

At a term of the Family Court of the State of New York, held in and for the County of Erie, at 1 Niagara Plaza, Buffalo, New York 14202 on July _____, 2023.

PRESENT: Hon. Thomas M. DiMillo, A.J.F.C.
Judge Presiding

STATE OF NEW YORK FAMILY COURT
ERIE COUNTY

MATTHEW COULOUTE, JR.,

- against -

LAUREN HAIDON,

Petitioner,

Respondent.

ORDER TO SHOW CAUSE

File No.: 204566

Docket No.: V-13065-17/23E

V-13065-17/23F

Upon the Petitions filed by the Petitioner-Father, Matthew Couloute, Jr., on or about July 14, 2023, and upon the annexed Affirmation of Kelly L. Ball, Esq., attorney for the child, Sophia Couloute, born 1/31/2012, and the exhibits attached hereto, and upon due deliberation; it is

ORDERED, that the parties show cause before this Court at Erie County Family Court, One Niagara Plaza, Part 2, 7th Floor, Buffalo, New York 14202, on the _____ day of July 2023, why an Order should not be made and entered granting the following relief:

- a. Restraining and prohibiting both parties from any type of duplication and/or dissemination of any Court documents served and/or filed with Erie County Family Court to any third party during the pendency of this case;
- b. Restraining and prohibiting both parties from discussing the pending proceedings with any third party, including the child, other than his or her attorney of record in these proceedings during the pendency of this case;

- c. Directing the Respondent-Mother to submit to a full and complete mental health evaluation to include psychological testing to be completed by an evaluator chosen by the Court at the sole cost of the Respondent-Mother; and
- d. such other and further relief as to this Court may seem just and proper; and it is further

ORDERED, that pending the return date of this Order to Show Cause, both parties are hereby restrained and prohibited from duplicating and/or disseminating any Court documents served and/or filed with Erie County Family Court to any third party and further restrained and prohibited from discussing the pending proceedings with any third party, including the child, other than his or her attorney of record in these proceedings; and it is further

ORDERED, that service of this Order to Show Cause with attached Affirmation and Exhibits upon Rupp Pfalzgraf LLC, Anthony Rupp, Esq., of counsel, and Matthew Couloute, *pro se*, by _____, on or before July _____, 2023, shall be deemed good and sufficient service; and it is further

ORDERED, that all responding papers, if any, shall be served upon the attorney for the child and opposing counsel not less than _____ days prior to the return date herein.

DATED:

Hon. Thomas M. DiMillo, A.J.F.C.

Check applicable box:

- ☐ Order mailed on [specify date(s) and to whom mailed]: _____
- ☐ Order received in court on [specify date(s) and to whom given]: _____

STATE OF NEW YORK FAMILY COURT
ERIE COUNTY

MATTHEW COULOUTE, JR.,

Petitioner,

- against -

LAUREN HAIDON,

Respondent.

AFFIRMATION

File No.: 204566

Docket No.: V-13065-17/23E

V-13065-17/23F

Kelly L. Ball, Esq., an attorney duly licensed to practice law in the State of New York, hereby affirms under penalty of perjury the following:

1. I am the attorney who has been appointed to represent the child, Sophia Couloute, age 11, in the above-referenced matter.
2. I previously represented this child in various matters between the parties and brought by the Department of Social Service dating back to 2017. As such, I am fully familiar with the facts and circumstances surrounding the instant application.
3. I make this Affirmation based upon my review of pleadings and other documentation, communications with counsel and Mr. Couloute, and other investigation.
4. This Affirmation is submitted in support of the annexed Order to Show Cause seeking the following relief:
 - a. an immediate restraining order against both parties to continue through the pendency of this case, restraining and prohibiting either party from any type of duplication and/or dissemination any Court documents served and/or filed with Erie County Family Court to any third party;

- b. an immediate restraining order against both parties to continue through the pendency of this case, restraining and prohibiting both parties from discussing the pending proceedings with any third party, including the child, other than his or her attorney of record in these proceedings;
- c. an order directing the Respondent-Mother to submit to a full and complete mental health evaluation to include psychological testing to be completed by an evaluator chosen by the Court at the sole cost of the Respondent-Mother; and
- d. such other and further relief as to this Court may seem just and proper.

5. There are currently three (3) petitions pending before this Court. The Respondent-Mother filed a Family Offense Petition, under Docket Number: O-08099-23, on or about July 13, 2023. The Petitioner-Father filed a Modification Petition, under Docket Number: V-13065-17/23E, and an Enforcement Petition, under Docket Number: V-13065-17/23F, on or about July 14, 2023.

6. On July 11, 2023, the Petitioner-Father emailed the undersigned and Marco Cercone, Esq., an attorney at Rupp Pfalzgraf LLC, and the lead attorney for the Respondent-Mother in the last litigation between the parties. This email had an attachment consisting of sixteen (16) pages including the following documents:

- a. An Order to Show Cause with Affidavit in Support sworn to on July 11, 2023;
- b. An Affidavit – UCCJEA sworn to on July 11, 2023;
- c. A Petition for Enforcement sworn to on July 11, 2023;

- d. A Petition for Modification sworn to on July 11, 2023;
- e. And an Order – Electronic Testimony Application.

A copy of the email and the attachment is attached hereto and made part hereof as Exhibit A.

7. Upon information and belief, on July 13, 2023, the Respondent-Mother appeared *ex parte* before the Hon. Kelly Brinkworth, J.F.C., in connection with the Family Offense Petition and was granted a Temporary Order of Protection. A copy of same is attached hereto and made part hereof as Exhibit B.

8. Upon information and belief, the Respondent-Mother was provided with a copy of the Temporary Order of Protection while at the Courthouse together with a Notice to Appear addressed to her. Pursuant to the Temporary Order of Protection, the Petitioner-Father was not in Court on July 13, 2023, and service was to be completed by law enforcement.

9. I have confirmed with the Chief Clerk's Office that the Temporary Order of Protection was faxed to the Erie County Sheriff's Office and as of this date there has been no indication that same was served. I was advised that no copy of the Temporary Order of Protection was sent electronically to the Petitioner-Father.

10. A Court appearance was held in this matter on July 17, 2023, and at that time, I had only reviewed the filed documents provided to me by the Court through the ENotify system which included the Orders of Appointment, Petitions, Orders to Show Cause, Affidavits of Service and Temporary Order of Protection.

11. I had not reviewed the documents attached to the Petitioner-Father's email dated July 11, 2023, as I had not yet been appointed to represent the child when I received it. Further, I typically don't review pleadings prior to filing as many times they are modified before filing or

not filed at all.

12. As the Petitioner-Father did not appear on July 17, 2023, the next morning, on July 18, 2023, I emailed him a copy of the Temporary Order of Protection. A copy of the email is attached hereto and made part hereof as Exhibit C.

13. The Petitioner-Father emailed me back and advised that there was an online post relating to this case on the website thefamilycourtcircus.com/2023/07/14/couloute-restrained and the link to same was included in the email.

14. The article includes a photo of the Petitioner-Father as well as racist and other derogatory remarks regarding the Petitioner-Father. It further includes one link to the Temporary Order of Protection and the Respondent-Mother's Court notice which, upon information and belief, was given to the Respondent-Mother on July 13, 2023, and another link to all of the documents attached to the Petitioner-Father's email on July 11, 2023. A hard copy of the post with the linked documents is attached hereto and made part hereof as Exhibit D.

15. Upon reviewing this material, I forwarded the link to Anthony Rupp, Esq., attorney for the Respondent-Mother.

16. Mr. Rupp promptly communicated with me after speaking with his client and made assurances that his client was not responsible for providing these documents.

17. Despite the assertions of counsel for the Respondent-Mother, upon information and belief, the Respondent-Mother either provided these documents directly to thefamilycourtcircus.com or provided them to another person who then forwarded them.

18. The basis for my assertion in this regard are as follows:

a. The attachment to the Petitioner-Father's July 11, 2023, email to Mr.

Cercone and me is identical to linked “papers” referred to in the article. The Petitioner-Father hand wrote in old docket numbers from the last case (V-13065-17/21 C and V-13065-17/21B). Once filed with Family Court, those docket numbers were edited to the current docket numbers (V-13065-13/23E and V-13065-13/23F) before being entered into the system. The leaked document has the old docket numbers. Further, both the email from the Petitioner-Father and the article link to the document are one (1) sixteen (16) page document with all documents in the exact same Order. It is submitted that the Court enters each filed document separately. Only someone who had access to that email could have disseminated.

- b. As of the date of the publication, July 14, 2023, as between the two parties, only the Respondent-Mother had a copy of the Temporary Order of Protection and the Court notice addressed only to her dated July 13, 2023, which were linked as one document in the publication.

19. This Court should be aware that there is a long history with thefamilycourtcircus.com posting inflammatory and false information relative to the cases involving these parties, my client, the Court, and the attorneys. I previously had to seek a Court Order restraining the parties from providing third parties with any information.

20. The release of and publication of personal information regarding my client is disgraceful and harmful to my client. It is completely astonishing to me that any parent would support, supply or encourage same, especially, in a case where this has been a problem in the past.


21. It is respectfully requested that both parties be immediately and for the pendency

of this matter restrained and prohibited from any type of duplication and/or dissemination of any Court documents served and/or filed with Erie County Family Court to any third party and that they be immediately and for the pendency of this matter restrained from discussing these proceedings with any third party, including the child, other than his or her attorney of record in these proceedings.

22. It is further respectfully submitted that the Respondent-Mother be required to submit to a full and complete psychological evaluation including psychological testing with an evaluator chosen by the Court at the sole cost of the Respondent-Mother.

WHEREFORE, it is respectfully requested that the Order to Show Cause be granted in its entirety together with such other and further relief as to this Court may seem just, equitable and proper.

Dated: 7/19/23



Kelly L. Ball, Esq., Attorney for Child

EXHIBIT A

Petition

1 message

Matthew Couloute <mattcouloute@gmail.com>

Tue, Jul 11, 2023 at 4:53 PM

To: Marco Cercone <cercone@ruppbaase.com>, Kelly Ball <kballlaw@gmail.com>

Once again, please find attached. The Affidavit of Service is with the hard copies to be sent out tomorrow.

Thanks.

Matthew Couloute

--

Matthew Couloute Jr. Esq.

Matthew@Base-Unlimited.com

<https://base-unlimited.com/>

<https://www.instagram.com/matthewcouloute/>

O: 844.244.1940

C: 860.810.9138

**Couloute v. Haidon 2023.pdf**

956K

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

In the Matter of a Proceeding under
Article of the Family Court Act

Matthew Coulares Jr
Petitioner

against

LAUREN HAIDEN
Respondent

File: *204566*
Docket No. *V. 13065-17/21C*
V. 13065-17/21B

ORDER TO SHOW CAUSE

Upon the petition of *Matthew Coulares Jr* verified the *11th* day of
July, ~~2023~~ annexed hereto, it is

1 Niagara St. Buffalo **ORDERED** that *Respondent, Lauren Haiden* show cause before this Court at
New York, on the _____ day of _____, at *9 AM* o'clock in the _____ morning
afternoon of that day, or as soon thereafter as the parties can be heard, why an order should not be
made as follows: *Granting Father Primary Physical Custody and*
Immediately giving the Father Access to the Child in Oregon
and why such other and further relief should not be granted as the Court may determine, and it is further

ORDERED that [delete if inapplicable]:

[Required if Court makes a temporary order of custody or visitation; check applicable box(es)]:

And the Court having searched the statewide registry of orders of protection, the sex
offender registry and the Family Court's warrant and child protective records, and having notified the
attorneys for the parties and for the child [check if applicable]: and the following self-represented party
or parties [specify]: _____ of the results of these searches;

And the Court having considered and relied upon the following results of these searches in
making this decision [specify; if no results found, so indicate]: _____

And the Court, having dispensed with the search of the statewide registry of orders of
protection, the sex offender registry and the Family Court's warrant and child protective records because
these databases had been reviewed within the past 90 days;

AND IT IS FURTHER ORDERED that service by
of this order together with the papers upon which it is granted upon _____
day of _____, be deemed sufficient service.

of a copy
on or before the

Dated: _____

ENTER

Family Court Judge

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

IN THE MATTER OF Custody/Visitation Proceeding

File #: 204566

Docket #: V.-13065 –
17/21C; V.-13065
17/21B

MATTHEW COULOUTE,

Petitioner,

-against-

LAUREN HAIDON

Respondent

**AFFIDAVIT IN SUPPORT
OF ORDER TO SHOW
CAUSE**

Matthew Couloute Jr. Esq. an attorney duly licensed to practice law in the State of Connecticut and New York affirms under the penalty of perjury:

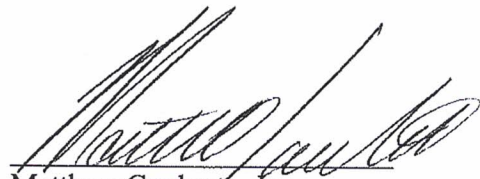
1. On or about June 18, 2018 Honorable Judge Lovallo entered a Custody and Visitation Order under docket number V-13065 – 17/17A.
2. Pursuant to the Order, Mother was to be the primary custodial parent and father would have access to the child in the State of Georgia on rotating holidays, rotating spring and winter breaks and every summer from the 3 weeks from the date Sophia's school year ended until one week prior to the beginning of the school year.
3. The Lovallo Order was subsequently modified by Honorable Thomas M. DiMillo on or about July 25, 2022. Judge DiMillo's Order, to be read in conjunction with Judge Lovallo's previous Order modified, modified the summer visitation allowing the Petitioner access in Georgia for three (3) consecutive weeks in the summer to commence upon the parents agreement between June 23rd and June 30th. Followed by a second, two (2) consecutive week access period again in the state of Georgia determined by the parents to begin between August 7th through the 14th.
4. Petitioner Father attempted to set a date for Sophia to travel during the correct period, June 23rd through June 30th. The Respondent requested that the travel period be pushed back and start July 10th or 11th to allow Sophia the ability to participate in her school carnival that ended July 9th. As a result and relying upon the Respondents representations that Sophia would be sent to Georgia on July 11th, the Father purchased an airline ticket to depart for Georgia on said date with a return to Erie County on July 31st, 2023.
5. In speaking with Sophia the day before here trip, Sophia had not yet packed and attempted to avoid the conversation of travel. Further, leading up to the travel day,

Sophia nor the respondent would discuss activities for the summer or plan for anything related to her stay in Georgia.

6. Additionally, when explaining to Sophia that her mother, father, judge, Kelly Ball, and her mother's attorney all agreed on how the summer would work, the Respondent interjected to state that she (the respondent) was forced into the agreement by the parties and never agreed to send Sophia. All in front of Sophia.
7. On the day of travel, Petitioner was just reaching the airport to get through security for Sophia's arrival at 2pm when I received an email stating that she would not be coming because "she was sick all night ... and threw up on the way to the airport. And, that if I wanted to see her that I would have to come to Buffalo for visitation.
8. Mother, now permanently disabled, is unable to adequately care for the emotional needs of the child. Since the Order was in place, the Sophia's emotion wellbeing has deteriorated the point that she cannot sleep without medication, currently must take additional medication for anxiety and further is unable to able to participate in school on a consistent basis to the extent that but for the pandemic and home schooling, Sophia was on track to be considered a truant pursuant to New York Statues.
9. And yet still, while Sophia has been in treatment for her anxiety, her mother continues to perpetrate the myth to the child that she was sexually assaulted and that if she returns the fathers care she will once again be sexually abused.
10. At this time, it is clear that the mother's mental health issues have become the child's mental health issues and Sophia is unable to differentiate the two.
11. As of this date, July 11th, 2023 I have been told once again that I would not be able to see Sophia unless I travel to Erie County for visitation contrary to and in defiance of the Order once again.

WHEREFORE, for all of the above reasons and others not identified herein, this Petitioner respectfully requests that the Court immediately order compliance with the existing Order as well as Modification of the same giving the Petitioner primary physical custody of Sophia.

Dated: July 11, 2023

A handwritten signature in black ink, appearing to read "Matthew Couloute, Jr.", written over a horizontal line.

Matthew Couloute, Jr.
3210 Lakeheath Drive
Cumming, GA 30041
860-810-9138

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

.....
In the Matter of a Proceeding for ☒ Custody ☐ Visitation
under the *Uniform Child Custody Jurisdiction and
Enforcement Act*

Matthew Couloute

Petitioner,

-against-

LAUREN HAIDON

Respondent.

Docket No.
AFFIDAVIT --
UCCJEA

STATE OF NEW YORK)

:ss.:
)

COUNTY OF)

I [specify name]: Matthew Couloute,
being duly sworn, deposes and states the following:

1. I ☒ reside ☐ am located at [specify address or indicate if ordered to be kept
confidential pursuant to Family Court Act §154-b(2) or Domestic Relations Law §254]:
3210 Lakehurst Dr. Cumming, GA 30041

I am the [specify relationship to child(ren); if foster parent, agency, institution or other
relationship, so state]: the FATHER and am the ☒ Petitioner ☐ Respondent
in the above-entitled proceeding.

2. (Upon information and belief) Each child who is the subject of this proceeding resides
at:

<u>Name</u>	<u>Date of Birth</u>	<u>Address¹</u>
<u>Sophia Couloute</u>	<u>11/31/12</u>	<u>LAST Known</u> <u>575 Center Rd</u> <u>W. Seneca, NY 14224</u>

3. (Upon information and belief) During the last five years each child who is the

¹ Specify address or indicate if ordered to be kept confidential pursuant to Family Court Act
§154-b(2) or Domestic Relations Law §254.

subject of this proceeding resided at:

Name

Address²

Duration (from/to)

Same as Above
Bopara Coulture 3210 Lakehurst Dr
Cumby GA 1 Calendar school
yr.

4. (Upon information and belief) The name and present address of the person(s) with whom each child resided during the past five years are as follows;

Name

Address³

Duration (from/to)

LAUREN HARTON
575 Center Rd
W. Seneca NY 14224
LAST KNOWN

5. I [check applicable box(es)]:

a. ☒ have ☐ have not participated as a party in other litigation concerning the ☒ custody ☐ visitation of one or more of the same children in ☒ New York State ☐ another state, territory, tribal jurisdiction or country [specify]: [If so, specify court, jurisdiction, children involved, parties, case number, date of determination and status]:

b. ☒ have ☐ have not participated as a witness in other litigation concerning the ☐ custody ☐ visitation of one or more of the same children in ☒ New York State ☐ another state, territory, tribal jurisdiction or country [specify]: [If so, specify court, jurisdiction, custody or visitation, children involved, parties, case number, date of determination and status]:

c. ☒ have ☐ have not participated as a [specify other capacity]: in other litigation concerning the ☐ custody ☒ visitation of one or more of the same children in ☒ New York State ☐ another state, territory, tribal jurisdiction or country [specify]: [If so, specify court, jurisdiction, custody or visitation, children involved, parties, case number, date of determination and status]:

6. [Check applicable box(es)]:

a. ☒ (Upon information and belief) I have the following information regarding a custody proceeding concerning ☐ custody ☒ visitation of one or more of the same child(ren) that is pending in ☒ New York State ☐ another state, territory, tribal jurisdiction

² Specify address or indicate if ordered to be kept confidential pursuant to Family Court Act §154-b(2) or Domestic Relations Law §254.

³ Specify address or indicate if ordered to be kept confidential pursuant to Family Court Act §154-b(2) or Domestic Relations Law §254.

or country [specify specify court, jurisdiction, custody or visitation, children involved, parties, case number, date of determination, and status; if the order has been stayed, so state, including date of stay and expiration, if any]:

b. ☐ (Upon information and belief) an order of ☐ custody ☐ visitation of one or more of the same child(ren) has been registered in ☐ New York State ☐ another state, territory, tribal jurisdiction or country [specify court(s) and jurisdiction(s) in which order registered, date of registration(s), court and jurisdiction that issued the order, children covered by the order and date of order, if available]:

c. ☒ I have no information regarding any pending custody or visitation proceedings concerning one or more of the same child(ren).

7. a. ☐ The following person(s) not a party to the proceedings (has)(have) physical custody of the child(ren) affected by this proceeding [specify name(s), address(es), which child(ren) and relationship(s) to child(ren)]:

b. ☒ I know of no person(s) not a party to this proceeding who (has)(have) physical custody of any of the child(ren) affected by this proceeding.

c. ☐ The following person(s) not a party to the proceedings claim(s) to have custody or visitation rights with respect to the child(ren) affected by this proceeding [specify name(s), address(es), which child(ren) and relationship(s) to child(ren)]:

d. ☐ I know of no person(s) not a party to the proceedings who claim(s) to have custody or visitation rights with respect to the child(ren) affected by this proceeding.

Signature of: ☒ Petitioner ☐ Respondent

Matthew Coulter
Print or Type Name

Signature of Attorney, if any

Attorney's Name (print or type)

Attorney's Address and Telephone

Number

Sworn to before me this 11th July 2023
day

(Deputy) Clerk of the Court
Notary Public



FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

In the Matter of a Proceeding for Custody/Visitation
Under Article 6 of the Family Court Act

File: 204566
Docket No. V.-13065-17/21C
V. 13065-17/21B

Matthew Carbone
Petitioner,

-against-

LAUREN HAIDEN
Respondent

PETITION FOR
ENFORCEMENT OF ORDER OF
☐ Custody ☒ Visitation
MADE BY ☒ FAMILY COURT
☐ SUPREME COURT

[Warning REQUIRED in petitions for contempt; delete or strike if inapplicable]:

☐ **WARNING: THE PURPOSE OF THE HEARING REQUESTED IN THIS
PETITION IS TO PUNISH THE ☐ PETITIONER ☐ RESPONDENT FOR
CONTEMPT OF COURT, WHICH MAY INCLUDE SANCTIONS OF A
FINE OR IMPRISONMENT OR BOTH. YOUR FAILURE TO APPEAR
IN COURT MAY RESULT IN YOUR IMMEDIATE ARREST AND
IMPRISONMENT FOR CONTEMPT OF COURT.**

PETITIONER

(list information about yourself)

STREET: 3210 Lakehurst Dr.
CITY/STATE: Cumming, GA
ZIP: 30041 COUNTY: Forsyth
DOB: 11/21/70
SEX: Male RACE: Black

RESPONDENT

(list information about other party)

STREET: 575 Center Rd
CITY/STATE: W Seneca, NY
ZIP: 14224 COUNTY: FRIE
DOB:
SEX: Female RACE: White

¹ If the order was entered by a Court outside New York State or a tribal court, use Form UCCJEA-11.

SS# _____

WGT: 196 HGT: 6'3EYE COLOR: Bru HAIR COLOR: baldTEL: 860-810-9138EMP: Self employedATTY: PRO SE
3210 Lakeshore DR
Cumming, GA 30041SS#: unknownWGT: 120 HGT: 5'7EYE COLOR: Bl HAIR COLOR: BlackTEL: 917-733-2265EMP: unknownATTY: Marco Cerrone
5500 Main St.
Williamsville, NY 14221

TO THE FAMILY COURT:

The undersigned Petitioner respectfully shows that:

1. I am [specify relationship to child(ren)]: FATHER of [specify child(ren)'s name(s)]: Sophia CoulanteI am seeking to enforce an order of [check applicable box(es)]: ☒ custody ☒ visitation.2. Petitioner is MOTHER and was the Respondent in an action filed in
☐ Supreme Court of the State of New York, _____ County, Index No.: _____
☒ Family Court of the State of New York, Erie County, Docket No.: V-13065-17/21C
entitled V-13065-17/21B3. A ☒ judgment ☒ order, dated July 25, 2022, was entered in the action directing the
☒ Respondent ☐ Petitioner to [specify terms]: MOTHER is to allow and facilitate
access to the minor child in GA for 3 consecutive
Week to start between June 23rd - June 30th.
MOTHER Refuses to send child and will allow access in FR
A true copy of the ☐ judgment ☒ order is attached and made a part of this Petition. only.

4. The names, addresses and dates of birth of all children affected by this order are:

Name	Address ²	Date of Birth
Sophia Coubute	575 Center Rd W. Conemaugh NY 14224	1/31/12

5. Under the terms of the ☐ judgment ☒ order, the ☐ Supreme Court ☐ Family Court
☒ has ☐ has not retained exclusive jurisdiction to enforce the ☐ judgment ☒ order.

6. (Upon information and belief) Respondent has failed to comply with the terms of the
☐ judgment ☒ order in that [specify provision(s) alleged to be violated and nature of violation(s)]: MOTHER
Refuses to send the child for summer visitation.
MOTHER continues to lie to child regarding father,
the Court order, and the prior relationship. Leaving
child angry and afraid of father

7. No previous application has been made to any Court or judge for the relief requested in this
 Petition (except [specify]: _____)

WHEREFORE, Petitioner respectfully requests that the ☐ judgment ☒ order of the
☐ Supreme Court ☒ Family Court, dated Approx July 25, 2012, be enforced in accordance with Article 6
 of the Family Court Act and for such other relief as the Court may deem just and proper.

Dated: 7/11/13


 Petitioner

Matthew Coubute Jr
 Print or type name

Signature of Attorney, if any

Attorney's Name (Print or Type)

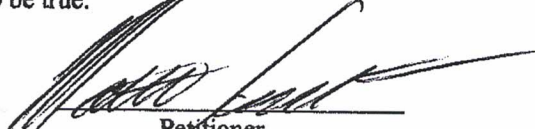
Attorney's Address and Telephone Number

² Unless ordered confidential, pursuant to Family Court Act §154-b, because disclosure would pose an unreasonable risk to the health or safety of the party. See Forms GF-21 and 21a, available at www.nycourts.gov.

GIA as
STATE OF ~~NEW YORK~~
COUNTY OF *Forsyth*)
:ss:

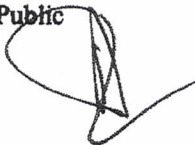
VERIFICATION

being duly sworn, says that (s)he is the Petitioner in the above-named proceeding and that the foregoing petition is true to (his)(her) own knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters (s)he believes it to be true.


Petitioner

Sworn to before me this
day of *07/11/23*

(Deputy) Clerk of the Court
Notary Public





FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

In the Matter of a Proceeding for Custody/Visitation
Under Article 6 of the Family Court Act

FILED 204566
Docket No. V-13065-17/21C
V-13065-17/21B

Matthew Callalate Jr
Petitioner,

-against-

LAUREN HADIN
Respondent

PETITION FOR
MODIFICATION OF ORDER OF
☒ Custody ☒ Visitation
MADE BY ☒ FAMILY COURT
☐ SUPREME COURT

TO THE FAMILY COURT:

The undersigned Petitioner respectfully shows that:

1. I am [specify relationship to child(ren)]: the FATHER of [specify child(ren)']s
name(s): Sophia L Callalate
I am seeking to modify an order of [check applicable box(es)]: ☒ custody ☒ visitation.

2. The home addresses of the Petitioner and Respondent are as follows:²
Petitioner: 3210 Lakeheath Dr. Cumming, GA 30041

Respondent: LAST KNOWN 575 Center Rd W. Seneca, NY 14224

3. Petitioner is Father - Matthew Callalate and was the PETITIONER in an action filed in
☐ Supreme Court of the State of New York, County, Index No. [specify]:
☒ Family Court of the State of New York, County, Docket No. [specify]: ERIE County
entitled FILED 204566
Doc: V-13065-17/21C
V-13065-17/21B

4. [Applicable when Petitioner and/or Respondent are on active duty or have recently returned from
active military service; DELETE if inapplicable]: N/A

a. Petitioner [check applicable box]:
is on active duty, deployed or temporarily assigned to military service as follows [specify type of
service, military branch or National Guard unit, anticipated dates and location of duty and how duty is

¹ If the order was entered by a Court outside New York State or a tribal court, use Form UCCJEA-9.

² Unless ordered confidential, pursuant to Family Court Act §154-b, because disclosure would pose an
unreasonable risk to the health or safety of the party. See Forms GF-21 and 21a, available at www.nycourts.gov.

likely to affect custody or visitation, if at all]:³

returned from active duty, deployment or temporarily assignment to military service as follows
[specify date of return, type of service, military branch or National Guard unit, anticipated dates and
location of duty and how return from active duty is likely to affect custody or visitation, if at all]:

b. Respondent [check applicable box]: N/A

is on active duty, deployed or temporarily assigned to military service as follows [specify type of
service, military branch or National Guard unit, anticipated dates and location of duty and how duty is
likely to affect custody or visitation, if at all]:⁴

returned from active duty, deployment or temporarily assignment to military service as follows
[specify date of return, type of service, military branch or National Guard unit, anticipated dates and
location of duty and how return from active duty is likely to affect custody or visitation, if at all]: N/A

5. a. A ☒ judgment ☒ order, dated April 25, 2022, was entered in the action directing
the Respondent Petitioner to [specify terms]:

A true copy of the judgment order is attached and made a part of this Petition.

b. [Applicable where the judgment or order had been entered in conjunction with a child
protective dispositional or permanency hearing order directing custody with a relative or other non-parent,
pursuant to Family Court Act §1055-b or §1089-a; delete if inapplicable]:

(i) The judgment order was issued in conjunction with the following child
protective or permanency proceeding [specify Family Court, county and docket #]: N/A

(ii) The judgment order provided that the following local department of social services
[specify]: and the following attorney for the child(ren)[specify]:
must be notified and shall be made parties to any subsequent proceedings for modification, enforcement or
termination of the judgment or order.

6. The names, addresses and dates of birth of all children affected by this order are:

Name	Address ⁵	Date of Birth
<u>Sophia Coulaute</u>	<u>575 Center Rd W. Beneca NY 14224</u>	<u>11/31/12</u>

³ Inapplicable if Petitioner is based at a permanent duty station or has had a permanent reassignment of station.

⁴ Inapplicable if Respondent is based at a permanent duty station or has had a permanent reassignment of station.

⁵ Unless ordered confidential, pursuant to Family Court Act §154-b, because disclosure would pose an unreasonable risk to the health or safety of the party. See Forms GF-21 and 21a, available at www.nycourts.gov.

7. [Applicable where Order or judgment had been issued by Supreme Court; delete if inapplicable]:
Under the terms of the judgment order, the Supreme Court
has not retained exclusive jurisdiction to modify the judgment order.

8. (Upon information and belief) Since the entry of the judgment order, there has been a change of circumstances in that [specify]: *The minor child continues to digress emotionally. Respondent mother refuses to allow access to Petitioner Father unless he has access in Buffalo, NY. Contrary to the order. Further the mother has talked so badly about Father, child is afraid*

9. Because of this change of circumstances, the judgment order should be modified as follows [specify]: *The child should be placed in the Father's care as the Primary Custodial Parent with visitation/supervised for the mother.*

10. [Applicable to cases in which petitioner is a relative or other non-parent seeking to modify a custody order and where a child protective petition or permanency hearing report has been filed regarding the children; delete if inapplicable]:

a. A child protective petition, Docket # [specify]: *SAME AS ABOVE*, was filed in Family Court, [specify county]: *ERAC* on [specify date]: _____, alleging that [specify names of respondents on that petition]: *MOTHER + FATHER WERE NEGLECTFUL* neglected or abused the above-named child(ren). The petition resulted in [specify whether finding was made and, if so, the disposition; if the disposition has been adjourned pending a consolidated hearing with this petition, pursuant to F.C.A. §1055-b, so indicate and give next court date]: *PETITION WAS DISMISSED*

b. A permanency report, Docket # [specify]: _____, pursuant to Article 10-A of the Family Court Act, was filed in Family Court, [specify county]: _____ on [specify date]: _____ indicating a permanency plan of custody of the child(ren) with Petitioner in this proceeding. The permanency hearing was adjourned to [specify date]: _____ pending a consolidated hearing with this custody modification petition, pursuant to F.C.A. §1089-a.

c. The child's birth mother has has not consented to the modification of the custody order to award custody to the Petitioner. If not, the following extraordinary circumstances support Petitioner's standing to seek custody of the child(ren) [specify]: *The child is harmed daily by the Respondent's Petitioner's continual emotional abuse*

d. The child's legally-established birth father has has not consented to the modification of the custody order to award custody to the Petitioner. If not, the following extraordinary circumstances support Petitioner's standing to seek custody of the child(ren) [specify]:

e. The child has been living with the following foster parent(s) [specify]: *N/A* since [specify date]: _____ The foster parent(s) has/have has/have not consented to the modification of

the custody order to award custody to the Petitioner. [If unaware whether they have consented, so state]:

f. The local department of social services [specify]: N/A in the related child abuse or neglect permanency proceeding has has not consented to the modification of the custody order to award custody to the Petitioner. [If unaware whether they have consented, so state]:

g. The attorney for the child(ren) [specify]: N/A in the related child abuse or neglect permanency proceeding has has not consented to the award of custody to the Petitioner. [If unaware whether they have consented, so state]:

11. No previous application has been made to any Court or judge for the relief requested in this Petition (except [specify]): Except Petitions found under current file number

WHEREFORE, Petitioner respectfully requests that the judgment order of the Supreme Court Family Court, dated _____, be modified as set forth above and for such other relief as the Court may deem just and proper.

Dated: 7/11/23

[Signature]
Petitioner

Matthew Coulante
Print or type name

PRO SE
Signature of Attorney, if any

Attorney's Name (Print or Type)

Attorney's Address and Telephone Number

GA as
STATE OF NEW YORK)
COUNTY OF Forsyth) :ss:

VERIFICATION

being duly sworn, says that (s)he is the Petitioner in the above-named proceeding and that the foregoing petition is true to (his)(her) own knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters (s)he believes it to be true.

[Signature]
Petitioner

Sworn to before me this
day of 07/11/23

(Deputy) Clerk of the Court
Notary Public



At a term of the Family Court of the
State of New York, held in and for the
County of _____, at
New York, on _____,

PRESENT: Hon. _____

In the Matter of a Proceeding for
☒ Custody ☐ Visitation or ☒ Enforcement ☒ Modification
☐ Registration of an Order of: ☐ Custody ☐ Visitation
Under the *Uniform Child Custody Jurisdiction and Enforcement Act*
[Domestic Relations Law Art.5-A]

Matthew Coulouk
Petitioner,

-against-

LAUREN HADON
Respondent.

File: 204566

Docket No. V-13065-17/21C
V-13065-17/21B

ORDER --
Electronic Testimony Application

The request of [specify name of applicant]: Matthew Coulouk, dated [specify]: 7/11/23
to testify or be deposed by telephone or other electronic means having been considered by this Court, it is hereby
ORDERED that the request is:

☐ **GRANTED** and the applicant must follow the instructions below.

OR

☐ **DENIED** for the following reasons:

If this application is denied, the applicant must appear at the hearing in person.

The hearing is scheduled for [specify date and time]:

ENTER:

DATED:

Judge of the Family Court

PURSUANT TO SECTION 1113 OF THE FAMILY COURT ACT, AN APPEAL FROM THIS ORDER MUST BE TAKEN
WITHIN 30 DAYS OF RECEIPT OF THE ORDER BY APPELLANT IN COURT, 35 DAYS FROM THE DATE OF MAILING OF
THE ORDER TO APPELLANT BY THE CLERK OF COURT, OR 30 DAYS AFTER SERVICE BY A PARTY OR THE
ATTORNEY FOR THE CHILD UPON THE APPELLANT, WHICHEVER IS EARLIEST.

INSTRUCTIONS IF REQUEST FOR TELEPHONE OR ELECTRONIC TESTIMONY IS GRANTED:

On [specify hearing or deposition date]: _____ at _____ ☐ A.M. ☐ P.M., you must [check applicable
box]: ☐ call Part _____ at telephone 912-816-9138 **OR** ☐ be available to receive a call from the Court;
In order to confirm the above arrangements for your testimony, you must call the following telephone number [specify]:
_____ at this Court to confirm your testimony no later than [specify deadline in advance of the hearing]: _____

It is your responsibility to transmit to this Court, Part __, by fax [specify fax #]: _____
or by personal delivery at least [check box]: ☐ _____ hours ☐ _____ days prior to the hearing, legible copies of any
documents you intend to offer into evidence at the hearing.

You may choose to appear in person in this Court on your trial date, rather than appear by telephone or other
electronic means. You may retain an attorney to represent you in this Court while you appear by telephone or other
electronic means. If you fail to appear, either in person or by telephone or other electronic means approved by this Court,
this Court may hear the matter in your absence or may issue a **WARRANT** for your arrest. If you are the Petitioner, if
you fail to appear, either in person, by telephone or other electronic means approved by this Court, the Court may
DISMISS the petition.

Check applicable box:

- ☐ Order mailed on [specify date(s)] and to whom mailed]: _____
☐ Order received in court on [specify date(s)] and to whom given]: _____

EXHIBIT B

ORI No: NY014023J

Order No: 2023-002229

NYSID No: _____

At a term of the Family Court of the State of New York,
held in and for the County of Erie, at Courthouse One Niagara Plaza,
Buffalo, NY 14202, on July 13, 2023

PRESENT: Honorable Kelly A. Brinkworth**In the Matter of a FAMILY OFFENSE Proceeding****Lauren E Haidon (DOB: 06/26/1982),
Petitioner****- against -****Matthew C Couloute Jr (DOB: 01/02/1970),
Respondent**

File # 204566

Docket # O-08099-23

Temporary Order of Protection**Ex Parte**

NOTICE: YOUR FAILURE TO OBEY THIS ORDER MAY SUBJECT YOU TO MANDATORY ARREST AND CRIMINAL PROSECUTION, WHICH MAY RESULT IN YOUR INCARCERATION FOR UP TO SEVEN YEARS FOR CRIMINAL CONTEMPT, AND/OR MAY SUBJECT YOU TO FAMILY COURT PROSECUTION AND INCARCERATION FOR UP TO SIX MONTHS FOR CONTEMPT OF COURT. IF YOU FAIL TO APPEAR IN COURT WHEN YOU ARE REQUIRED TO DO SO, THIS ORDER MAY BE EXTENDED IN YOUR ABSENCE AND THEN CONTINUES IN EFFECT UNTIL A NEW DATE SET BY THE COURT.

THIS ORDER OF PROTECTION WILL REMAIN IN EFFECT EVEN IF THE PROTECTED PARTY HAS, OR CONSENTS TO HAVE, CONTACT OR COMMUNICATION WITH THE PARTY AGAINST WHOM THE ORDER IS ISSUED. THIS ORDER OF PROTECTION CAN ONLY BE MODIFIED OR TERMINATED BY THE COURT. THE PROTECTED PARTY CANNOT BE HELD TO VIOLATE THIS ORDER NOR BE ARRESTED FOR VIOLATING THIS ORDER .

A petition under Article 8 of the Family Court Act, having been filed on July 13, 2023 in this Court and good cause having been shown, and Matthew C Couloute Jr having been not present in Court.

NOW, THEREFORE, IT IS HEREBY ORDERED that Matthew C Couloute Jr(DOB:01/02/1970) observe the following conditions of behavior:

[01] Stay away from:

[A] Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[B] the home of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[C] the school of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[D] the business of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[E] the place of employment of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[14] Refrain from communication or any other contact by mail, telephone, e-mail, voice-mail or other electronic or any other means with Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012) including all social media contact, text messaging and third party communication;

[02] Refrain from assault, stalking, harassment, aggravated harassment, menacing, reckless endangerment, strangulation, criminal obstruction of breathing or circulation, disorderly conduct, criminal mischief, sexual abuse, sexual misconduct, forcible touching, intimidation, threats, identity theft, grand larceny, coercion, unlawful dissemination or publication of intimate image (s) or any criminal offense against Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[99] Observe such other conditions as are necessary to further the purposes of protection: Matthew C Couloute Jr (DOB: 01/02/1970) access with the child, Sophia Couloute, is hereby suspended pending further order of this Court;

It is further ordered that this temporary order of protection shall remain in force until and including January 13, 2024, but if you fail to appear in court on this date, the order may be extended and continue in effect until a new date set by the Court.

Dated: July 13, 2023

ENTER



Honorable Kelly A. Brinkworth

PURSUANT TO SECTION 1113 OF THE FAMILY COURT ACT, AN APPEAL FROM THIS ORDER MUST BE TAKEN WITHIN 30 DAYS OF RECEIPT OF THE ORDER BY APPELLANT IN COURT, 35 DAYS FROM THE DATE OF MAILING OF THE ORDER TO APPELLANT BY THE CLERK OF COURT, OR 30 DAYS AFTER SERVICE BY A PARTY OR THE ATTORNEY FOR THE CHILD UPON THE APPELLANT, WHICHEVER IS EARLIEST.

The Family Court Act provides that presentation of a copy of this order of protection to any police officer or peace officer acting pursuant to his or her special duties authorizes, and sometimes requires such officer to arrest a person who is alleged to have violated its terms and to bring him or her before the court to face penalties authorized by law.

Federal law requires that this order is effective outside, as well as inside, New York State. It must be honored and enforced by state and tribal courts, including courts of a state, the District of Columbia, a commonwealth, territory or possession of the United States, if the person restrained by the order is an intimate partner of the protected party and has or will be afforded reasonable notice and opportunity to be heard in accordance with state law sufficient to protect due process rights (18 U.S.C §§ 2265, 2266).

It is a federal crime to:

- cross state lines to violate this order or to stalk, harass or commit domestic violence against an intimate partner or family member;
- buy, possess or transfer a handgun, rifle, shotgun or other firearm or ammunition while this Order remains in effect (Note: there is a limited exception for military or law enforcement officers but only while they are on duty); and
- buy, possess or transfer a handgun, rifle, shotgun or other firearm or ammunition after a conviction of a domestic violence-related crime involving the use or attempted use of physical force or a deadly weapon against an intimate partner or family member, even after this Order has expired (18 U.S.C. §§ 922(g)(8), 922(g)(9), 2261, 2261A, 2262).

Check Applicable Box(es):

- ☐ Party against whom order was issued was advised in Court of issuance and contents of Order
- ☐ Order personally served in Court upon party against whom order was issued
- ☒ Service directed by Police Service
- ☐ [Modifications or extensions only]: Order mailed on [specify date and to whom mailed]:
- ☐ Warrant issued for party against whom order was issued [specify date]: _____
- ☐ ADDITIONAL SERVICE INFORMATION [specify]: _____

CCs: Matthew C Couloute Jr
Erie County Sheriff's Department
Lauren E Haidon
FAX

EXHIBIT C

Re: Family Court Proceedings

1 message

Kelly Ball <kballlaw@gmail.com>

Tue, Jul 18, 2023 at 8:12 AM

To: Matthew Couloute <mattcouloute@gmail.com>

Mr. Couloute - Please be advised that a Temporary Order of Protection is currently in effect against you in favor of Ms. Haidon and my client, Sophia. Pursuant to the Temporary Order of Protection, among other things, stay away from my client and refrain from any attempts to contact her. A copy of the Temporary Order of Protection is attached. Kelly Ball

On Tue, Jul 18, 2023 at 8:04 AM Matthew Couloute <mattcouloute@gmail.com> wrote:

I'll be representing myself.

Thanks

Matt

On Tue, Jul 18, 2023, 8:00 AM Kelly Ball <kballlaw@gmail.com> wrote:

Mr. Couloute - I have been appointed to represent Sophia in the pending Erie County Family Court Proceedings. Please advise me if you have an attorney or if you will be representing yourself? Thank you.

Kelly Ball

--

*****PLEASE NOTE MY NEW ADDRESS*****

Kelly L. Ball, PLLC
Attorney at Law
70 Niagara Street, 3rd Floor
Buffalo, New York 14202
716-332-7530

This communication contains legally PRIVILEGED and CONFIDENTIAL information intended only for the use of the addressee(s) named above. If you are not the intended recipient of this e-mail, or an authorized employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is STRICTLY PROHIBITED. If you have received this e-mail in error, please notify the sender by reply e-mail and delete this communication from your computer. Thank you for your cooperation.

--
*****PLEASE NOTE MY NEW ADDRESS*****

Kelly L. Ball, PLLC
Attorney at Law
70 Niagara Street, 3rd Floor
Buffalo, New York 14202
716-332-7530

This communication contains legally PRIVILEGED and CONFIDENTIAL information intended only for the use of the addressee(s) named above. If you are not the intended recipient of this e-mail, or an authorized employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is STRICTLY PROHIBITED. If you have received this e-mail in error, please notify the sender by reply e-mail and delete this communication from your computer. Thank you for your cooperation.

EXHIBIT D



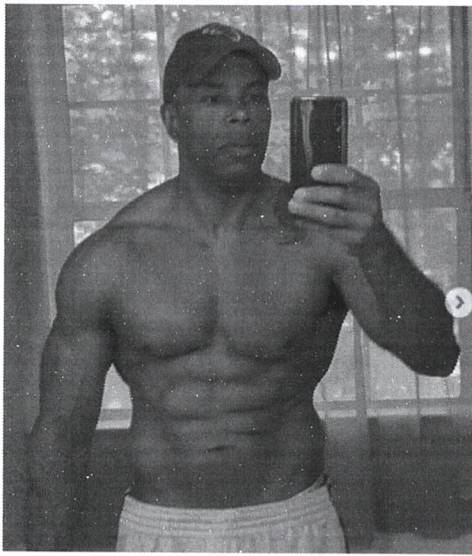
Couloute Restrained

July 14, 2023

Blog star Matthew Couloute has been restrained by Judge Brinkworth of Erie County Family Court in protection of his abused daughter and battered ex-wife. The long arm of New York reached to Cumming, Georgia slapping a no-contact restraining order on the now-famous Blog star. Oi vey, the dumb nigger just can't get enough Blog coverage, he has to flap his big nigger lips, threaten his daughter's mother with elimination by hit squad, never see it coming, while he would be nowhere in sight, next his vodka soaked brain terrorizes his daughter, by threatening to drag mom back into court, whip his legal blackness on the white judge, and take the child away from mom! The great Couloute shows his true color, expressing his self-impotence by traumatizing his daughter, promising to knock off mom; smashing the garage windows by third party contract hit is just a nigger's way of letting family know he cares. The local police are not impressed by interstate threats of bodily harm, a federal felony. The restraint against Couloute provides six months of peace and quiet, free from familial discord created by Couloute's mental defect, personality disorders, abusive conduct, verbal harassment, and deficient parenting skills. Christmas will be a silent night this year, no tears, no screaming.

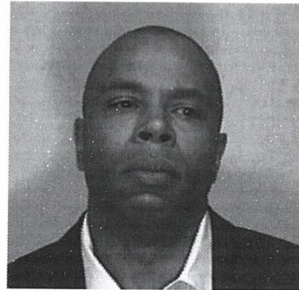
Couloute faces a family court buzzsaw, being a loser, he recently filed papers demanding possession of his daughter on claim that his acrimonious relationship with the cherub is all the fault of mother, whose mental illness infected the child to the point his daughter wants nothing to do with him. Couloute faces an uphill battle, as he cannot demonstrate he has financial means to support a child. Couloute cannot even support himself, no job, no income, no tax returns, no credit card, even his twenty year old jalopy of a ride is unregistered and uninsured. He lives in a run down house, rent free, owned by his mother, pays no property taxes, the abode lacks a working air conditioner, where he will plead to the court that a steady diet of canned tunafish is good for kids too!

Blog aficionados know well the antics of nigger boy Couloute and his paedophile ways, it has been the talk of Connecticut for the last seven years, when he abandoned daughter and mother, moved to Georgia, not providing a penny of support, but was able to mobilize the State Criminal Justice System to arrest baby momma, in attempt to retrieve his child sex toy from across state lines with the help of paedo pals Ryan McGuigan, Brendan Danaher, Danielle O'Donnell, and nigger pal Omar Williams. Danaher's antics go before a federal jury this September.

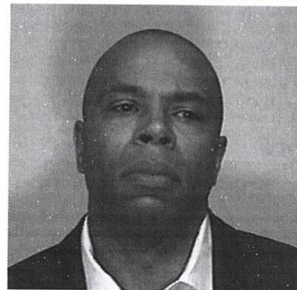


Matthew Couloute embarking on a love affair with judges of Erie County Family Court.

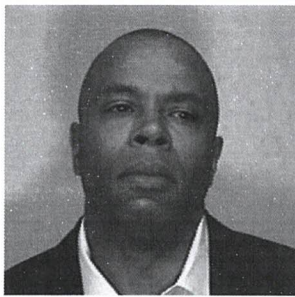
Related Posts:



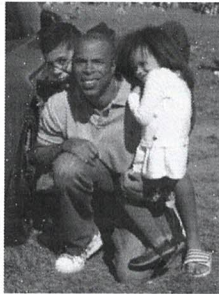
He's Back!!!



Matthew Couloute at it again!



Matthew Couloute Gets Bitch Slapped



Matthew Couloute: School Bully



Couloute Admits Georgia Residency



Integrity?

Tags: [KELLY BRINKWORTH](#) [MATTHEW COULOUTE](#) [SHARON LOVALLO](#)

[PREVIOUS](#)
[Escort Services](#)

[NEXT](#)
[Cruel Ruel](#)

Judge Adelman's favorite vile rant Blog of the worst kind!

Wilbur's power of hooves!

Neve | Powered by WordPress

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

In the Matter of a Proceeding under
Article of the Family Court Act

Matthew Coulares Jr
Petitioner

against

LAUREN HAIDEN
Respondent

File: *204566*
Docket No. *V. 13065-17/21C*
V. 13065-17/21B
ORDER TO SHOW CAUSE

Upon the petition of *Matthew Coulares Jr* verified the *11th* day of
July, ~~2023~~ annexed hereto, it is

1 Niagara St. Buffalo **ORDERED** that *Respondent, Lauren Haiden* show cause before this Court at
New York, on the _____ day of _____, at *9 AM* o'clock in the _____ morning
afternoon of that day, or as soon thereafter as the parties can be heard, why an order should not be
made as follows: *Granting Father Primary Physical Custody and*
Immediately giving the Father Access to the Child in Oregon
and why such other and further relief should not be granted as the Court may determine, and it is further

ORDERED that [delete if inapplicable]:

[Required if Court makes a temporary order of custody or visitation; check applicable box(es)]:

And the Court having searched the statewide registry of orders of protection, the sex
offender registry and the Family Court's warrant and child protective records, and having notified the
attorneys for the parties and for the child [check if applicable]: and the following self-represented party
or parties [specify]: _____ of the results of these searches;

And the Court having considered and relied upon the following results of these searches in
making this decision [specify; if no results found, so indicate]:

And the Court, having dispensed with the search of the statewide registry of orders of
protection, the sex offender registry and the Family Court's warrant and child protective records because
these databases had been reviewed within the past 90 days;

AND IT IS FURTHER ORDERED that service by _____ of a copy
of this order together with the papers upon which it is granted upon _____
day of _____, be deemed sufficient service. on or before the

Dated: _____

ENTER

Family Court Judge

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

IN THE MATTER OF Custody/Visitation Proceeding

File #: 204566

Docket #: V.-13065 –
17/21C; V.-13065
17/21B

MATTHEW COULOUTE,

Petitioner,

-against-

LAUREN HAIDON

Respondent

**AFFIDAVIT IN SUPPORT
OF ORDER TO SHOW
CAUSE**

Matthew Couloute Jr. Esq. an attorney duly licensed to practice law in the State of Connecticut and New York affirms under the penalty of perjury:

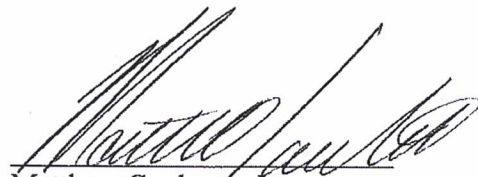
1. On or about June 18, 2018 Honorable Judge Lovallo entered a Custody and Visitation Order under docket number V-13065 – 17/17A.
2. Pursuant to the Order, Mother was to be the primary custodial parent and father would have access to the child in the State of Georgia on rotating holidays, rotating spring and winter breaks and every summer from the 3 weeks from the date Sophia's school year ended until one week prior to the beginning of the school year.
3. The Lovallo Order was subsequently modified by Honorable Thomas M. DiMillo on or about July 25, 2022. Judge DiMillo's Order, to be read in conjunction with Judge Lovallo's previous Order modified, modified the summer visitation allowing the Petitioner access in Georgia for three (3) consecutive weeks in the summer to commence upon the parents agreement between June 23rd and June 30th. Followed by a second, two (2) consecutive week access period again in the state of Georgia determined by the parents to begin between August 7th through the 14th.
4. Petitioner Father attempted to set a date for Sophia to travel during the correct period, June 23rd through June 30th. The Respondent requested that the travel period be pushed back and start July 10th or 11th to allow Sophia the ability to participate in her school carnival that ended July 9th. As a result and relying upon the Respondents representations that Sophia would be sent to Georgia on July 11th, the Father purchased an airline ticket to depart for Georgia on said date with a return to Erie County on July 31st, 2023.
5. In speaking with Sophia the day before here trip, Sophia had not yet packed and attempted to avoid the conversation of travel. Further, leading up to the travel day,

Sophia nor the respondent would discuss activities for the summer or plan for anything related to her stay in Georgia.

6. Additionally, when explaining to Sophia that her mother, father, judge, Kelly Ball, and her mother's attorney all agreed on how the summer would work, the Respondent interjected to state that she (the respondent) was forced into the agreement by the parties and never agreed to send Sophia. All in front of Sophia.
7. On the day of travel, Petitioner was just reaching the airport to get through security for Sophia's arrival at 2pm when I received an email stating that she would not be coming because "she was sick all night ... and threw up on the way to the airport. And, that if I wanted to see her that I would have to come to Buffalo for visitation.
8. Mother, now permanently disabled, is unable to adequately care for the emotional needs of the child. Since the Order was in place, the Sophia's emotion wellbeing has deteriorated the point that she cannot sleep without medication, currently must take additional medication for anxiety and further is unable to able to participate in school on a consistent basis to the extent that but for the pandemic and home schooling, Sophia was on track to be considered a truant pursuant to New York Statues.
9. And yet still, while Sophia has been in treatment for her anxiety, her mother continues to perpetrate the myth to the child that she was sexually assaulted and that if she returns the fathers care she will once again be sexually abused.
10. At this time, it is clear that the mother's mental health issues have become the child's mental health issues and Sophia is unable to differentiate the two.
11. As of this date, July 11th, 2023 I have been told once again that I would not be able to see Sophia unless I travel to Erie County for visitation contrary to and in defiance of the Order once again.

WHEREFORE, for all of the above reasons and others not identified herein, this Petitioner respectfully requests that the Court immediately order compliance with the existing Order as well as Modification of the same giving the Petitioner primary physical custody of Sophia.

Dated: July 11, 2023

A handwritten signature in black ink, appearing to read 'Matthew Couloute, Jr.', written over a horizontal line.

Matthew Couloute, Jr.
3210 Lakeheath Drive
Cumming, GA 30041
860-810-9138

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

.....
In the Matter of a Proceeding for ☒ Custody ☐ Visitation
under the *Uniform Child Custody Jurisdiction and
Enforcement Act*

Matthew Couloute

Petitioner,

-against-

LAUREN HAIDON

Respondent.

Docket No.
AFFIDAVIT --
UCCJEA

STATE OF NEW YORK)

:ss.:
)

COUNTY OF)

I [specify name]: Matthew Couloute ,
being duly sworn, deposes and states the following:

1. I ☒ reside ☐ am located at [specify address or indicate if ordered to be kept
confidential pursuant to Family Court Act §154-b(2) or Domestic Relations Law §254]:
3210 LAKEHEATH DR. CUMMING, GA 30041

I am the [specify relationship to child(ren); if foster parent, agency, institution or other
relationship, so state]: the FATHER and am the ☒ Petitioner ☐ Respondent
in the above-entitled proceeding.

2. (Upon information and belief) Each child who is the subject of this proceeding resides
at:

<u>Name</u>	<u>Date of Birth</u>	<u>Address¹</u>
Sophia Couloute	11/31/12	LAST KNOWN 575 Center Rd W. Seneca, NY 14224

3. (Upon information and belief) During the last five years each child who is the

¹ Specify address or indicate if ordered to be kept confidential pursuant to Family Court Act
§154-b(2) or Domestic Relations Law §254.

subject of this proceeding resided at:

Name

Address²

Duration (from/to)

Same AS Above
Bopira Coucouk 3210 Lakehurst Dr
Carmine GA 1 Calendar school yr.

4. (Upon information and belief) The name and present address of the person(s) with whom each child resided during the past five years are as follows:

Name

Address³

Duration (from/to)

LAUREN HAZARD
575 Center Rd
W. Seneca NY 14224
LAST KNOWN

5. I ☒ [check applicable box(es)]:

a. ☒ have ☐ have not participated as a party in other litigation concerning the ☒ custody ☐ visitation of one or more of the same children in ☒ New York State ☐ another state, territory, tribal jurisdiction or country [specify]: [If so, specify court, jurisdiction, children involved, parties, case number, date of determination and status]:

b. ☒ have ☐ have not participated as a witness in other litigation concerning the ☐ custody ☐ visitation of one or more of the same children in ☒ New York State ☐ another state, territory, tribal jurisdiction or country [specify]: [If so, specify court, jurisdiction, custody or visitation, children involved, parties, case number, date of determination and status]:

c. ☒ have ☐ have not participated as a [specify other capacity]: in other litigation concerning the ☒ custody ☐ visitation of one or more of the same children in ☒ New York State ☐ another state, territory, tribal jurisdiction or country [specify]: [If so, specify court, jurisdiction, custody or visitation, children involved, parties, case number, date of determination and status]:

6. [Check applicable box(es)]:

a. ☒ (Upon information and belief) I have the following information regarding a custody proceeding concerning ☒ custody ☐ visitation of one or more of the same child(ren) that is pending in ☒ New York State ☐ another state, territory, tribal jurisdiction

² Specify address or indicate if ordered to be kept confidential pursuant to Family Court Act §154-b(2) or Domestic Relations Law §254.

³ Specify address or indicate if ordered to be kept confidential pursuant to Family Court Act §154-b(2) or Domestic Relations Law §254.

or country [specify specify court, jurisdiction, custody or visitation, children involved, parties, case number, date of determination, and status; if the order has been stayed, so state, including date of stay and expiration, if any]:

b. ☐ (Upon information and belief) an order of ☐ custody ☐ visitation of one or more of the same child(ren) has been registered in ☐ New York State ☐ another state, territory, tribal jurisdiction or country [specify court(s) and jurisdiction(s) in which order registered, date of registration(s), court and jurisdiction that issued the order, children covered by the order and date of order, if available]:

c. ☒ I have no information regarding any pending custody or visitation proceedings concerning one or more of the same child(ren).

7. a. ☐ The following person(s) not a party to the proceedings (has)(have) physical custody of the child(ren) affected by this proceeding [specify name(s), address(es), which child(ren) and relationship(s) to child(ren)]:

b. ☒ I know of no person(s) not a party to this proceeding who (has)(have) physical custody of any of the child(ren) affected by this proceeding.

c. ☐ The following person(s) not a party to the proceedings claim(s) to have custody or visitation rights with respect to the child(ren) affected by this proceeding [specify name(s), address(es), which child(ren) and relationship(s) to child(ren)]:

d. ☐ I know of no person(s) not a party to the proceedings who claim(s) to have custody or visitation rights with respect to the child(ren) affected by this proceeding.

Signature of: ☒ Petitioner ☐ Respondent

Matthew Coulter
Print or Type Name

Signature of Attorney, if any

Attorney's Name (print or type)

Attorney's Address and Telephone

Number

Sworn to before me this 11th July 2023
day

(Deputy) Clerk of the Court
Notary Public



F.C.A. §§ 652

General Form GF-41
(Petition for Enforcement of Order
of Custody or Visitation Made by
Supreme Court or Family Court)¹
9/2007

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

In the Matter of a Proceeding for Custody/Visitation
Under Article 6 of the Family Court Act

File: 204566
Docket No. V.-13065-17/21C
V. 13065-17/21B

Matthew Carbone
Petitioner,

-against-

LAUREN HAIDEN
Respondent

PETITION FOR
ENFORCEMENT OF ORDER OF
☐ Custody ☒ Visitation
MADE BY ☒ FAMILY COURT
☐ SUPREME COURT

[Warning REQUIRED in petitions for contempt; delete or strike if inapplicable]:

☐ **WARNING: THE PURPOSE OF THE HEARING REQUESTED IN THIS
PETITION IS TO PUNISH THE ☐ PETITIONER ☐ RESPONDENT FOR
CONTEMPT OF COURT, WHICH MAY INCLUDE SANCTIONS OF A
FINE OR IMPRISONMENT OR BOTH. YOUR FAILURE TO APPEAR
IN COURT MAY RESULT IN YOUR IMMEDIATE ARREST AND
IMPRISONMENT FOR CONTEMPT OF COURT.**

PETITIONER

(list information about yourself)

STREET: 3210 Lakeshore Dr.
CITY/STATE: Cumming, GA
ZIP: 30041 COUNTY: Forsyth
DOB: 11/2/70
SEX: Male RACE: Black

RESPONDENT

(list information about other party)

STREET: 575 Center Rd
CITY/STATE: W Seneca, NY
ZIP: 14224 COUNTY: FRIE
DOB:
SEX: Female RACE: White

¹ If the order was entered by a Court outside New York State or a tribal court, use Form UCCJEA-11.

SS# _____

WGT: 196 HGT: 6'3EYE COLOR: Bru HAIR COLOR: baldTEL: 860-810-9138EMP: Self employedATTY: PRO SE
3210 Lakeshore Dr
Cumming, GA 30041SS#: unknownWGT: 120 HGT: 5'7EYE COLOR: Bl HAIR COLOR: BlackTEL: 917-733-2265EMP: unknownATTY: Marco Cerrone
5500 Main St.
Williamsville, NY 14221

TO THE FAMILY COURT:

The undersigned Petitioner respectfully shows that:

1. I am [specify relationship to child(ren)]: FATHER of [specify child(ren)'s name(s)]: Sophia CoulartI am seeking to enforce an order of [check applicable box(es)]: ☒ custody ☒ visitation.2. Petitioner is MOTHER and was the Respondent in an action filed in ☐ Supreme Court of the State of New York, _____ County, Index No.: _____☒ Family Court of the State of New York, Erie County, Docket No.: V-13065-17/21C
entitled V-13065-17/21B3. A ☐ judgment ☒ order, dated July 25, 2022, was entered in the action directing the ☒ Respondent ☐ Petitioner to [specify terms]: MOTHER is to allow and facilitateaccess to the minor child in GA for 3 consecutive
Week to start between June 23rd - June 30th.MOTHER refuses to send child and will allow access in FL only.
A true copy of the ☐ judgment ☒ order is attached and made a part of this Petition.

4. The names, addresses and dates of birth of all children affected by this order are:

Name	Address ²	Date of Birth
Sophia Coubute	575 Center Rd W. Conemaugh NY 14224	1/31/12

5. Under the terms of the ☒ judgment ☒ order, the ☐ Supreme Court ☐ Family Court
☒ has ☐ has not retained exclusive jurisdiction to enforce the ☐ judgment ☒ order.

6. (Upon information and belief) Respondent has failed to comply with the terms of the
☐ judgment ☒ order in that [specify provision(s) alleged to be violated and nature of violation(s)]: mother
refuses to send the child for summer visitation.
mother continues to lie to child regarding father,
the court order, and the prior relationship. Leaving
child angry and afraid of father

7. No previous application has been made to any Court or judge for the relief requested in this
 Petition (except [specify]: _____)

WHEREFORE, Petitioner respectfully requests that the ☐ judgment ☒ order of the
☐ Supreme Court ☒ Family Court, dated April 25, 2013, be enforced in accordance with Article 6
 of the Family Court Act and for such other relief as the Court may deem just and proper.

Dated: 7/11/13


 Petitioner

Matthew Coubute Jr
 Print or type name

Signature of Attorney, if any

Attorney's Name (Print or Type)

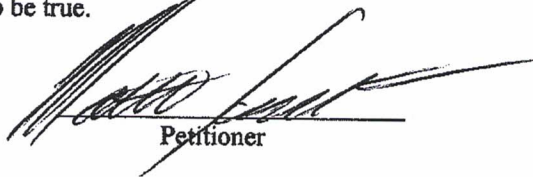
Attorney's Address and Telephone Number

² Unless ordered confidential, pursuant to Family Court Act §154-b, because disclosure would pose an unreasonable risk to the health or safety of the party. See Forms GF-21 and 21a, available at www.nycourts.gov.

GIA as
STATE OF ~~NEW YORK~~
COUNTY OF *Forsyth*)
:ss:

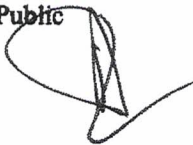
VERIFICATION

being duly sworn, says that (s)he is the Petitioner in the above-named proceeding and that the foregoing petition is true to (his)(her) own knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters (s)he believes it to be true.


Petitioner

Sworn to before me this
day of *07/11/23*

(Deputy) Clerk of the Court
Notary Public





FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF

In the Matter of a Proceeding for Custody/Visitation
Under Article 6 of the Family Court Act

FILE: 204566
Docket No. V-13065-17/21C
V-13065-17/21B

Matthew Callalate Jr
Petitioner,

PETITION FOR
MODIFICATION OF ORDER OF
☒ Custody ☒ Visitation
MADE BY ☒ FAMILY COURT
☐ SUPREME COURT

-against-

LAUREN HADJID
Respondent

TO THE FAMILY COURT:

The undersigned Petitioner respectfully shows that:

1. I am [specify relationship to child(ren)]: the FATHER of [specify child(ren)]:
name(s): Sophia L Callalate
I am seeking to modify an order of [check applicable box(es)]: ☒ custody ☒ visitation.

2. The home addresses of the Petitioner and Respondent are as follows:²
Petitioner: 3210 Lakeheath Dr. Cumming, GA 30041

Respondent: LAST KNOWN 575 Center Rd W. Seneca, NY 14224

3. Petitioner is Father - Matthew Callalate and was the PETITIONER in an action filed in
☐ Supreme Court of the State of New York, County, Index No. [specify]:
☒ Family Court of the State of New York, County, Docket No. [specify]: ERIE County
entitled File: 204566
Doc: V-13065-17/21C
V-13065-17/21B

4. [Applicable when Petitioner and/or Respondent are on active duty or have recently returned from
active military service; DELETE if inapplicable]: N/A
a. Petitioner [check applicable box]:
is on active duty, deployed or temporarily assigned to military service as follows [specify type of
service, military branch or National Guard unit, anticipated dates and location of duty and how duty is

¹ If the order was entered by a Court outside New York State or a tribal court, use Form UCCJEA-9.

² Unless ordered confidential, pursuant to Family Court Act §154-b, because disclosure would pose an
unreasonable risk to the health or safety of the party. See Forms GF-21 and 21a, available at www.nycourts.gov.

likely to affect custody or visitation, if at all]:³

returned from active duty, deployment or temporarily assignment to military service as follows
[specify date of return, type of service, military branch or National Guard unit, anticipated dates and
location of duty and how return from active duty is likely to affect custody or visitation, if at all]:

b. Respondent [check applicable box]: N/A

is on active duty, deployed or temporarily assigned to military service as follows [specify type of
service, military branch or National Guard unit, anticipated dates and location of duty and how duty is
likely to affect custody or visitation, if at all]:⁴

returned from active duty, deployment or temporarily assignment to military service as follows
[specify date of return, type of service, military branch or National Guard unit, anticipated dates and
location of duty and how return from active duty is likely to affect custody or visitation, if at all]: N/A

5. a. A ☒ judgment ☒ order, dated APRIL 25, 2022, was entered in the action directing
the Respondent Petitioner to [specify terms]:

A true copy of the judgment order is attached and made a part of this Petition.

b. [Applicable where the judgment or order had been entered in conjunction with a child
protective dispositional or permanency hearing order directing custody with a relative or other non-parent,
pursuant to Family Court Act §1055-b or §1089-a; delete if inapplicable]:

(i) The judgment order was issued in conjunction with the following child
protective or permanency proceeding [specify Family Court, county and docket #]: N/A

(ii) The judgment order provided that the following local department of social services
[specify]: and the following attorney for the child(ren)[specify]:
must be notified and shall be made parties to any subsequent proceedings for modification, enforcement or
termination of the judgment or order.

6. The names, addresses and dates of birth of all children affected by this order are:

Name	Address ⁵	Date of Birth
<u>Sophia Coulaute</u>	<u>575 Center Rd W. Benning NY 14224</u>	<u>11/31/12</u>

³ Inapplicable if Petitioner is based at a permanent duty station or has had a permanent reassignment of station.

⁴ Inapplicable if Respondent is based at a permanent duty station or has had a permanent reassignment of station.

⁵ Unless ordered confidential, pursuant to Family Court Act §154-b, because disclosure would pose an unreasonable risk to the health or safety of the party. See Forms GF-21 and 21a, available at www.nycourts.gov.

7. [Applicable where Order or judgment had been issued by Supreme Court; delete if inapplicable]:
Under the terms of the judgment order, the Supreme Court
has not retained exclusive jurisdiction to modify the judgment order.

8. (Upon information and belief) Since the entry of the judgment order, there has been a change of circumstances in that [specify]: *The minor child continues to digress emotionally. Respondent Mother refuses to allow access to Petitioner Father unless he has access in Buffalo, NY. Contrary to the order. Further the mother has talked so badly about Father, child is afraid.*

9. Because of this change of circumstances, the judgment order should be modified as follows [specify]: *The child should be placed in the Father's care as the Primary Custodial Parent with visitation/supervised for the mother.*

10. [Applicable to cases in which petitioner is a relative or other non-parent seeking to modify a custody order and where a child protective petition or permanency hearing report has been filed regarding the children; delete if inapplicable]:

a. A child protective petition, Docket # [specify]: *SAME AS ABOVE*, was filed in Family Court, [specify county]: *ERIE* on [specify date]: _____, alleging that [specify names of respondents on that petition]: *MOTHER + FATHER WERE NEGLECTFUL* neglected or abused the above-named child(ren). The petition resulted in [specify whether finding was made and, if so, the disposition; if the disposition has been adjourned pending a consolidated hearing with this petition, pursuant to F.C.A. §1055-b, so indicate and give next court date]: *Petition was dismissed*

b. A permanency report, Docket # [specify]: _____, pursuant to Article 10-A of the Family Court Act, was filed in Family Court, [specify county]: _____ on [specify date]: _____ indicating a permanency plan of custody of the child(ren) with Petitioner in this proceeding. The permanency hearing was adjourned to [specify date]: _____ pending a consolidated hearing with this custody modification petition, pursuant to F.C.A. §1089-a.

c. The child's birth mother has has not consented to the modification of the custody order to award custody to the Petitioner. If not, the following extraordinary circumstances support Petitioner's standing to seek custody of the child(ren) [specify]: *The child is harmed daily by the Respondent's Petitioner's continual emotional abuse*

d. The child's legally-established birth father has has not consented to the modification of the custody order to award custody to the Petitioner. If not, the following extraordinary circumstances support Petitioner's standing to seek custody of the child(ren) [specify]: _____

e. The child has been living with the following foster parent(s) [specify]: *N/A* since [specify date]: _____ The foster parent(s) has/have has/have not consented to the modification of

the custody order to award custody to the Petitioner. [If unaware whether they have consented, so state]:

f. The local department of social services [specify]: N/A in the related child abuse or neglect permanency proceeding has has not consented to the modification of the custody order to award custody to the Petitioner. [If unaware whether they have consented, so state]:

g. The attorney for the child(ren) [specify]: N/A in the related child abuse or neglect permanency proceeding has has not consented to the award of custody to the Petitioner. [If unaware whether they have consented, so state]:

11. No previous application has been made to any Court or judge for the relief requested in this Petition (except [specify]: Except Petitions found under current file number)

WHEREFORE, Petitioner respectfully requests that the judgment order of the Supreme Court Family Court, dated _____, be modified as set forth above and for such other relief as the Court may deem just and proper.

Dated: 7/11/23

[Signature]
Petitioner

Matthew Coulante
Print or type name

PRO SE
Signature of Attorney, if any

Attorney's Name (Print or Type)

Attorney's Address and Telephone Number

Attorney's Address and Telephone Number

GA as
STATE OF NEW YORK)

COUNTY OF Forsyth) :ss:

being duly sworn, says that (s)he is the Petitioner in the above-named proceeding and that the foregoing petition is true to (his)(her) own knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters (s)he believes it to be true.

[Signature]
Petitioner

Sworn to before me this
day of 07/11/23

[Signature]
(Deputy) Clerk of the Court
Notary Public



At a term of the Family Court of the
State of New York, held in and for the
County of _____, at
New York, on _____,

PRESENT: Hon.

In the Matter of a Proceeding for

☒ Custody ☐ Visitation or ☒ Enforcement ☒ Modification☐ Registration of an Order of: ☐ Custody ☐ VisitationUnder the *Uniform Child Custody Jurisdiction and Enforcement Act*

[Domestic Relations Law Art.5-A]

Matthew Coulouk
Petitioner,

-against-

LAUREN HADON
Respondent.

File: 204566

Docket No. V13065-17/21CV13065-17/21B

ORDER --

Electronic Testimony Application

The request of [specify name of applicant]: Matthew Coulouk, dated [specify]: 7/11/23
to testify or be deposed by telephone or other electronic means having been considered by this Court, it is hereby

ORDERED that the request is:☐ **GRANTED** and the applicant must follow the instructions below.

OR

☐ **DENIED** for the following reasons:

If this application is denied, the applicant must appear at the hearing in person.

The hearing is scheduled for [specify date and time]:

ENTER:

DATED:

Judge of the Family Court

PURSUANT TO SECTION 1113 OF THE FAMILY COURT ACT, AN APPEAL FROM THIS ORDER MUST BE TAKEN
WITHIN 30 DAYS OF RECEIPT OF THE ORDER BY APPELLANT IN COURT, 35 DAYS FROM THE DATE OF MAILING OF
THE ORDER TO APPELLANT BY THE CLERK OF COURT, OR 30 DAYS AFTER SERVICE BY A PARTY OR THE
ATTORNEY FOR THE CHILD UPON THE APPELLANT, WHICHEVER IS EARLIEST.

INSTRUCTIONS IF REQUEST FOR TELEPHONE OR ELECTRONIC TESTIMONY IS GRANTED:

On [specify hearing or deposition date]: _____ at _____ ☐ A.M. ☐ P.M., you must [check applicable
box]: ☐ call Part _____ at telephone 912-816-9138 OR ☐ be available to receive a call from the Court;

In order to confirm the above arrangements for your testimony, you must call the following telephone number [specify]:
_____ at this Court to confirm your testimony no later than [specify deadline in advance of the hearing]: _____

It is your responsibility to transmit to this Court, Part __, by fax [specify fax #]: _____
or by personal delivery at least [check box]: ☐ _____ hours ☐ _____ days prior to the hearing, legible copies of any
documents you intend to offer into evidence at the hearing.

You may choose to appear in person in this Court on your trial date, rather than appear by telephone or other
electronic means. You may retain an attorney to represent you in this Court while you appear by telephone or other
electronic means. If you fail to appear, either in person or by telephone or other electronic means approved by this Court,
this Court may hear the matter in your absence or may issue a **WARRANT** for your arrest. If you are the Petitioner, if
you fail to appear, either in person, by telephone or other electronic means approved by this Court, the Court may
DISMISS the petition.

Check applicable box:

- ☐ Order mailed on [specify date(s)] and to whom mailed: _____
☐ Order received in court on [specify date(s)] and to whom given: _____

ORI No: NY014023J
Order No: 2023-002229
NYSID No: _____

At a term of the Family Court of the State of New York,
held in and for the County of Erie, at Courthouse One Niagara Plaza,
Buffalo, NY 14202, on July 13, 2023

PRESENT: Honorable Kelly A. Brinkworth

In the Matter of a FAMILY OFFENSE Proceeding

Lauren E Haidon (DOB: 06/26/1982),
Petitioner

- against -

Matthew C Couloute Jr (DOB: 01/02/1970),
Respondent

File # 204566
Docket # O-08099-23
Temporary Order of Protection

Ex Parte

NOTICE: YOUR FAILURE TO OBEY THIS ORDER MAY SUBJECT YOU TO MANDATORY ARREST AND CRIMINAL PROSECUTION, WHICH MAY RESULT IN YOUR INCARCERATION FOR UP TO SEVEN YEARS FOR CRIMINAL CONTEMPT, AND/OR MAY SUBJECT YOU TO FAMILY COURT PROSECUTION AND INCARCERATION FOR UP TO SIX MONTHS FOR CONTEMPT OF COURT. IF YOU FAIL TO APPEAR IN COURT WHEN YOU ARE REQUIRED TO DO SO, THIS ORDER MAY BE EXTENDED IN YOUR ABSENCE AND THEN CONTINUES IN EFFECT UNTIL A NEW DATE SET BY THE COURT.

THIS ORDER OF PROTECTION WILL REMAIN IN EFFECT EVEN IF THE PROTECTED PARTY HAS, OR CONSENTS TO HAVE, CONTACT OR COMMUNICATION WITH THE PARTY AGAINST WHOM THE ORDER IS ISSUED. THIS ORDER OF PROTECTION CAN ONLY BE MODIFIED OR TERMINATED BY THE COURT. THE PROTECTED PARTY CANNOT BE HELD TO VIOLATE THIS ORDER NOR BE ARRESTED FOR VIOLATING THIS ORDER.

A petition under Article 8 of the Family Court Act, having been filed on July 13, 2023 in this Court and good cause having been shown, and Matthew C Couloute Jr having been not present in Court.

NOW, THEREFORE, IT IS HEREBY ORDERED that Matthew C Couloute Jr(DOB:01/02/1970) observe the following conditions of behavior:

[01] Stay away from:

[A] Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[B] the home of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[C] the school of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[D] the business of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[E] the place of employment of Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[14] Refrain from communication or any other contact by mail, telephone, e-mail, voice-mail or other electronic or any other means with Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012) including all social media contact, text messaging and third party communication;

[02] Refrain from assault, stalking, harassment, aggravated harassment, menacing, reckless endangerment, strangulation, criminal obstruction of breathing or circulation, disorderly conduct, criminal mischief, sexual abuse, sexual misconduct, forcible touching, intimidation, threats, identity theft, grand larceny, coercion, unlawful dissemination or publication of intimate image (s) or any criminal offense against Lauren E Haidon (DOB: 06/26/1982) and Sophia Couloute (DOB: 01/31/2012);

[99] Observe such other conditions as are necessary to further the purposes of protection: Matthew C Couloute Jr (DOB: 01/02/1970) access with the child, Sophia Couloute, is hereby suspended pending further order of this Court;

It is further ordered that this temporary order of protection shall remain in force until and including January 13, 2024, but if you fail to appear in court on this date, the order may be extended and continue in effect until a new date set by the Court.

Dated: July 13, 2023

ENTER


2023/7/15 10:21 AM KBA:KWB054CE:1977014/02550770003882288


Honorable Kelly A. Brinkworth

PURSUANT TO SECTION 1113 OF THE FAMILY COURT ACT, AN APPEAL FROM THIS ORDER MUST BE TAKEN WITHIN 30 DAYS OF RECEIPT OF THE ORDER BY APPELLANT IN COURT, 35 DAYS FROM THE DATE OF MAILING OF THE ORDER TO APPELLANT BY THE CLERK OF COURT, OR 30 DAYS AFTER SERVICE BY A PARTY OR THE ATTORNEY FOR THE CHILD UPON THE APPELLANT, WHICHEVER IS EARLIEST.

The Family Court Act provides that presentation of a copy of this order of protection to any police officer or peace officer acting pursuant to his or her special duties authorizes, and sometimes requires such officer to arrest a person who is alleged to have violated its terms and to bring him or her before the court to face penalties authorized by law.

Federal law requires that this order is effective outside, as well as inside, New York State. It must be honored and enforced by state and tribal courts, including courts of a state, the District of Columbia, a commonwealth, territory or possession of the United States, if the person restrained by the order is an intimate partner of the protected party and has or will be afforded reasonable notice and opportunity to be heard in accordance with state law sufficient to protect due process rights (18 U.S.C §§ 2265, 2266).

It is a federal crime to:

- cross state lines to violate this order or to stalk, harass or commit domestic violence against an intimate partner or family member;
- buy, possess or transfer a handgun, rifle, shotgun or other firearm or ammunition while this Order remains in effect (Note: there is a limited exception for military or law enforcement officers but only while they are on duty) ; and
- buy, possess or transfer a handgun, rifle, shotgun or other firearm or ammunition after a conviction of a domestic violence-related crime involving the use or attempted use of physical force or a deadly weapon against an intimate partner or family member, even after this Order has expired (18 U.S.C. §§ 922(g)(8), 922(g)(9), 2261, 2261A, 2262).

Check Applicable Box(es):

- ☐ Party against whom order was issued was advised in Court of issuance and contents of Order
- ☐ Order personally served in Court upon party against whom order was issued
- ☒ Service directed by Police Service
- ☐ [Modifications or extensions only]: Order mailed on [specify date and to whom mailed]:
- ☐ Warrant issued for party against whom order was issued[specify date]: _____
- ☐ ADDITIONAL SERVICE INFORMATION [specify]: _____

CCs: Matthew C Couloute Jr
Erie County Sheriff's Department
Lauren E Haidon
FAX

**FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE**

In the Matter of an Article 8 Family Offense Proceeding

Lauren E. Haidon (Petitioner)

Matthew C. Couloute Jr (Respondent)

File #: 204566
Docket #: O-08099-23

**NOTICE TO APPEAR
(IN PERSON)**

To: Lauren E. Haidon
575 Center Rd.
West Seneca, NY 14224

You are hereby notified to appear **IN PERSON** on:

Date/Time/Part:	July 17, 2023 at 10:30 AM in Part 4
Purpose:	Further Proceedings
Presiding:	Hon. Sharon M. LoVallo
Location:	Courthouse, One Niagara Plaza, Buffalo, NY 14202
Floor:	7
Room:	Report to Reception Window for Part 4

Please bring this notice with you and check in with the Court Officer in the Part.

Dated: July 13, 2023

Kelly A. Buckley, Chief Clerk