COMPLAINT regarding June 27th, 2014 pending motion to Vacate/quash ex parte orders entered on December 20th, 2013 and January 17th, 2014 plus the dismissal of Ira Kaplan Esq, as attorney Mr. Keith John Yonos from plaintiff’s case:

Plaintiff filed a Motion on June 13th, 2014 in Bergen County Court House located on 10 Main street Hackensack NJ. The financial clerk dated that motion to be heard on June 20th, 2014. Plaintiff had also filed a motion regarding 2014 Summer Camp for minor son, Keith-Alexander Yonos on the same date to be heard also on June 20th, 2014. Another motion regarding review of child support and requesting to decrease it filed on June 13th, 2014to be heard on June 20th, 2014 by financial clerk

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Judge Clerk Theresa (Terry) was forced to give many reschedules of these three motions due to the fact that plaintiff’s ex husband's attorney Mr. Ira Kaplan had requested reschedules in order to respond to his motions, which he did over the phone (conversation recorded and available; evidence that all three motions were to be heard on June 27th, 2014). On June 27th, 2014 plaintiff was prepared to present and argue those three motions and Mr. Ira Kaplan’s cross motions.

Judge Peter Melchionne stated that he was not hearing the motion regarding the VACATE/Quash and dismissal of Mr. Ira Kaplan on that day. Plaintiff asked the judge the specific reason. He said he was rescheduling it for July 11th, 2014 and told his clerk to put it in the calendar. Judge Peter Melchionne said Mr. Ira Kaplan had not responded to that specific motion. Plaintiff told the judge he had responded via regular mail and e-mail and he was provided it to his clerk. Still Judge Peter Melchionne said he was not entertaining it that day. Mr. Ira Kaplan did not defend or argue he remain silent. Judge Peter Melchionne denied the review and decrease of child sport and plaintiff’s request to review of Keith John Yonos’ current financial status.

Judge Peter Melchionne denied plaintiff viewing the bill of the "summer camp" that minor son was attending but to pay the amount plaintiff’s ex husband was demanding --without a factual and updated bill, plaintiff has been forced to pay $1,300.

On or about July 7th or 8th, 2014 plaintiff called Judge Peter Melchionne's chamber to confirm the time of the hearing dated on July 11th, 2014. Plaintiff spoke with Theresa (Terry) and she was told there was no hearing because Judge Peter Melchionne was on vacation. Plaintiff asked when was that motion going to be heard. Theresa (Terry) said July 25th, 2014.

On August 6, 2014 plaintiff requested her ex-husband's attorney to be dismissed from the case and entered the financial questionnaire due July 3rd, 2014 that Mr. Kaplan refused to take three times during the "oral examination". Mr. Kaplan asked for incarceration as punishment because according to him plaintiff never gave it to him. This is an untrue and harassing statement as plaintiff has a witness willing to testify who was present when he refused taking the questionnaire. Mr. Ira Kaplan was very abusive, retaliatory, harassing, intimidating, yelling accusatory remarks, calling plaintiff names, asking a sheriff twice to arrest her --sheriff said "she is not doing anything wrong, I have no power to do that" -- during the "financial oral examination-deposition" per court order.

Mr. Ira Kaplan repeated question was what car I was currently driving, vin number, plate, registration and car insurance. I refused to provide him that information. I informed him I was driving my employment company car. He demanded to know where I worked and I provided him with my job employment information and gave him a copy of my most recent job paystub.

I clearly told Mr. Ira Kaplan and his client Mr. Keith J Yonos not to interfere my job employment and with my company car since I could potentially loose my employment if he was to harass me.

On or about end of August or firs week of September I was walking toward my home and a Bergen County sheriff was driving toward me. The sheriff got out of his vehicle and said “Amy Weber, you are Amy Weber because you got out of that white car and I am here to serve you.” I did not look or spoke to that sheriff and walked toward my home and entered into my home.

The next day I found near my car some wet documents since it had rained the night before. I noticed that one piece of the documents had the writing of Mr. Keith J Yonos and had the VIN number, plate and registration of my car and a specific note “look for this car that she is driving” referring to me Amy Weber.

How does Mr. Keith John Yonos know which car I was driving and obtained the vin number and all the information of that vehicle?

There has been a constant changing of the Judges that must be noted:

1-Judge Peter Melchionne passed it back to Judge Frances McGrogan.    
2-Judge Frances McGrogan "is also on vacation as Judge Peter Melchionne has been for the past month" plaintiff had no judge to go to.   
3- A new Judge was to hear plaintiff’s OSC Judge Terry Paul Bottinelli.

Judge Terry Paul Bottinelli never heard my OSC. Judge Bottinelli’s male Clerk came out to the hallway and told my court-watcher friend, Mr. Keny Nunez and me that Judge Bottinelli was only available to hear OSC when “a kid was to be removed from a parent not for my type of OSC.”

Where are the Judges in Bergen County? Why are they not hearing plaintiff’s case?

On August 27th, 2014 Ira Kaplan wanted to jail the plaintiff but the struggle ended about an hour later. Plaintiff was traumatized and unable to work the entire week.   Plaintiff has no news of her son for the past two years.   Plaintiff has had to go to the psychologist Mary Mandies approved by the Judge Frances McGrogan for court ordered "meaningful 6 month treatment" in order to see her son, as well as her court-approved psychiatrist Dr. Ramon Ravelo.

There is a FaceBook page (<http://facebook.com/amiespainfulsilence>) and website ([http://painfulsilence.com](http://painfulsilence.com/" \t "_blank)) exposing Family Court and CPS corruption in both plaintiff's case and others' cases.  Plaintiff pled the 5th amendment.  The sheriffs' deputies were very intimidating as they examined the plaintiff's digital social and personal sites.  Ira Kaplan Esq, attorney for ex-husband, said someone wrote on Painful Silence FaceBook wall/ Luis Padierna's "event page": Judge McGrogan, you are next.  Mario Blanch Esq asked plaintiff about it and she said there are several administrators on that page and that the posting she was next to be exposed.   Ira Kaplan Esq referred to everything that plaintiff was posting pictures of her son, that she was posting her case worker's ( Luis Padierna) documents plus the phrase "Judge McGrogan, you are next".    Plaintiff's attorney, Mario Blanch Esq, spoke to her, saying they are trying to arrest her.  Plaintiff's brother was outside and also a friend Kenny Nunez (who is willing to be a witness).  They will testify that they had sheriffs around them, also.

On September 22nd, 2014 during the night -- unknown time –

the white car  used regularly by plaintiff was parked as usual on the street.  That vehicle was vandalized.  Four tires knifed, all front and back glass broken, all four doors' windows broken, front and back lights broken and front bumper detached.   No camera recording on the street available but a neighbor may have to release the video.    On September 25th, 2014 another vehicle parked on my driveway was also vandalized.   Same damages all tires, etc.  Plaintiff's front cameras got the video of the act of crime and in it can see a man and the description is: white, bald head, probably about 5'8"/or 9" height. The town police have the recording. We also can view a man that walked prior to commit the crime on my driveway tall, thin and with a hoody on. My neighbor Anthony saw him and provided the same descriptions.

On October 15th, 2014 my side driveway that was recently installed with bricks paver was vandalized around 7: 30 PM. I happened to see a man thru my window with a hoody on, tall and thin carrying a bucket and spilled something on my pavers. I steed outside my home to take a look and I saw oil spilled. I have friends over staying at my home and we called the Fairview police Department and filed a report. We also provide a copy of a burned CS of the home camera video recording.

Same night October 15th, 2014 around 11: 30 PM we caught a young man entering on my driveway attempting to get near the vehicle that was parked in my drive way. My friend was in my back yard saw him,

My friend asked him what was he doing in our premises and who was he. The young man responded he was going to visit my duplex next-door neighbor Mr. Koder Hijazi, that unknown individual whistled and walked toward Mr. Koder Hijazi’s home and his front door. I saw him too. The Fairview Police Department is currently investigating this dangerous issue.

Mr. Ira Kaplan since 2007 thru my entire DCP&P case and custody battle t has been harassing me while representing Mr. Keith J. Yonos has always made statement that “my neighbor had reported to his client Mr. Keith J. Yonos personal activities about my home and who has been at my home.

I have currently filed a complaint against Mr. Koder Hijazi since I have been informed he has been harassing my friends and anyone that is living or visiting my home.

Plaintiff informs all involved once again that she does not have any videos, audio recordings and CPS documents with her or at her home. Everything has been disseminated in a USB flash drive--prior the gag order and it is out internationally in the hands of hundreds of people including but not limited journalists.

I have received e-mails from my professional LinkedIn account stating that Mr. Ira Kaplan has tried to view my LinkedIn private profile. I consider this action as inappropriate, unwelcome and harassment.

Despite that this pending motion is not being heard Mr. Ira Kaplan sent me an e-mail stating that the decision of Judge Terry Paul Bottinelli is considered final when in fact it is not. Mr. Ira Kaplan asked Judge Frances McGrogan to reinforced the judgment during my hearing on August 27th, 2014 and Judge McGrogan denied it.

I continue to be harassed by Bergen County sheriffs with this judgment that I am requesting to be vacated and have Mr. Kaplan dismissed from this case—still pending and not heard by any judge since June 27th, 2014.

In sum, Mr. Kaplan has violated the following Rules of Professional Conduct:

1.4;6 1.6 Confidentiality; 1.7,1.8, 1.18, 2.4 – Conflict of Interest; 3.1, 3.2, 3.3, 3.4; 3.5 Illegal ex parte communication; 4.1; 4,4a; 7,3; 8.3 (d.i); Rule 4.1: Truthfulness in Statements to Others; and 8.4

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