

(ENDORSED)  
**FILED**  
FEB 20 2024

Clerk of the Court  
Superior Court of CA County of Santa Clara  
BY \_\_\_\_\_ DEPUTY

**j. RARAS**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SANTA CLARA**

KOSTIANTYN MARS

) Case No.: 22FL003144

Petitioner, ) [Honorable Beth McGowen,  
vs. ) Presiding Judge of Superior Court of California]

) [Dept. 72 – Honorable Brooke A. Blecher,  
HANNA MARS, ) Supervising Judge of Superior Court of California]

Respondent. ) [Dept. 79 – Hon. Stephen P. Lowney,  
vs. ) Judge to be served the Disqualification Statement]

) **NOTICE OF PETITIONER'S VERIFIED  
STATEMENT OF DISQUALIFICATION OF  
SANTA CLARA SUPERIOR COURT JUDGE  
STEPHEN P. LOWNEY  
FOR IMPERMISSIBLE CONFLICT OF  
INTEREST,  
REQUEST FOR HIS DISQUALIFICATION,  
STAY ON ALL HIS ORDERS UNTIL FINAL  
JUDGMENT,  
AND NULLIFICATION OF ALL HIS ORDERS  
RETROACTIVELY BACK TO 10/31/2022**

[Statement of Disqualification and Memorandum of  
Points and Authorities filed concurrently]

(Code Civ. Proc. 170.1(a)(6)A(iii);  
170.1(a)(3)A; 170.3)

**TO THE SANTA CLARA COUNTY SUPERIOR COURT  
AND PRESIDING JUDGE, HONORABLE BETH MCGOWEN  
AND SUPERVISING JUDGE, HONORABLE BROOKE BLECHER,  
AND RESPONDENT THROUGH COUNSEL:**

Petitioner Kostiantyn Mars hereby gives notice of his verified statement of disqualification against Santa Clara County Superior Court judge Honorable Stephen P. Lowney, by which he makes request for his disqualification, stay on all of his orders until final judgment, and nullification of his orders in this case retroactively back to 10/31/2022.

The Verified Disqualification Statement and accompanying memorandum of points and authorities will be filed and served. Code of Civil Proc. 170.3(c)(1)

Respectfully submitted,

DATED: February 12, 2024

KOSTIANTYN MARS  
PER SE

(ENDORSED)

F I L E D

FEB 20 2024

Clerk of the Court

Superior Court of CA County of Santa Clara  
BY \_\_\_\_\_ DEPUTY

J. RARAS

1 KOSTIANTYN MARS  
2 PO BOX 8081  
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4 CONSTANTINE.MARS@GMAIL.COM  
5 (408) 518-0088

6 HON. BETH MCGOWEN  
7 PRESIDING JUDGE OF SUPERIOR COURT OF CALIFORNIA  
8 CHAMBERS OF HON. BETH MCGOWEN, PRESIDING JUDGE  
9 191 N FIRST STREET,  
10 SAN JOSE, CA 95113  
11 (408) 882-2700

12

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 IN AND FOR THE COUNTY OF SANTA CLARA

15 KOSTIANTYN MARS ) Case No.: 22FL003144  
16 Petitioner, ) [Honorable Beth McGowen,  
17 vs. ) Presiding Judge of Superior Court of California]  
18 HANNA MARS, ) [Dept. 72 – Honorable Brooke A. Blecher,  
19 Respondent. ) Supervising Judge of Superior Court of California]  
20 )  
21 ) PETITIONER'S COVER LETTER TO  
22 ) HONORABLE BETH MCGOWEN,  
23 ) PRESIDING JUDGE  
24 ) OF SUPERIOR COURT OF CALIFORNIA  
25 ) AND  
26 ) HONORABLE BROOKE A. BLECHER,  
27 ) SUPERVISING JUDGE  
28 ) OF SUPERIOR COURT OF CALIFORNIA

29 Dear Honorable Beth McGowen and Honorable Brooke A. Blecher,

30

31 I respectfully request that my case 22FL003144 to be assigned to Department 72 and to be heard  
32 by Honorable Brooke A. Blecher.

33 Otherwise I do not feel it would be given its due regard, taking into account gruesome  
34 experience with corrupt judges of Department 79: Hon. Stephen P. Lowney, who is requested to be  
35 disqualified from Superior Court, and previous disqualified judges Flint and Towery.

36 Please transfer case 22FL003144 to Department 72 accordingly.

37

1 It is my belief that impartial hearing could be made only by the Judge who represents the  
2 highest standards of judicial ethics, and it is of my belief that Honorable Brooke A. Blecher,  
3 Supervising Judge, is well known for highest impartiality and adherence to ethical standards.

4

5 I kindly request your help with transfer of the case 22FL003144 to Department 72, because after  
6 gruesome experience with three corrupted judges (Lowney, Flint and Towery), two of whom  
7 became center of loud media scandals about falsifications and abuse of judicial power, were  
8 investigated for suspect of bribery, repetitive judicial misconduct and severe abuse of judicial  
9 power, and were prematurely terminated from Superior Court, credibility and reputation of Superior  
10 Court was irreparably damaged by those corrupted judges.

11

12 I do understand, that it might happen, that severe falsifications, repetitive misconduct, threats  
13 and coercion, and intentionally harmful orders of Lowney, Flint and Towery could be caused by  
14 them being bribed by unethical attorney Nancy L Roberts, who was requested to be disqualified  
15 already twice, and who has huge documented history of falsifications, lies and false allegations,  
16 impermissible pressure on judges, experts, emergency screeners, professional supervisors,  
17 avoidance of service, harassment of parties in the case and process servers.

18 Motion to Disqualify Nancy L Roberts from case 22FL003144 is respectfully attached to  
19 Evidence for Verified Written Statement, to which this Cover Letter is attached.

20 Unfortunately with the help of corrupted judge Stephen P. Lowney, Nancy L Roberts was able  
21 to escape disqualification on 02/07/2024 – and it is suspected that the only reason that saved Nancy  
22 Roberts from disqualification if suspected bribe, obtained by Lowney from Nancy in January 2024.

23

24 I kindly bring to your attention that case 22FL003144 is about massive fraud scheme facilitated  
25 by Nancy L Roberts with the goal of international child abduction of my son Max Mars outside of  
26 the United States. Efforts of Nancy L Roberts in falsifying court records, bribing judges,  
27 impermissible pressure on experts, led to more than year of enforced parental alienation, while my

1 son is held in undisclosed location, and all contact with my son is blocked (which is motivated by  
2 intentionally harmful orders of corrupt judge Flint, suspected of receiving bribe from Nancy L  
3 Roberts in April 2023, and investigation of whom is still pending).

4 Evidence of documented history of international child abduction, witness statements and  
5 supervised visits reports were filed with the Court – but were completely ignored by corrupted  
6 judges Lowney and Flint.

7  
8 Signature of corrupted judge Towery on fraudulent DVRO in September 2022, led my  
9 grandmom, defenseless 95 years old senior woman with disabilities, to be kicked out from home  
10 and put into irreparable terminal condition due to violence and stress of Respondent in this case.

11  
12 Signature of corrupted judge Flint, led my son to being held in undisclosed location, all contact  
13 with him blocked, my child used as hostage and leverage in attempts of Nancy L Roberts and  
14 corrupted judges Lowney and Flint to force me to sign-off custody, abandon my son and give up all  
15 documents of my son therefore allowing international abduction of my son outside of the United  
16 States.

17 Respondent in this case filed new DVRO against me prohibiting all contact with my son –  
18 because I greeted my son with his 8<sup>th</sup> birthday, and Max was happy to see father on his birthday,  
19 hugged me and smiled to me (which according to unethical attorney Nancy L Roberts is prohibited  
20 until I will sign-off custody and give up all documents of my son).

21  
22 Corrupted judge Lowney made orders forcing me to give up passport and all documents of my  
23 son, and threatened to put me into jail through contempt, and silence me with “vexatious litigant”  
24 prefiling order if I will try to legally request reconsideration of his intentionally harmful orders.

1 Meanwhile my son does not have any contact with me, sim card is pulled out from his phone,  
2 and his mother promised me to abduct and “bury our son in Ukrainian soil, so you will never see  
3 him again”. Even without international child abduction that she threatened to do – she already  
4 blocked all our contact with my son, without any reasons for that (there were no conflict, no  
5 violence, only the fact that I provided green cards to my son and my soon-ex-wife in August 2022,  
6 and said that instead of international child abduction to Ukraine that she threatened, we should  
7 focus on healthy co-parenting and safety of our child here, in the United States – for which she  
8 retaliated by harming my 95 years old grandmom and abduction of my son in less than a month, in  
9 September 2022).

10

11 This matter was never heard because of falsifications and fraud of unethical attorney Nancy L  
12 Roberts, who dismissed trial on opposing DVROs in 2022. Later Nancy Roberts postponed for the  
13 next 6 months trial on opposing DVROs 2023 with the help of corrupted judge Lowney – evidence  
14 to that DVRO clearly demonstrates that Nancy L Roberts is lying to court about Max being  
15 allegedly “abandoned child”. Evidence clearly shows that I did not abandon my son, I love and care  
16 about my child, and I offer my ex-spouse peace and healthy co-parenting with the focus on our  
17 child’s best interest – but in turn she calls police on me, asks police about putting me into jail for  
18 greeting my son with birthday, files DVRO against me, and prohibits me both greeting my son with  
19 birthday, and any contact with my son.

20

21 Which demonstrates some absolutely unhealthy approach to enforce parental alienation in  
22 preparation for international child abduction, which is facilitated through massive fraud schema of  
23 bribery, fraud, falsifications, threats and coercion. And it is documented in evidence that harmful  
24 behavior of Respondent is advised by her unethical attorney Nancy L Roberts, and falsifications,  
25 threats and coercion of corrupted judges Lowney, Flint and Towery were made solely in favor of  
26 unethical attorney Nancy L Robert, suspected in bribing them.

27

28

1  
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3  
4 Please find enclosed Verified Written Statement of Disqualification of Hon. Stephen P. Lowney,  
5 with the request for stay on all orders of corrupted judges Lowney, Flint and Towery, and  
6 nullification of all their orders retroactively back to 10/31/2022, and List of Evidence for Verified  
7 Written Statement of Disqualification attached.  
8

9 I respectfully request that the case 22FL003144 to be assigned to Department 72, and to be  
10 heard by Honorable Brooke A. Blecher, with the hope that highest ethical standards of Supervising  
11 Judge Honorable Brooke A. Blecher could give this case chance of Impartiality and Justice.

12  
13 Appreciate your help and understanding in effort to save my son from domestic violence and  
14 international child abduction.

15  
16  
17 Sincerely.

18  
19  
20 DATED: February 12, 2024  
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28



---

KOSTIANTYN MARS  
PER SE

(ENDORSED)  
**FILED**  
FEB 20 2024

Clerk of the Court  
Superior Court of CA County of Santa Clara  
BY J. RARAS DEPUTY

1 KOSTIANTYN MARS  
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4 PER SE

5  
6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
7  
8 **IN AND FOR THE COUNTY OF SANTA CLARA**

9 KOSTIANTYN MARS ) Case No.: 22FL003144  
10 Petitioner, ) [Honorable Beth McGowen,  
11 vs. ) Presiding Judge of Superior Court of California]  
12 HANNA MARS, ) [Dept. 72 – Honorable Brooke A. Blecher,  
13 Respondent. ) Supervising Judge of Superior Court of California]  
14 ) [Dept. 79 – Hon. Stephen P. Lowney,  
15 ) Judge to be served the Disqualification Statement]  
16 )  
17 ) PETITIONER'S VERIFIED  
18 ) WRITTEN STATEMENT OF  
19 ) DISQUALIFICATION AGAINST JUDGE  
20 ) STEPHEN P. LOWNEY,  
21 ) STAY ON ALL HIS ORDERS UNTIL FINAL  
22 ) JUDGMENT,  
23 ) AND NULLIFICATION OF ALL HIS ORDERS  
24 ) RETROACTIVELY BACK TO 10/31/2022  
25 )  
26 ) [Memorandum of Points and Authorities and Notice  
27 ) filed concurrently]  
28 )  
29 ) (Code Civ. Proc. 170.1(a)(6)A(iii);  
30 ) 170.1(a)(3)A; 170.3)

31 **TO THE HONORABLE COURT AND RESPONDENT (c/o Counsel):**

32  
33 Petitioner Kostiantyn Mars hereby provides his verified statement for disqualification of Santa  
34 Clara County Superior Court Judge Hon. Stephen P. Lowney, request for stay on all his orders until  
35 final judgment, and request for nullification of all his orders retroactively back to 10/31/2022.

36 Respectfully submitted,

37   
38

39 KOSTIANTYN MARS  
40 PER SE

41 DATED: February 12, 2024

**VERIFIED STATEMENT OF DISQUALIFICATION OF  
SANTA CLARA COUNTY SUPERIOR COURT JUDGE STEPHEN P. LOWNEY**

Petitioner Kostiantyn Mars, states and declares:

1. Regrettably, I am compelled to request disqualification of Hon. Stephen P. Lowney from presiding over case 22FL003144, and immediate resignation of Stephen P. Lowney from Superior Court of California, because of documented undeniable personal conflict of interest of Hon. Stephen P. Lowney with the Petitioner, after Petitioner notified Stephen P. Lowney that he reported Judge Lowney to government authorities for suspect of bribery, impermissible falsifications of court records, repetitive judicial misconduct and severe abuse of judicial power, and now Stephen P. Lowney is investigated for suspect of bribery and intentional severe repetitive judicial misconduct
  2. Stephen P. Lowney used direct threats and coercion to force me, Petitioner in this case, to abandon my son, give up documents of my son, and allow international child abduction of my son outside of the United States by mother, who has documented previous history of international child abduction (Evidence 2, 3, 5)
  3. Stephen P. Lowney threatened to put me into jail through contempt of court, and to silence me with vexatious litigant pre-filing order, and punished me with unreasonable CCP 271 sanctions in case if I will legally request reconsideration of his intentionally harmful orders using legal motions that could draw attention of the Court (Evidence 1, 2, 3, 4, 5).
  4. Stephen P. Lowney, knowingly and intentionally, through series of intentionally harmful orders, facilitated international abduction of my son outside of the United States by Respondent, who has documented history of international and domestic child abduction. Lowney is suspected in receiving bribe from Respondent through her attorney Nancy Roberts, who was requested to be disqualified already twice.

5. Stephen P. Lowney is suspected of receiving bribe from unethical attorney Nancy L Roberts in January 2024, in the first month of his assignment in Department 79. It is supported by following facts:

- Stephen P. Lowney was intentionally rescheduling all hearings from January 2024, postponing ruling until suspected date of receipt of bribe – hearings 01/02/2024, 01/18/2024 and 01/25/2024 were unreasonably rescheduled to February: 02/07/2024, 02/27/2024
  - Massive amount of hearings were intentionally concentrated on 02/07/2024 (9 separate hearings) – all of which Stephen P. Lowney denied without consideration, except trial on DVROs, which he intentionally rescheduled 6 months later (prolonging unreasonable temporary no contact with my son) (Evidence 20, 1, 2, 3)
  - Stephen P. Lowney unreasonably removed Final Trial from Court Calendar twice: 02/05/2024 (removed without any notice), 03/05/2024 (removed and threatened that “there will be no trial”) (Evidence 1, 2, 3)
  - Stephen P. Lowney evaded any documented evidence and court reports from his hearings:
    - i. there is always no court reporter (even when reporter is requested, Ev. 7),
    - ii. request for audio and video recording is denied (Evidence 4, 5)
    - iii. request for statement of decision is denied (Evidence 6)
    - iv. request for media coverage is denied (and signed by Nancy L Roberts Ev 8,9)
    - v. request for ADA accommodations with audio recordings and transcripts denied (Evidence 8)
  - Stephen P. Lowney denied 2<sup>nd</sup> motion of Disqualification of unethical attorney Nancy L Roberts (Evidence 19, 13), without consideration – despite massive amount of evidence of falsifications, impermissible pressure on judges, experts, emergency screener, professional supervisors, harassment of servers and parties in the case. It is suspected that Nancy L Roberts paid additionally for getting out being

disqualified and reported to California Bar Association for unethical conduct and violation of professional and ethical standards

- Stephen P. Lowney unreasonably ordered me to give up passport and all documents of my son (Evidence 1, 2, 3), therefore facilitating international child abduction outside of the United States of my son, who is currently held in undisclosed location after parental abduction by his mother – and threatened to put me into jail with contempt and silence me with vexatious litigant pre-filing order. This order was made against factual and legal basis of the case, in complete ignorance to more than 50 pieces of evidence and witness statements, against signed emergency screener recommendations. Stephen P. Lowney refused to hear matter, refused to review evidence, and made intentionally harmful order facilitating international child abduction solely in favor of unethical attorney Nancy L Roberts, who is suspected in bribing Lowney in January 2024.
  - All my filings from 9 matters on 02/07/2024 were denied without consideration, and without statement of decision (Evidence 1, 2, 3)
  - Trial on opposing DVROs 2023, which is ultimately a revival of trial on opposing DVROs 2022 (which was fraudulently dismissed by unethical attorney Nancy L Roberts), was unreasonably rescheduled to June, 6 months later by Stephen P. Lowney despite all evidence was already filed with the Court, and available to be presented same day on 02/07/2024 (Evidence 1, 2, 3, 12)
  - Stephen P. Lowney made ruling solely in favor of Nancy L Roberts, suspected in bribing Lowney in January 2024, despite massive amount of evidence of:
    - i. Nancy L Roberts impermissible pressure on experts, emergency screener and professional supervisors (Ev 11)
    - ii. Nancy L Roberts violation of professional standards and unethical conduct (Ev 19, 13),

iii. Parental child abduction by her client and violation of Court orders and CCP  
278.5 (Ev 14, 15)

iv. Unethical malicious child detention, blocking all contact and facilitation of international child abduction (in evidence for opposing DVROs , Ev 12)

- Stephen P. Lowney lied in the courtroom about judge Flint allegedly “rotated to another department on standard rotation” (Evidence 5)
  - Stephen P. Lowney threatened to punish me by jail through contempt and vexatious litigant pre-filing order in case if I will request reconsideration of any of intentionally harmful orders of Stephen P. Lowney, which he called “meritless” (because he denies them anyways without consideration) (Evidence 2, 3)
  - Nancy L Roberts rescheduled contempt hearing against me for recording and reporting bribed judge Flint to the date when Lowney will make judgment – which confirms that she has and unlawful, corrupt agreement with Lowney

6. Hon. Stephen P. Lowney intentionally removed all witnesses from hearing 02/07/2024, and kicked witnesses from Teams, ensuring that there are no witnesses and no recordings of his falsifications and abuse of judicial power.

7. Hon. Stephen P. Lowney, by single harmful and wrongful order on 02/07/2024 (Evidence P1), facilitated international abduction of my son outside of the United States by Respondent (who has documented history of international child abduction) (Evidence 20).

8. Stephen P. Lowney refused to reconsider intentionally harmful orders of bribed judge Flint made on 11/13/2023, which were based on falsified numbers provided by unethical attorney Nancy L Roberts (Evidence 4, 5), and refused to review equalizing payments balance sheet, bank and loan statements that were filed with the Court both for partial trial 11/13, and for reconsideration hearing 2/1.

9. Hon. Stephen P. Lowney, knowingly and intentionally, by consecutive series of intentionally harmful and wrongful orders and falsifications of Court records, facilitated orders granting abduction of my son Max Mars outside of the United States by his mother with documented

1 history of international child abduction outside of the United States (2019-2020), and child  
2 abduction inside United States (2022-2023) (Evidence 20). It is suspected that Hon. Stephen  
3 P. Lowney is facilitating abduction of my son Max Mars because of bribe that he is  
4 suspected in receival from Nancy L Roberts in January 2024.

5 10. Hon. Stephen P. Lowney is suspected in receiving bribe from Nancy L Roberts, in January  
6 2024, during his first month of assignment in Department 79, despite knowing gruesome  
7 history of previous corrupt judges of this department, Andrea E. Flint and James E. Towery.

8 11. Extreme prejudice of Hon. Stephen P. Lowney against me, Petitioner in this case, in favor of  
9 unethical attorney Nancy L Roberts (who is requested to be disqualified from this case and  
10 is reported to California Bar Association) is documented in orders from 02/01/2024  
11 (Evidence 4) and 02/07/2024 (Evidence 1) that demonstrate extreme abuse of judicial power  
12 by Stephen P. Lowney, complete ignorance to the legal and factual basis of the case,  
13 complete ignorance to more than 50 pieces of evidence and witness statements, intentionally  
14 harmful ruling solely in favor of Nancy L Roberts. Besides these orders, the very fact that  
15 hearing was held without court reporter, all and every documentation and transcripts were  
16 denied and prohibited by Stephen P. Lowney, hearing held solely in fake show style, without  
17 any evidence ever reviewed, and with usage of threats and coercion (Evidence 2, 3, 5),  
18 demonstrates that Hon. Stephen P. Lowney has extreme and harmful prejudice against me,  
19 Petitioner on this case

20 12. Facilitation of international child abduction which Hon. Stephen P. Lowney is doing through  
21 intentionally harmful orders, demonstrative abuse of judicial power and massive  
22 falsifications and manipulations with the Court calendar, is part of massive fraud scheme,  
23 facilitated by unethical attorney Nancy L Roberts, who is suspected in bribing previous two  
24 corrupted judges Flint and Towery, both terminated from Court with the scandals (Evidence  
25 19, 20). Both Towery and Flint were making orders in “shadows” – without witnesses, court  
26 reporters, without any evidence how those harmful rulings were made. Lowney is using  
27 exactly the same corrupt approach, prohibiting any type of recording of his harmful rulings.

1 Hon. Stephen P. Lowney, by threats, coercion, intentionally harmful orders, confirmed his  
2 extreme prejudice against me, Petitioner on this case, and by his actions he provoked me to report  
3 him for suspect of bribery and judicial misconduct – therefore creating undeniable personal  
4 conflict of interest between Hon. Stephen P. Lowney and me, Petitioner on this case.

5

6 According to Code Civ. Proc. 170.1(a)(6)A(iii); 170.1(a)(3)A; 170.3, judicial officer who has  
7 undeniable personal conflict of interest (or any kind of personal interest in the case, including  
8 personal financial interest caused by suspected bribe) cannot preside over the case of his interest,  
9 and is legally obliged to recuse themselves from such case.

10

11 In the light of aforementioned, I am compelled to request:

- 12 - Immediate disqualification of Hon. Stephen P. Lowney from presiding over the case  
13 22FL003144, pursuant Code Civ. Proc. 170.1(a)(6)A(iii); 170.1(a)(3)A; 170.3;
- 14 - Immediate resignation of Hon. Stephen P. Lowney from Superior Court of California for  
15 suspect of bribery, received on the first month of his assignment in Department 79;
- 16 - Transfer of the case 22FL003144 to Department 72 to get impartial judgment by  
17 Supervising Judge Honorable Brooke A. Blecher;
- 18 - Stay on all orders of corrupted judges Lowney, Flint and Towery until final judgement;
- 19 - Nullification of all orders of corrupted judges Lowney, Flint and Towery, suspected of  
20 bribery, retroactively back to 10/31/2022, including intentionally harmful orders:  
21 02/07/2024, 02/01/2024, 06/29/2023, 11/13/2023, 07/31/2023, 08/01/2023, 10/31/2022.
- 22 - Immediate disqualification of unethical attorney Nancy L Roberts, suspected of bribing  
23 THREE corrupted judges (Lowney, Flint, Towery). It is requested that Nancy L Roberts to  
24 be disqualified from representing her client on the case 22FL003144, and facts and evidence  
25 of Nancy L Robert's fraud, falsifications and violations of professional and ethical standards  
26 to be reported to California Bar Association, and attorney license of Nancy L Roberts to be  
27 suspended immediately and indefinitely.

28

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3  
4 I kindly request your help to restore reputation and impartiality of the Superior Court, and  
5 transfer case 22FL003144 to Department 72 for being heard by impartial Supervising Judge Brooke  
6 A. Blecher.

7  
8 I kindly request stay on all orders on this case made by corrupt judges Lowney, Flint and  
9 Towery until final judgment, and nullification of all orders of these corrupt judges Lowney, Flint  
10 and Towery retroactively back to 10/31/2022.

11  
12 Thank you for your prompt attention and support in resolving this urgent matter that endangers  
13 life of my son.

14  
15 I declare on penalty of perjury under the laws of the State of California that the foregoing is true  
16 and correct, and I separately verify this statement by the attached verification.

17  
18 Executed at San Jose, California.

19  
20 DATED: February 12, 2024



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KOSTIANTYN MARS

21  
22 [Verification attached]

23 [Evidence List and Evidence 1 – 19 attached]

24  
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## VERIFICATION

I, Kostiantyn Mars, declare as follows:

1. I am the Petitioner in this case.
  2. I have personal knowledge of the foregoing facts. I make this declaration because I have personal knowledge and experience with the facts.
  3. I certify that the facts attested to in the foregoing verified Statement of Disqualification are true and correct.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this verification is executed on February 12, 2024, at San Jose, California.

---

KOSTJANTYN MARS

(ENDORSED)  
**FILED**  
FEB 20 2024

Clerk of the Court  
Superior Court of CA County of Santa Clara  
BY \_\_\_\_\_ J. RARAS DEPUTY

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4 PER SE

5 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
6  
7 **IN AND FOR THE COUNTY OF SANTA CLARA**

8 KOSTIANTYN MARS

) Case No.: 22FL003144

9 Petitioner, ) [Honorable Beth McGowen,  
10 vs. ) Presiding Judge of Superior Court of California]

11 HANNA MARS, ) [Dept. 72 – Honorable Brooke A. Blecher,  
12 ) Supervising Judge of Superior Court of California]

13 Respondent. ) [Dept. 79 – Hon. Stephen P. Lowney,  
14 ) Judge to be served the Disqualification Statement]

15 )  
16 ) PETITIONER'S  
17 ) MEMORANDUM OF POINTS AND  
18 ) AUTHORITIES IN SUPPORT OF HIS VERIFIED  
19 ) STATEMENT OF DISQUALIFICATION AGAINST  
20 ) SANTA CLARA SUPERIOR COURT JUDGE  
21 ) STEPHEN P. LOWNEY,  
22 ) STAY ON ALL HIS ORDERS UNTIL FINAL  
23 ) JUDGMENT,  
24 ) AND NULLIFICATION OF ALL HIS ORDERS  
25 ) RETROACTIVELY BACK TO 10/31/2023

26 ) [Verification Statement of Disqualification and Notice  
27 ) filed concurrently]

28 ) (Code Civ. Proc. 170.1(a)(6)A(iii);  
29 ) 170.1(a)(3)A; 170.3)

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2                   **I. INTRODUCTION**

3                   Petitioner Kostiantyn Mars seeks to disqualify the Hon. Stephen P. Lowney and previous  
4 corrupted judges, suspected of bribery, Flint and Towery, retroactively in order to void their orders  
5 for the time period they presided in this case, Dissolution of Family Mars, from October 31, 2022  
6 until today.

7                   This Memorandum accompanies Petitioner's Verified Statement of Disqualification to be filed  
8 and served Judge Flint.

9                   Hon. Stephen P. Lowney has documented and undeniable personal conflict of interest with  
10 Petitioner, after Petitioner notified corrupted judge Lowney that he reported Judge Lowney to  
11 government authorities for suspect of bribery, abuse of judicial power, falsification of court records  
12 and intentional severe and repetitive judicial misconduct.

13                  Hon. Stephen P. Lowney knowingly and intentionally, by series of intentional harmful and  
14 wrongful orders, facilitated abduction of Petitioner's child outside of the United States, and  
15 threatened to put Petitioner in jail through contempt of court, and silence petitioner with vexatious  
16 litigant pre-filing order in case if Petitioner will not give up passport and documents of his son, and  
17 will request reconsideration of intentionally harmful orders of corrupt judge Lowney, suspected of  
18 bribery on his first month of assignment in Department 79.

19                  Hon. Stephen P. Lowney knowingly and intentionally falsified court records, heavily  
20 manipulated Court calendar, removing final trial from calendar twice, removing mandatory status  
21 conference from calendar, unreasonably rescheduling trial on opposing DVROs twice (from  
22 01/25/2024 to 02/07/2024, and then 6 months later – to June 2024), ordered Petitioner to abandon  
23 his son and give up passport and all documents of my son to unethical attorney Nancy L Roberts,  
24 who is suspected in bribing Lowney in January 2024.

25                  Judge Lowney, through threats and coercion, attempted to force me to abandon my son and give  
26 up passport and all documents of my son, therefore facilitating international child abduction  
27 outside of the United States – same as did bribed judges Flint and Towery, terminated from Court.  
28

1 On 02/07/2024 Hon. Stephen P. Lowney, after denying all and every type of documenting  
2 hearing (including Court Reporter, Statement of Decision, Request for Audio Recording, Media  
3 Coverage, ADA Accomodations for Audio Recordings and Transcripts), and after kicking all  
4 witnesses from Teams, made extremely suspicious hearing without reviewing any evidence, and  
5 absolutely ignoring facts and documented filed evidence of the case.

6 Lowney made extremely prejudiced rulings solely in favor of unethical attorney Nancy L  
7 Roberts, who was requested to be disqualified on this hearing already 2<sup>nd</sup> time (first motion to  
8 disqualify was denied by bribed judge Flint, who was terminated from Superior Court)

9 Intentionally harmful orders of bribed judge Lowney, audio recording and transcript of hearing  
10 2/7/2024 are attached in Evidence 1, 2, 3, and are shared with Government Authorities, to which  
11 Petitioner reported corrupted judge Lowney for suspect of bribery, severe repetitive abuse of  
12 judicial power and severe repetitive judicial misconduct.

13 Corrupted judge Lowney has undeniable personal conflict of interest with me, Petitioner on this  
14 case, after I notified bribed judge Lowney that I reported him to government authorities.

15 Furthermore, bribed judge Lowney threatened to punish me with jail through contempt of court,  
16 and silence me indefinitely through vexatious litigant pre-filing order – which he threatened to  
17 decide upon in nearest weeks.

18 Judge who has personal conflict of interest with the party in the case, or has any kind of  
19 personal interest in the case, is legally obliged to recuse themselves pursuant Code Civ. Proc.  
20 170.1(a)(6)A(iii); 170.1(a)(3)A; 170.3;

21 In the light of aforementioned, I request immediate disqualification of corrupted judge Lowney  
22 from this case, immediate resignation of corrupted judge Lowney from Superior Court, stay on all  
23 his orders until final judgment, and retroactive nullification of all his orders back to 10/31/2022.

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2                   **II. BACKGROUND FACTS**

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- 4       1. Regrettably, I am compelled to request disqualification of Hon. Stephen P. Lowney from  
5 presiding over case 22FL003144, and immediate resignation of Stephen P. Lowney from  
6 Superior Court of California, because of documented undeniable personal conflict of interest  
7 of Hon. Stephen P. Lowney with the Petitioner, after Petitioner notified Stephen P. Lowney  
8 that he reported Judge Lowney to government authorities for suspect of bribery,  
9 impermissible falsifications of court records, repetitive judicial misconduct and severe abuse  
10 of judicial power, and now Stephen P. Lowney is investigated for suspect of bribery and  
11 intentional severe repetitive judicial misconduct
- 12       2. Stephen P. Lowney used direct threats and coercion to force me, Petitioner in this case, to  
13 abandon my son, give up documents of my son, and allow international child abduction of  
14 my son outside of the United States by mother, who has documented previous history of  
15 international child abduction (Evidence 2, 3, 5)
- 16       3. Stephen P. Lowney threatened to put me into jail through contempt of court, and to silence  
17 me with vexatious litigant pre-filing order, and punished me with unreasonable CCP 271  
18 sanctions in case if I will legally request reconsideration of his intentionally harmful orders  
19 using legal motions that could draw attention of the Court (Evidence 1, 2, 3, 4, 5).
- 20       4. Stephen P. Lowney, knowingly and intentionally, through series of intentionally harmful  
21 orders, facilitated international abduction of my son outside of the United States by  
22 Respondent, who has documented history of international and domestic child abduction.  
23 Lowney is suspected in receiving bribe from Respondent through her attorney Nancy  
24 Roberts, who was requested to be disqualified already twice.
- 25       5. Stephen P. Lowney is suspected of receiving bribe from unethical attorney Nancy L Roberts  
26 in January 2024, in the first month of his assignment in Department 79. It is supported by  
27 following facts:
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- 1           □ Stephen P. Lowney was intentionally rescheduling all hearings from January 2024,  
2           postponing ruling until suspected date of receipt of bribe – hearings 01/02/2024,  
3           01/18/2024 and 01/25/2024 were unreasonably rescheduled to February: 02/07/2024,  
4           02/27/2024
- 5           □ Massive amount of hearings were intentionally concentrated on 02/07/2024 (9  
6           separate hearings) – all of which Stephen P. Lowney denied without consideration,  
7           except trial on DVROs, which he intentionally rescheduled 6 months later  
8           (prolonging unreasonable temporary no contact with my son) (Evidence 20, 1, 2, 3)
- 9           □ Stephen P. Lowney unreasonably removed Final Trial from Court Calendar twice:  
10           02/05/2024 (removed without any notice), 03/05/2024 (removed and threatened that  
11           “there will be no trial”) (Evidence 1, 2, 3)
- 12           □ Stephen P. Lowney evaded any documented evidence and court reports from his  
13           hearings:
- 14                 i. there is always no court reporter (even when reporter is requested, Ev. 7),  
15                 ii. request for audio and video recording is denied (Evidence 4, 5)  
16                 iii. request for statement of decision is denied (Evidence 6)  
17                 iv. request for media coverage is denied (and signed by Nancy L Roberts Ev 8,9)  
18                 v. request for ADA accommodations with audio recordings and transcripts  
19                 denied (Evidence 8)
- 20           □ Stephen P. Lowney denied 2<sup>nd</sup> motion of Disqualification of unethical attorney  
21           Nancy L Roberts (Evidence 19, 13), without consideration – despite massive  
22           amount of evidence of falsifications, impermissible pressure on judges, experts,  
23           emergency screener, professional supervisors, harassment of servers and parties in  
24           the case. It is suspected that Nancy L Roberts paid additionally for getting out being  
25           disqualified and reported to California Bar Association for unethical conduct and  
26           violation of professional and ethical standards
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- 1       Stephen P. Lowney unreasonably ordered me to give up passport and all documents  
2      of my son (Evidence 1, 2, 3), therefore facilitating international child abduction  
3      outside of the United States of my son, who is currently held in undisclosed location  
4      after parental abduction by his mother – and threatened to put me into jail with  
5      contempt and silence me with vexatious litigant pre-filing order. This order was  
6      made against factual and legal basis of the case, in complete ignorance to more than  
7      50 pieces of evidence and witness statements, against signed emergency screener  
8      recommendations. Stephen P. Lowney refused to hear matter, refused to review  
9      evidence, and made intentionally harmful order facilitating international child  
10     abduction solely in favor of unethical attorney Nancy L Roberts, who is suspected in  
11     bribing Lowney in January 2024.
- 12      All my filings from 9 matters on 02/07/2024 were denied without consideration, and  
13     without statement of decision (Evidence 1, 2, 3)
- 14      Trial on opposing DVROs 2023, which is ultimately a revival of trial on opposing  
15     DVROs 2022 (which was fraudulently dismissed by unethical attorney Nancy L  
16     Roberts), was unreasonably rescheduled to June, 6 months later by Stephen P.  
17     Lowney despite all evidence was already filed with the Court, and available to be  
18     presented same day on 02/07/2024 (Evidence 1, 2, 3, 12)
- 19      Stephen P. Lowney made ruling solely in favor of Nancy L Roberts, suspected in  
20     bribing Lowney in January 2024, despite massive amount of evidence of:  
21       i. Nancy L Roberts impermissible pressure on experts, emergency screener and  
22       professional supervisors (Ev 11)  
23       ii. Nancy L Roberts violation of professional standards and unethical conduct  
24       (Ev 19, 13),  
25       iii. Parental child abduction by her client and violation of Court orders and CCP  
26       278.5 (Ev 14, 15)

1                                  iv. Unethical malicious child detention, blocking all contact and facilitation of  
2                                  international child abduction (in evidence for opposing DVROs , Ev 12)

- 3                                  □ Stephen P. Lowney lied in the courtroom about judge Flint allegedly “rotated to  
4                                  another department on standard rotation” (Evidence 5)  
5                                  □ Stephen P. Lowney threatened to punish me by jail through contempt and vexatious  
6                                  litigant pre-filing order in case if I will request reconsideration of any of intentionally  
7                                  harmful orders of Stephen P. Lowney, which he called “meritless” (because he  
8                                  denies them anyways without consideration) (Evidence 2, 3)  
9                                  □ Nancy L Roberts rescheduled contempt hearing against me for recording and  
10                                 reporting bribed judge Flint to the date when Lowney will make judgment – which  
11                                 confirms that she has and unlawful, corrupt agreement with Lowney

12                                6. Hon. Stephen P. Lowney intentionally removed all witnesses from hearing 02/07/2024, and  
13                                 kicked witnesses from Teams, ensuring that there are no witnesses and no recordings of his  
14                                 falsifications and abuse of judicial power.

15                                7. Hon. Stephen P. Lowney, by single harmful and wrongful order on 02/07/2024 (Evidence  
16                                 P1), facilitated international abduction of my son outside of the United States by Respondent  
17                                 (who has documented history of international child abduction) (Evidence 20).

18                                8. Stephen P. Lowney refused to reconsider intentionally harmful orders of bribed judge Flint  
19                                 made on 11/13/2023, which were based on falsified numbers provided by unethical attorney  
20                                 Nancy L Roberts (Evidence 4, 5), and refused to review equalizing payments balance sheet,  
21                                 bank and loan statements that were filed with the Court both for partial trial 11/13, and for  
22                                 reconsideration hearing 2/1.

23                                9. Hon. Stephen P. Lowney, knowingly and intentionally, by consecutive series of intentionally  
24                                 harmful and wrongful orders and falsifications of Court records, facilitated orders granting  
25                                 abduction of my son Max Mars outside of the United States by his mother with documented  
26                                 history of international child abduction outside of the United States (2019-2020), and child  
27                                 abduction inside United States (2022-2023) (Evidence 20). It is suspected that Hon. Stephen  
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- 1 P. Lowney is facilitating abduction of my son Max Mars because of bribe that he is  
2 suspected in receival from Nancy L Roberts in January 2024.
- 3 10. Hon. Stephen P. Lowney is suspected in receiving bribe from Nancy L Roberts, in January  
4 2024, during his first month of assignment in Department 79, despite knowing gruesome  
5 history of previous corrupt judges of this department, Andrea E. Flint and James E. Towery.
- 6 11. Extreme prejudice of Hon. Stephen P. Lowney against me, Petitioner in this case, in favor of  
7 unethical attorney Nancy L Roberts (who is requested to be disqualified from this case and  
8 is reported to California Bar Association) is documented in orders from 02/01/2024  
9 (Evidence 4) and 02/07/2024 (Evidence 1) that demonstrate extreme abuse of judicial power  
10 by Stephen P. Lowney, complete ignorance to the legal and factual basis of the case,  
11 complete ignorance to more than 50 pieces of evidence and witness statements, intentionally  
12 harmful ruling solely in favor of Nancy L Roberts. Besides these orders, the very fact that  
13 hearing was held without court reporter, all and every documentation and transcripts were  
14 denied and prohibited by Stephen P. Lowney, hearing held solely in fake show style, without  
15 any evidence ever reviewed, and with usage of threats and coercion (Evidence 2, 3, 5),  
16 demonstrates that Hon. Stephen P. Lowney has extreme and harmful prejudice against me,  
17 Petitioner on this case
- 18 12. Facilitation of international child abduction which Hon. Stephen P. Lowney is doing through  
19 intentionally harmful orders, demonstrative abuse of judicial power and massive  
20 falsifications and manipulations with the Court calendar, is part of massive fraud scheme,  
21 facilitated by unethical attorney Nancy L Roberts, who is suspected in bribing previous two  
22 corrupted judges Flint and Towery, both terminated from Court with the scandals (Evidence  
23 19, 20). Both Towery and Flint were making orders in “shadows” – without witnesses, court  
24 reporters, without any evidence how those harmful rulings were made. Lowney is using  
25 exactly the same corrupt approach, prohibiting any type of recording of his harmful rulings.
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1      In the light of aforementioned, I am compelled to request recusal of corrupted judge Stephen P.  
2 Lowney, suspected of bribery in the first month of his assignment in Department 79, from presiding  
3 over case 22FL003144, pursuant Code Civ. Proc. 170.1(a)(6)A(iii); 170.1(a)(3)A; 170.3; and  
4 request his immediate resignation from Superior Court, stay on all orders of corrupted judges  
5 Lowney, Flint and Towery until final judgment, and retroactive nullification of their orders back to  
6 10/31/2022.

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2                   **III. LEGAL STANDARD TO DISQUALIFY JUDGE**

3       A judge shall be disqualified if “a person aware of the facts might reasonably entertain a doubt  
4       that the judge would be able to be impartial” (Cal. Code Civ. Pro 170.1(a)(6)(A)(iii) as the  
5       California Superme Court explained:

6       *[I] It is not enough that a judicial decision be sound. It is of next importance that the tribunal  
7       rendering it be free from the charge of interest or the taint of partiality, else public confidence  
8       will be destroyed and judicial usefulness gravely impaired.*

9       *Meyers v. San Diego (1898) 121 Cal. 102, 104*

10  
11       *Judges are required to be impartial and unbiased by the due process clause – applicable to  
12       state judges under US Const., Amend. XIV Aetna Life Ins. Co v Lavoi (1986) 475 US 813 The  
13       main underlying policy is to promote public confidence in the integrity of the judicial process.*

14       *Lilieberg v Health Services Acquisition Corp, (1998) 484 US 874, 859-860*

15  
16       The standard for recusing judge under Sec. 170.1(a)(6) is an objective standard:

17       *The standard for disqualification provided for in subdivision (a)(6)(C) of section 170.1 is  
18       fundamentally an objective one. It represents a legislative judgment that due to the sensitivity of  
19       the question and inherent difficulties of proof as well as the importance of public existence of an  
20       actual bias. Rather, if a reasonable man would entertain doubts concerning the judge's  
21       impartiality, disqualification is mandated.*

22       *UFW of Am. v Superior Court, 170 Cal. App. 3d 97, 104 (1985)*

23  
24       *Implicit in this time-honored standard of review is the assumption that such findings were  
25       made fairly and impartially. Actual bias is not required. Due process may require recusal even  
26       wehre there is no actual bias shown and there exists a sufficient motive for bias.*

27       *Tumey v Ohio, (1927) 273 US 510, 523*

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3                   **IV. MANDATORY REASONS FOR DISQUALIFICATION**

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Corrupted judge Lowney, knowingly and intentionally, through a series of consecutive wrongful and intentionally harmful orders, facilitated international abduction of my son Max Mars, minor child, outside of the United States, by granting full custody to biological mother, Respondent, with documented history of child abduction outside of the United States, and ordering primary parent, father, Petitioner, to give up child's passport and all documents to biological mother – despite clear threats of biological mother to abduct and "bury our son in Ukrainian soil so you will never see him again".

Judge Lowney completely ignored all and each piece of evidence filed with the Court, refused to hear matters and simply denied them solely in favor of opposing attorney Nancy L Roberts, who is suspected in bribing corrupted judge Lowney in January 2024, in the very first month of his assignment in Department 79.

Corrupted judge Lowney was notified about massive fraud scheme that Nancy L Roberts facilitated with the goal to obtain or re-issue passport of my son Max Mars, to facilitate international child abduction outside of the United States. Lowney was also aware that previous bribed judge, Andrea E. Flint was terminated from Superior Court for suspect of bribery, one year before end of her official term, and that corrupted judge Flint unreasonably removed from Court records Emergency Screener Recommendations, knowingly and intentionally falsifying Court records, and therefore denying whole group of protective orders that Emergency Screener recommended after thorough investigation of Child's safety and best interest. Those recommendations included:

- Child abduction prevention orders
- Mental health treatment for Respondent
- Parenting counseling
- Relief of custody and visitation

1 Besided those orders, Judge Flint also knowingly and intentionally falsified multiple other  
2 Court records (including removal of Petitioner's statements made on record in courtroom), and  
3 denied other protective orders, requested by Petitioner, including:

- Child abduction prevention orders
- Minor's counsel
- Parenting counseling
- Free unsupervised visitaitions
- Sanctioning Respondent for child abduction and malicious custody deprivation in violation of CCP 278.5
- Sanctioning Respondent for impermissible pressure on emergency screener and professional supervisors, which led to blocking emergency screening and withdrawal of supervisors – in violation of Court orders from 10/31/2022
- Disqualification of Opposing Attorney for impermissible conflict of interest, impermissible pressure on emergency screener and professional supervisors, unethical conduct and violation of professional and ethical standards
- Sanctioning Respondent and her attorney for falsification of community assets and debts balance numbers, refusal to provide any proofs of income, and falsification of numbers of requested equalization payments

19  
20 Corrupted judge Lowney not only copied aggressive and violent behavior of bribeb judge Flint,  
21 but intentionally lied in the Court, and tried to convince me that fake hearing, threats and coercion  
22 that he is doing to force me to abandon my son, sign-off custody and give up my son's documents,  
23 are according to Lowney "the law, which is the same" – despite it's obvious that there is nothing  
24 lawful in lies, falsifications, threats and coercion in courtroom.

25 Actions of Lowney demonstrate absolutely impermissible abuse of judicial power, and require  
26 your immediate attention.

27 In help to Honorable Court, I already reported Lowney to government authorities.  
28

1      Therefore since the very moment when I notified corrupted judge Lowney that I reported him  
2 for suspect of bribery, severe abuse of judicial power, and severe repetitive judicial misconduct,  
3 there is obvious and undeniable personal conflict of interest between corrupted judge Lowney and  
4 me, Petitioner and party in the case 22FL003144.

5      Judge who has personal conflict of interest with the party in the case, same as any kind of  
6 personal interest (financial or not), is legally obliged to recuse themselves from the case.

7      It is also mandatory to nullify all orders, made by corrupted judges Lowney, Flint, Towery,  
8 suspected of bribery, retroactively back to 10/31/2022, to restore impartiality of Court proceedings  
9 and protect safety of my child, including orders:

10     02/07/2024 – Intentionally harmful orders to abandon my son, give up passport and all  
11 documents (therefore facilitating international child abduction outside of the United States) to  
12 unethical attorney Nancy L Roberts (requested to be disqualified already twice), orders denying  
13 disqualification of unethical attorney Nancy L Roberts, suspected in bribing THREE judges in a  
14 row on this single case 22FL003144 during about ONE single year (bribed judges Lowney, Flint,  
15 Towery – two of whom terminated from Superior Court due to suspect of bribery and severe  
16 judicial misconduct), orders related to falsifying QDRO by Nancy L Roberts, and transferring title  
17 of VW Tiguan in unlawful way, dictated by unethical attorney Nancy L Roberts

18     02/01/2024 – Intentionally harmful orders of falsified amount of equalizing payment, based on  
19 falsified numbers of unethical attorney Nancy L Roberts, and sanctions per CCP 271 which were  
20 assigned to threaten me with vexatious litigant prefilng order in case if I will request  
21 reconsideration of these orders

22     11/13/2024 – Intentionally harmful orders of falsified equalizing payment, based on falsified  
23 numbers provided by unethical attorney Nancy L Roberts, granted by bribed judge Flint on the last  
24 hearing before her termination from Superior Court (this hearing was video recorded and recording  
25 was shared with government authorities. Flint was using the same approach of faking hearings,  
26 using threats and coercion, as Lowney)

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1       06/29/2023 – harmful wrongful custody orders which led to child abduction and physical and  
2 emotional violence against minor child by Respondent, who motivates violence and abduction by  
3 these harmful orders. No contact ordered to father absolutey unreasonably and against more than 50  
4 pieces of evidence and witness statements. Signed Emergency Screener recommendations were  
5 unreasonably removed without any consideration. Supervised visits reports were never reviewed.  
6 Child safety and best interest was completely neglected. Ordered to Petitioner to give up passport  
7 and documents of minor child, is actually obvious facilitation of international child abduction.

8       07/31/2023 – harmful wrongful and unreasonable VW Tiguan car title transfer that is financed  
9 from registered owner and lender Petitioner to Respondent – cannot be executed because there is no  
10 order for payout of the car based on statement of date of separation, order is vague and unspecified,  
11 and Petitioner financially cannot afford buyout of the car to execute order

12       08/01/2023 – Respondent legally must be held in Contempt of Court for violation of orders  
13 10/31/2023, Respondent's Attorney must be Disqualified for unethical conduct, violation of  
14 professional and ethical standards. Taking into account that Flint was bribed by Nancy L Roberts,  
15 and Flint denied disqualification, I had to report Nancy L Roberts to Bar Association

16       02/08/2023 – Fraudulent stipulation on maximum amount of spousal support with smith-osler,  
17 which unethical attorney Nancy L Roberts fooled me into signing in exchange to release my son  
18 from being hostage in undisclosed location, with all contact with my child blocked. In turn for my  
19 signature, unethical attorney Nancy L Roberts and her client violated verbal agreements  
20 immediately, abducted my son, blocked all contact, violated court orders 10/31/2022 by blocking  
21 emergency screening completely, made impermissible pressure on emergency screener and  
22 professional supervisors, therefore blocking visitis, blocking custody review hearing, through  
23 bribery, fraud and lying to judge in the courtroom, got signed emergency screener recommendations  
24 removed from court records by bribed judge Flint – therefore vacated stipulation by itself.

25       10/31/2023 – harmful wrongful order of maximum spousal support, ordered disregarding  
26 community financial situation and Petitioner's financial situation. Order was intentionally made to  
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1 make maximum financial damage to Petitioner and block ability of Petitioner to hire attorney and  
2 pay for paid supervised visits.

3 It is also obvious, that documents that bribed judge Flint removed from case, and bribed  
4 Lowney refused to hear and prohibited mentioning, do not cease existing, and another, impartial  
5 Judge can review them together with evidence, and make impartial judgment – of course, if  
6 corrupted and suspected of bribery judge Lowney will be recused from this case in the sake of  
7 impartiality.

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2                   **V. CONCLUSION**

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4       Judge who has personal conflict of interest with the party in the case is legally obliged to recuse  
5 themselves from the case pursuant CCP 170.1, 170.3, and specifically Code Civ. Proc.  
6 170.1(a)(6)A(iii); 170.1(a)(3)A; 170.3

7

8       Hon. Stephen P. Lowney has obvious, undeniable, impermissible personal conflict of interest  
9 with Petitioner, after Petitioner notified Lowney that he reported corrupted judge Lowney to  
10 government authorities for suspect of bribery (punishable up to 5 years in jail for judge) and severe  
11 intentional repetitive misconduct (punishable by resignation from Court). Each and every order of  
12 Judge Lowney starting 02/12/2024 is motivated solely by desire to retaliate to Petitioner.

13

14      It is also obvious that corrupted judge Lowney demonstrated extreme level of prejudice against  
15 Petitioner on hearings 02/07/2024 and 02/01/2024, while making massive falsifications, severe  
16 intentionally harmful orders, severe manipulations of the court calendar, and using obvious and  
17 documented threats and coercion in attempt to force Petitioner to abandon his son, give up passport  
18 and all documents of Petitioner's son Max Mars, therefore facilitating international child abduction  
19 outside of the United States.

20      It is suspected that corrupted judge Lowney was bribed by unethical attorney Nancy L Roberts  
21 in January 2024, because Lowney was actively postponing all hearings until receiving of bribe.  
22 After suspected date of receiving bribe, Lowney shamelessly falsified court records and shamelessly  
23 ruled solely in favor of unethical attorney Nancy L Roberts, suspected of bribing Lowney.

1       In the light of aforementioned, I am compelled to request immediate resignation of Hon.  
2 Stephen P. Lowney from presiding over case 22FL003144, pursuant Code Civ. Proc.  
3 170.1(a)(6)A(iii); 170.1(a)(3)A; 170.3; immediate resignation of corrupted judge Lowney from  
4 Superior Court, stay on all orders of corrupted judge Lowney until final judgment, and request  
5 nullification of all orders of corrupted judges Lowney, Flint and Towery retroactively back to  
6 10/31/2022.

7       I also kindly request immediate disqualification of unethical attorney Nancy L Roberts,  
8 suspected in bribing THREE corrupted judges of Superior Court (Lowney, Flint, Towery). It is  
9 requested that Nancy L Roberts to be immediately disqualified from representing her client on case  
10 22FL003144, facts and evidence of her violations of professional and ethical standards to be  
11 reported to California Bar Association, and her attorney license to be suspended immediately and  
12 indefinitely.

13  
14       Appreciate your thorough attention to this urgent matter.

15  
16       I declare on penalty of perjury under the laws of the State of California that the foregoing is true  
17 and correct, and I separately verify this statement by the attached verification.

18  
19  
20       Respectfully submitted,

21  
22  
23 DATED: February 12, 2024



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KOSTIANTYN MARS