

Paul A. Clark, Esq
Attorney for Plaintiff
10 Huron Avenue, # 1-N Jersey
City, New Jersey 07306. Tele:
(202) 368-5435
Email: pclark@pclarklegal.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SURENDER MALHAN,
MARYANN PETRI,
AND MICHAEL VOLPE
PLAINTIFFS,

vs.

CHRISTINE NORBUT BEYER, COMMISSIONER OF
NEW JERSEY DEPT OF CHILDREN AND
FAMILIES, HEIDI W. CURRI, PETER MELCHIONNE,
MATT PLATKIN, AND JOHN DOES 1 THROUGH 10

DEFENDANTS.

Defendants.

No. 3:22-cv-06353-MAS-TJB

CERTIFICATION
OF PLAINTIFF
SURENDER MALHAN
FOR
PRELIMINARY INJUNCTION

I, Surender Malhan of full age, hereby certify as follows:

GAG ORDER

1. I am living in the United States of America - one of the most civilized nations in the entire history of the human race and, (a) I don't know where my two helpless children are. (b) I cannot write on social media a one-line message for my son and daughter - "I love you very much!"
2. What kind of a world we are living in - where a parent cannot even write on social media to his son and daughter - "I love you very much!"
3. A Child Predator is anyone who exploits a child, abuses a child, inflicts emotional and/or physical pain on a child; causes directly or indirectly irreparable harm to a child. In our

Family Courts, children are tortured and abused to a level that our family courts now qualify to be called - a Child Predator Industry. A Judge's chambers are torture chambers, gas chambers - for children and innocent parents.

4. Security Act Title IV-D: When I refer to Security Act Title IV-D, I am referring to (a) subsections which provide incentives to the State government for collecting Child Support, i.e. for every dollar the State government collects in child support (child support money taken from one parent and given to the other parent), the federal government gives the state government some matching incentive - i.e. funds move from federal account to State account. I have spoken with traumatized, shell shocked parents whose children were taken away by CPS and they now have no knowledge of where their children are. All this in America! The land of the Free, where now - Child Predators roam free!
5. Since February 2011, I have witnessed up-close -
 - (a) In family courts there are no freedoms, there is no Constitution.
 - (b) In family courts there is practically zero accountability and virtually total secrecy. This has turned family courts into a fertile breeding ground for evil, injustice, crime and corruption.
 - (c) The levels of evil, injustice, crime and corruption, the total lack of human values - is so appalling, so palpable - that it will be fair to conclude that - one hundred years from today children may read in history books - "...in the final analysis, American Civilization was destroyed by the family courts (and all who aided and abetted)."
 - (d) Kidnapping of children in family courts is very easy - (i) Step-1: based on false alarm, remove the child from one or both parents. (Remove from both parents if trafficking through DCPD/CPS). (ii) Step-2: Order psychological evaluation, therapy, supervised visits. Gradually wean the child away from the parent. (iii) After few months - with full support/assistance of several family court actors - the child's relationship with the parent is terminated forever.

- (e) Secrecy, Power, Money and Lack of Accountability -- the ultimate, most powerful recipe to transform human beings into devils, or to unleash the devil inside a human being.
- (e) Secrecy breeds crime and corruption. Every evil person, every criminal, every Child Predator demands absolute secrecy - Gag Orders.
- (f) After Kidnapping and psychologically murdering children, the poor helpless parent(s) are threatened, silenced, sanctioned - they cannot tell their horrifying experience to anyone in news media or on social media. There is no "knee to the neck,... choke hold" video anywhere.
6. This is happening all over America. The central goal in every case in family court is, - to rob the Bank of Litigants Joe and Mary. The central goal in every case is (a) extract all assets. (b) make both litigants work like a slave for decades and extract all earnings.
 7. Several dozens of litigants I have spoken with personally have had similar experience.
 8. I want to talk about this. This is my moral and legal duty.
 9. It is the moral and legal duty of every victim of evil, injustice, crime and corruption to have courage to speak, to inform "we the people" - as many as he can.
 10. The number one reason we are still having some civilized values is - "people are watching".
 11. I want to protect and serve. I want to help protect our civilized values for ourselves and for our children. For this the number one most vital step is that I share my story with the media, on social media and reach out to as many as I can.
 12. What kind of a world we are living in - where a parent cannot even write on social media to his son and daughter - "I love you very much!"

**ALINA HAS CONSISTENTLY VIOLATED IMPORTANT COURT ORDERS BUT
SOMEHOW I AM THE ONE THE COURT HAS SANCTIONED**

13. All we need is to open our eyes, switch on our brain and we will see - this is a case of a monumental, horrendous, bone chilling marriage fraud, immigration fraud masterminded by

Viktoriya Myronova and her daughter Alina Myronova. If we "follow the money", we will see evidence of this all over right from the time they both arrived from Ukraine in 2004 to the time Alina filed for divorce in Feb 2011 -- over \$300,000 outright stolen from marital assets and my business SpaceAge (a software services firm).

14. Alina and her mother Viktoriya should be in prison for the endless list of crimes, yet everyone in family court has leveraged this to extract my 42 years of blood, tears, sweat and toil.
15. As per Judgement of Divorce, Alina must confer with me on all important matters related to our children.
16. Since filing of divorce on 24 Feb 2011, Alina has not conferred with me on any matter related to our children.
17. Since filing of divorce on 24 Feb 2011, Alina has consistently tried to ensure that I have no parenting time, that I have zero contact with my children.
18. The Judgement of Divorce requires that our children be in therapy. As per JOD that is the only path for me to resume contact with my children.
19. Since filing of divorce on 24 Feb 2011, time and again, Alina has shown little or no respect of the court and court orders.
20. Past several months, I have asked Alina several times about children being in therapy and till date she has not replied.
21. And now, recently I came to know that **Alina has fled from the State of New Jersey and gone underground!** Earlier I could at least google my children's name and get something posted by their school. Now I get nothing. Even google gives no results for "SIX people" - Alina Myronova, Viktoriya Myronova, Kenneth Hayden (Viktoriya's 5th boyfriend and 2nd husband). Jeffrey Michael Rothstein (Alina's 3rd boyfriend and 2nd husband), and my 2 children. It is fair to say Alina has gone to extreme lengths to "go underground", to go off the radar.

22. In first week of December 2022, I came to know that Alina has sold her Bayonne, New Jersey residence.
23. Alina and Jeff Rothstein (her boyfriend/husband) apparently sold the house at 98 W 54th Street owned by A&J Holdings LLC (Alina and Jeff Holdings LLC) in August 2022. Zillow.com indicates that 98 W 54th St, Bayonne was sold on 08/26/22 for \$649,000.00. www.zillow.com/homedetails/98-W-54th-St-Bayonne-NJ-07002/38868845_zpid/
24. This court should be able to take judicial notice of this, and it also would appear to qualify as a business record. Despite the JOD and pending appeal, Myronova failed to notify me and the court, that she has moved. I began to suspect something was amiss when a certified letter to Myronova at 98 W 54th Street in Bayonne was forwarded to Massachusetts. In December 2022, legal documents were hand delivered to 98 W 54th Street. A day or two later a person purporting to be the resident at 98 W 54th Street called me and told me that he was living at 98 W 54th Street and that Myronova had sold the house and had not lived there in months. He (caller), i.e, the buyer too said, he did not know where Alina lives now.
25. One certified mail sent to Alina was returned via Massachusetts. This can indicate that Alina has moved out of State. While another source says Alina moved to Florida. I have no definite knowledge about where my children are today.
26. I have emailed Alina several times asking about where my children are, if they are in therapy, school, etc. I have received no reply.
27. I have filed a motion in family court to sanction Alina for taking the children away out of state without consulting or informing me, but I do not expect the family court to ever take any legal action to hold Alina accountable.
28. During litigation Alina was caught red-handed falsifying evidence to defraud me, and even after I proved this, the court never sanctioned Alina a single penny,

29. The only possible chance I have of any contact with my children would be through the internet—but the honorable David Katz has blocked this.
30. In Judge Katz’s interview with journalist MaryAnn Petri, he portrays himself as a fair and empathic judge, but nothing could be further from the truth. My story contradicts virtually all of Judge Katz’s claims in his interview with MaryAnn Petri, and I should be allowed to respond.

SALE OF MY PREMARITAL AND POST MARITAL ASSETS.

LEIN ON MY PREMARITAL AND POST MARITAL ASSETS

31. The Judgement of Divorce awarded Alina 65% in pre-marital asset, my residence - 2L.
32. The Judgement of Divorce awarded Alina 40% in post-marital assets, my office units 1M, 1N.
33. I have an appeal pending. Transcripts are still not completed as there are over 200 volumes (transcription cost running into over \$125,000.00).
34. As of November 2022, I had a “pre-approved” HELOC loan on 2L but I have not been able to finalize it due to a lien on the property.
35. As of Jan 2023, my financial situation is steadily improving. I have not missed a single \$1000 per week backlog payment that was ordered by the family court.

Option to Buy Marital Residence 2L

36. Unit 2L, 10 Huron Avenue, Jersey City: This has been my residence since May 1996.
37. In 2007, I purchased 2L with my premarital assets.
38. **Alina is about 23 years younger to me, she arrived from Ukraine and began living with me in June 2004 and began earning in Jan 2005** (made possible by the job I offered her in my business). Even if she poured all her earnings towards purchase of 2L, her equity in 2L would have been barely 15%. She contributed \$0.00. Instead she dissipated marital assets, i.e. diverted all her earnings 100% and much more to her mother Viktoriya.
39. Judgement of Divorce awarded Alina 65% in 2L despite she contributed \$0.00.

40. Judgement of Divorce gave me the Option to Buy 2L, by matching any bonafide offer and paying Alina her 65%.
41. Alina had an offer for 2L at \$475,000. 65% of this is \$308,750.00
42. I was able to get a loan pre-approved for an amount of \$400,000.00.
43. Since Judgement of Divorce in Feb 2022, I am current on my child support payment and installment payments towards the backlog as ordered by the court.
44. As of November 2022, the “arrears” were about - \$2,259,929.00 and I am current on the installment payment plan as per the Judgement of Divorce.
45. This child support backlog of over \$2.2 million has resulted because, over \$2 million in legal fees awarded to Alina's attorney - has been accounted in State of New Jersey Child Support Probation's account books as Child Support Backlog. **Such accounting practice is gravely illegal.**
46. The Title Company, blocked the sale saying that there is a \$2,259,929.00 lien that must be paid off before I can get a mortgage.
47. This has become like a chicken and egg problem.
48. I ask the Court to order that Lien on 2L by any individual or Bank giving me the loan will be Primary and the Lien by Alina / Child Support will be Secondary. If the title company gets this assurance the money will be distributed.
49. My office units and my residence are in same building - just one level below my residence.
50. I have health challenges. I work over 70 hours a week. There are times when at night 11PM or 1AM, I have the need to go down to my office units to do some work. I cannot afford to have my business located even one block away.
51. I am also bidding for certain contracts which I can get within this year. For this it is absolutely vital that my office should not be moved.

52. Moving my office will cause loss of time of upto at least one month and the cost of hiring people to relocate. I just cannot afford this.

Proposed Solution on Residence and Office Units

53. Please remove the Lien on 2L so I can get a loan. Or, order that the Lien by the Bank will be primary lien.

54. Option to buy as ordered in the Judgement of Divorce is a valid enforceable order.

55. Order the enforcement of Option to Buy as ordered in the Judgement of Divorce and as required by State and Federal Rules, since I am current on my child support payments.

56. For the \$2.25 million in child support backlog (a) I have an appeal pending. (b) As per JOD there is a payment plan which I am current on.

57. For the \$2.25 million in child support backlog as per JOD the payment plan was NOT - that all assets be sold with the intent of paying out the child support backlog. The JOD set up a payment plan that I am following. I have not missed a single payment.

I, Surender Malhan of full age, hereby certify that all the facts stated herein are true and accurate. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Surender Malhan.

Date: 02/06/2023