23 Q -- name is out there, there's no evidence.

24 ATTY. TUKEY: -- we've been over this. He's  
25 testified that he brought certain things. He  
26 testified that he's seen other things. We've been  
27 over this ground.

1 MS. SULLIVAN: I'm sorry, Your Honor. I'm just  
2 trying to like -- coming in here, I mean I come in  
3 here with like mounds of evidence. You know what? I  
4 think I'm going to wrap this up because...

5 BY MS. SULLIVAN:

6 Q Just to clarify for custody, right now are you the  
7 one with the decision making power over visitation?

8 ATTY. TUKEY: Objection. Relevance, Your Honor.

9 THE COURT: Sustained.

10 Q Have -- do you think I'm a threat to the children?

11 A Yes.

12 Q Did you bring any evidence today to show that I'm a  
13 threat to the children?

14 A No.

15 ATTY. TUKEY: Your Honor, the evidence speaks  
16 for itself. I mean this is more argument than cross-  
17 examination.

18 THE COURT: I agree.

19 MS. SULLIVAN: Okay. I apologize.

20 Q Isn't it true -- I hate to ask this question, man.  
21 Isn't it true that you have beat Skylar with a hairbrush?

22 ATTY. TUKEY: Objection, Your Honor.

23 THE COURT: Sustained.

24 MS. SULLIVAN: Wait. He's saying that I'm a  
25 threat but his behavior matters. He said -- he said  
26 I'm claiming he's an abuser. So what are the nature  
27 of those accusations? How am I, you know -- I know

1           where you're -- I know. I know. I know. Because I  
2           can do this with my testimony, right?

3           THE COURT: You're going to have an opportunity  
4           to testify.

5           MS. SULLIVAN: What's that?

6           THE COURT: You have an opportunity to testify.

7           MS. SULLIVAN: Right. I'm doing -- Judge Albis  
8           told me that before, like not to testify before  
9           something. All right.

10       BY MS. SULLIVAN:

11       Q    So isn't it true -- you mentioned Sonny -- that you  
12       had spoken to Sonny Whelen. I think he's like the  
13       owner/president of Whelen Engineering. Isn't it true that I  
14       have been friends with him since the day -- I mean within  
15       the first year of our relationship? Isn't it true that I  
16       have a personal relationship with Sonny Whelen?

17           ATTY. TUKEY: Objection. Relevance, Your Honor.

18           THE COURT: I'll allow that.

19           THE WITNESS: He knows who you are. I wouldn't  
20       call you're -- he's your friend.

21       Q    So you wouldn't know if we have communications  
22       outside of your presence in the last three years?

23       A    I think he would have told me if he had had contact  
24       with you.

25       Q    Okay. Isn't it true that -- and this has to do with  
26       the claim about the funding. I'm laying a foundation here.  
27       Isn't it true that I used to work with you with Hale

1 Motorsports and know clients, friends, people? I mean we  
2 were doing this for twelve years.

3 A You were never a part of the race team.

4 Q I didn't do hospitality?

5 ATTY. TUKEY: Objection. Relevance.

6 MS. SULLIVAN: Well, he just said I'm not part  
7 of it.

8 THE COURT: I'll allow it. Yeah.

9 BY MS. SULLIVAN:

10 Q Isn't it true that I might have friendships with a  
11 lot of the people that we worked with for the twelve years  
12 during our marriage?

13 ATTY. TUKEY: What's the relevance, Your Honor?

14 MS. SULLIVAN: Well, he's asked me not to  
15 contact anybody and I have personal relationships  
16 with some of these people. That's why I'm opposed to  
17 the order.

18 THE COURT: Well, the order, if you read the  
19 order, the order does not prevent you from having  
20 contact. It's a temporary order.

21 MS. SULLIVAN: Oh, no. What I'm saying that's  
22 why I want this -- when we leave here today, I want  
23 no orders. I want this out.

24 THE COURT: Well, if an order's granted --

25 MS. SULLIVAN: I understand.

26 THE COURT: -- it will say you can have no  
27 contact with third parties if that contact is



1 stressful or objectionable to the -- to the  
2 applicant. So if you call --

3 MS. SULLIVAN: He gets stressed --

4 THE COURT: -- somebody up and say do you want  
5 to go out for lunch on Saturday --

6 MS. SULLIVAN: Right.

7 THE COURT: -- that's fine.

8 MS. SULLIVAN: But what's to prevent him from  
9 seeing me at lunch with that person and then coming  
10 in with this --

11 THE COURT: It's a fact --

12 MS. SULLIVAN: -- unfounded --

13 THE COURT: It's a factual matter.

14 MS. SULLIVAN: Okay. I'm just saying it's like  
15 we're talking about my constitutional rights here and  
16 I don't want things taken away from me because he --  
17 I mean my testimony, I'll save it.

18 BY MS. SULLIVAN:

19 Q All right. So you don't know if I have -- if I'm  
20 friends with people or not. Also for -- so in your claim  
21 here that someone called the team, is it -- we don't have  
22 that person here. So we don't really know what he heard or  
23 what was said to him.

24 So I want to take a look at this single Facebook  
25 because the other -- I just want to address the other  
26 things. So we talked about criminal behavior. Take actions  
27 against you. Ooh. My wife continues to email me,

1 threatening to take actions against me. What emails did you  
2 present here today to support that? That's item seven.

3 A I think we answered what we brought today.

4 Q All right. So there's -- so you really have no  
5 evidence for that. Okay.

6 ATTY. TUKEY: Objection.

7 Q Okay. You also mention in number eight that I'm  
8 including links to your business website as a part of her  
9 postings. These posts are ongoing. Isn't it true that the  
10 only time I linked to your business is in the document you  
11 presented today?

12 A That's not true.

13 Q But you didn't bring any others to show it? You also  
14 say that --

15 MS. SULLIVAN: Your Honor, I really hate to do  
16 this. But Your Honor --

17 BY MS. SULLIVAN:

18 Q Or you also state that I'm criticizing the Court,  
19 results of corruption in the judicial system. I think this  
20 is number four; is that correct?

21 A Yes.

22 Q Okay. Just looking for your knowledge. Are you  
23 aware of Jennifer's Law that was recently passed in  
24 Connecticut?

25 A Yes.

26 Q Okay. Are you aware that -- did you read the full  
27 post that you provided the Court?

1 MS. SULLIVAN: Your Honor, I'm referring to  
2 number 3, his number 3.

3 THE COURT: Uh-huh.

4 BY MS. SULLIVAN:

5 Q Did you read that full post?

6 A Yes.

7 Q Okay. Is it possible that your concern is that my  
8 appeal will be granted or that I will be granted a mistrial  
9 based on judicial error, improper procedure, or whatever?

10 A No. That's not a concern.

11 Q Okay. What -- did you have any problem with the  
12 email that I wrote?

13 THE COURT: You're talking about --

14 MS. SULLIVAN: Oh, I'm sorry.

15 Q All right. Aside from your name being at the end of  
16 this, did you have any other problem with the content?

17 A It's not true.

18 Q I'm sorry?

19 A It's not the truth. You're telling half the story.

20 Q Okay. But what is threatening about it? Is your  
21 name mentioned anywhere in here other than the end which  
22 just lists the parties, all of the parties to the matter?  
23 In my description, like in my content of what I wrote, am I  
24 attacking you? Am I threatening you?

25 A It goes to my reputation.

26 Q It goes to your -- but on here aren't I criticizing  
27 the courts? I'm not criticizing you. It's criticizing --

1 that's right. I asked you like point to the language in  
2 here that you find threatening or disturbing.

3 A Your pattern of behavior is what's --

4 Q Okay. But one posting doesn't illustrate a pattern.  
5 So what in here is -- where is the threat? I just want to  
6 know from your perspective, aside from me posting your name  
7 at the end, what in this document do you find threatening to  
8 your person and your personal safety and whatnot?

9 A I think I've answered this question several times  
10 now.

11 Q No. I'm asking you to read this -- where was the  
12 language in here? So are you saying there's nothing in here  
13 that you find threatening?

14 A That's not what I said.

15 Q Could you explain it? The question is where in this  
16 post, in the language in the post, where do you find  
17 threatening, excessive, what are you saying, escalating  
18 behavior?

19 ATTY. TUKEY: Do you have that in front of you?

20 THE WITNESS: No. Go ahead. I don't need it.

21 MS. SULLIVAN: Oh, my gosh. I'm so sorry.

22 Well, that would make a lot of sense.

23 ATTY. TUKEY: If I may, Your Honor?

24 THE COURT: Yes.

25 THE WITNESS: As I've already answered, it's the  
26 whole content and then you put my business and my  
27 name at the end of it like I'm associated with the

1           entire thing.

2 BY MS. SULLIVAN:

3           Q    Well, this is -- I'm quoting from transcripts in our  
4 case. So again, what -- not the whole thing, but what is it  
5 about this post that -- that's what I'm trying to ask you.  
6 Like where is the threat in here? What do you understand  
7 from what you read here, why is it threatening?

8           A    It's your obsessive behavior. That's what's  
9 threatening.

10           MS. SULLIVAN: Your Honor, could you ask him to  
11 answer the question?

12           THE COURT: I think he's doing the best he can.

13           Q    Okay. So one thing -- and there's nothing in here  
14 you can point. So then this document that you entered as  
15 Exhibit 3, there's nothing threatening in here?

16           ATTY. TUKEY: Objection, Your Honor.

17           MS. SULLIVAN: There's only one document he's  
18 presenting. So if he's saying that it's a  
19 combination, without a combination and if he can't  
20 see a threat here, how can this document be  
21 threatening?

22           ATTY. TUKEY: It's argument, Your Honor.

23           THE COURT: It's a full exhibit.

24           MS. SULLIVAN: Okay. I understand.

25           Q    So you're saying that the document itself isn't  
26 threatening? That's a good question. Is this document by  
27 itself threatening?

1 A Yes.

2 MS. SULLIVAN: Your Honor, I have to have him  
3 explain where is the language.

4 BY MS. SULLIVAN:

5 Q Just like I asked you in the previous document, read  
6 the first line. Where did you see the threat? In this  
7 document, in this language, where do you see the threat?

8 A The overall content with my name attached to the end  
9 is why --

10 Q Could you explain the content?

11 ATTY. TUKEY: Your Honor --

12 Q What is the overall --

13 ATTY. TUKEY: -- the document speaks for itself.

14 THE WITNESS: How long are we going to be here  
15 for?

16 THE COURT: Yeah.

17 ATTY. TUKEY: He's answered this --

18 MS. SULLIVAN: But I'm looking for his  
19 understanding of it. He's coming in here saying --

20 ATTY. TUKEY: He's answered.

21 Q So are you saying then that you don't really  
22 understand the contents?

23 A That's not what I said.

24 Q I'm just asking to know your state of mind here.  
25 Like what is it?

26 A It's your behavior.

27 Q You only gave us one document. So we got to stick

1 with that one. Where is the threatening language?

2 ATTY. TUKEY: Objection. Asked and answered,  
3 Your Honor. He's answered it a number of times.

4 THE COURT: Yeah. You need to move on. That's  
5 the best you're going to get.

6 MS. SULLIVAN: All right. Thank you, Your  
7 Honor. I think I'm just about done. Let's see.

8 BY MS. SULLIVAN:

9 Q Let me ask you this. In your filing for this ex  
10 parte order, is it possible that you are concerned -- I got  
11 to rephrase this.

12 MS. SULLIVAN: Sorry, Your Honor.

13 Q Isn't it true that your racing -- you purchased a  
14 Corvette to race. Isn't it true that on your financial  
15 affidavit you claimed you only made about \$65,000?

16 ATTY. TUKEY: Objection. Relevance.

17 THE COURT: Sustained.

18 Q So you purchased the Corvette. Is that Corvette --  
19 isn't your racing a personal hobby?

20 ATTY. TUKEY: Objection. Relevance.

21 THE COURT: Sustained.

22 MS. SULLIVAN: Well, he -- again he's making  
23 claims that he's worried about his funding with his  
24 business. But is it a business or is it a personal  
25 activity? He didn't lose the funding because there  
26 was none. I'm just trying to understand. I mean,  
27 Your Honor, I'll get to my testimony.

1 BY MS. SULLIVAN:

2 Q Just for foundation. Have you had me followed in the  
3 past month?

4 ATTY. TUKEY: Objection. Relevance, Your Honor.

5 THE COURT: Sustained.

6 MS. SULLIVAN: It has to do with finding out the  
7 address, how I got served.

8 ATTY. TUKEY: It's not relevant.

9 THE COURT: At this point that's not relevant.

10 MS. SULLIVAN: All right. Thank you, Your  
11 Honor.

12 Q Would you agree -- and this is a yes or no question.  
13 Would you agree that your unsigned documents describing your  
14 issues is actually a confession of your own behavior?

15 ATTY. TUKEY: Objection. Argument.

16 THE COURT: Sustained. It's argumentative.

17 Q Okay. You mentioned stalking and I know you  
18 mentioned previous -- in your previous testimony that my car  
19 was on the road. Oh, the cigarettes. That's what I wanted  
20 to get to. All right. Oh, wait. No. I went to that one.

21 You mentioned one date. I think it was April 23<sup>rd</sup>  
22 that you saw a vehicle that might have been mine. How many  
23 other times?

24 ATTY. TUKEY: How many other times what, Your  
25 Honor?

26 Q How many other times have you seen me on your  
27 driveway or have -- have I been spotted?



1 A That's the only one I knew about.

2 Q Mr. Hale, do you know what the definition of stalking  
3 is?

4 ATTY. TUKEY: Objection, Your Honor.

5 MS. SULLIVAN: He said I'm stalking him.

6 THE COURT: I'll allow it.

7 MS. SULLIVAN: He should know the vocabulary.

8 THE WITNESS: I'm not sure of the Webster  
9 Dictionary definition, but I have an idea what it is.

10 MS. SULLIVAN: Your Honor, could we get  
11 clarification? What is the legal definition of  
12 stalking?

13 ATTY. TUKEY: You just asked if he knows what --  
14 she just asked if he knows what the definition is and  
15 he answered.

16 THE COURT: Yeah.

17 BY MS. SULLIVAN:

18 Q I'm sorry. What was your answer?

19 A Yes.

20 Q Okay. What is the definition of stalking in your  
21 view?

22 A Following somebody, stalking them on -- following  
23 them electronically, physically.

24 Q And you said I did it once. Okay.

25 ATTY. TUKEY: Objection.

26 Q Is that correct? Did you just say you had one date?

27 A I said the one date that you were spotted on our

1 road.

2 Q Okay. And did -- I'm sorry. Just for clarification.  
3 Did you spot me?

4 A No.

5 Q Okay. And just for general information and, again, I  
6 don't want my rights taken away here. Is Plains Road a  
7 public road?

8 A Yes.

9 Q And isn't it a fact that your house is not visible  
10 from the road?

11 A Correct.

12 Q Okay. So -- and if you're on the road -- I just want  
13 to make sure from your perspective. If you are on Plains  
14 Road, on the road, can you see your house from it?

15 A If there's no leaves on the trees, yes. You can see  
16 it.

17 Q All right. But -- okay. Fine. But it's April. The  
18 leaves are there.

19 MS. SULLIVAN: I'm sorry. I have no objection.

20 Q So on this one date that I might have been spotted,  
21 no one saw me. Or you didn't see me; is that true?

22 A No. I did not see you.

23 Q Okay. And so why was that a threatening act, in your  
24 perspective, if it was true?

25 A I don't want you anywhere near the house or the kids  
26 physically.

27 Q Thank you for that. Wow. Okay. So really isn't

1 this -- I'm going to ask -- I have to ask you this at this  
2 point based on that last comment. You don't want me  
3 anywhere the kids and isn't it true that you have prevented  
4 me from seeing the kids physically since August 9<sup>th</sup> of 2020?  
5 Isn't that true? Physically.

6 A Our daughter does not want to see you.

7 Q That wasn't my question. Have you prevented physical  
8 visitation since January 9<sup>th</sup>, 2020 and that was the police  
9 incident? Have you let me see the kids physically?

10 A The way the ex parte reads, that I have that  
11 decision.

12 Q Yeah.

13 MS. SULLIVAN: Your Honor, just for the record.  
14 Kyle S. versus Jane something, the Supreme Court, it  
15 is well founded that judges cannot give visitation to  
16 third parties. That's the nature of my appeal,  
17 because he has had entire control. So he does have  
18 control. That's what's in the order.

19 BY MS. SULLIVAN:

20 Q And isn't it true that throughout the entire trial --  
21 so you had -- I just want to clarify where you see I'm  
22 threatening. You don't want me near the kids. August 9<sup>th</sup>,  
23 2020, you ended physical visitation. Our trial didn't start  
24 until the beginning of April; is that correct?

25 ATTY. TUKEY: Objection. Relevance, Your Honor.

26 THE COURT: Yeah. This isn't relevant to the  
27 restraining order.

1 MS. SULLIVAN: All right. I'm sorry.

2 BY MS. SULLIVAN:

3 Q And I haven't been near the kids. I'm at home. I'm  
4 afraid of --

5 ATTY. TUKEY: Objection, Your Honor.

6 MS. SULLIVAN: I know. I'm afraid of him. I'll  
7 deal with that downstairs later.

8 Q Okay. So basically -- so again, where is the threat?  
9 You haven't --

10 THE COURT: That's closing argument.

11 MS. SULLIVAN: Okay. Fine. I guess I'm done.

12 ATTY. TUKEY: Thank you.

13 RE-DIRECT EXAMINATION BY ATTY. TUKEY:

14 Q You were just asked if you -- no. You're not done  
15 yet.

16 A Okay. Sorry.

17 Q Sorry. I just want to clarify some things, okay?

18 A Okay.

19 Q You were just asked if you prevented Ms. Sullivan  
20 from seeing the kids. Okay? I'm focusing on that. Are you  
21 following all the court orders relative to the kids?

22 A Yes.

23 Q Okay. You were given custody of the kids?

24 A Yes.

25 Q And under the court orders there are certain things  
26 she has to do to be able to see the kids?

27 A Correct.

1 Q Okay. And you're following those orders?

2 A Yes.

3 Q All right. I want to -- I want to ask you about --  
4 did you present every piece of paper -- well, I'm going to  
5 strike that.

6 Did you present every social media post that you've  
7 seen with regard to her posting something negative to you?  
8 Did you present that to the Judge today?

9 A No.

10 Q Why not?

11 A I forwarded it all to my attorneys and --

12 Q Oh, I know. But did you -- did you present a  
13 representation of what she's doing?

14 A Yes.

15 Q Okay. Are there more?

16 A Yes.

17 Q Okay. In fact --

18 MS. SULLIVAN: I love this surprise. I gave --  
19 just for the record, I gave him all of my disclosure  
20 before we started, everything, and he didn't give me  
21 anything.

22 ATTY. TUKEY: And I gave her my exhibits too,  
23 Your Honor. This is based on her cross-examination.

24 MS. SULLIVAN: No, no. I understand. No. I  
25 understand why, but I gave you everything. Oh,  
26 absolutely. As long as we have all of them.

27

1 BY ATTY. TUKEY:

2 Q Let me ask you, sir. With regard to the testimony  
3 about that particular Exhibit 3, okay, where there was  
4 questions about is it threatening in and of itself, can you  
5 just crystalize for the Judge what the concern is with that  
6 type of information going out on her posts? What are you  
7 worried about?

8 A I mean it's --

9 Q And make sure you explain it because the Court has to  
10 understand what you're worried about.

11 A It goes against my reputation. It says that I've  
12 done something wrong. As a business owner, we're a customer  
13 based business. If any of my customers believe any of this  
14 and stop doing business with us, it affects my children. It  
15 affects everything.

16 Q Okay. And with regard to other things that are out  
17 there in the public, what is your concern? What's your  
18 concern about the civil suit that she filed against you?

19 A I mean it's basically the same type of thing. That  
20 she says that I've done things that I haven't done.

21 Q And is this a pattern of behavior with her?

22 A Yes.

23 Q All right. With regard to -- and I want to make sure  
24 because it got a little confusing with regard to Ms.  
25 Sullivan being outside your house. How many times have you  
26 found cigarettes or boxes or stubbed out cigarettes at your  
27 driveway?

1 A Several times.

2 Q Okay. And you have cameras on your property?

3 A The immediate property. Yes.

4 Q All right. Do the -- do the cameras show the end of  
5 your driveway?

6 A No.

7 Q Okay. So if someone's outside at the end of your  
8 driveway, the cameras wouldn't show it?

9 A Correct.

10 Q All right. And as far -- you were asked on cross,  
11 who saw Ms. Sullivan on the road --

12 A My mother.

13 Q -- on Plains Road?

14 A My mother.

15 Q Okay. And when was that?

16 A I think it was April 23<sup>rd</sup>.

17 Q Okay. The day after the incident with Whelen?

18 A Yes.

19 Q And your mother's here today to testify?

20 A Yes.

21 Q Okay. You were asked some questions about a court  
22 order that was attached to your -- do you have your  
23 application there?

24 A No. I don't.

25 ATTY. TUKEY: I thought I gave it to you to look  
26 at. It may have been given to the clerk. Your  
27 Honor, can I --

1 THE COURT: I don't think he has it.

2 ATTY. TUKEY: Oh, this one's my copy I think.

3 THE COURT: Oh, I have that.

4 ATTY. TUKEY: It was his application that I  
5 thought I gave him.

6 THE COURT: Well, I have that online.

7 ATTY. TUKEY: I thought I gave to him to look  
8 at. Okay. I got another copy here.

9 BY ATTY. TUKEY:

10 Q You referenced a court order of 1/14/19 which was  
11 before the final divorce and I'm going to show that to you.

12 MS. SULLIVAN: Objection, Your Honor, because  
13 you've already ruled that those orders before the  
14 divorce were -- he's referring to the previous  
15 protective order of 2019.

16 ATTY. TUKEY: Well, it's a court order, Your  
17 Honor, and I'm just --

18 MS. SULLIVAN: But Your Honor already said that  
19 it wasn't relevant.

20 THE COURT: Let him finish making his comments,  
21 please.

22 ATTY. TUKEY: Just an offer of proof. It goes  
23 to that the behavior has been -- even though that  
24 court order may have been merged into the final  
25 judgment, there was an order at one time because of  
26 his concerns and it was an order by Judge Diana. So  
27 we did have testimony about that.



1 THE COURT: Yeah. I'm aware of that order.

2 ATTY. TUKEY: Okay.

3 THE COURT: I've looked at it.

4 ATTY. TUKEY: Okay.

5 MS. SULLIVAN: But I'm also objecting to that  
6 order because there's another order right above it  
7 with the same order number where Your Honor -- or  
8 Honorable Diana denied it. Hang on. I don't know  
9 the numbers but if I can give it to you?

10 There's two orders with the same number and the  
11 first one says the motion was denied and this one  
12 says that it was granted. So it's kind of moot at  
13 this point because we're not -- the order's not  
14 included.

15 THE COURT: Yeah. It's being offered not for  
16 the effectiveness of the order but for the pattern of  
17 behavior.

18 MS. SULLIVAN: But if the order shouldn't -- we  
19 don't know which one -- the two documents, the two  
20 orders, both signed by Honorable Diana, both on the  
21 same date, one says denied and one gives this. One  
22 says no parties were present and there's no  
23 transcript of that proceeding because I looked when I  
24 was looking it up on my court thing and I saw the  
25 two.

26 There were only two attorneys present and the  
27 order was denied. Then it says the same date on

1           October 14<sup>th</sup> of 2019, it says all of a sudden parties  
2           are present. I was in school that day. No parties  
3           were there. It was a status conference with just our  
4           attorneys.

5           ATTY. TUKEY: Your Honor, there's an order in  
6           the file and I just want to ask my client about the  
7           order. That's all.

8           MS. SULLIVAN: But again, if there's another  
9           order with the same number that says denied --

10          THE COURT: I noted that.

11          MS. SULLIVAN: Okay. Thank you, Your Honor.

12          BY ATTY. TUKEY:

13          Q     Did you have concerns back in '19 that information  
14                could be given to business associates of yours that could  
15                harm you coming from her?

16          A     Yes.

17          Q     And you still have those concerns?

18          A     Yes.

19          Q     All right. Can you explain -- you were asked some  
20                questions about your relationship with Whelen Engineering in  
21                terms of the racing relationship. Explain -- explain that  
22                so the Court understands that.

23          A     Sonny Whelen and I have raced together in the same  
24                series since 2000, somewhere in there. He's raced on the  
25                same team as me for a couple of races. We've had a personal  
26                relationship. And the car that we purchased was one of  
27                their old cars that they used to race and campaign and we

1 were going to keep it the same way.

2 Q What do you mean keep it the same way?

3 A All the decaling said Whelen Engineering all over the  
4 car.

5 Q Okay. So it had Whelen Engineering on it?

6 A Yes.

7 Q So is that the relationship with that car?

8 A Yes.

9 Q All right. And you have a driver's suit with Whelen  
10 Engineering on it too?

11 A Correct.

12 Q And you've been told not to use that stuff anymore?

13 A Correct.

14 Q Okay. So as far as that relationship, are you  
15 concerned about Whelen -- whether they're sponsoring you  
16 actually or just to have their name on the car that you  
17 race, are you concerned that someone is talking to them  
18 negatively about you?

19 A Yes.

20 Q Okay. And I think during cross-examination there was  
21 some question about a -- you put cameras up on your  
22 property. Did Ms. Sullivan break one of those cameras?

23 A Yes.

24 MS. SULLIVAN: Objection. Already addressed or  
25 asked and answered or what.

26 THE COURT: It's re-direct. I'll allow it.

27 MS. SULLIVAN: Okay.

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(PAUSE)

BY ATTY. TUKEY:

Q Sir, do you recognize Plaintiff's 4 identification?  
It's my only copy, so I'm going to stand here with you.

A Okay. Yes.

Q Okay. And what is that?

A It's Ms. Sullivan's Twitter account.

Q All right. And does it reference your divorce case?

MS. SULLIVAN: Oh, I stipulate. You can -- we  
can just enter it. I'm good with it.

ATTY. TUKEY: Okay.

THE COURT: Okay.

MS. SULLIVAN: I'm sorry. Save some time.

THE COURT: It may be a full exhibit.

ATTY. TUKEY: I'm sorry, Your Honor. I have one  
copy of this.

THE COURT: Okay.

Q Let me just ask you. Is this another example of  
things that go out on her account that portray you in a  
negative light?

A Yes.

Q And portray what happened in court as a negative  
thing and that you somehow won when you shouldn't have won?

A Correct.

Q Or you did something wrong?

A Yes.

Q And that you are somehow part of some situation where

1 you're making the kids not see their mother?

2 A Yes.

3 Q Is that what you're concerned about?

4 A Yes.

5 Q And why would you be concerned about that vis-a-vis  
6 your business?

7 MS. SULLIVAN: Same objection, Your Honor,  
8 because as far as like the relation -- whether he's  
9 letting me see the kids, he's suggesting that maybe  
10 Mr. Hale is not, that's the nature of our contempt  
11 motion which was filed back in February which we're  
12 still waiting for Honorable Moukawsher to respond to.

13 THE COURT: Yeah. That's not an objection.

14 MS. SULLIVAN: Well, then I object to his  
15 characterization of who's letting the kids -- who has  
16 the power to see the kids. He is preventing from  
17 seeing the kids and that's the nature of the contempt  
18 motion, is that he hasn't followed the order. That's  
19 why I brought it up, Your Honor.

20 (PAUSE)

21 THE COURT: All right. You may continue.

22 ATTY. TUKEY: Thank you, Your Honor. I have no  
23 further questions, Your Honor.

24 MS. SULLIVAN: Re-direct, Your Honor, very  
25 briefly?

26 THE COURT: Sure. Re-cross.

27 MS. SULLIVAN: Okay. Thank you. Actually.

1           We'll start with -- actually, Your Honor, if you  
2           could hand the tweets back to your -- because I just  
3           want to ask him the same question.

4 RE-CROSS EXAMINATION BY MS. SULLIVAN:

5           Q     In that --

6                     THE COURT:   Before you start let me just point  
7           out that the court session ends in a little more than  
8           fifteen minutes.  If we're not finished, I'll have to  
9           continue the case to another day.

10                    MS. SULLIVAN:  I'll finish quick.

11                    THE COURT:  All right.

12                    ATTY. TUKEY:  Your Honor, I do have a witness  
13           here.  I have Peter Tiezzi from Whelen Engineering  
14           and I -- the idea was to try to -- I didn't want to  
15           take him out of order for many reasons, but I was  
16           going to try to get him done.

17                    THE COURT:  We'll see what we can do.

18                    ATTY. TUKEY:  Okay.

19                    THE COURT:  We'll do the best we can.

20                    ATTY. TUKEY:  Thank you, Your Honor.

21           Q     All right.  So just see here.  So you're not  
22           following the court orders.  That said, that was your  
23           testimony?  That you're -- that you said you were following  
24           the court orders.

25                    ATTY. TUKEY:  Objection as to form, Your Honor.

26                    I don't understand.

27                    THE COURT:  Yeah.  I'm not sure what you're

1 talking about.

2 BY MS. SULLIVAN:

3 Q All right. With regard --

4 MS. SULLIVAN: Well, I think the question was --  
5 you asked are you following the court orders and he  
6 said yes. It was kind of a general question.

7 Q Isn't it true -- as an illustration of you not  
8 following the court orders. When we first filed for the  
9 divorce, one of the standing orders is to complete a  
10 parenting course within sixty days. Did you do that?

11 ATTY. TUKEY: Objection. Relevance, Your Honor.

12 THE COURT: Sustained.

13 MS. SULLIVAN: But he said he --

14 THE COURT: Ma'am, sustained.

15 Q Okay. You said you're worried about your reputation.  
16 Looking --

17 MS. SULLIVAN: Your Honor, does he have the  
18 document, the tweet document?

19 THE COURT: He does.

20 Q Can you, please, tell me anywhere in that document,  
21 where is your name?

22 A In this document you just referred to me --

23 Q Yeah. In that document, the one that you have in  
24 your hand, where is your name?

25 A Didn't finish my sentence.

26 Q I'm sorry? Oh. I can't hear you. It's kind of like  
27 you need to talk a little louder because it's -- the wall is

1 between us.

2 A In this document you only refer to me as ex and it's  
3 mainly about Judge Albis.

4 Q Okay. How is that threatening your reputation? I'm  
5 talking about Judge Albis. How does that threaten your  
6 reputation?

7 A You also refer to me in these documents by using the  
8 word ex.

9 Q Okay. But in most of these tweets that you provided  
10 aren't I retweeting other things related to a global issue?

11 A I don't know if they're retweets. Most of these are  
12 what you wrote about Judge Albis --

13 Q Okay. Continue.

14 A -- and the outcome.

15 Q Give me an example of one.

16 MS. SULLIVAN: And, Your Honor, like that's part  
17 of my appeal. It's not -- I'm not -- it's -- never  
18 mind. I'm not saying he's a jerk or anything. It's  
19 just technical issues.

20 BY MS. SULLIVAN:

21 Q But go ahead.

22 ATTY. TUKEY: Your Honor, the document speaks --

23 THE COURT: It speaks for itself.

24 MS. SULLIVAN: Okay. It speaks for itself. All  
25 right.

26 Q So even though I referred to you as my ex, is it  
27 possible that I am involved based on my tweets with a group



1 of thousands of people about an issue that is -- has just  
2 come about as being really relevant?

3 ATTY. TUKEY: Objection. Speculation, Your  
4 Honor.

5 THE COURT: Sustained. The Court understands  
6 the exhibit.

7 BY MS. SULLIVAN:

8 Q Okay. You had -- do you understand what coercive  
9 control is, Mr. Hale?

10 ATTY. TUKEY: Objection, Your Honor.

11 MS. SULLIVAN: Well, he's previously said he  
12 knew about Jennifer's Law and Jennifer's Law includes  
13 coercive control.

14 ATTY. TUKEY: We're getting -- I'm just  
15 objecting to relevance. We're getting far a stream  
16 again.

17 THE COURT: Again, it's not your application for  
18 a restraining order.

19 MS. SULLIVAN: Got you.

20 Q You said -- okay. You brought up the cigarettes  
21 again. Is it possible, is it possible that there are  
22 teenagers are on the road who might have left them there?

23 A Anything's possible.

24 Q Thank you. You said you had a relationship with  
25 Whelen and he had -- you used his decals on your car. Do  
26 you recall a race that you were in in either October or  
27 November of last year and your car did not have Whelen on

1 the -- on it?

2 A Yes.

3 Q Okay. And that was the same Corvette that you  
4 purchased from Whelen?

5 A Correct.

6 Q Okay. What was the decal?

7 A It said I love Perry.

8 Q Okay. And who's Perry?

9 ATTY. TUKEY: Objection. Relevance, Your Honor.

10 MS. SULLIVAN: Oh, he just -- he just identified  
11 I heart Perry on his car. We were talking about  
12 Whelen as potentially being his --

13 THE COURT: I'll allow it. Go ahead.

14 MS. SULLIVAN: Thank you.

15 THE WITNESS: It's my ex-brother-in-law.

16 BY MS. SULLIVAN:

17 Q And isn't it true that you and Mr. Youngwall filed --  
18 and this has to do with his pattern of behavior. File  
19 similar restraining orders, ex parte orders at the same time  
20 with relatively the same language?

21 ATTY. TUKEY: Objection. Relevance, Your Honor.  
22 I mean we're getting -- we're getting way off if  
23 we're going to try to compare --

24 THE COURT: We're also talking about documents  
25 not in evidence.

26 ATTY. TUKEY: Yeah.

27 MS. SULLIVAN: Okay. Well, he just said he --

1           that he had I heart Perry.

2 BY MS. SULLIVAN:

3           Q    So Whelen wasn't your only sponsor; is that correct?

4                    ATTY. TUKEY:  Objection.  Relevance.

5                    THE COURT:  Sustained.

6           Q    Actually let me just clarify this.  Other than using  
7 the name, you purchased the car from Whelen.  So you really  
8 don't have a sponsorship or a fiduciary relationship with  
9 Whelen Engineering; is that correct?

10                   THE COURT:  You're not helping your case.

11                   MS. SULLIVAN:  Oh, I'm sorry.

12                   THE COURT:  You're just not.  The question is  
13 whether you called Whelen and made the report.

14                   MS. SULLIVAN:  Oh, sorry.

15                   THE COURT:  And the outcome of it -- if you did,  
16 then the outcome is very damaging.  If you didn't,  
17 then there's no case.  That's the only issue in front  
18 of me today.

19                   MS. SULLIVAN:  Okay.

20                   THE COURT:  So you will testify under oath  
21 whether you did it or not and that'll run the case.

22                   MS. SULLIVAN:  Okay.

23                   THE COURT:  Let's move on.

24           Q    All right.  How are you --

25                   MS. SULLIVAN:  You know what?  There's nothing  
26 in evidence.  So I'm good.

27                   ATTY. TUKEY:  I have no further --

1 MS. SULLIVAN: Thank you, Your Honor.

2 ATTY. TUKEY: -- questions, Your Honor.

3 THE COURT: You may step down.

4 (Whereupon, the witness was excused).

5 ATTY. TUKEY: Your Honor, may I call -- I hate  
6 to jump the gun. May I call Peter Tiezzi to the  
7 stand?

8 THE COURT: Yes.

9 MS. SULLIVAN: Objection, Your Honor. I wasn't  
10 given notice of the expert witness. I have no  
11 notice. So I have no way of doing any research to  
12 prepare any type of cross.

13 THE COURT: This is an expert witness?

14 ATTY. TUKEY: No. It's a fact witness.

15 MS. SULLIVAN: But I had -- I have no idea who  
16 this person is.

17 THE COURT: In a restraining order, the  
18 applicant hearing, there's really very little time.  
19 We don't follow the normal Chapter 13 disclosures.

20 MS. SULLIVAN: Well, just to say. I provided --

21 THE COURT: He's a fact witness. I'll allow it.

22 MS. SULLIVAN: Okay. But --

23 ATTY. TUKEY: Thank you, Your Honor.

24 MS. SULLIVAN: I claim it.  
25

1 P E T E R T I E Z Z I , I I I ,

2 Having been first duly sworn by the clerk, was examined and  
3 testified as follows:

4 THE CLERK: After you take a seat, please state  
5 your first and last name and business address for the  
6 record.

7 THE WITNESS: It's Peter Tiezzi, III. Business  
8 address is 51 Winthrop Road, Chester, Connecticut.

9 THE COURT: Can you spell Tiezzi for the record,  
10 please?

11 THE WITNESS: T-I-E-Z-Z-I.

12 THE COURT: Thank you. Whenever you're ready,  
13 counsel.

14 ATTY. TUKEY: Thank you, Your Honor.

15 DIRECT EXAMINATION BY ATTY. TUKEY:

16 Q How do you say your last name, sir, just so I get it  
17 right?

18 A Tiezzi.

19 Q Tiezzi. I got it.

20 A Yes.

21 MS. SULLIVAN: One more objection. These  
22 witnesses have been in here the whole time. I mean  
23 again, they should have been outside. I mean --

24 THE COURT: No motion to segregate witnesses.

25 MS. SULLIVAN: I'm sorry?

26 THE COURT: There was no motion to exclude the  
27 witnesses. That's only done if there's a motion to

1 do it, which I would always grant. But no motion was  
2 made.

3 MS. SULLIVAN: All right. I appreciate that,  
4 Your Honor. But again, I claim it. Some leniency on  
5 the pro se person, but I understand.

6 THE COURT: Go right ahead.

7 ATTY. TUKEY: Thank you, Your Honor.

8 BY ATTY. TUKEY:

9 Q Mr. Tiezzi -- thank you. Can you just tell me what  
10 you do for work?

11 A I'm general manager of Motorsports for Whelen.

12 Q Whelen Engineering?

13 A Yes.

14 Q Okay. So you deal with the race team?

15 A I deal with multiple sponsorships that Whelen has,  
16 whether it's sponsoring cars or different series.

17 Q Okay. So Whelen has their name on certain cars  
18 around the area?

19 A In certain divisions. Yes.

20 Q Okay. And that's for, one, a traveling billboard and  
21 sometimes for sponsorships too?

22 A Correct.

23 Q Okay. And you heard the testimony about Whelen being  
24 on Mr. Hale's race car?

25 A Yes.

26 Q Okay. And was that true up until about a couple of  
27 weeks ago, that the Whelen name was on his race car?

1 A I believe so. I mean I really haven't been involved  
2 with -- with the relationship Randy had with Sonny Whelen.

3 Q Okay. But there came a time when you --

4 MS. SULLIVAN: Objection. If he has no  
5 relationship, why is he testifying?

6 THE COURT: Well, we'll see. Overruled.

7 MS. SULLIVAN: Okay. Thank you. I claim it.

8 BY ATTY. TUKEY:

9 Q There came a time when you directed Mr. Hale to  
10 remove any type of Whelen name from his car; is that true?

11 A I did not tell him to remove it.

12 Q Okay. Did you send him a text message?

13 A I did.

14 Q Okay. I'm going to show you what's been marked as  
15 Plaintiff's Exhibit 1 and ask you if you recognize that.  
16 Okay?

17 A Yes.

18 Q All right. And what is it?

19 A It was a text message.

20 MS. SULLIVAN: I stipulate. Let's just move on.

21 THE COURT: It's already a full exhibit.

22 MS. SULLIVAN: Oh, it was a full exhibit? Oh.

23 THE WITNESS: It was Randy saying this is my  
24 cell number. He wanted me to get back to him and I  
25 said I would and -- you want me to read what's on it  
26 or --

27 Q What was the purpose for this?

1           A    The purpose of it was to give Randy the phone number  
2 from the person from the New York Times that had called me.

3           Q    Okay.  And did you do -- did you text him the phone  
4 number?

5           A    Yes.

6           Q    And that's represented here --

7           A    Yes.

8           Q    -- on the exhibit?

9           A    Yes.

10          Q    All right.  So someone named Samantha from the New  
11 York Times, you thought, called you, right?

12          A    The call was forwarded to me from sales.

13          Q    Okay.  But -- and they left their number and their  
14 name, right, this person?

15          A    I talked to the person.

16          Q    Okay.

17          A    The number -- the number was either on my digital  
18 readout on the computer or I had asked for the number.  I  
19 don't remember which one.

20          Q    Okay.  But you were given that number some way --

21          A    Yes.

22          Q    -- connected to that person who called herself  
23 Samantha?

24          A    Yes.

25          Q    Okay.  And it was a female?

26          A    Yes.

27          Q    All right.  And they told you they were doing a story



1 for the New York Times?

2 A They were doing a story on Randy Hale. Yes.

3 Q Okay. And what were they trying to find out from  
4 you?

5 A Wanted to know the relationship between Whelen and  
6 Randy.

7 Q Okay. And did they say anything about Randy?

8 A Not immediately.

9 Q Okay. But eventually?

10 A Yes.

11 Q Okay. What did they say?

12 A They just said toward the end of the conversation  
13 that they were writing a story about Randy Hale and four  
14 others, about domestic violence and referenced Jennifer's  
15 Law.

16 Q Okay. And you took that to be accurate, that it was  
17 somebody from the Times calling to get information about Mr.  
18 Hale?

19 A Yes.

20 Q All right. And he was concerned about that because  
21 he asked you to send whatever information you had, right?

22 A Yes. I mean it was kind of third party, but yes.

23 Q Yes. Okay. And he asked for her last name on that  
24 text?

25 A Which I didn't have.

26 Q You just had written down Samantha?

27 A Yup.

1 MS. SULLIVAN: Actually, Your Honor, hearsay.  
2 Samantha's not here.

3 THE COURT: Overruled.

4 MS. SULLIVAN: If Samantha exists. I mean we're  
5 talking -- he's talking about a phone call.

6 THE COURT: He's talking about his text. I'll  
7 allow it.

8 MS. SULLIVAN: Okay. But it's still hearsay  
9 from where the information came from. It's like  
10 three eggs --

11 THE COURT: Ma'am, I ruled.

12 MS. SULLIVAN: I got it.

13 THE COURT: It's really not appropriate --

14 MS. SULLIVAN: I apologize.

15 THE COURT: -- to continue the argument unless  
16 invited to do so.

17 MS. SULLIVAN: I'm really sorry.

18 BY MS. SULLIVAN:

19 Q So it's the position of Whelen Engineering that  
20 Whelen doesn't want to be associated with a name on Mr.  
21 Hale's car based on that call; is that true?

22 A I -- I can't answer that because I did not make that  
23 decision.

24 Q Okay. But --

25 MS. SULLIVAN: Objection. If he can't make the  
26 decision, why is he testifying?

27 THE COURT: You may continue. That's overruled.

1           ATTY. TUKEY: Thank you, Your Honor.

2           MS. SULLIVAN: Claim it.

3 BY ATTY. TUKEY:

4           Q    Do you have an understanding of whether that  
5 decision's been made?

6           A    I heard it was made. Yes.

7           MS. SULLIVAN: Objection. Hearsay.

8           THE COURT: Overruled.

9           MS. SULLIVAN: I claim it.

10          ATTY. TUKEY: Okay. I have no further  
11 questions, Your Honor.

12          THE COURT: Any cross?

13 CROSS-EXAMINATION BY MS. SULLIVAN:

14          Q    You mentioned -- just one question. You said that --  
15 what was the relationship -- you know, you just talked --  
16 actually, you know what? That's hearsay.

17          MS. SULLIVAN: No questions.

18          THE COURT: Thank you. You may step down.

19          ATTY. TUKEY: Thank you, Your Honor.

20          THE COURT: We appreciate your time.

21                (Whereupon, the witness was excused).

22          THE COURT: Any other witnesses?

23          ATTY. TUKEY: I do have other witnesses, Your  
24 Honor. I think we're right at the break. I do have  
25 a short witness. I could put Mr. Hale's mother on  
26 very quickly.

27          THE COURT: Okay.

1           ATTY. TUKEY: I would call Elizabeth Hale to the  
2 stand, Your Honor.

3           THE COURT: Ms. Hale?

4           MS. SULLIVAN: Actually, Your Honor, I do object  
5 to the witness. Mom? Personal? Of course she's  
6 going to protect her son.

7           THE COURT: Ma'am, that's part of argument.  
8

1                   E L I Z A B E T H   H A L E,

2   Having been first duly sworn by the clerk, was examined and  
3   testified as follows:

4                   THE CLERK:   After you take a seat, please state  
5                   your first and last name, spell your last name, and  
6                   your address for the record.

7                   THE WITNESS:   My name is Elizabeth Hale.   I live  
8                   at --

9                   MS. SULLIVAN:   I can't hear you.

10                  THE WITNESS:   -- 380 Plains Road.

11                  THE COURT:   Can you keep your voice up a little  
12                  bit?

13                  ATTY. TUKEY:   Keep your voice -- it's hard.  
14                  That microphone doesn't amplify.   It just records.  
15                  Okay?

16                  THE WITNESS:   Okay.

17                  ATTY. TUKEY:   And H-A-L-E, Hale?

18                  THE WITNESS:   Correct.

19   DIRECT EXAMINATION BY ATTY. TUKEY:

20                  Q   Okay.   Ma'am, you're Randal's mom?

21                  A   Correct.

22                  Q   Okay.   And where do you live in relation to Randal?

23                  A   I live next door.

24                  Q   Okay.   And that's off of Plains Road?

25                  A   Correct.

26                  Q   And did there come a time when you saw Mrs. Sullivan,  
27                  Margaret Sullivan, outside of the driveway of Mr. Hale's

1 house?

2 A Actually the last time I saw her I was going out to  
3 the grocery store, went down the road, in a very short --  
4 couple houses down she was -- it's a very tiny road.

5 Q Yup.

6 A And she was pulled over to the side and I --  
7 surprised to see her and --

8 Q And was that on 4/23 of this year, on April 23<sup>rd</sup>?

9 A Yes.

10 Q Okay. And so where were you going?

11 A I was going to the grocery store.

12 Q Okay. So when you drove out of the driveway, the  
13 common driveway between yours and Randy's house --

14 A No. It's --

15 Q Is it a common driveway?

16 A No. It's going in the opposite direction. So his  
17 house was on the left. I was going to the right.

18 Q Okay. And when you went to the grocery store, did  
19 you pass Ms. Sullivan --

20 A Yes.

21 Q -- in her vehicle? And what was she doing?

22 A Just working at her phone, had her head down.

23 Q Okay. And what vehicle was she in?

24 A An SUV, a black SUV.

25 Q Okay. And after you passed her, did you see her  
26 again?

27 A I went down to the grocery store. I was there about

1 forty five minutes maybe. On the way back, she was parked  
2 in a different spot, also pulled over and doing, you know,  
3 just watching, looking down at her phone.

4 Q Okay. So on the same road, she was in a different  
5 spot?

6 A Yes.

7 Q All right. Was she further down the road?

8 A Yes. The second time, she was.

9 Q She was further down which way?

10 A Going -- going down towards 154 which would be to my  
11 right.

12 Q Okay. So let's just use -- when you came out of the  
13 driveway, you took a right?

14 A Correct.

15 Q So -- and what side of the road was Ms. --

16 A On the opposite side.

17 Q -- Sullivan's car on?

18 A On the opposite side.

19 Q That was on the left side of the road?

20 A Correct.

21 Q Okay. And then you passed her and which way was her  
22 car facing when you passed?

23 A It was facing towards Randy's house.

24 Q Okay. And which way in relation to you?

25 A In the opposite direction. I was going down and she  
26 was coming -- parked going up towards his driveway.

27 Q Okay. So your nose was facing her nose?

1 A Yes.

2 Q And that would mean if her -- if that's the case,  
3 then your driver's side was --

4 A On her driver's side.

5 Q On her driver's side. Okay. And then when you came  
6 back, where was the car? Was it further down the road in  
7 the direction she was pointed or further down the road  
8 behind the direction she was facing?

9 A Behind.

10 Q Okay. And how would she have to do that? Would she  
11 just back her car up?

12 A She'd have to turn around.

13 Q Why?

14 A Because -- well, you have to go up the road and turn  
15 around to get in the opposite -- to go in the opposite  
16 direction.

17 Q Okay. So you said about forty five minutes from the  
18 first time to the second time that you saw her?

19 A Yeah. Approximately.

20 Q Okay. Have you ever seen Ms. Hale outside of the  
21 house in the last year or so?

22 A Could be. I mean I have seen her on the road before.

23 Q Okay. And after she moved out of the house?

24 A Correct.

25 Q Okay. How -- what were you doing when you saw her  
26 there?

27 A I was driving. I usually go to the right to go down



1 to 154 to go on the main road.

2 Q Okay. And have you seen her? Has she been in her  
3 car?

4 A Yes.

5 Q Parked?

6 A Not before, no. I haven't seen her parked before.  
7 Just driving up the road.

8 Q Okay. You've seen her driving. Have you seen her  
9 driving when walking your dog?

10 A Yeah.

11 Q Okay. So more than one time you've seen her outside  
12 of Mr. Hale's house?

13 A Yes.

14 Q Okay. And that's within the last year or so?

15 A Approximately. Yeah.

16 ATTY. TUKEY: I have no further questions, Your  
17 Honor.

18 THE COURT: I just have one clarification. So  
19 when you saw her the second time when you were coming  
20 back from the grocery store, were you again facing  
21 each other?

22 THE WITNESS: Yes.

23 THE COURT: Okay.

24 THE WITNESS: No, no, no. I was -- I was coming  
25 up the road and she was pointing in the same  
26 direction.

27 THE COURT: Okay. Thank you. Any cross?

1 MS. SULLIVAN: I'll make it short.

2 CROSS-EXAMINATION BY MS. SULLIVAN:

3 Q Betsy, it's really great to see you. I haven't seen  
4 you in three years. So -- oh, I don't want to do this.

5 Betsy, how old are you?

6 A Seventy nine.

7 Q Okay. After the divorce, wasn't there a period of  
8 time where --

9 A I can't hear you. I'm sorry.

10 Q I'm sorry. After the divorce, wasn't there a period  
11 of time where transitions for visitation took place at the  
12 bottom of your driveway?

13 A Say that again?

14 Q Didn't -- like when the kids were trading off and I  
15 was getting the kids from Randy or I was bringing them back  
16 to Randy -- right after the divorce, remember we did have  
17 custody, shared custody? Didn't we use the bottom of your  
18 driveway on -- on a regular basis because Mr. Hale didn't  
19 want me at his house?

20 A It could have been. Yeah.

21 Q Okay. Well, could have been. Is it possible that  
22 you saw me driving during that time? I haven't been in  
23 Haddam --

24 A No.

25 Q I have not been in Haddam for two years.

26 A No.

27 Q Okay. You realize this is on the transcript. The

1 kids are going to see all of this.

2 ATTY. TUKEY: Objection, Your Honor.

3 THE COURT: Only if -- only if someone tells  
4 them how to do it.

5 MS. SULLIVAN: Again, that's the basis of what  
6 Mr. Hale doesn't like.

7 ATTY. TUKEY: Objection, Your Honor.

8 THE COURT: Sustained.

9 MS. SULLIVAN: Okay. Fine.

10 BY MS. SULLIVAN:

11 Q Betsy --

12 MS. SULLIVAN: And this just goes to the  
13 credibility of the witness, Your Honor.

14 Q Was there ever a time when Mr. Kay called you and me  
15 and Randy into the office -- or into the school because  
16 Randy told the principal you threatened to hit him with a  
17 spoon?

18 ATTY. TUKEY: Objection --

19 A That was a joke.

20 ATTY. TUKEY: -- as to relevance, as to form.

21 THE COURT: Excuse me.

22 Q But did --

23 THE COURT: Excuse me. An objection has been  
24 filed. What's the objection?

25 ATTY. TUKEY: It's as to form, not specific in  
26 time and date, and --

27 THE COURT: I'll sustain the objection.

1           ATTY. TUKEY:  -- and relevance as well.

2           THE COURT:  Ma'am, when there's an objection,  
3           please stop talking.

4  BY MS. SULLIVAN:

5           Q    Betsy, I wasn't on the road.  This hurts me because  
6  I've never said anything bad about you.  If that's --

7           ATTY. TUKEY:  Objection, Your Honor.

8           MS. SULLIVAN:  I'm done.

9           ATTY. TUKEY:  Your Honor, she's intimidating  
10          this witness.

11          MS. SULLIVAN:  I'm done with the witness.  I am  
12          done with the witness.

13          THE COURT:  Thank you.  You may be excused,  
14          ma'am.  We appreciate your time.

15          MS. SULLIVAN:  It's just hurtful.

16          (Whereupon, the witness was excused).

17          THE COURT:  We're well past the luncheon hour.

18          ATTY. TUKEY:  And I appreciate that, Your Honor.  
19          I'm sorry.

20          THE COURT:  The case --

21          MS. SULLIVAN:  I'm sorry.  My closing argument's  
22          like one sentence.

23          THE COURT:  Are you -- are all parties available  
24          tomorrow?

25          MS. SULLIVAN:  Oh, no.  I can't come back.  I  
26          can't.  Can we end this?  I have two sentences to  
27          close.

1           ATTY. TUKEY: I can be here in the morning, Your  
2 Honor.

3           MS. SULLIVAN: I can't.

4           THE COURT: Well, ma'am -- put her under oath.  
5 Stand up. Put her under oath.

6           MS. SULLIVAN: I'm sorry?

7           THE COURT: She's going to administer the oath.

8           MS. SULLIVAN: Oh, I'm not testifying. I'm  
9 done.

10          THE COURT: You're not testifying?

11          MS. SULLIVAN: Not at all.

12          THE COURT: The restraining order is granted.

13          MS. SULLIVAN: Oh, wait. Closing arguments.

14          ATTY. TUKEY: Thank you, Your Honor.

15          THE COURT: I don't need a closing argument.

16          MS. SULLIVAN: Your Honor --

17          THE MARSHAL: Stop, stop, stop.

18          MS. SULLIVAN: There's no -- fine. There's no  
19 preponderance of evidence.

20          THE MARSHAL: Stop talking. Stop, stop, stop.

21          THE COURT: The --

22          MS. SULLIVAN: There's no preponderance of the  
23 evidence.

24          THE COURT: The -- if you don't want to testify,  
25 then --

26          MS. SULLIVAN: But he hasn't proven his case.

27          THE COURT: I differ with you.

1 MS. SULLIVAN: Okay. Fine.

2 THE COURT: Do you want to testify?

3 MS. SULLIVAN: No.

4 THE COURT: Okay.

5 MS. SULLIVAN: No. I mean this isn't true.

6 THE COURT: Ma'am, you have the opportunity and  
7 the right to testify and call witnesses.

8 MS. SULLIVAN: But this --

9 THE COURT: Do you wish to do that?

10 MS. SULLIVAN: No, because -- I can give a  
11 reason.

12 THE COURT: I don't need a reason. Just yes or  
13 no.

14 MS. SULLIVAN: My reason is that the standard,  
15 the legal standard is preponderance of evidence and  
16 he hasn't proven it. Even with his own testimony,  
17 he's not afraid of me.

18 THE COURT: I'm not concerned about his fear.  
19 I'm concerned about his economic fear and without  
20 your testimony, I have to find that it was you that  
21 called --

22 MS. SULLIVAN: But he said --

23 THE COURT: Ma'am, I am speaking. Please do not  
24 interrupt me. I've given you every opportunity.  
25 I've asked you if you wanted to testify and you said  
26 no. So now I am ruling.

27 MS. SULLIVAN: I'm not allowed to make a closing

1 argument?

2 THE COURT: I don't need a closing argument.

3 MS. SULLIVAN: You said you were going to give  
4 us time for one.

5 THE COURT: I don't need a closing argument.

6 MS. SULLIVAN: But that's not --

7 THE COURT: If you don't want to testify -- I  
8 understand your argument, that he's not met the  
9 statutory requirements of a restraining order.

10 MS. SULLIVAN: But it's not even economic  
11 funding, even though they testified.

12 THE COURT: It doesn't --

13 MS. SULLIVAN: It's a hobby of his.

14 THE COURT: That doesn't matter, ma'am.

15 MS. SULLIVAN: It's a hobby. There was no  
16 economics.

17 THE COURT: Ma'am --

18 MS. SULLIVAN: There's no economics.

19 THE COURT: Ma'am, when a disgruntled  
20 litigant --

21 MS. SULLIVAN: I know.

22 THE COURT: When a disgruntled litigant goes to  
23 third parties to spread stories about their former  
24 spouse, that is a horrendous act.

25 MS. SULLIVAN: I'm not. He didn't -- he didn't  
26 show anything. Your Honor, he didn't show anything  
27 about me --

1 THE COURT: Please be quiet.

2 MS. SULLIVAN: -- spreading stories.

3 THE COURT: Please be quiet.

4 MS. SULLIVAN: You're not -- objection, Your  
5 Honor.

6 THE COURT: Please be quiet. I'll ask you  
7 again. Do you wish to testify? I have no evidence  
8 to counter his allegations in the testimony that I've  
9 heard.

10 MS. SULLIVAN: Not even with my cross-  
11 examination of him and how he --

12 THE COURT: Oh, I understand. I think you're  
13 right. He's probably not physically afraid of you.

14 MS. SULLIVAN: But I haven't done anything.

15 THE COURT: I don't think he's physically afraid  
16 of you.

17 MS. SULLIVAN: But no one -- no one said I made  
18 a call.

19 THE COURT: Do you want to testify?

20 MS. SULLIVAN: But he didn't even say I made a  
21 call.

22 THE COURT: Ma'am.

23 MS. SULLIVAN: Fine. I will. But wait. Does  
24 that mean more time?

25 THE COURT: It means we can -- yeah. We'll have  
26 to continue it. It's already ten minutes after. The  
27 marshals don't get -- you know, I can take my lunch



1 hour and start ten minutes late. The marshal can't  
2 and the clerk can't.

3 MS. SULLIVAN: I'm sorry.

4 THE COURT: And the reporter can't. This  
5 matter's continued to tomorrow at 2:00.

6 MS. SULLIVAN: I'm sorry?

7 ATTY. TUKEY: 2:00?

8 THE COURT: Continued to tomorrow at 2:00.

9 ATTY. TUKEY: Thank you, Your Honor.

10 THE COURT: Thank you. If you have witnesses,  
11 bring your witnesses.

12 ATTY. TUKEY: Thank you, Your Honor.

13 (Whereupon, the proceedings were concluded).  
14

DOCKET NO. MMX-FA22-5014792s : SUPERIOR COURT  
RANDAL HALE, III : JUDICIAL DISTRICT  
OF MIDDLESEX  
v. : AT MIDDLETOWN, CONNECTICUT  
MARGARET SULLIVAN : MAY 12, 2022

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Middlesex, Middletown, Connecticut, before the Honorable Gerard A. Adelman, Judge, on the 12<sup>th</sup> day of August, 2021.

Dated this 6th day of June, 2022 in  
Middletown, Connecticut.

---

Pamela Gendreau  
Court Recording Monitor

DOCKET NO. MMX-FA22-5014792s : SUPERIOR COURT  
RANDAL HALE, III : JUDICIAL DISTRICT  
OF MIDDLESEX  
v. : AT MIDDLETOWN, CONNECTICUT  
MARGARET SULLIVAN : MAY 12, 2022

C E R T I F I C A T I O N

I, Pamela Gendreau, hereby certify the enclosed disk is a true and accurate electronic version of the transcript of the above referenced case, held in Superior Court, Judicial District of Middlesex, Middletown, Connecticut, before the Honorable Gerard A. Adelman, Judge, held on the above date.

Pamela Gendreau  
Court Recording Monitor

MMX-FA22-5014792-S : SUPERIOR COURT  
RANDAL HALE III : JUDICIAL DISTRICT  
 : OF MIDDLESEX  
V. : AT MIDDLETOWN,  
 : CONNECTICUT  
MARGARET SULLIVAN : MAY 13, 2022

BEFORE THE HONORABLE GERARD I. ADELMAN, JUDGE

A P P E A R A N C E S :

Representing the Petitioner:

ATTORNEY ROBERT G. TUKEY  
Gould, Larson, Bennet, McDonnell, Quilliam, & Tukey  
30 Plains Road  
Essex, Connecticut 06426

Representing the Respondent: \*Ordering Party\*

MARGARET SULLIVAN, Self-Represented

Recorded By:  
Jason Bogdan

Transcribed By:  
Jason Bogdan  
Court Recording Monitor  
One Court Street  
Middletown, CT 06457

1 (Proceedings started at 2:23 p.m.)

2 THE COURT: All right. Hale v. Sullivan.

3 ATTY. TUKEY: Ready, Your Honor.

4 THE RESPONDENT: Ready, Your Honor.

5 ATTY. TUKEY: Afternoon, Your Honor.

6 THE COURT: Good afternoon.

7 THE RESPONDENT: Good afternoon, Your Honor.

8 THE COURT: Can we just put the parties under  
9 oath for today?

10 THE CLERK: Both parties please stand and raise  
11 their right hand.

12 (Whereupon, the petitioner and the respondent  
13 were sworn in.)

14 THE PETITIONER: I do.

15 THE RESPONDENT: No, Your Honor, because I do  
16 not plan to testify.

17 THE COURT: The hearing is cancelled --

18 ATTY. TUKEY: Thank you, Your Honor.

19 THE COURT: -- the TRO may be granted. The  
20 count -- the count -- the grounds for the tri -- the  
21 TRO are that the Court finds that the respondent has  
22 stalked the applicant within the definition at -- in  
23 46b-16a. Stalking means two or more of the willful  
24 acts performed in a threatening, predatory, or  
25 disturbing manner harassing, following, lying in  
26 wait, surveilling, monitoring, or sending unwanted  
27 gifts or messages to another person directly,

1 indirectly, or through a third person by any method,  
2 device, or other means that causes such person to  
3 reasonably fear for his or her physical safety.

4 The Court finds that the undisputed evidence is  
5 that the respondent has surveilled the -- the  
6 applicant by -- on more than one occasion parking her  
7 car outside the area of his home and that she has  
8 made unwanted messages to a third person, namely,  
9 she -- she has contacted a -- a business relationship  
10 of the plaintiff pretending to be a -- a reporter and  
11 indicating that a story was being written about the  
12 applicant for sexual abuse or --

13 THE RESPONDENT: Objection.

14 THE COURT: -- other negative issues. This  
15 falls under the definition of stalking which is one  
16 of the definitions under 46b-15.

17 So, Ma'am, I am issuing a restraining order.  
18 You have to surrender any firearms and ammunition you  
19 might have. You are not to threaten, abuse, attack,  
20 follow, stalk, or interfere with the protected  
21 person. You are not to go to the protected person's  
22 home or any residence in which he is living.

23 This is a no contact order. You may not contact  
24 him by any means, directly, telephonically, written,  
25 computer, nor may you contact any third parties if  
26 that contact has the impact of creating harassment or  
27 disturbing to the applicant.

1           This order does not -- does not extend to the  
2 children, the minor children, and I will enter it for  
3 the statutory period of one year. That order may be  
4 extended upon proper motion made prior to the  
5 termination of the order.

6           Do you have any questions about the order, Ms.  
7 Sullivan?

8           THE RESPONDENT: I don't have questions on the  
9 order, but I would object that Your Honor didn't  
10 hear -- didn't even read the motion or address that.  
11 And I asked if -- I said if I misspoke and said on  
12 papers me -- they're -- everything is in the record  
13 and basically what I provided there is the appeal  
14 that I'm going to filing tomorrow.

15          THE COURT: Okay, that --

16          THE RESPONDENT: Okay, I'm just trying -- I'm  
17 trying to be fair, Your Honor. If you --

18          THE COURT: That's fine, Ma'am. There's --

19          THE RESPONDENT: -- and you -- actual -- and  
20 actually, you said in court yesterday that you did  
21 not find my actions threatening, you were only  
22 worrying about the economic laws to which my motion  
23 here clearly demonstrates that Mr. Hale, not only did  
24 he not fi -- sign an appropriately executed  
25 affidavit, as required by statute and the form, but  
26 you took that affidavit and he lied. He said he  
27 received funding in the affidavit which is the basis

1 of your decision to offer that temporary restraining  
2 order.

3 You do have judicial power, but if defendants  
4 (sic) lie under oath, how can we trust the system  
5 and -- listen, he lied and that's evidenced -- he  
6 signed the oath which you accepted as an affidavit  
7 yesterday. And then, on the stand he clearly said he  
8 was making purchases and he was not being funded.

9 All the other elements -- you said you didn't  
10 think I was stalking him. You said in court  
11 yesterday you didn't think I was a personal threat.  
12 You wanted an answer to the question in paragraph  
13 five, but if that question is based on a false  
14 statement that the defendan -- or I'm sorry, the  
15 plaintiff made -- you know what I'm talking about --  
16 how can that possibly stand?

17 Our laws say clearly. And I think I cite -- and  
18 I'll cite it in here. Any person -- hang on, I have  
19 my legal standards. CGS 46 -- first of all, CGS 46b-  
20 15(b) which is the basis of the restraining order,  
21 the applicant shall -- shall be -- or the application  
22 shall be accompanied by an affidavit made under oath  
23 which includes a brief statement of -- of conditions.

24 §53a-156, Perjury: Class D felony. A person is  
25 guilty of perjury if, in any official proceeding,  
26 such person intentionally, under oath or in an  
27 unsworn declaration -- so, that kind of makes up for



1           what we dealt with.

2           Under sections 1-65a to 165h (sic), if you make  
3           a false statement, swears, affirms, or testifies  
4           falsely as to a material statement that the person --  
5           such person does not believe to be true, in any  
6           prosecution for an offense under this section, it  
7           shall -- it'll be an affirmative de -- defense if he  
8           was coerced, but that wasn't the case here. Section  
9           C of the same -- above, perjury is a Class D felony.

10           1-65bb(6), a sworn declaration means a  
11           declaration in a signed record given under oath.  
12           Sworn declaration includes a sworn statement,  
13           verification, certificate, or affidavit. (7),  
14           unsworn declaration means a declaration in a signed  
15           record that is not given under oath but is given  
16           under the penalty of perjury.

17           He lied. There was no economic hardship. And  
18           Your Honor, I don't want -- and I know you might  
19           have -- and part of my statement in here. I -- one  
20           of the exhibits that the defendant (sic) gave you was  
21           my Facebook post which was really a transcript about  
22           Honorable Albis. And I know family court has been  
23           coming under attack and I would encourage you to go  
24           review my -- what I'm posting. I am tempered when  
25           they make the accusations -- and I've seen them about  
26           you. I immediately respond, Let's get off the  
27           bullshit. Let's look at -- I'm sorry. Let's look at

1 the law.

2 I don't believe our system is corrupt, but I  
3 believe that errors are made. And I think I showed  
4 you three yesterday. I -- an unsworn affidavit that  
5 doesn't meet the standard, blank pages that have  
6 nothing but typed words on them that don't clearly  
7 link them to the case it was filed. I did ask why  
8 you extended the order to the children, but you  
9 don't -- I do -- I get it; you have judicial ex --  
10 you know, authority.

11 And I think and -- and you relied on a statement  
12 when you looked -- when you made the ex parte order,  
13 the clerk sent it up to you. And I'm not criticizing  
14 the clerks, but if you're kind of relying on they  
15 checked it, it was signed, then you read it, and  
16 you're making the order, I get it, but that's where  
17 the problems in our family court lie.

18 It's not that the lawyers are corrupt, it's not  
19 that the judges are corrupt, not the GALs are  
20 corrupt; they've forgotten the law. I actually went  
21 to a family bar meeting and what's the big joke?  
22 There is no law in family law.

23 Most cases are agreed to back there and they  
24 come to you and everyone's in agreement and it goes  
25 on. It's only in cases like ours where there's high  
26 conflict, but the law has to matter. Probate court  
27 was designated under like the guise of a little bit

1 more freedom, so let the parties talk because of the  
2 delicate and sensitive natures of those issues and  
3 the emotions. But in family court, the -- there's  
4 no -- I -- again, I understand you have broad  
5 judicial discretion, but one of your first priorities  
6 is to follow the law.

7 And Your Honor, I mean, what's really -- you  
8 know, I mean, if you've looked at my brief, I mean, I  
9 have been in this for six months just to get my kids  
10 back. And what was posted in there on that e -- on  
11 that piece that was introduced into evidence was a --  
12 a violation -- I mean, it truly was a violation of  
13 federal law. The GAL said, Well, I'm not sure what's  
14 in her medical records, so I'd like to subpoena the  
15 last three so I can find out if there's anything  
16 relevant.

17 THE COURT: Ma'am, this part is not relevant to  
18 this --

19 THE RESPONDENT: Okay, I'm so -- I --

20 THE COURT: -- to this case.

21 THE RESPONDENT: -- I just want you to know that  
22 I appreciate -- I'm not attacking anyone, but the  
23 law's gotta matter at some point and he lied. And it  
24 was proven yesterday based on his affidavit which  
25 contri -- I know contributed to your granting of that  
26 motion.

27 Yes, if you -- if he's saying I'm messing with

1 his business and he's losing money, damn straight you  
2 should order that. I understand why you ordered it.  
3 But then when he comes in and said, No, I wasn't  
4 being funded; I was actually paying them. All he  
5 lost was a sticker on his car.

6 A sticker and that's -- that -- if this is -- I  
7 mean, that's what's going to fracture our judicial  
8 system, he said he lost a sticker. He only presented  
9 three documents and he couldn't even tell you in  
10 there what was threatening. And you said that in  
11 court yesterday. It's got to stop with him.

12 I'm -- I spent all morning working on my  
13 restraining order. All that stuff you wouldn't let  
14 me in, he has been stalking me by his attorneys.

15 He -- I would ask you, you know I wasn't served.  
16 The only reason I was in court yesterday is because I  
17 got two pages of a document which I outline in here.  
18 Did another marshal -- was another marshal sent out?  
19 If you don't still have service, that means -- and  
20 I'm here. How does he know where I live? My family  
21 wasn't -- I haven't even told my family.

22 I told them I'm waiting until we get through  
23 this restraining order because, truly, I was feeling  
24 safe for the first time. He's had me followed by  
25 private investigators. I put privacy film on my  
26 window. So, Your Honor, I'm working on a restraining  
27 order and you want to give a no contact order because

1 he lost a sticker?

2 ATTY. TUKEY: Your Honor, at this point, I'm  
3 going to object to what we're doing here. It's  
4 outside --

5 THE RESPONDENT: I'm done.

6 ATTY. TUKEY: -- the procedure. That -- there  
7 is no motion pending before this Court to be heard  
8 right now. And if she's --

9 THE RESPONDENT: That's fine, but you didn't  
10 hear my motion.

11 ATTY. TUKEY: -- just going to --

12 THE RESPONDENT: That's fine, I'm done.

13 ATTY. TUKEY: -- just start putting things on  
14 the record maligning my client, I have to object and  
15 I have to put an end to this.

16 THE COURT: Your objection is noted.

17 I will -- I will respond out of a -- out of  
18 courtesy to --

19 THE RESPONDENT: I'm --

20 THE COURT: -- the self-represented party.

21 Self-represented parties must follow the rules, but  
22 the appellate and supreme court has directed us to be  
23 flexible in that.

24 So, let me -- let me begin. The temporary  
25 restraining order was granted and based on the  
26 affidavit. I ruled yesterday that the fact that the  
27 add -- addendum page was not signed and notarized was

1 form over substance and -- and that I -- it didn't  
2 mean anything to me.

3 The fact about the service, I gave you every  
4 opportunity to object and to being here that you  
5 weren't served, and you insisted you wanted to get it  
6 over with. You wanted to deal with it.

7 His testimony is undisputed because, despite the  
8 fact that I have yesterday gave you three or four  
9 opportunities to testify, you didn't want to. Then  
10 you said you would, so I continued to today to allow  
11 you to testify, and now you're telling me you don't  
12 want to testify.

13 The fact --

14 THE RESPONDENT: I shouldn't --

15 THE COURT: I listened to you, please listen to  
16 me. The fact that the affidavit was incorrect when  
17 he said he was getting funded, he corrected that  
18 under the -- on the stand under oath. That -- that's  
19 not -- that's not perjury.

20 The -- and the fact that he wasn't getting money  
21 from Whelen Engineering is really besides the point.  
22 His undisputed testimony was that he had a long,  
23 personal relationship with the owner of that company,  
24 that having the stickers on the car was of some  
25 import to him, and that because some undisclosed  
26 person called pretending to be a New York Times  
27 reporter doing a story on the sexual improprieties of

1 the -- of Mr. Hale, Whelen Engineering decided  
2 they -- they couldn't risk having anything to do with  
3 him. I find that extremely offensive.

4 And I see that, you know, you talk about family  
5 court being attacked. One of the attacks is that the  
6 party who is unhappy with the judge's ruling has gone  
7 beyond the court and gone into the public to  
8 besmirch, slander the -- the opposing party, making  
9 it difficult if not impossible for some of these  
10 people to maintain a job or find a job.

11 We have a system. If you're unhappy with --  
12 with the outcome with -- of Judge Albis' order or  
13 this order, you take an appeal. You have every right  
14 to do that and -- and the -- the -- the Court expects  
15 that to happen. That's the proper way to do it.

16 I find that the actions that I think have been  
17 proven are sufficient to give Mr. Hale the protection  
18 of a restraining order. I want you to note as well  
19 that the violation of a restraining order is a  
20 possible D felony which is punishable by up to five  
21 years in prison and/or \$5,000 in fines. And  
22 restraining orders are enforceable in all fifty  
23 states and all territories and possessions of the  
24 United States of America.

25 THE RESPONDENT: Can I ask one question?

26 THE COURT: Yes --

27 THE RESPONDENT: To clar -- does clar -- do I

1 know what --

2 THE COURT: -- absolutely.

3 THE RESPONDENT: -- I'm being -- okay. So Mr.  
4 Hale's -- despite what you said, would it be  
5 acceptable -- because I know you saw my -- some of my  
6 social media posts. As long as Mr. Hale's name is  
7 not mentioned or even that I referred to dad or ex,  
8 may I still continue my advocacy for judges and  
9 courts becoming more aware of coercive control?

10 THE COURT: Yeah, if he's not mentioned or -- or  
11 implied.

12 THE RESPONDENT: If I just --

13 THE COURT: It become -- a violation of a  
14 restraining order becomes a factual dispute --

15 THE RESPONDENT: No, I understand. Well -- and  
16 I just want to say, and may I talk about my children  
17 online not in reference to him? Can I just talk  
18 about my children?

19 THE COURT: That may lead to the --

20 THE RESPONDENT: I'm sorry?

21 THE COURT: That may lead to the guardian of the  
22 children trying for a restraining order for the  
23 children depending on what's said.

24 THE RESPONDENT: Well, I'm not saying anything  
25 bad about my -- okay, fair enough. Am I allowed to  
26 talk to express my, let's just say, surprise,  
27 frustration, and awe at what happened here today? Am



1 I still allowed to participate in the public  
2 conversation about proceedings and how they go on?

3 THE COURT: Of course.

4 THE RESPONDENT: Okay, I just want to make sure  
5 that --

6 THE COURT: You -- you can't -- you simply  
7 can't -- you can't slander --

8 THE RESPONDENT: Yeah.

9 THE COURT: -- your former husband and you can't  
10 contact third parties if that contact is designed to  
11 harass the applicant.

12 THE RESPONDENT: And --

13 THE COURT: And that becomes a factual dispute  
14 if it happens.

15 THE RESPONDENT: Okay, I understand. The last  
16 thing I would just like to point out is, you did not  
17 hear the motion that I -- you didn't rule on this  
18 motion, so I've been --

19 THE COURT: I ruled on it yesterday.

20 THE RESPONDENT: No, my motion for perjury. The  
21 one I filed that's on the record right now. I  
22 filed --

23 THE COURT: Perjury is a -- is a criminal act.  
24 The Court doesn't rule on motions for perjury.

25 THE RESPONDENT: Well, I was trying to --

26 THE COURT: Ma'am, if you think your hu --

27 THE RESPONDENT: Okay, then I'll take this

1 downstairs.

2 THE COURT: -- if you think he's committed  
3 perjury, you should consult the State's Attorney.

4 THE RESPONDENT: I will do that right now. I  
5 understand and --

6 THE COURT: Family court --

7 THE RESPONDENT: -- now, let me ask you this:  
8 If, for some reason, the State's Attorney finds that  
9 this is a relevant claim, how does that affect this  
10 order?

11 ATTY. TUKEY: Your Honor, at this point -- I  
12 mean, I --

13 THE RESPONDENT: I'm asking -- understanding --

14 ATTY. TUKEY: -- I understand the Court can't  
15 give legal advice, I understand the Court's being --

16 THE RESPONDENT: I concede.

17 ATTY. TUKEY: -- sensitive to the fact that  
18 she's not represented, but we've been called back  
19 here today to finish a restraining order hearing that  
20 we were told, due to Ms. Sullivan's request, we were  
21 going to finish. Now, we've come here and we're  
22 sitting here, and he's paying his attorney to do  
23 that.

24 And I understand that, you know, the orders need  
25 to be explained, but she's asking questions that --

26 THE RESPONDENT: But --

27 ATTY. TUKEY: -- I can't give her legal advice,

1           you can't give her legal advice. And at this point,  
2           I think it's an abuse of process. She's filed a ten-  
3           page motion at 1:45 today -- or 12:45 today that I  
4           was just reading out in the hall on my phone, and  
5           apparently she's going to file another re -- a  
6           restraining order against him.

7           So, we're going to be back here. At some point,  
8           the process gets abused and that's what's happening  
9           here. I want to put that on the record for notice  
10          purposes for Ms. Sullivan. Thank you.

11          THE COURT: Thank you.

12          THE RESPONDENT: Thank you, Your Honor. I'm  
13          good.

14          THE COURT: You're finished.

15          THE RESPONDENT: Thank you, Your Honor.

16          ATTY. TUKEY: Thank you, Your Honor.

17          THE RESPONDENT: Have a great day.

18          (Proceedings ended at 2:41 p.m.)

19  
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MMX-FA22-5014792-S : SUPERIOR COURT  
RANDAL HALE III : JUDICIAL DISTRICT  
OF MIDDLESEX  
V. : AT MIDDLETOWN,  
CONNECTICUT  
MARGARET SULLIVAN : MAY 13, 2021

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Middlesex, Middletown, Connecticut, before the Honorable Gerard I. Adelman, on the 13<sup>th</sup> day of May 2022.

Dated this 24<sup>th</sup> day of May 2022 in Middletown, Connecticut.

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Jason Bogdan  
Court Recording Monitor

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E L E C T R O N I C  
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