

THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
<http://www.courts.state.nh.us>

Court Name: _____

Case Name: _____

Case Number: _____ PNO _____
(if known)

**OBJECTION TO EXTENSION OF DOMESTIC VIOLENCE OR STALKING
FINAL PROTECTIVE ORDER**

Plaintiff

Defendant

Date of Birth

Date of Birth

I object to the protective order extension order granted on: _____

I request a hearing

The specific reason or basis for my objection is as follows:

Date

Signature

Telephone

Address

THE STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS

SALEM DISTRICT COURT

Docket No. 473-2016-CV-124

Christina DePamphilis

v.

Paul Maravelias

DEFENDANT'S OBJECTION TO EXTEND STALKING ORDER

INTRODUCTION

In December of 2016, the Plaintiff's father David DePamphilis begun a series of harassing and intimidating behaviors against the Defendant, Paul Maravelias, including revenge-threats of unspecified "legal action" unless Defendant capitulated to DePamphilis's deranged will.

Over two weeks thereafter on 12/28/16, DePamphilis suborned his daughter Christina, the Plaintiff, to file a fraudulent stalking petition against Defendant. The said petition boasted a litany of malicious, fabricated lies regarding Defendant's kind and socially appropriate conduct. The Plaintiff had actually never experienced "reasonable fear" as defined in 633:3-A.

In a woeful miscarriage of justice, the stalking petition was granted in a Final Order dated 2/7/17, due to additional perjurious claims made by Plaintiff at Salem District Court in a 1/5/17 hearing.

As the Defendant's conduct never threatened the "safety" or "well-being" (633:3-a, III-c) of the Plaintiff in the first place, nor have his subsequent acts of truthful First-Amendment-protected

speech made to third-parties, the Defendant objects to Plaintiff's motion to extend the said Final Order of Protection submitted 1/5/18 and granted 1/12/18.

FACTUAL BACKGROUND

On 12/12/16, Defendant made a romantic proposal to Plaintiff after Plaintiff welcomed him to her house. It was the third time Defendant had even seen Plaintiff in three years. The time prior, Plaintiff had come to Defendant's house. Plaintiff told Defendant she thought the gesture was "very sweet" but declined. After Plaintiff politely rejected the dinner invitation, Defendant wished her a "beautiful Christmas", left, and never once spoke to her ever again.

On 12/28/16, Plaintiff filed a perjurious stalking order at the behest of her father David's psychotic outburst of rageful anger at Defendant. David's unhinged mental state was evident by the abusive, vitriolic verbal harassment he had waged telephonically against Defendant and Defendant's parents (*vide* Exhibit 1: Letter from Theodore Maravelias) as a result of Defendant's innocent gesture to his daughter.

The aforesaid stalking petition falsely claimed that Defendant had been imposing and insistent during his invitation to dinner. On 1/5/17, Plaintiff perjured to the Court that Defendant had mentioned the sexual "age of consent" as his reason for asking her out on her sixteenth birthday. Judge Stephen cited this new false allegation – found nowhere in the written petition – as part of his false finding of "stalking". Defendant had said nothing of the sort during the polite exchange. Fortuitously, Defendant had been cell-phone audio-recording the dinner date proposal in question for sentimental reasons. Defendant Maravelias eagerly attempted to play his recording during the stalking petition hearing, since it proves the audacious fallacy of the Plaintiff's

malignant claims. Plaintiff's counsel disallowed Defendant from playing his exculpatory audio recording citing New Hampshire's draconian "wire-tap" statute (570). The Defendant forbidden to prove his complete innocence, the order was issued wrongly against him days thereafter.

Defendant's subsequent acts of speech were fully compliant with the falsified stalking order. The Plaintiff does not dispute that Defendant then made no further contact, neither direct nor indirect. She only alleges acts of speech to third-parties, which fall outside the scope of the said order.

Plaintiff's motion to extend the order establishes no basis whatsoever for any threatened "safety" or "well-being" of the Plaintiff. Rather, Plaintiff's abusive motion attempts to weaponize the stalking statute as a cowardly instrument to assault Defendant's First-Amendment-protected free speech rights to third-parties, in order to silence his vocal public outspokenness about the injustice which Plaintiff has done against him, for which she is criminally and civilly liable.

On 12/14/17, Defendant motioned the Court to annul the Final Order, since it was issued 1) in violation of Supreme Court rules for factual findings in stalking orders, 2) on the basis of no true "reasonable fear", given Plaintiff's subsequent online vulgar harassment and incitation against Defendant, and 3) on the basis of demonstrable felony perjury. This motion is attached (*vide* Exhibit 2: Defendant's Annulment Motion) along with constituent original exhibits. Judge Robert S. Stephen denied the said motion with no written explanation on 12/28/17, leaving Defendant scant recourse for the injustice done against him.

In the said 12/14/17 annulment motion, Maravelias noted that he is appalled by Plaintiff's "physical deterioration and turpitudinous criminality".

Given his utter personal disinterest in Plaintiff, and given the fraudulent aspect of said order's issuance *ab initio*, Defendant concludes that zero legal basis exists for extending the present

unconstitutional abridgement of his bodily liberty to movement, speech, and property ownership, against which the extant Final Order of “Protection” categorically infringes.

THEREFORE, the reasons set forth above do impel the Defendant Paul Maravelias to pray this Honorable Court:

- I. Deny Plaintiff’s motion to extend the aforecited Final Order, effecting its expiration;
- II. Vacate, annul, and reverse the Final Order, due to its initial fraudulence;
- III. Hold the Plaintiff, Christina DePamphilis, in criminal Contempt of Court for acts of perjury under oath, falsification, and injustice; and
- IV. Grant such other and further relief as may be just and proper for the reparation of Defendant’s unfairly damaged reputation proceeding from miscarriages of justice.

Respectfully submitted,

Paul J. Maravelias, *in propria persona*

January 18th, 2018

Exhibit 1: Letter from Theodore Maravelias

1/2/18

Testimony from Theodore G. Maravelias re:
Paul Maravelias vs. David DePamphilis

About a year ago, whenever the date of his daughter Christina's birthday was, I received a call from David DePamphilis whose family had been good friends with us and our children for years.

Right away he started screaming at me in an unhinged manner at the top of his lungs. For a moment, I was wondering if this was actually him. After some time, I realized that it was him. David was screaming vulgarity after vulgarity to the top of his lungs and I was in complete and utter shock. The tone of his voice was violent in nature and was absolutely unaffected by any sense of propriety or sanity.

I have never been spoken to that way by anybody in my life. The tone of his voice was hate-filled and downright demonic.

I had mixed emotions all at once. At first, I was very offended and upset that he thought he could talk to me in this manner. Yet at the same time I could tell how unstable he was. I was in complete shock and I was completely blindsided. I couldn't believe that someone could talk to me like that.

I was waiting for the punch line as to what was so bad that my son had done. I was waiting for him to tell me something horrible. All he could do was to tell me that my son had bought his daughter a car and that he told her that he loved her.

Admittedly, I understood that what my son did was non-traditional and might be misinterpreted. Nevertheless, I know my son would never threaten or otherwise try to harm anyone- much less good family friends. I knew that Dave knew that as well because of his exposure to our family and to Paul over the years.

I had to use all of my training and experience as a health care recruiter for over 20 years to try to assess and diffuse what I believed to be a raving psychotic individual. In the day to day course of my job, I deal with problem calls from healthcare professionals and I need to know how to keep my cool and to bring clarity to a situation so that a mutually beneficial solution can be reached. I have been the top recruiter in my company for 14 years. All my work is done over the phone and I have developed a very keen sense as to what somebody is truly feeling. I feel that I have a pretty highly-developed ear as to what someone's intentions are. Voice inflections, what is said, what is not said, tone of voice are all indicators that help me form a consistently accurate assessment as to what a person is feeling.

With Dave DePamphilis' erratic and thoroughly deranged diatribe against me, I was able to assess that this man's anger was so severe that I was convinced, am even more convinced today, that he was not in full possession of his faculties during that call and that he is consequently prone to fits of uncontrollable rage.

His subsequent acts of persecution: (driving around our neighborhood on March 21st, looking for Paul presumably to confront him and going on social media with a message to Paul with Dave's middle finger extended) are indicators to me that he is trying to provoke and harass my son. David DePamphilis' demonstrative obsessive hatred and vindictiveness against my son, have only served to confirm my initial

assessment of the level of danger that he poses to my son Paul and to the rest of my family.

Under normal circumstances, Dave seems like a normal, rational person. However, when he is angered, he turns into someone who I believe is capable of violence, including homicide. It is not something that I can prove a priori but it is my assessment based on the violent tone and unhinged screaming that he inveighed against me.

I thought about going to the Windham Police Department whereas I believed this possibly constituted criminal threatening. However, I was convinced that if I did this, he would not have been open to a possible compromise that would not involve a strategy of legal attacks against my son. I was also fearful that he would potentially violently assault my son either directly or indirectly.

Since that time, I regret not going to the police. As more examples of Dave's unending attempts to destroy my son's reputation have evinced themselves, I have become more and more fearful regarding the physical safety of my son, and the physical safety of the rest of my family.

I believe that any night could be our last night as I envision a heavily armed Dave DePamphilis coming to our house in a homicidal rage. I don't believe this potential capacity to murder my son and my family is far-fetched or is hyperbole. I know what I heard during that sadistic call to me and I heard the very viable capacity for violence in his voice. I can't prove it, but any reasonable person would be in fear after having endured the dehumanizing and humiliating verbal assault that I was forced to endure. In order to protect my son's life, and my family's lives, I pray the court would grant a restraining order against Dave DePamphilis.

I realize that a restraining order is not a full-proof defense against a pre-meditated armed assault against my family. However, it would give us a certain peace of mind that it might make such a murderous rampage less likely to happen. My fear and my family's fear, will probably not subside any time soon, but if this order is granted, at least I will be assured that this court cares for the safety of my family and is willing to enact common sense measures to protect us. If a restraining order is not granted, and if my son or me and my family are murdered, what confidence could future would-be victims have in our local judicial system? Leaving my son and my family unprotected and therefore exposed to a potentially lethal attack, would be a de facto death sentence levied against my son and also perhaps other members in my family. My son giving a gift to the defendant's daughter and expressing feelings of affection without any threat or intimidation, ought not to warrant a de facto death sentence.

I ask the court to defend our right not to live in fear. Please protect us. Please don't expose us, through inaction, to this man's uncontrollable rage, which seems to me to know no bounds. If you heard what I heard during that call, you would conclude, as would any reasonable person, that Dave DePamphilis represents a demonstrably clear and present danger to my son Paul and to the rest of my family.

Respectfully submitted,

Theodore G. Maravelias

34 Mockingbird Hill Rd.

Windham, NH

**Exhibit 2: Defendant's
Annulment Motion**

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
http://www.courts.state.nh.us**

Court Name: _____

Case Name: _____

Case Number: _____
(if known)

MOTION: _____

I, _____
state the following facts and request the following relief:

Date

Signature

Telephone

Address

I certify that on this date I provided a copy of this document to _____ (other party) or to
_____ (other party's attorney) by: Hand-delivery OR US Mail OR
 E-mail (E-mail only by prior agreement of the parties based on Circuit Court Administrative Order).

Date

Signature

ORDER

Motion granted. Motion denied.

Recommended:

Date

Signature of Marital Master/Referee

Printed Name of Marital Master/Referee

So Ordered:

I hereby certify that I have read the recommendation(s) and agree that, to the extent the marital master/judicial referee/hearing officer has made factual findings, she/he has applied the correct legal standard to the facts determined by the marital master/judicial referee/hearing officer.

Date

Signature of Judge

Printed Name of Judge

MOTION FOR VACATION AND ANNULMENT OF STALKING ORDER

- 1) The Plaintiff and her father fraudulently pursued this order in bad-faith, lying about having any “fear” of me: I attach her social media post, made on 6/21/17 after obtaining the said order, wherein Plaintiff and father provoke me with vulgar middle finger insults, identifying me publicly as recipient. They included Plaintiff’s 20-year-old boyfriend (now 21) to try to incite me into violating the stalking order on the basis of jealousy. Their targeted provocation against me proves beyond question the utter absence of “genuine fear”, and that the order was a malicious instrument of intimidation. I’ve obeyed the order trusting it will be annulled.
- 2) The said stalking order was issued in plain violation of established NH Supreme Court rules limiting admissible factual basis in stalking orders. This Court’s finding in said order referenced the birthday incident wherein I allegedly made creepy, intimidating comments to Plaintiff: to wit, mentioning her “age of consent” and saying I’d “be back when she is 18”. These false accusations appeared nowhere in the stalking petition. They were added circumventively by Plaintiff later on 1/5/17 in the hearing. But South v. McCabe (2007-120) mandated that findings for stalking be limited to only those accusations alleged before the hearing in the written petition, extending the identical existing rule for DV orders (In the Matter of Aldrich & Gauthier, 156 NH, 2007) to stalking orders. Thus, the said stalking order is erroneous even absent the Plaintiff’s perjury.
- 3) I produce new evidence that Plaintiff willfully lied about my conduct to obtain the order, according to her father’s scheme. The order’s factual finding text specifically cites Plaintiff’s lie that I’d mentioned the “age of consent” or said I’d be “back” while making a romantic proposal to her. At the hearing, I was disallowed to play a sentimental cell-phone audio recording of this same exchange to prove the utter falsehood of the aforesaid claims. But, I have subsequently lawfully played it for my parents in Vermont. I attach my criminal complaint against Plaintiff and her father David for criminal Perjury and False Reporting. This includes my parents’ testimony of the recording’s contents, proving that I never once said anything close to the alleged accusations which this Court specifically cited as forming a “course of conduct” in its finding.
- 4) I have zero ongoing interest in Plaintiff. I abhor her physical deterioration and turpitudinous criminality.

WHEREAS the said erroneous stalking order has unfairly damaged my good reputation, and whereas the false facts illegally admitted into the stalking finding are hurtfully visible to anyone who internet searches my name, and whereas I submit proof that no valid “reasonable fear” ever occasioned the perjurious stalking petition as made evident by the Plaintiff’s subsequent reckless acts of harassment against me,

NOW THEREFORE, I, Paul Maravelias, do humbly pray this Honorable Court reverse, vacate, and annul the said stalking order before its expiration on 2/7/18.

On 6/21/17, Christina DePamphilis (“Plaintiff”) and her father David posted the following image of themselves making vulgar gestures against the Defendant, Paul Maravelias, on a public social media site (<http://vsco.co/christinamamaria>) after obtaining the stalking protective order against Maravelias.

It was targeted against Maravelias, and its caption read “Did Dartmouth [Defendant’s college] teach you how to do this 🖕👊” [Middle finger “emoji”].

This was to taunt Maravelias that DePamphilis had successfully abused him with a falsified restraining order, and bait Maravelias into violating it. DePamphilis cruelly desired Maravelias to violate her “protective” order and see him arrested, proving bad-faith and lack of “fear”.

Permalink for verification: <http://bit.ly/2y0JFEF>



November 1st, 2017

Paul J. Maravelias

34 Mockingbird Hill Rd
Windham, NH 03087

To: Windham Police Department

Cc:

Detective Jason Dzierlatka
Detective Christopher van Hirtum

In re **David DePamphilis Criminal Complaint** (felony Perjury under 641:1, felony Conspiracy under 629:3, misdemeanor Defamation under 644:11, and misdemeanor False Reports to Law Enforcement under 641:4)

Fair and impartial public servants of Windham:

It has come to pass that my abuser David Nicholas DePamphilis of 10 Cardiff Road has severely violated four criminal laws to wage his ongoing course of undue harassment against me.

The felon, David DePamphilis, lied to your police department in December 2016 when he filed a false “stalking” petition against me through his daughter, to satisfy his own lust for revenge.

I submit proof that the crime of felony Perjury occurred decisively on January 5th, 2017 at Salem District Court at around 1:30pm when David caused “a false material statement under oath or affirmation” to be made when he did not “believe the statement to be true” (RSA 641:1 I. (a)).

My complaint is not semantic hairsplitting, petty revenge, or fighting over facts.

David’s willful crime has directly caused tremendous financial and emotional damage to me, as well as the marked abuse of my property rights and destruction of my good record.

At the 1/5/17 stalking hearing, David suborned his attorney Jerome Blanchard and daughter Christina to perjure the following falsehood about my normal, kind words to her while asking the young woman out to dinner on her 16th birthday, before I left after her respectful decline:

“Q Did he use the phrase at any point during this conversation, age of consent?”

A Yes

Q What did he say?

A He said I was age of consent at 16.” (Page 27 of transcripts for Christina DePamphilis vs. Paul Maravelias, Case No. 473-2016-CV-00124, attached as Exhibit C)

Though it is difficult for me to refrain from writing about how shockingly inaccurate their whole dramatic canard about “stalking” was (we had been normal family friends), I need to stay focused here on this certain specific criminal perjury.

Under the Perjury statute (641:1), only *material* willfully false representations are punishable. The knowingly false accusation above was material: **it directly caused** the issuance of the restraining order, in the words of Judge Stephen's finding of stalking:

"[Maravelias] referred to [that day, her 16th birthday] as **the 'age of consent'**" and "mentioned he will wait until she is ready and **be back when she is 18 years old**"

(Stephen, Robert S. in Final Order 473-2016-CV-00124, attached as Exhibit D).

These specific false claims which caused the order (that I said I'd "be back" in two years and mentioned a creepy sexual motivation behind my kind gesture) were **not once mentioned in David's initial written "stalking" petition** he had his daughter write on 12/28, nor during his own verbal explosions and tirades against me and my family on 12/12 and 12/14. It is crystal clear this was an intentional, willful "buzz-word" dreamed-up maliciously to get the order.

Now, let actionable proof be submitted of David's outrageous perjury:

I had actually been taking a sentimental cell-phone recording of the 12/12/16 verbal exchange in question. It was disallowed as evidence in the stalking hearing under the "wiretapping" statute.

Your department possesses this recording from when David vindictively had me arrested for it.

I played the recording for my parents in Norwich, VT on 10/21/2017, and I attach two letters from them (Exhibits A and B) which indicate the contents of this audio recording: that **I absolutely never said the alleged things above**. (Also that there was never any "fear", etc.)

Unlike the recording itself, this testimony is indubitably admissible, actionable evidence.

My parents and I are happy to testify in person at court or come to the station to make a recorded statement about the contents of this audio recording, which proves what I had and hadn't spoken.

Thus I have hereunto submitted proof for all three elements of criminal perjury: that the false statement was 1) material, 2) maliciously, knowingly false, and 3) indeed factually untrue.

David has additionally committed criminal Conspiracy under RSA 629:3. The statute reads,

"A person is guilty of conspiracy if, with a purpose that a crime defined by statute be committed, he agrees with one or more persons to commit or cause the commission of such crime, and an overt act is committed by one of the conspirators in furtherance of the conspiracy."

David conspired with his daughter Christina and lawyer Jerome Blanchard to deliver the referenced illegal and defamatory perjuries into the stalking hearing at Salem District Court.

Furthermore, he is guilty of a separate count of Conspiracy for suborning the falsehoods written in the initial "stalking" petition, including that I had "insisted" with his daughter and even made the creepy statement "you will learn to love me". I had never said any such thing, as my audio recording proves.

These certain malicious lies were misdemeanor crimes of False Reporting (641:4) but fell just short of an additional count of felony Perjury, since they were not "material" representations,

unlike the aforementioned perjuries cited by the judge in the false finding of stalking. Exhibit E shows the inclusion of these outrageous lies, among others, in the petition.

David has also committed criminal Defamation (644:11) against me, since the same referenced act of Perjury also satisfies 644:11's lower standard of Defamation, occurring when a person:

“purposely communicates to any person, orally or in writing, any information which he knows to be false and knows will tend to expose any other living person to public hatred, contempt or ridicule”.

As a victim of his false accusation and massive resulting injustice, I respectfully demand David DePamphilis be arrested and prosecuted for felonious Perjury and Conspiracy, and misdemeanor Defamation and False Reporting.

Nota bene: Although the daughter Christina DePamphilis orally delivered David's perjury, David suborned it to happen having premeditated the aforecited direct examination. He is liable under accepted legal maxims *respondeat superior* and *quid facit per alium facit per se*. Still, his daughter is knowingly complicit, and I request a warrant be issued for her arrest as well.

Thank you for your impartial professionalism as you attend to justice in this criminal matter.

Respectfully,

Paul J. Maravelias

10/23/2017

Theodore Maravelias

34 Mockingbird Hill Rd, Windham, NH 03087

To: Windham Police Department

Cc: Detectives Jason Dzierlatka and Christopher van Hirtum

Re: David DePamphilis Criminal Complaint (felony "Perjury" under 641:1 and misdemeanor "False Reports to Law Enforcement" 641:4)

To whom it may concern:

We are respectfully requesting an arrest warrant be issued for David N. DePamphilis (10 Cardiff Road in Windham). We are outraged that he has delivered intentional lies to your department to corrupt the course of justice, among other crimes.

On December 28th, 2016 David filed a "stalking" petition against our son Paul Maravelias through his daughter Christina. David and his wife Laurie were unquestionably the originators of this action, and even your prosecutor admitted this in court (10/6/17) during an unrelated matter.

David DePamphilis concocted a slew of intentional lies in the "stalking" petition against our son, and then even more lies during the hearing. He suborned his daughter to perjure in court to get revenge on our son with the stalking order.

Though DePamphilis dreamed-up too many lies to list here, Judge Robert S. Stephen cited one particularly outrageous fallacy which directly caused the "stalking" order to be issued.

This intentional "false material statement" (the requirement in 641:1) was that, when my son had nicely invited David's daughter and wife to dinner, he:

"referred to [that day, her 16th birthday] as the 'age of consent' to her mother"

and

"mentioned he will wait until she is ready and be back when she is 18 years old" (quotes from Judge Stephen's finding of "stalking" in Christina DePamphilis v. Paul Maravelias, 473-2016-CV-00124).

For sentimental reasons, my son had been audio taping the exchange in question on his cell-phone.

On October 21st, 2017, I listened to this audio recording at Norwich in the State of Vermont.

The recording clearly documents the **entirety** of my son's interaction with on them that day, and that he **never spoke anything remotely close to the disturbing, sexualizing "age of consent" reference, nor states that he would "be back when she is 18"**.

The recording also proves that David's wife and daughter outright lied about many other facts, such as saying that my son "insisted".

We know these false statements by David constituted intentional perjury since DePamphilis had screamed harassing insults and perverse expletives at me and my son over phone on December 12th (later that day) and then on December 14th: he never once then alleged that our son had said something as creepy and disturbing as referencing his kind invitation as motivated by some sort of sexual impulse on the brink of the girl's legal age. David surely would have mentioned this during his unhinged and threatening tirade, if my son had said this.

In fact, this particular damaging false accusation was not even in the original written stalking petition, which included complaints of "stalking" as foolish as "I noticed Paul was looking at me while seated in his backyard during a family party". We were good family friends. That is beyond insincere and disingenuous.

Clearly, the intentional perjury in question was only contrived by Mr. DePamphilis immediately before the 1/5/17 stalking hearing, or else it would have certainly been included in the written petition (12/28/16) and also in his verbal tirades against us on 12/12/16 and 12/14/16.

For the separate misdemeanor false police reporting charge, we refer to different falsehoods about this exchange which were in the written stalking petition: that our son said "you will love me" and "insisted" during his romantic expression.

The recording I listened to (while in the State of Vermont) proves this is false. **These specific lies caused the stalking order.**

As I understand it, my son is also producing evidence of various alcohol crimes David has committed with minors.

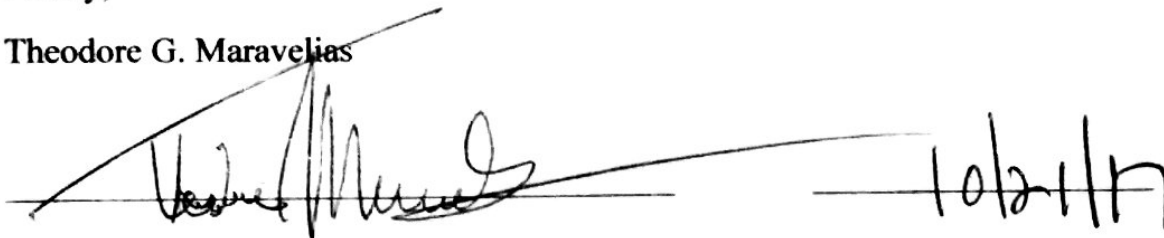
David DePamphilis is a vindictive and merciless man who has abused our son, caused great stress for my family, and caused a miscarriage of justice against him by intentionally perjuring to get the stalking order. I firmly believe that at the very least, this constitutes perjury.

We were family friends with this family for a long time. Instead of showing neighborly love and understanding, he chose vindictiveness and was sadly willing to employ perjury to carry his retaliatory actions out.

Therefore, as your taxpaying constituent, I respectfully demand equal application of the law. We request an arrest warrant be issued for David DePamphilis and, if possible, his complicit daughter Christina as well.

Firmly,

Theodore G. Maravelias

A handwritten signature, likely of Theodore G. Maravelias, is written over a horizontal line. To the right of the signature, the date "10/2/17" is written.

CELL: 603-770-8072

10/23/2017

Caroline Maravelias

34 Mockingbird Hill Rd, Windham, NH 03087

To: Windham Police Department

Cc: Detectives Jason Dzierlatka and Christopher van Hirtum

Re: David DePamphilis Criminal Perjury

To whom it may concern:

I'm a stay-at-home mother from Windham. I am indignant that my neighbor David DePamphilis has slandered our son to the point of outright lying to the court (perjury) and to this police department to obtain a false "stalking" restraining order against my son.

My husband and I are respectfully requesting for David to be arrested and prosecuted for his crime of perjury and false police reporting, which we have proof of.

DePamphilis vindictively filed a "stalking" petition against our son through his daughter on 12/28/16. This was two weeks after we had settled him down from his emotional outburst. He had a verbally abusive explosion against my husband and son Paul after Paul had respectfully invited his daughter to dinner on her birthday.

David got so angry that he willfully lied to the court that our son made creepy and disturbing, sexual comments when he invited Christina to dinner and her mother as well. My son actually behaved like a gentleman, and we have an audio recording which proves David lied outrageously to get the court order.

On 10/21/17, in Norwich, VT, I listened to the sentimental cell-phone recording my son Paul made of his romantic invitation on 12/12/16 to David's daughter. David and his daughter claimed in court that Paul had said "you will learn to love me!", that he was "insistent", and that he even said downright weird, frightening things like referencing the "age of consent", suggesting sexual intercourse.

The judge actually attributed this last lie in his false finding of "stalking", proving that David's perjury was absolutely material to the case and directly caused the perversion of justice against our son.

The audio recording I listened to confirmed my son's testimony during the stalking hearings that he **absolutely never said any of these outrageous false accusations. He never once mentioned the "age of consent" or any reason for his choice of that particular day at all.** He was kind, respectful, and even said "I respect your feelings" once Christina politely rejected him. David's family members had actually been happy to see Paul. The recording proves his daughter in fact invited him back, after Paul first went to the door and her mother was in the shower.

The "stalking" petition and allegations in the court hearing paint a picture of my son so completely false that my husband and I are outraged months later. Hearing the recording for the first time has validated our outrage at David's perjury. David's wife and daughter were actually laughing and joking with Paul; I heard Christina say "that's so sweet", "thank you", "no, you're fine", etc. Laurie said she "appreciated" the gesture. The dishonesty of this family in their delusions against my son two weeks later is absolutely disturbing. To call his kind behavior "stalking" is appalling.

In the nearly two weeks that passed after the incident until the police came to deliver the restraining order, my son never left the house except to go to dinner with his grandmother in Ipswich and once to Shaw's at night. Clearly, if my son was some sort of danger to Christina, he had during that time the opportunity to act upon that. Instead, he remained home virtually the whole time.

Months later, David and his daughter posted a childish, bullying picture and text on social media aimed at our son.

We waited until now so that there would not be any interactions with the settled criminal charge against our son, from when David vindictively complained to your department about this same audio recording under the "wiretapping" law. We expect fair and equal application of the law. If our son has been arrested for trying to defend himself in court with his innocent recording, we expect that David be held criminally accountable for documented felony perjury – a far more serious offense.

My and my husband's testimony about this recording's contents is admissible evidence, and no Vermont state law was broken when Paul reproduced his audio recording there (only 10 states have such a corrupted law which has caused severe miscarriage of justice against our son). We're respectfully demanding that David DePamphilis and his complicit daughter Christina be arrested and prosecuted for these crimes.

I will be happy to testify in a court of law about any of the related facts.

Sincerely,

Caroline Maravelias

Caroline Maravelias

11/1/17

Exhibit C

Summary:

This is a reproduction of the referenced page from the stalking hearing transcripts. The entire transcript is digitally attached in three separate PDF files. Please note that the transcripts are of absolutely awful quality, though no errors in transcription affect in the referenced portions on page 27 indicating DePamphilis's testimony from 1/5/17. Red box emphasis to material perjuries cited by judge is added.

27

1 love with you since 2011? How old were in 2011?

2 A I was ten up until December when my birthday is

3 December 12th, so I turned 11 December 12th.

4 Q What, if anything, else did he say at that point?

5 A He talked about how he has been loyal and committed to

6 me and that in college he could be doing stuff to a bunch of

7 other girls, but he's committed to me and he knows how much

8 loyalty means to me.

9 Q Did he use the phrase at any point during this

10 conversation, age of consent?

11 A Yes.

12 Q What did he say?

13 A He said I was age of consent at 16. And I had told him

14 that we did not feel -- I did not feel that way about him and

15 that the age gap was ridiculous. And he told my mom that she

16 was narrow minded when she mentioned that and that she told him

17 he needed to move on. He said he would never love anyone else

18 and that he would not move, because I'm the perfect girl. And

19 then my friends actually showed up and my mom's friend showed

20 up, too, so he left.

21 Q Okay. Was there any conversation about him

22 transforming himself for you?

23 A Yes. He said it and then he said he got like fit and

24 then he said he will just be getting richer and that he'll come

25 back when I'm 18.

AMERICAN
All that is Golden Gate
and what is the way to the way

Exhibit D

Summary:

This is a reproduction of Judge Stephen's finding of "stalking" based upon the two specific perjuries presently discussed, proving them "material" to an "official proceeding" under 641:1's requirement for Perjury.

These are the two intentional perjuries for which we submit proof of falsity and willfulness. We do not have actionable proof of falsity and willfulness for the other material perjury referenced in this finding (about the "dropping off" incident), so we restrict our demand for arrest and prosecution to the basis of only the perjuries highlighted in red.

A scan of the full order is attached digitally.

[The facts relied upon by the court to form the basis for its finding must be detailed below]

The Defendant has been obsessed with the Defendant since she was 11 years old and he was 17. When she was 12 and he was 18 he drove her home and attempted to drop the other person off first but the Plaintiff refused; The Defendant testified that he loves her and would give his life to protect her. He waited until she turned 16 which he referred to as the "Age of Consent" to her mother, offered her a brand new MAZZARETTI. When the gift was rejected he mentioned he will wait until she is ready and be back when she is 18 years old. The level of obsession and relentless pursuit of a girl beginning at the age of 11 or 12 gives rise to reasonable fear. In addition, the demeanor of the Defendant during his testimony demonstrated his obsession for the Plaintiff, including his constant communication directly to the Plaintiff commenting on her mannerisms and professing his love for her.

2.7.16
Date

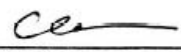

Signature of Judge
Robert S. Stephen
Print/Type Name of Judge

Exhibit E

Summary:

This is an excerpt from David DePamphilis's stalking petition filed vicariously through his daughter Christina against Maravelias on 12/28/16. It is absolutely libelous and littered with imagined, delusional false accusations against Maravelias. The area highlighted in red indicates the misdemeanor false reports to law enforcement under 641:4 which Maravelias's audio recording proves as false, corroborating his accurate memory and testimony.

Since these false reports were not directly attributed in Stephen's finding, they might not have been "material" under the definition of Perjury. However, the form does indeed state, "I understand making a false statement on this form will subject me to criminal penalties". We therefore demand imposition of such penalties for these false statements.

The full stalking petition is attached digitally. It also usefully reveals the shocking truth that the outrageous "age of consent" perjury was never once mentioned here, since it was maliciously dreamed-up right before the 1/5/17 stalking hearing but after this 12/28/16 written petition.

~~UPPERCASED ONE AGAIN.~~ PAUL HAD ALSO JOINED
Anytime Fitness Gym in Wintham to try to
talk to my father to "buddy up" with him.
My father had to quit the gym. Paul then
went to college and things were quiet until
my birthday 12/12/16 when he showed up at
my home with a brand new Maserati car
as a gift professing his love for me. My
mom + me told him that he should leave +
take the car with him. He insisted that we
go to dinner with him and that I would "learn"
to love him. We were SCARED and called my
dad at work. My dad spoke with his parents
and with Paul to express his concern.

Paul J. Maravelias
34 Mockingbird Hill Rd
Windham, NH 03087

November 26th, 2017
To: Salem, NH Police Department

In re **David DePamphilis Criminal Complaint** (felony Perjury under 641:1, felony Conspiracy under 629:3, and misdemeanor Defamation under 644:11)

To whom it may concern:

I attach my criminal complaint against David DePamphilis and his complicit daughter Christina DePamphilis in relation to their acts of verifiable Perjury done against me at a fraudulent “stalking” petition hearing in January 2017.

I submitted this complaint to the Windham Police. They informed me that these charges would fall under your jurisdiction, since the referenced crime occurred at a court proceeding in Salem at the District Court on Geremonty Drive. DePamphilis and I are Windham residents.

The attached complaint references a separate misdemeanor crime of “False Reports to Law Enforcement” in the original written “stalking” petition. This secondary charge likely falls under Windham jurisdiction, since the petition form was submitted there. I am following up with Windham Police about that charge and about unrelated drug/alcohol offenses that David has committed against minors. I attach my complaint for those unrelated offenses too, only for subjective demonstration of the undeniable bad-faith of his malicious “stalking” complaint.

As a psychologically battered victim of restraining order abuse, defamatory false accusation, and unconstitutional deprivation of due process, please help restore my faith in the justice system by arresting and prosecuting David DePamphilis (and his daughter, if possible) for this heinous felony crime against my sacred honor, undertaken by him solely for vindictive belittlement against me. My public reputation has suffered greatly and unfairly because of his willful crime.

Whereas you rightly expect me to keep obeying the law in the face of such infuriating injustice, so do I rightly expect you to enforce it. What I submit herewith far exceeds the probable cause standard for issuance of an arrest warrant, since I prove *all three* elements of Perjury. Thank you.

Respectfully,

Paul J. Maravelias
