

ME

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IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS

In the Matter of)
)
HAL RICHARDSON,)
Petitioner,)
and) Case No. 96-D-217
)
CLAUDINE DOMBROWSKI,)
Respondent.)
_____)

STATE OF KANSAS)
) ss
COUNTY OF SHAWNEE)

AFFIDAVIT IN SUPPORT OF
MOTION FOR ORDER TO APPEAR & SHOW CAUSE
(Pursuant to K.S.A. 20-1204a)

I, Jason P. Hoffman, after first being duly sworn according to law, do hereby say
the following:

1. My name is Jason P. Hoffman. I am one of the attorneys for the petitioner herein. I am providing this Affidavit in support of petitioner's Motion for Order to Appear and Show Cause filed herein on January 27, 2009. I have personal knowledge of all the facts stated in this Affidavit.
2. The Court directed respondent to remove all pictures of the parties' minor child from her website on September 27, 2006;
3. In mid-February, 2008, counsel for petitioner conducted a cursory Google search of respondent's name that disclosed that respondent maintained a

myspace.com account¹. The URL for the account is www.myspace.com/firesheart. A number of links on respondent's myspace.com page were to various pictures of the parties' minor child. Notably, the link:

http://www.slide.com/r/89V7tcZj6D_tKrxfhvfnOtitOfDTgFtE?view=large redirected the user to the external website slide.com and to "Claudine & Rikki's Slide Show". There appeared to be 78 images on this webpage, the majority of which are of the parties' minor child. There were links to several other slide shows on the slide.com page created by respondent entitled "Class of 2013", "Untitled" and "4-21-2007 School Carnival" that contained an additional 33 images of the parties' minor child. Finally, when the link to "angelfury" (respondent's screen name on her slide.com page) was opened, a slide show is presented featuring pictures of the parties' minor child. While respondent's website- AngelFury.org² –did not contain pictures of the parties' minor child, pages maintained by respondent certainly did.

4. On February 13, 2008, petitioner filed his Motion to for Order to Appear and Show cause setting forth the facts at ¶ 2, above, and arguing that respondent was not acting in conformity with the Court's directive with respect to maintaining pictures of the parties' minor child on the Web. As a result,

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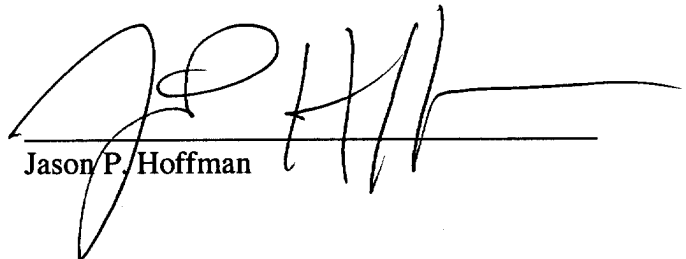
<http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendID=70664122>
The name on respondent's myspace.com account is "AngelFury".

² Angelfury.org is a web site that is "under construction" the home page of which contains a dialogue box attributed to respondent. The link at the bottom of the home page to Claudine Dombowski's e-mail identifies her e-mail address as AngelFury@AngelFury.org.

petitioner asked that respondent be required to show cause why she should not be held in contempt. Further, petitioner asked that his attorney fees for the preparation and prosecution of the Motion for Order to Appear and Show Cause be assessed against respondent.

5. Shortly after petitioner's Motion for Order to Appear and Show Cause was filed, respondent took steps to remove some- but not all –of the images of the parties' minor child from the sites detailed by petitioner.
6. The Court took up petitioner's Motion for Order to Appear and Show Cause on April 25, 2008. Judge Johnson made is very clear to respondent that she was not to maintain any web pages with the parties' minor child's image on them and that she was otherwise not to post pictures of the parties' minor child on the internet.
7. On or about January 27, 2009, counsel for petitioner became aware that respondent was maintaining or contributing to a web page located at <http://ks-fcrc.com/default.aspx>. A link of that page <http://ks-fcrc.com/ks96d217.aspx>, directs the visitor to a page detailing the history- in respondent's view –of the instant litigation. Among other things, the page contains a presentation containing a collage of photographs of the parties' minor child set to a Sinead O'Connor song and digital video and audio of court proceedings that were apparently clandestinely recorded by respondent.

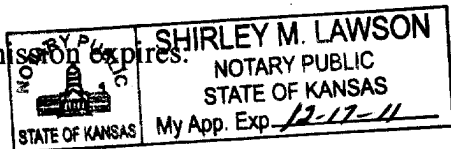
Further affiant sayeth naught,


Jason P. Hoffman

Subscribed and sworn to before me this 19th day of February 2009.



Notary Public

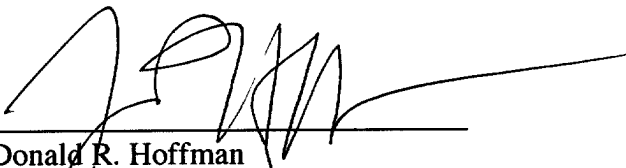
My commission expires. 

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 19th day of February, 2009, a true and correct copy of the above and foregoing document was deposited in the United States Mail, first class, postage prepaid, addressed to the following:

Claudine Dombrowski, Pro Se
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